

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

**Date:** **Monday 19 to Wednesday 21 May 2025**  
(Thursday 22 May as an overflow day if required)

**Time:** **9.30am**

**Meeting room:** **Henderson Chamber**

**Venue:** **Level 2, 1 Smythe Road, Henderson**

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**HEARING REPORT**

**PRIVATE PLAN CHANGE 100 - RIVERHEAD**

**RIVERHEAD LANDOWNER GROUP**

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**COMMISSIONERS**

**Chairperson** **Karyn Kurzeja**  
**Commissioners** **Nigel Mark-Brown**  
**Vanessa Wilkinson**

**Julie McKee**  
**KAIWHAKAHAERE WHAKAWĀTANGA**  
**HEARINGS MANAGER**

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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. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant has presented their case, members of the hearing panel may ask questions to clarify the information presented.
- **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 has the right to summarise the application and reply to matters raised by submitters. Hearing panel members may further question the applicant at this stage. The applicants reply may be provided in writing after the hearing has adjourned.
- **The chair** 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.

### **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 CHANGE TO THE AUCKLAND UNITARY PLAN BY RIVERHEAD LANDOWNER GROUP**

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**Reporting officer, David Wren**

Reporting on proposed Private Plan Change 100 which seeks to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions. The request also seeks to shift the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.

**APPLICANT:** RIVERHEAD LANDOWNER GROUP





Hearing Report for Proposed Plan Change 100: Riverhead Landowner Group, Private plan change to the Auckland Unitary Plan (Operative in part) Section 42A Hearing Report under the Resource Management Act 1991

**Report to:** Hearing Commissioners

**Hearing Date/s:** TBC

**File No:**

**File Reference**

**Report Author** David Wren

**Report  
Approvers** Peter Vari

**Report produced** TBC

## Summary of Proposed Plan Change 100 Riverhead

<b>Plan subject to change</b>	Auckland Unitary Plan (Operative in part), 2016
<b>Number and name of change</b>	Proposed Plan Change 100 (Private) (Riverhead) to the Auckland Unitary Plan
<b>Status of Plan</b>	Operative in part
<b>Type of change</b>	Private (requested) plan change.
<b>Applicant</b>	Riverhead Landowner Group (referred to as <b>'the applicant'</b> in this report).
<b>Committee date of approval (or adoption) for notification</b>	The decision to accept the plan change request was made by the Environment Court on 20 March 2024 (2024 NZEnvC049)
<b>Parts of the Auckland Unitary Plan affected by the proposed plan change</b>	Private plan change request to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.8 ha to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions. The request also seeks to shift the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.
<b>Date draft proposed plan change was sent to iwi for feedback</b>	<p>In respect of Mana Whenua, engagement correspondence was sent to 19 iwi groups which were contacted in September and October 2021. Six iwi groups responded confirming their interest in being involved: Te Kawerau a Maki; Ngāti Whātua o Kaipara; Te Rūnanga o Ngāti Whātua; Te Ākitai Waiohua; Ngāti Manuhiri; and Ngāti Whanaunga.</p> <p>Several hui have been held with Te Kawerau a Maki and Ngāti Whātua o Kaipara, as well as the other iwi (either via hui or further email correspondence).</p> <p>In summary:</p> <ul style="list-style-type: none"> <li>• Extensive engagement was carried out with Te Kawerau a Maki and Ngāti Whātua o Kaipara via several hui. Through their input, the Cultural Landscape map was developed as well as the associated Precinct provisions.</li> <li>• The other four iwi, Te Rūnanga o Ngāti Whātua; Te Ākitai Waiohua; Ngāti Manuhiri; and Ngāti Whanaunga, did express interest in the proposal and a summary of their engagement is provided in section 5.0 of the applicant's consultation report</li> </ul>

<b>Date of notification of the proposed plan change and whether it was publicly notified or limited notified</b>	Full public notification. 18 April 2024
<b>Plan development process used – collaborative, streamlined or normal</b>	Normal
<b>Submissions received (excluding withdrawals)</b>	254
<b>Date summary of submissions notified</b>	12 July 2024
<b>Number of further submissions received (numbers)</b>	9
<b>Legal Effect at Notification</b>	N/a
<b>Main issues or topics emerging from all submissions</b>	<ul style="list-style-type: none"> <li>• Flooding</li> <li>• Infrastructure</li> <li>• Character of Riverhead</li> </ul>

### Report Author

This report has been prepared by David Wren – Planning Consultant for the Auckland Council.

I am a fully qualified planner and hearing commissioner and am a full member of the New Zealand Planning Institute. I operate a boutique planning consultancy called Planning Policy Research.

I hold a Bachelor of Town Planning from Auckland University and a Post Graduate Diploma in Development Studies from Massey University.

I have over 42 years of planning experience both in New Zealand and Overseas. My work has mainly consisted of sitting on hearing panels appointed by Auckland Council and as a duty commissioner, preparing applications and submissions for resource consent for residential and commercial property, preparing reports on requested Plan Changes for Auckland Council, preparing submissions for clients and attending hearings on the Proposed Auckland Unity Plan, and presenting expert evidence in the Environment Court in resource consent and planning matters. I am also a part-time senior lecturer in the Property Department at the University of Auckland.

I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Consolidated Practice Note and have complied with it in preparing this report. I also agree to follow the Code when presenting to the Commissioners. I confirm that the issues addressed in this report are within my area of expertise and that I have not omitted to consider material facts known to me that might alter or detract from my opinions.

### **Note on this s42A Report**

This report has been produced to assist the Commissioners appointed to hear and decide on PPC100 and the applicant and those who made submissions on PPC100. The report provides an assessment of PPC100 **as notified**. It cannot, and does not, provide an assessment of PPC100 as it is proposed to be amended by the applicant in response to submissions.

The evidence to be produced by the applicant and submitters may result in changes being proposed to PPC100. If after the circulation of evidence, on behalf of the applicant and submitters, there are significant changes proposed to PPC100, an addendum may be produced to this report, which will assess and advise on those amendments. Any addendum report will be produced prior to the hearing of submissions and in accordance with any direction from the hearing panel.

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## Abbreviations

Abbreviations in this report include:

<b>Abbreviation</b>	<b>Meaning</b>
PPC100	Proposed Plan Change 100
RMA	Resource Management Act 1991
AUP	Auckland Unitary Plan
RPS	Regional Policy Statement
AT	Auckland Transport
WSL	Watercare Services Limited

<b>Attachments</b>	
<b>Appendix 1</b>	<b>Plan Change 100</b>
<b>Appendix 2</b>	<b>Section 32 Report</b>
<b>Appendix 3</b>	<b>Environment Court Decision to Accept PPC100</b>
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<b>Appendix 5</b>	<b>Recommended Changes</b>
<b>Appendix 6</b>	<b>Specialist Technical Memos</b>

## EXECUTIVE SUMMARY

1. PPC100 seeks to rezone approximately 6 hectares of Future Urban Land within the north to Rural – Mixed Rural zone. The RUB is also proposed to be shifted accordingly. The stormwater assessment that has been undertaken by CKL to support his Plan Change application has identified that this land is subject to significant natural hazard – flooding and is not suitable for urbanisation. The Rural – Mixed Rural zone is proposed to be applied for consistency with the adjoining rural sites.
2. PPC100 also seeks to rezone approximately 75.8 hectares of Future Urban zoned land for urban development, which will comprise approximately:
  - 1.8ha Business – Local Centre zone;
  - 0.7ha Business – Neighbourhood Centre zone;
  - 4.3ha Residential – Terrace Housing and Apartment Building zone; and
  - 69ha Residential – Mixed Housing Suburban zone;
3. The private plan change proposes to introduce and apply the ‘Riverhead Precinct’ to the portion of the Plan Change area proposed to be urbanised to manage the effects of urbanisation on the local environment and to ensure that a quality built environment is achieved.
4. The ‘Riverhead Precinct’ comprises two sub-precincts:
  - Sub-Precinct A applies to land zoned Residential - Terrace Housing and Apartment Building and provides for the greatest height and residential densities at a key intersection adjacent to the Local Centre Zone and public transport facilities. A wider range of non-residential activities is provided for at ground floor; and
  - Sub-Precinct B applies to land zoned Residential – Mixed Housing Suburban and provides for a transition in building height between Sub-Precinct A and the surrounding Mixed Housing Suburban area where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.
5. The proposal also includes the introduction of the Stormwater management area Flow 1 (SMAF1) Control.
6. A copy of PPC100 is contained in Appendix 1 to this report.
7. The normal plan change process set out in Schedule 1 of the Resource Management Act 1991 (‘RMA’) was adhered to in developing PPC100.
8. PPC100 was notified on 18 April 2024 and 254 submissions were received. The summary of decision requests were notified on 12 July 2024.
9. Nine further submissions were received;
10. In preparing for hearings on PPC100, this hearing report has been prepared in accordance with section 42A of the RMA.
11. This report considers the issues raised by submissions and further submissions on PPC100. The discussion and draft recommendations in this report are intended to assist the Hearing Commissioners, and those persons or organisations that lodged submissions on PPC100. The recommendations contained within this report are not the decisions of the Hearing Commissioners.
12. This report also forms part of council’s ongoing obligations, which is, to consider the appropriateness of the proposed provisions, as well as the benefits and costs of any

policies, rules or other methods, as well as the consideration of issues raised submissions on PPC100. This report is an interim report as the applicant will have the opportunity to respond to this report and potentially change parts of the PPC100 in response to the matters raised in submissions.

13. A report in accordance with section 32 of the RMA has also been prepared by the applicant for this purpose and is attached in Appendix 2. This 'Section 32 report' and associated documentation related to PPC100, on the council's website should be also considered in making decisions on PPC100.
14. The interim recommendation is that PPC100 be declined due to uncertainty about some of the outcomes of PPC100 including effects of flooding and the ability of the land to be serviced for infrastructure (transport, wastewater and water) in the near future.



## 1. BACKGROUND

15. This report concerns a private plan change request from the Riverhead Landowner Group. (i.e. the “applicant”).
16. PPC100 proposes to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and approximately 75.8 ha to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions. The request also seeks to shift the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.
17. The rezoning proposal provides capacity for approximately 1450-1750 dwellings.
18. The Plan Change also includes a precinct, which details refined residential standards for the Residential Terrace Housing and Apartment Building and Residential – Mixed Housing Suburban zones and in response to the locational attributes of the Plan Change area. The precinct also details the indicative road and open space network, stormwater management, provisions to recognise Mana Whenua values including the provision of a cultural landscape map, and ensure that development progresses with the availability of infrastructure.
19. The Plan Change area together with the proposed precinct boundaries are shown on Figure 1 below.

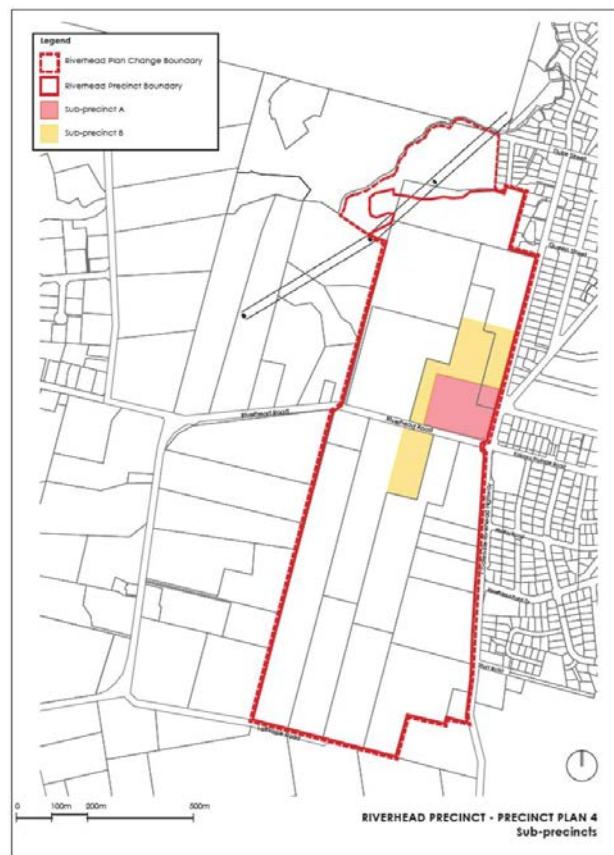
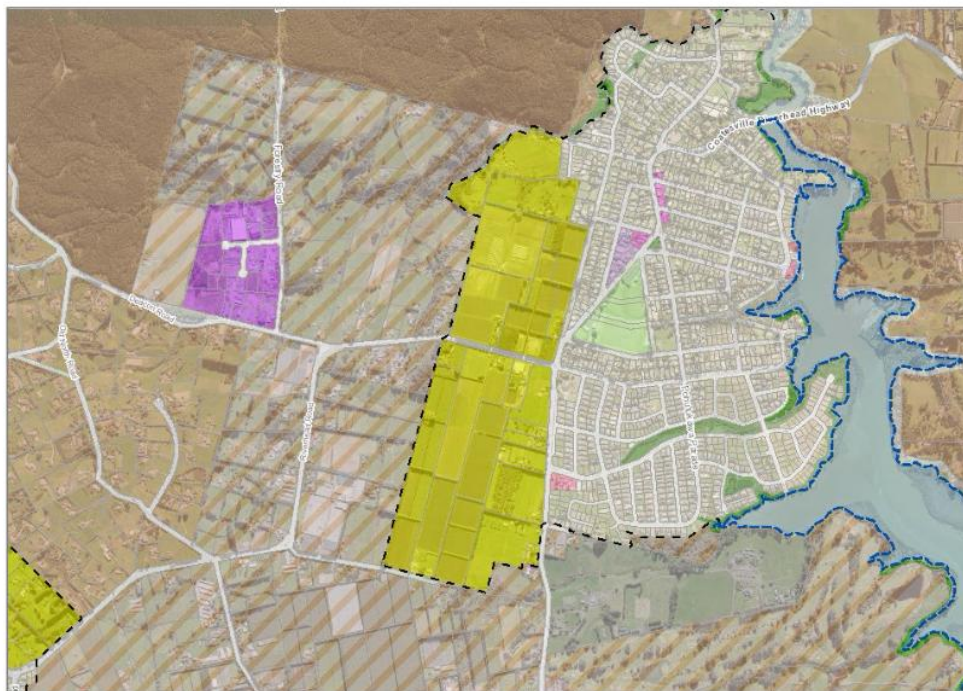


Figure 1 – Plan Change location and precinct boundaries.

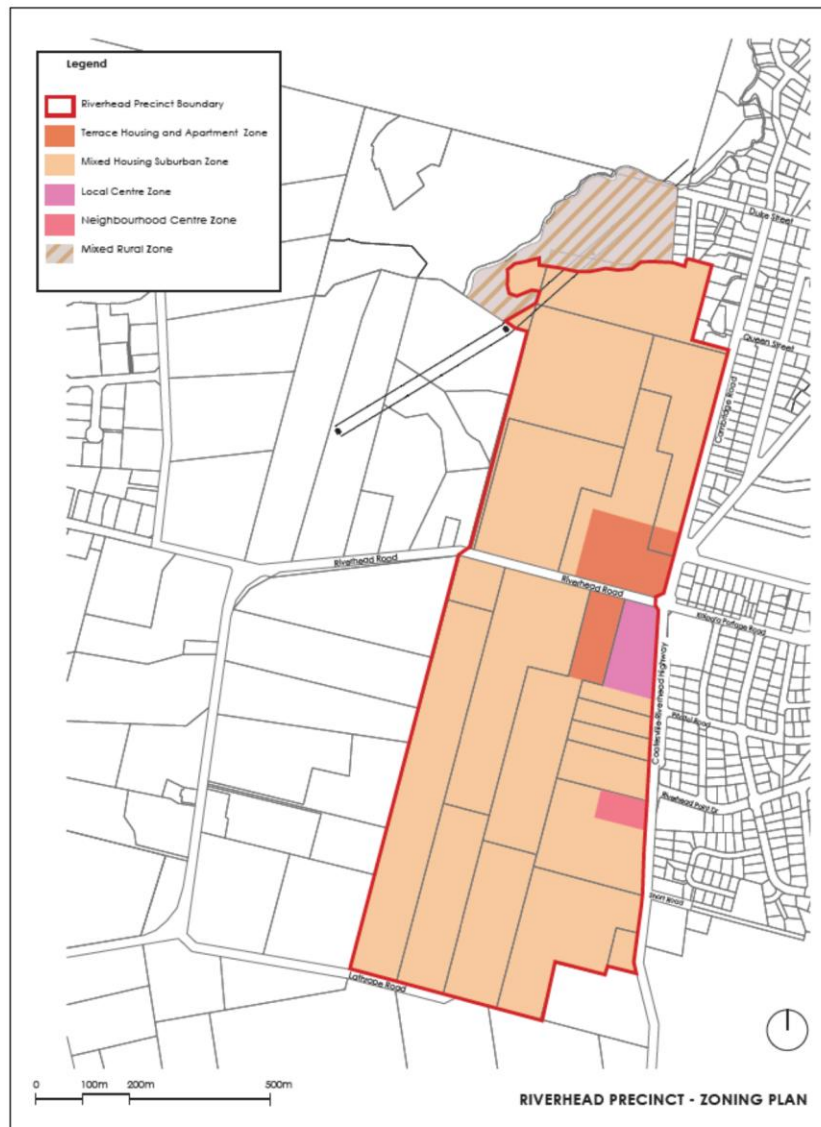
20. The Plan Change area consists of 80.5ha of Future Urban zone land within the rural coastal settlement of Riverhead. All the land within the plan change area is currently zoned Future Urban Zone (FUZ). The Plan Change area is a physically well-defined area bound by Coatesville-Riverhead Highway and Cambridge Road to the east, the Rangitopuni Stream to the north, and rural-zoned land to the west and south. The Plan Change area is regular in shape, with individual land parcels creating a geometric pattern of shelterbelts and other farm boundary definitions.
21. The current land use within the Plan Change area is predominantly horticulture with some agriculture (grazing). Various residential and commercial (horticulture-related) buildings are present across the Plan Change area. The topography of the Plan Change area is largely flat with the land in the northern portion of the Plan Change area sloping gently towards the north.
22. In terms of land use and built form in the immediate locality, the surrounding area is characterised by a mix of activities and building types. To the west and the south of the Plan Change area are large rural landholdings. To the north is the Riverhead State Forrest. The existing Riverhead township is located to the east.
23. The land within the plan change area is currently not served for water, wastewater and reticulated stormwater infrastructure.
24. There are a number of overland flow paths that traverse the Plan Change area. In addition, the northern portion of the Plan Change area is subject to flooding.
25. SH16 is located approximately 2km south of the Plan Change area and can be accessed via Coatesville-Riverhead Highway, Old North Road or Riverhead Road. SH16 provides connections to Kumeu to the west, and Westgate to the south. It also provides a connection to SH18 (via Brigham Creek Road or Trig Road) which provides a connection to Albany and the North Shore.
26. Figure 2 below sets out the current zoning of the land which is Future Urban Zone (FUZ) shown here in yellow.



**Figure 2: Current Auckland Unitary Plan zoning**

## 2. PROPOSED PLAN CHANGE PROVISIONS

27. Figure 3 below sets out the applicant's proposed zoning.



**Figure 3 – Proposed Zoning**

28. PPC100 seeks to rezone approximately 6 hectares of Future Urban Land within the north to Rural – Mixed Rural zone. The RUB is also proposed to be shifted accordingly. The stormwater assessment that has been undertaken by CKL to support the Plan Change application has identified that this land is subject to significant natural hazard – flooding and is not suitable for urbanisation. The Rural – Mixed Rural zone is proposed to be applied for consistency with the adjoining rural sites.
29. PPC100 also seeks to rezone approximately 75.8 hectares of Future Urban zoned land for urban development, which will comprise approximately:
- 1.8ha Business – Local Centre zone;

- 0.7ha Business – Neighbourhood Centre zone;
  - 4.3ha Residential – Terrace Housing and Apartment Building zone; and
  - 69ha Residential – Mixed Housing Suburban zone;
30. PPC100 also proposes to introduce the Stormwater Management Area – Flow1 control over the Plan Change area.
31. PPC100 also proposes to apply the ‘Riverhead Precinct’ to the portion of the Plan Change area proposed to be urbanised to manage the effects of urbanisation on the local environment. The ‘Riverhead Precinct’ comprises two sub-precincts summarised below:
- Sub-Precinct A is applied to land zoned Residential - Terrace Housing and Apartment Building and provides for the greatest height and residential densities at a key intersection adjacent to the Local Centre Zone and public transport facilities. A wider range of non-residential activities is provided for at ground floor; and
  - Sub-Precinct B is applied to land zoned Residential – Mixed Housing Suburban and provides for a transition in building height between Sub-Precinct A and the surrounding Mixed Housing Suburban area where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.
32. A package of provisions, including policies, activity standards, development standards, and associated matters of discretion and assessment criteria are proposed to achieve the objectives of the precinct and the wider Unitary Plan.
- More permissive activity statuses for restaurants, cafes, retail, and healthcare facilities within the Residential – Terrace Housing and Apartment Building zone;
  - A transport infrastructure staging rule to coordinate the occupation of buildings with the delivery of required infrastructure;
  - A road widening setback rule along Riverhead Road to provide for future widening;
  - A riparian planting rule requiring a 10m native vegetation riparian buffer each side of a permanent or intermittent stream to mitigate the effects of urbanisation on water;
  - A stormwater quality rule to ensure impervious areas are treated and that development incorporates inert building materials to increase the quality of stormwater runoff;
  - A rural interface setback rule to provide a buffer between residential activities within the precinct and the neighbouring Mixed Rural zone;
  - A fencing rule to require lower height/greater permeability fences where adjoining publicly accessible open space, to ensure development positively contributes to the visual quality and interest of those spaces;
  - A height rule that increases height within Sub-Precinct B to 11m (three-storeys) to enable a transition in height from the Terrace Housing and Apartment Building zone and the Local Centre zone;
  - Height in relation to boundary, yard, maximum impervious area, building coverage, landscaped area, outlook space and outdoor living space rules to replace those of the underlying zone with those set out in the MDRS.
  - Additional assessment criteria to ensure there is adequate wastewater/water supply infrastructure to service development;
  - Additional assessment criteria for open space to ensure that the open space network integrates with natural features and delivers the multi-purpose green corridor: a key structuring element for the precinct and required for stormwater conveyance purposes;

- Additional assessment criteria for the layout and design of roads to ensure a highly connected street layout that integrates with the wider Riverhead area and provides for all modes of transport; and
- Additional assessment criteria to recognise and the spiritual connections and key views of cultural significance to of Te Kawerau a Maki and Ngāti Whātua o Kaipara and other interested iwi to ensure hononga to ancestors, the connection and leadership, and whakapapa are all preserved to honour the special significance of this cultural history.

33. The reasons given by the applicant for the plan change request include the following;

*The purpose of the Plan Change is to enable the provision of additional housing in Riverhead along with a Local Centre, a Neighbourhood Centre and a network of open spaces. The Applicant is the majority owner of the Plan Change area and intends to develop their landholdings in a manner consistent with the proposed zoning framework, which this Plan Change request will enable.*

*The Plan Change is consistent with the objectives of the Council's planning documents and, in this regard, the reasons for the Plan Change are justified and consistent with sound resource management practice.*

34. The applicant 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:
  - Planning Report including attachments by B&A
  - Riverhead Structure Plan by B&A
  - Urban Design Statement by Urban Acumen.
  - Retail Assessment by Property Economics
  - Integrated Transport Assessment by Flow Transportation Specialists
  - Ecological values assessment by RMA Ecology Ltd
  - Stormwater Management and Flood Risk Assessment by CKL
  - Water and Wastewater Servicing Memorandum by Water Acumen.
  - Water and Wastewater Servicing Strategy Development by GHD
  - Water and Wastewater Servicing Memorandum 01 by Water Acumen
  - Water and Wastewater Servicing Memorandum 02 by Water Acumen
  - Correspondence with Chorus and Vector
  - Archaeological Assessment by Clough and Associates.
  - Contamination Assessment by Soil and Rock Consultants
  - Geotechnical Assessment by Soil and Rock Consultants
  - Landscape and Natural Character Effects Assessment by Boffa Miskell
  - Arboricultural Assessment by Greenscene NZ

- Consultation Summary Report by B&A

### 3. HEARINGS AND DECISION-MAKING CONSIDERATIONS

35. Clause 8B of Schedule 1 of RMA requires that a local authority shall hold hearings into submissions on its proposed plan.
36. Section 34 of the RMA provides for a local authority to delegate its functions, powers or duties under the RMA.
37. The Council has delegated its authority to three independent hearing commissioners to hear and make decisions on PPC100.
38. These hearing commissioners will not be recommending a decision to the council but will be issuing the decision directly.
39. This report summarises and discusses submissions received on PPC100. It makes recommendations on whether to accept, in full or in part; or reject, in full or in part; each submission. This report also recommends what amendments can be made to address matters raised in submissions if considered appropriate. Any conclusions or recommendations in this report are not binding to the hearing commissioners.
40. This report also includes views of the Rodney Local Board on the content of PPC100.
41. The Hearing Commissioners will consider all the information in submissions together with evidence presented at the hearing.
42. This report draws on technical advice provided by the following technical experts:

<b>Author(s)</b>	<b>Name/s</b>
Technical expert- transportation	Martin Peake – Consultant – Progressive Transport Solutions Limited
Technical expert – Arboricultural	Regine Leung - Senior Arborist Earth, Streams and Trees   Specialist Unit Planning and Resource Consents, Auckland Council
Technical expert – Geotechnical	Nicole Li - Principal Geotechnical Specialist Engineering, Assets and Technical Advisory Resilience and Infrastructure, Auckland Council
Technical expert – Historic Heritage (Archaeological)	Mica Plowman – Senior Specialist: Heritage, Heritage Unit, Plans and Places, Auckland Council.

Technical expert – Historic Heritage (Built Heritage)	Megan Walker (Specialist: Historic Heritage): Heritage, Heritage Unit, Plans and Places, Auckland Council.
Technical experts - Stormwater	Amber Tsang – Consultant Planner (on behalf of Auckland Council Healthy Waters); and  Kedan Li – Senior Healthy Waters Specialist, Auckland Council Healthy Waters
Technical expert – Open Space and Parks Planning	Douglas Sadlier - Senior Parks Planner Parks Planning   Parks and Community Facilities Auckland Council
Technical expert – Water Wastewater	Lavannya Iliger - Regulatory Engineering & Resource Consents, Auckland Council
Technical expert – Infrastructure Funding	Ian Kloppers - Head of Infrastructure Funding & Development Strategy – Auckland Council.
Technical expert - Ecology	Alica Wong Ecologist Environmental Services, Auckland Council.
Technical expert – Contamination	Sarah Pinkerton Contaminated Land Consultant

#### **4. STATUTORY AND POLICY FRAMEWORK**

43. 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.
44. The following sections summarise the statutory and policy framework, relevant to PPC100.

##### **Resource Management Act 1991**

##### **Plan change matters – regional and district plans**

45. In the development of a proposed plan change to a regional and/ or district plan, the RMA sets out mandatory requirements in the preparation and process of the proposed plan change. Table 4.1 below summarises matters for plan changes to regional and district plan matters.



Relevant Act/ Policy/ Plan	Section	Matters
Resource Management Act 1991	Part 2	Purpose and intent of the Act
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
Resource Management Act 1991	Section 80	Enables a 'combined' regional and district document. The Auckland Unitary Plan is in part a regional plan and district plan to assist Council to carry out its functions as a regional council and as a territorial authority
Resource Management Act 1991	Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities

**Table 4.1 Plan change matters relevant to regional and district plans**

46. The mandatory requirements for plan preparation are comprehensively summarised by Environment Court in *Long Bay-Okura Great Park Society Incorporated and Others v North Shore City Council* (Decision A078/2008)<sup>1</sup>, where the Court set out the following measures for evaluating objectives, policies, rules and other methods. This is outlined in Box 1.

**Box 1**

**A. General requirements**

<sup>1</sup> Subsequent cases have updated the Long Bay summary, including *Colonial Vineyard v Marlborough District Council* [2014] NZEnvC 55.



1. *A district plan (change) should be designed to accord with and assist the territorial authority to carry out its functions so as to achieve, the purpose of the Act.*
2. *When preparing its district plan (change) the territorial authority must give effect to any national policy statement or New Zealand Coastal Policy Statement.*
3. *When preparing its district plan (change) the territorial authority shall:*
  - (a) *have regard to any proposed regional policy statement;*
  - (b) *not be inconsistent with any operative regional policy statement.*
4. *In relation to regional plans:*
  - (a) *the district plan (change) must not be inconsistent with an operative regional plan for any matter specified in section 30(1) [or a water conservation order]; and*
  - (b) *must have regard to any proposed regional plan on any matter of regional significance etc.;*
5. *When preparing its district plan (change) the territorial authority must also:*
  - *have regard to any relevant management plans and strategies under other Acts, and to any relevant entry in the Historic Places Register and to various fisheries regulations; and to consistency with plans and proposed plans of adjacent territorial authorities;*
  - *take into account any relevant planning document recognised by an iwi authority; and*
  - *not have regard to trade competition;*
6. *The district plan (change) must be prepared in accordance with any regulation (there are none at present);*
7. *The formal requirement that a district plan (change) must also state its objectives, policies and the rules (if any) and may state other matters.*

#### **B. Objectives [the section 32 test for objectives]**

8. *Each proposed objective in a district plan (change) is to be evaluated by the extent to which it is the most appropriate way to achieve the purpose of the Act.*

#### **C. Policies and methods (including rules) [the section 32 test for policies and rules]**

9. *The policies are to implement the objectives, and the rules (if any) are to implement the policies;*
10. *Each proposed policy or method (including each rule) is to be examined, having regard to its efficiency and effectiveness, as to whether it is the most appropriate method for achieving the objectives of the district plan taking into account:*
  - *the benefits and costs of the proposed policies and methods (including rules); and*
  - *the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*

#### **D. Rules**

11. In making a rule the territorial authority must have regard to the actual or potential effect of activities on the environment.

**E. Other statutes:**

12. Finally territorial authorities may be required to comply with other statutes. Within the Auckland Region they are subject to:

- the Hauraki Gulf Maritime Park Act 2000;
- the Local Government (Auckland) Amendment Act 2004.

**Resource Management Act 1991- District matters**

47. There are mandatory considerations in the development of a proposed plan change to district plans and rules. Table 4.2 below summarises district plan matters under the RMA, relevant to PC100.

**Table 4.2 Plan change- district plan matters under the RMA**

<b>Relevant Act/ Policy/ Plan</b>	<b>Section</b>	<b>Matters</b>
Resource Management Act 1991	Part 2	Purpose and intent of the Act
Resource Management Act 1991	Section 31	Functions of territorial authorities in giving effect to the Resource Management Act 1991
Resource Management Act 1991	Section 73	Sets out Schedule 1 of the RMA as the process to prepare or change a district plan
Resource Management Act 1991	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
Resource Management Act 1991	Section 75	Outlines the requirements in the contents of a district plan
Resource Management Act 1991	Section 76	Outlines the purpose of district rules, which is to carry out the functions of the RMA and achieve the objective and policies set out in the district plan. A district rule also requires the territorial authority to have regard to the actual or potential effect (including adverse effects), of activities in the proposal, on the environment

## 4.2. National policy statements

48. Pursuant to Sections 74(1)(ea) and 75 of the RMA the relevant national policy statements (NPS) must be considered in the preparation, and in considering submissions on PPC100.
49. The applicant considers that the following are relevant to the assessment of PPC100.
- The National Policy Statement on Urban Development (NPS-UD)
  - Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
  - New Zealand Coastal Policy Statement (NZCPS)
  - National Policy Statement on Freshwater Management (NPS-FM)
  - National Policy Statement on Electricity Transmission 2008
  - National Policy Statement for Highly Productive Land 2022 (NPS-HPL)
  - National Policy Statement for Indigenous Biodiversity as being relevant to the consideration of PPC100.

### The National Policy Statement on Urban Development (NPS-UD)

50. The application discusses the NPS-UD in section 6.2.1 of the request document.
51. The NPS – UD provides direction to decision-makers under the Act on planning for urban environments. The NPS-UD sets out objectives and policies that apply to all decision-makers when making planning decisions that affect an urban environment.

### Applicant's assessment

52. The applicant's overall assessment is that PPC100 is consistent with the NPS-UD. The assessment does not directly address all the objectives but refers to Policies 1, and 2, Objective 4 and 6 and Objective 8 and Policy 8.
53. Policy 1 states;  
*Policy 1:  
Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*
- a. have or enable a variety of homes that:*
    - i. meet the needs, in terms of type, price, and location, of different households; and*
    - ii. enable Māori to express their cultural traditions and norms; and*
  - b. have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
  - c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
  - d. support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
  - e. support reductions in greenhouse gas emissions; and*
  - f. are resilient to the likely current and future effects of climate change.*
54. In respect of Policy 1 the applicant considers that PPC100 provides for a well functioning urban environment in the following reasons
- *Enabling a variety of housing choices across the Plan Change area, including medium density housing within the Mixed Housing Suburban zone and more intensive forms of*

*housing like apartments in accessible areas, like those close to the Local Centre, where there are employment opportunities and public transport connections;*

- *Respecting Mana Whenua values associated including the key views and connections identified on the Mana Whenua cultural landscape map;*

- *Promoting good accessibility between housing, jobs, community services and open spaces by enabling more people to live in accessible locations close to public and active transport, which also supports a reduction in greenhouse gas emissions through reduced car dependence;*

- *Supporting the competitive operation of land and development markets by providing a broadly enabling zone framework and providing flexibility for the market to take up those opportunities; and*

- *Being resilient through the likely current and future effects of climate change through flooding and promoting a compact and efficient urban form.*

55. Policy 2 requires the Council to provide at least sufficient development capacity to meet expected demand for housing and business land over the short, medium and long terms.

56. The application notes that PPC100 will enable the development of an additional 1450-1750 dwellings and additional commercial and retail capacity in the north west. The application considers that this will assist the Council in meeting its obligations with several greenfield areas that are planned for release not progressing.

57. Objective 4 is as follows.

*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.*

58. The applicant considers that the change proposed for Riverhead is consistent with this objective for the following reasons;

*The Plan Change will enable development of greater height and density throughout Riverhead than what has previously been provided for. This will result in significant change over time in the built character and may detract from the current amenity values currently enjoyed by some residents, related to the spacious and suburban qualities of Riverhead. The Plan Change will enable a different set of amenity values to be realised over time, when compared to those currently associated with suburban environments. In particular, the amenity values offered within medium and higher density urban environments include more vibrant areas with additional amenities which residents are able to access amenities easily and largely via active modes of transport. Policy 6 essentially recognises and gives weight to these changing amenity values.*

59. Objective 6 and policy 8 state;

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

- (a) integrated with infrastructure planning and funding decisions; and*

- (b) strategic over the medium term and long term; and*

- (c) responsive, particularly in relation to proposals that would supply significant development capacity.*

*Policy 8:*

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

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

60. The applicant states that PPC100 is responsive in that;

Local authority decisions are required to ensure development is integrated with infrastructure planning and funding as well as being responsive, particularly in relation to proposals that would add significantly to development capacity and add to well functioning urban environments even if the development capacity is unanticipated by RMA planning documents or is out of sequence with planned land release (Objective 5 and Policy 6). As discussed in Section 6.3.2, the urbanisation of and within the Plan Change area is out of sequence with the FULSS however, there is a need to urbanise this land now to overcome growth challenges and there is funded infrastructure available to service the Plan Change area.

*Objective 8:*

*New Zealand's urban environments:*

- (a) support reductions in greenhouse gas emissions; and*
- (b) are resilient to the current and future effects of climate change*

61. The applicant states that PPC100 achieves Objective 8 as;

- The Plan Change proposes a comprehensive and integrated development over a large land holding that is contiguous with existing urban development on the opposite side of Coatesville Riverhead Highway. This scale of development will enable social amenities such as schools, open spaces, ecological corridors, a retirement village and a village centre to be established. This creates opportunities for residents to live and work closer to home, thereby reducing the need for travel to nearby centres for both residents of the existing settlement and future residents within the Plan Change area; and
- The Plan Change will result in a street network that provides for walking and cycling infrastructure, as well as improving connectivity to the existing settlement such adding additional pedestrian crossings on Coatesville-Riverhead Highway

#### Comment

62. It is considered that in many respects, PPC100 gives effect to the NPS:UD. It provides for urban development on land identified for future development.

63. However there are a number of matters that are not supported by the NPS:UD. These include the following;

- The assessment undertaken by the requestor has not taken into account the Auckland Future Development Strategy which has replaced the FULSS. This is because the FDS was adopted by the Council after the plan change request and assessment was made. On the face of it there are mismatches in the timing of the development anticipated in the FDS and the prerequisites within the FDS are not all met. I discuss this in more detail in paragraphs 158-168 below.
- The potential increase in flooding on land downstream from the PPC100 land and for the potential of flooding within the PPC100 land itself. This potential in my view represents a poor level of resilience to the impact of climate change.
- The potential to serve the PPC100 with public transport is limited at this time and there is considerable uncertainty about the provision and funding of

major transport infrastructure that is required to be provided prior to the urbanisation of the Plan Change area.

- The ability to serve the entire PPC100 area with water and wastewater infrastructure in the near future also appears to be limited. The provision of this infrastructure does not appear to be well integrated with the planned development.

64. These matters are discussed in more detail under the relevant headings throughout this report.
65. Overall it is my opinion that for the reasons set out in paragraph 63 above, significant aspects of PPC100 do not give effect to the NPS:UD.

### **Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.**

66. The application states that the Amendment Act gives Tier 1 urban authorities discretion whether to apply the MDRS to settlements predominantly urban in character with a population under 5,000, as these are not captured by the definition of a “relevant residential zone”. This discretion applies to Riverhead which at the 2018 Census, had a population of 2,802. Under PC78 the Council is proposing to retain the current zoning of smaller settlements (less than 5,000 population) and to not apply the MDRS. The stated explanation is that the smaller settlements are separated from the main urban area, where public transport is limited and increased density of development will add to vehicle travel distances and associated greenhouse gas emissions.
67. The application notes however that there are submissions on PC78 which request that the MDRS be applied to these smaller settlements. These submissions have yet to be heard.
68. The application further states that it is considered appropriate to apply an MHS zoning to the Plan Change area, with specific provisions to enable development of a density provided for under the MDRS.

#### Comment

69. The applicant has adopted a hybrid approach to the implementation of the MDRS. Through the precinct provisions it has adopted some of the standards, but has not fully incorporated the MDRS as a whole, and it has not specifically identified qualifying matters which would have been required if the MDRS had been adopted.
70. Given that the MDRS is not required to be applied in this location it is accepted that the approach taken by the applicant is acceptable in this respect. The development enabled by the provisions proposed are subject to a number of submissions and the details of these are discussed later in section 10.8 of this report.
71. Overall it is considered that PPC100 is consistent with the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

### **New Zealand Coastal Policy Statement (NZCPS)**

72. The application notes that;  
*This Structure Plan and development of the identified area for urban land uses will give effect to the NZCPS in that any future land use activities will need to comply with the Auckland-wide stormwater quality and stormwater management provisions which will*

*manage sediment and contaminant runoff, which could make its way into the coastal receiving environment. Further mitigation measures will be considered as part of a future resource consent process via the certification requirements of the Council's regional-wide Network Discharge Consent.*

#### Comment

73. The effects of PPC100 have been assessed by Ms Tsang and Ms Li in the assessment from healthy waters which is set out in Appendix 6. One of the main issues identified in that assessment is that stormwater runoff from the Plan Change area is proposed to discharge into the upper Waitemata Harbour. The upper harbour is identified as a marine significant ecological area (SEA) in the AUP. The report further notes that appropriate treatment of stormwater is required on site prior to discharge in order to manage water quality effects from the harbour.
74. Section 8 of the CKL report prepared on behalf of the applicant proposals the runoff from all public and private impervious areas are treated to a level of treatment consistent with GD01 Stormwater Management Devices in the Auckland Region through communal bioretention devices, communal swales and communal wetlands or bioretention devices. The report from Healthy Waters considers that the stormwater quality treatment proposal in the CKL report is appropriate. However some concerns are expressed about the wording of the related provisions within the proposed precinct and recommended alternative provisions are set out in the report.
75. In my view, subject to changes to the notified precinct provisions, the effect of stormwater runoff on the coastal marine area will be suitably managed and overall PPC100 is consistent with the relevant provisions of the New Zealand Coastal Policy Statement.

#### **National Policy Statement for Freshwater Management 2020 (NPSFM).**

76. The applicant has provided an assessment of PPC100 in respect of the NPSFM. This assessment notes as follows;
  - It is proposed to apply the Stormwater Management Area Control – Flow 1 ('SMAF 1') across the portions of the Plan Change area proposed to be urbanised to manage the increase in stormwater discharge to sensitive stream environments.
  - An integrated stormwater management approach has been proposed and a number of best practicable options have been identified in the SMP included at Appendix 10.
  - Key structuring elements are identified within proposed Precinct Plan 1, including roads, pedestrian connections, and open spaces are located clear of existing freshwater bodies and it is anticipated that the delivery of works will not result in the loss of extent or value associated with the stream and wetland within the Plan Change area.
  - Existing waterbodies will also be protected in accordance with the provisions of Chapter E3 Lakes, rivers, streams and wetlands and relevant regulations of the National Environmental Standard for Freshwater Management ('NES-FW').
  - The Plan Change will also enhance streams as Riparian enhancement along the identified streams is required under the proposed Riverhead Precinct.

#### Comment

77. Ms Li on behalf of Healthy Waters (Appendix 6) supports the use of the SMAF control but considers that it should be applied over the entire precinct and not just portions of it as proposed. This is because Sub-stormwater Catchments S03\_P\_1 and S03\_P\_2 are proposed to discharge to a modified watercourse (i.e. approximately 300m downstream of the PPC 100 site boundary) via the local stormwater network along Riverhead Point Drive. Any hydrological and erosion effects on this modified watercourse, which is considered a stream as per the AUP(OP) definition<sup>2</sup>, should be avoided and/or mitigated.
78. In respect of the NPS:FM the Council ecologist, Ms Wong (Appendix 6), has concerns that PPC100 does not correctly identify and provide for the protection of some wetlands and that some watercourses identified as drains are in fact streams that should be protected. In my view these should be identified by the applicant in evidence.
79. Based on this advice I consider that amendments to PPC100 would be needed to give effect to the NPS:FW.

### **National Policy Statement on Electricity Transmission 2008**

80. The application states the National Grid Corridor overlay applying under the AUP gives effect to the NPS by controlling the location of activities, and the extent of subdivision and development near the National Grid Line. The north-western portion of the Plan Change area is traversed by the National Grid Corridor overlay and a 110kv Transpower Transmission Line, and the measures in D26 National Grid Corridor Overlay will be adhered to in order to avoid reverse sensitivity effects on the National Grid Corridor.

#### Comment

81. It is considered that the applicant's assessment is generally correct. It should also be noted that the extent of the National Grid Overlay affected has been substantially reduced through the proposal to rezone land in the north of the plan change area to Rural – Mixed Rural Zone.

### **National Policy Statement for Highly Productive Land 2022 (NPS-HPL)**

82. The application states that as the plan change is currently within the Future Urban Zone the policies contained within the HPS-HPL do not apply.

#### Comment.

83. I agree that the policies do not apply to the land within the plan change area.

### **National Policy Statement for Indigenous Biodiversity (NPS-IB)**

84. The applicant states that the NPS-IB sets out a range of regulated measures that require Local Government to take a more proactive role in protecting indigenous biodiversity. In broad terms, the NPS-IB requires every territorial authority to undertake a district-wide assessment in accordance with Appendix 1 of the NPS-IB to determine if an area is significant indigenous vegetation and/or significant habitat of indigenous fauna.

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<sup>2</sup> The definition in Chapter J of the AUP(OP) for river or stream is 'a continually or intermittently flowing body of fresh water, excluding ephemeral streams, and includes a stream or modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal except where it is a modified element of a natural drainage system'.



85. The application further states the Plan Change area is currently an active horticultural site. Land within the site has been intensively worked for many years and all past existence of indigenous vegetation has long since been removed.

Comment

86. There are no Significant Ecological Areas identified on the AUP. The specialist memo on ecology does not specifically identify any matters relevant to the NPS-IB other than already noted in the discussion on the NPS-FW above.
87. Subject to those comments I consider that PPC100 gives adequate effect to the NPS-IB.

**4.3. National environmental standards or regulations**

88. Under section 44A of the RMA, local authorities must observe national environmental standards in their district/ region. No rule or provision may duplicate or be in conflict with a national environmental standard or regulation. It is considered that the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 and National Environmental Standards for Freshwater Regulations 2023 are relevant to consideration of PPC100. These are discussed below.

**National Environmental Standards**

89. The applicant has identified that the NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011('NESCOCS'); and the NES for Freshwater 2020 ('NES-FW') apply.
90. The application notes;

*These NES documents have been taken into account in the preparation of the relevant expert reports and are further discussed in Section 9 of the report below. Assessments undertaken to date confirm that the NESCOCS will apply at the time of development to manage contaminated land, to be appropriately addressed as part of future resource consent processes. As discussed above, the delivery of key structuring elements within the Plan Change area is unlikely to require resource consent under the NES-FW, however the relevant regulations will apply at the time of future development and will also be appropriately assessed through future resource consent processes.*

Comment

91. In respect of the NESCOCS, the effects of contamination has been assessed for the Council by Sarah Pinkerton – Contaminated land Consultant. This assessment is set out in Appendix 6 to this report.
92. Overall Ms Pinkerton considers that the PPC100 is considered to be consistent with the purpose of the NES:CS. Ms Pinkerton does recommend some actions in respect of contaminated land. These are discussed further below in the section of environmental effects in paragraphs 260-264.
93. The Council's ecological report does not refer to the NES-FW but these standards will apply regardless as assessed by the applicant above in paragraphs 76 to 79.

#### **4.4. Auckland Unitary Plan Regional Policy Statement**

##### Applicant's Assessment

94. Section 75(3)(c) of the RMA requires that a district plan must give effect to any regional policy statement (RPS). The applicant has assessed PPC100 in respect of the RPS in section 6.4 of the request document and Appendix 5 of the request document.
95. The section of the RPS identified by the applicant in the s32 report that are relevant to PPC100 include;
- B2.2 Urban growth and form  
B2.6 Rural and Coastal Towns and Villages
96. A more detailed assessment against the objectives and policies is also set out in Appendix 5 of the s32 report.

##### **B2.2 Urban growth and form**

97. Section B2.2 of the AUP includes the RPS objectives and policies for urban growth and form.
98. The application states that PPC100 meets these objectives for the following reasons;
- The proposed shift in the RUB will ensure that urbanisation of land that is subject to significant natural hazard risk from flooding is avoided in accordance with B2.2.2(2)(l). The proposed shift in RUB will align with the floodplain extent which is a strong natural boundary in accordance with B2.2.2(2)(m)(i).
  - The Plan Change supports a quality compact urban form, by enabling urbanisation of land that is immediately adjacent to the existing Riverhead urban area and contained within the existing Rural Urban boundary. The proposed zoning pattern will enable provision of a range of housing types, and the proposed centres will provide local employment opportunities;
  - The Plan Change has been informed by the Riverhead Structure Plan which has been developed in accordance with the structure plan guidelines set out in Appendix 1 and therefore gives effect to policy B2.2.7(d);
  - The Plan Change includes infrastructure-related provisions to ensure the provision of infrastructure is coordinated with development and therefore gives effect to policy B2.2.7(c);
  - The proposal will facilitate improved social outcomes through including provisions that enable the establishment of neighbourhood and local centres, open spaces, a variety of housing types (which will result in a variety of occupants ranging from families with children and working professionals as well as empty nesters and the elderly). This in turn will lead to greater social and cultural vitality. This gives effect to Objective B2.2.1(1)(e) and Policy B2.2.2(2)(e); and
  - The development will provide for greater productivity and economic growth through providing for residential growth and commercial activities. Residential growth would be provided for adjacent to an existing residential area and the proposed neighbourhood and local centres would provide local services for the community. This gives effect to Objective B2.2.1(1)(b) and Policy B2.2.2(5) and (6).

99. As noted above Appendix 5 to the S32 report provides an assessment against the remaining relevant parts of the RPS

Comment

100. I consider that PPC100 gives effect to many of the matters raised in these objectives and policies.

101. The development proposed within the plan change area is consistent with the Structure Plan developed by the applicants. However a number of issues remain.

102. Policy 2.2.2(2)(l) in relation to the position of the RUB states;

*avoiding areas with significant natural hazard risks and where practicable avoiding areas prone to natural hazards including coastal hazards and flooding, including the effects of climate change including sea level rise on the extent and frequency of hazards the natural hazard risks or is necessary to give effect to identified qualifying matters.*

103. While the rezoning of the area to the north of the plan change area (22 Dunlop Road) to Mixed Rural Zone due to the potential flooding concerns and the associated shift of the RUB responds to this policy, the assessment by Healthy Waters (Appendix 6) indicates that additional areas also should be zoned MRZ and that there are other areas within the plan change area that are also subject to increased flooding hazard as a result of PPC100 as notified.

104. Policy 2.2.2(7) is to;

*Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that contribute to a well- functioning urban environment and that do all of the following:*

*(a) support a quality compact urban form;*

*(b) provide for a range of housing types and employment choices for the area;*

*(c) integrate with the provision of infrastructure;*

*(caa) provide good accessibility, including by way of efficient and effective public or active transport;*

*(ca) incorporate resilience to the effects of climate change;*

*(d) follow the structure plan guidelines as set out in Appendix 1; and*

*(e) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets.*

105. In my view the range of housing enabled by PC100 is likely to be suitable for the location and is consistent with the RPS. Within the area a reasonably compact urban form is enabled. While the plan change area is separated from the main urban area of Auckland, the land has been identified in the AUP for future urbanisation. This urbanisation cannot be contiguous with the greater urban area and be compact in that sense. A number of submissions raise concerns about the intensity of development not being compatible with the existing character of Riverhead. These are discussed in section 10.8.

106. I consider that PPC100 provides for a suitably compact urban form, and provided for a range of housing choices in the area, but is less effective in providing for employment. The latter is the product of the location of Riverhead where commuting for employment is unlikely to change.

107. The applicant identifies that PPC100 includes provisions that restrict development until suitable and adequate infrastructure is provided. The details of the effectiveness of these are discussed later in this report. The issues that arise in respect of infrastructure are the adequacy of the infrastructure to be provided or the capacity of infrastructure (including planned infrastructure) and the adequacy of the provisions to ensure that the development does not proceed in advance of infrastructure. This includes transportation infrastructure and water and wastewater infrastructure. It is noted later in this report that amendments will be required to PPC100 in respect of the provisions relating to infrastructure to give effect to the RPS.
108. In addition in respect of water and wastewater infrastructure, while the initial development enabled by PPC100 may be able to be served, there appear to be considerable timing gaps before the planned provision of infrastructure for development in the medium to long term.

### **B2.6 Rural and Coastal Towns and Villages**

109. The applicant has considered this Chapter of the RPS and considers that;

*Overall, in terms of the relevant objectives and policies of B2.6, it is considered that an expansion of the Riverhead town gives effect to these RPS provisions. The policies enable significant expansions to existing rural towns through the structure plan process and subsequent plan changes. This approach is being followed for Riverhead. Therefore, it is concluded that the urbanisation of Riverhead as proposed within this Plan Change is consistent with the RPS and will give effect to it.*

#### Comment

110. The objectives in B2.6.1 as follows:

*(1) Growth and development of existing or new rural and coastal towns and villages is enabled in ways that:*

*(a) avoid natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character unless growth and development protects or enhances such values; and*

*(b) avoid elite soils and avoid where practicable prime soils which are significant for their ability to sustain food production; and*

*(c) avoid areas with significant natural hazard risks; (ca) are resilient to the effects of climate change;*

*(d) are consistent with the local character of the town or village and the surrounding area; and*

*(e) enables the development and use of Mana Whenua's resources for their economic well-being.*

*(2) Rural and coastal towns and villages have adequate infrastructure.*

111. The associated policies are:

#### **B2.6.2 Policies**

*(1) Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following:*

*(a) maintains or enhances the character of any existing town or village;*

*(b) incorporates adequate provision for infrastructure;*

*(c) avoids locations with significant natural hazard risks where those risks cannot be adequately remedied or mitigated;*  
*(d) avoids elite soils and avoids where practicable prime soils which are significant for their ability to sustain food production;*  
*(e) maintains adequate separation between incompatible land uses;*  
*(f) is compatible with natural and physical characteristics, including those of the coastal environment;*  
*(g) provides access to the town or village through a range of transport options including walking and cycling; and*  
*(h) improves resilience to the effects of climate change.*

*(2) Avoid locating new or expanding existing rural and coastal towns and villages in or adjacent to areas that contain significant natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character, unless the growth and development protects or enhances such resources including by any of the following measures:*

*(a) the creation of reserves;*  
*(b) increased public access;*  
*(c) restoration of degraded environments;*  
*(d) creation of significant new areas of biodiversity; or*  
*(e) enablement of papakāinga, customary use, cultural activities and appropriate commercial activities.*

*(3) Enable the establishment of new or significant expansions of existing rural and coastal towns and villages through the structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines.*

*(4) Enable small-scale growth of and development in rural and coastal towns and villages without the need for structure planning, in a manner consistent with policies B2.6.2(1) and (2).*

*(5) Enable papakāinga, marae, customary use, cultural activities and appropriate commercial activities on Māori land and on other land where Mana Whenua have collective ownership.*

112. In my view there are three main issues in respect of this section of the RPS. These are whether natural hazards are suitably avoided, whether adequate provision is made for infrastructure and whether the character of Riverhead will be suitably maintained or enhanced.
113. In my view natural hazards, which in the case of Riverhead, relates mostly to flooding hazards have been only partially avoided through the proposal to rezone land from FUZ to MRZ. Healthy Waters (Appendix 6) have identified that there is additional land that should also be rezoned and that the overall effects of flooding have not been fully evaluated and / or mitigated.
114. In respect of infrastructure PPC100 includes various provisions for linking the provision of infrastructure to development. It is considered that amendments to these provisions are required to ensure the RPS is given effect to in this respect. It is also considered that the provision of water and wastewater infrastructure has not been adequately considered with WSL's submission concerned that some of the infrastructure required not being available until much later than assumed by the applicant.

115. It is questionable whether PPC100 is consistent with the adequate provision of transport infrastructure particularly in respect of public transport provision as identified in the assessment from Mr Peake (Appendix 6). There is also in my view some uncertainty about the delivery of some necessary infrastructure such as the SH16 (Brigham Creek to Waimauku) safety improvements. While an NOR has been lodged for some of this work (NOR R1) I understand this is on hold and there has been no funding allocated to this in the current LTP and sits outside the Inner -Northwest 30-year DC Policy. While this project is in the National Land Transport Plan it is my understanding that it has not yet been fully funded at the time of writing this report.
116. The existing character of Riverhead in my view is largely defined by single houses on reasonably sized lots. In the older parts of the town there are informal road boundaries often with large grass berms and no curbs. Footpaths may not be present or present only on one side of the road. In the newer area (mainly in the south) the roads are similar to other newer parts of Auckland with formal layouts including footpaths, kerns and berms. There is little multi-unit development in most parts of the town. Vegetation is more prominent in the older areas.
117. The development enabled by PPC100 includes an area of higher density THAB zoning and a larger area of a modified form of the MHS zoning, that will enable development up to 8m. The development enabled by PPC100 is overall at a higher density than the SHZ enabled development in the existing town. To this extent the development proposed will be of a different character that the existing town.
118. On the face of it this is inconsistent with Objective B2.6.1(1)(d) and contrary to Policy B2.6.2(1)(a). However, in my view this change also has to be considered in light of other parts of the RPS and the national direction that is calling for a higher density compact urban form. There is therefore a tension between the overall direction for increased residential intensity and the direction that rural and coastal towns and villages should retain their character.
119. I consider that these three issues need to be addressed by the applicant in evidence before PPC1000 can be considered to give effect to this aspect of the RPS.

## **B2.7 Open Space and recreation facilities and B2.8 Social facilities**

### Applicant's Assessment

120. These parts of the RPS are only briefly assessed in Appendix 5 of the section 32 document.

### Comment

121. In respect of open space and recreation these matters are discussed in greater detail in paragraphs 273 to 277 of this report. The applicant notes that the open space will be ensured by the Auckland wide provisions of the unitary plan. However, in my view the precinct provisions will also play a prime part and achieving adequate open space in Riverhead and the Council Parks Planner has raised a number of concerns about both the location of proposed parks infrastructure and the practicalities of achieving the precinct proposals on the ground.
122. Again these matters are addressed in more detail later in the report.

123. In respect of social facilities, the applicant identifies a number of social facilities allocated within 15 kilometres of Riverhead and that the business zoning proposed will also provide for social facilities. It's unclear why the 15 kilometre measure has been adopted by the applicant

### **B3.2 Infrastructure**

#### Applicant's Assessment

124. The applicant addresses infrastructure in Appendix 5 of the application documents with a report from GHD. The application states that in respect of water supply that there is capacity within the existing reservoir to service the plan change in the short term and but that upgrades to mains will be required in the long term.
125. In respect of wastewater the application states that there is capacity within the existing Riverhead wastewater pump station to service the Plan Change area in the short term. In the long term, the planned diversion of Kumeu and Huapai from the Riverhead system will also provide sufficient capacity to service the entirety of the Plan Change area. Should development within the Plan Change area occur prior to this diversion, the GHD assessment identifies a number of available options to provide for additional capacity, including both localised upgrades relative to the Plan Change area and the construction of a new wastewater pump station.
126. The application also states that electrical and telecommunication connections can also be provided.

#### Comment

127. The body responsible for managing water and wastewater infrastructure is Watercare Services Ltd (Watercare) which is an Auckland Council CCO. Watercare has lodged a submission opposing the plan change. This submission is discussed in more detail in section 10.4 this report.
128. The information provided by Watercare is that while there is some capacity for additional wastewater servicing, the upgrades necessary for buildout of the PPC100 area are not planned for until after 2050. Based on this assessment, and unless funding agreements can be brought forward, it appears that the full wastewater infrastructure needs of PPC100 cannot be provided, at least until 2050.
129. In respect of water supply, Watercare notes that the existing water supply network has capacity for approximately 250 additional dwellings. A dual watermain along Deacon Road will be required to support development of the PPC100 area and these upgrades will be the responsibility of the applicant. The existing bulk water supply network has good capacity in both trunk and storage to service an additional 4,500 DUEs across the entire Riverhead and Kumeu / Huapai water supply areas. Development in excess of this (either from development enabled in the Plan Change 100 area or via infill or future plan changes in Kumeu or Huapai) will trigger the requirement for an additional bulk reservoir.
130. The applicant states that they have identified a number of options for the future servicing of Riverhead. The application also states that the Precinct provisions and the Auckland wide chapters off the AUP will ensure that appropriate provision is made for future infrastructure. However there does not appear to be any discussion about how such upgrades will be funded.

131. I consider that this will need to be addressed by the applicant in evidence before PPC100 can be considered to give effect to this aspect of the RPS.

### **B3.3 Transport**

#### Applicant's Assessment

132. The applicant has assessed these objectives and policies and advises as follows;

*The effects of the Plan Change on the existing and future transport network have been assessed in an Integrated Transport Assessment ('ITA') prepared by Flow Transportation and included within Appendix 8. The ITA has shown that extent of development enabled by live zoning in the plan change can be accommodated on the surrounding road network while maintaining acceptable levels of safety and efficiency with the identified transport infrastructure upgrades. The Plan Change will enhance accessibility of all modes of transport within Riverhead by providing a connected an integrated road network which provides for cyclists and pedestrians and creates linkages to the existing Riverhead settlement.*

*The Plan Change is in keeping with the relevant objectives and policies.*

#### Comment

133. The transport aspects of PPC100 have been assessed for the Council by Martin Peake, Transportation Consultant. In relation to the RPS provision Mr Peake notes that;

*In summary, I consider that PPC100 partly aligns with traffic and transport AUP RPS Objectives and Policies by providing facilities within Riverhead itself for active modes, and public transport facilities, and through the partial implementation of elements of the planned prerequisite infrastructure identified in the FDS (Future Development Strategy) for CRH (Coatesville Riverhead Highway). The Precinct Provisions as proposed prevent dwellings being occupied until the SH16 / CRH roundabout is constructed and operational which would address effects on the wider road network, although as I discuss ....., I consider that this restriction should also apply to four-laning of SH16 east of CRH.*

*I consider that until the upgrades to CRH and Riverhead Road are complete and more frequent public transport services are provided, that Riverhead will be largely reliant on private vehicle travel for access to the wider transport network. The timing of when these upgrades would occur is currently unknown.*

134. I generally agree with the assessment of Mr Peake. As the timing of the roading upgrades beyond the scope of the applicant are unknown, it is not clear that transport infrastructure and development will be integrated particularly in respect of infrastructure outside of the Plan Change area that is beyond the control of the applicant, and to a certain extent the Council. This is reinforced by the uncertainty around such infrastructure expressed in the memorandum from Mr Kloppers.
135. I also consider that changes are required to the Precinct provisions to ensure that subdivision and development does not occur prior to the transport upgrades being made.
136. It is also unclear how PPC100 makes provides land use patterns that will reduce the rate of growth for private vehicle trips given the separation of Riverhead from main employment centres and the general lack of public transport provision.



137. Overall I have concluded that PPC100 risks doing little to give effect to much of B3.3.2 particularly given the uncertainty around the timing of major transport upgrades required.

**B4. Te tiaki taonga tuku iho - Natural heritage**

138. Chapter B4 of the AUP sets out the strategic framework for natural heritage resources. Section B4.2 sets out the strategic framework for outstanding natural features and landscapes.

Comment

139. The plan change area is not identified as having high natural character.

**B5. Ngā rawa tuku iho me te āhua - Historic Heritage and special character**

140. Chapter B5 of the AUP sets out the RPS objectives and policies for historic heritage and special character.

141. The applicant does not specifically address this chapter in its assessment.

Comment

142. Given the archaeological and historic heritage assessment undertaken by the applicant and reviewed by Council specialists (Rebecca Ramsay and Megan Walker) set out in Appendix 6 of this report, it is considered that this chapter is not particularly relevant to PPC100 and that the existing provisions of the AUP are sufficient to manage any historic heritage resources that may exist within the plan change area.

**B6. Mana Whenua**

143. Chapter B6 of the AUP sets out the strategic framework for the recognition of the Treaty of Waitangi partnerships and participation, recognition of Mana Whenua values; Māori economic, social and cultural development; and the protection of Mana Whenua cultural heritage.

Applicant's Assessment

144. The applicant states that engagement has been undertaken with all Mana Whenua groups with known customary interests in the Plan Change area. The consultation report included as Appendix 14 of the application details the results of this engagement to date. It is noted that there are no known identified sites of Significance or Value to Mana Whenua within the Plan Change area. The Plan Change is in keeping with the relevant objectives and policies..

Comment

145. It would appear that there are no matters of concern to Mana Whenua that are not being addressed by the applicant and that adequate and ongoing consultation is being undertaken by the applicant. No Mana Whenua groups have made submissions on PPC100 and no major concerns were raised through the pre-notification consultation processes with any Iwi group. I also note that the applicant is maintaining ongoing consultation with mana whenua.

**B7 Toitū te whenua, toitū te taiao – Natural resources**

146. Chapter B7 – Natural Resources is concerned with a number of matters including land and water resources including habitats and biodiversity.

#### Applicant's Assessment

147. The applicant states that in respect of these matters;

*The Plan Change area is predominantly worked in pasture, with no presence of indigenous vegetation. A copper beech tree meeting the criteria to be nominated as a notable tree under the AUP is located at the western side of the Plan Change area at 298 Riverhead Road, Riverhead. This tree is proposed to be retained where possible through this Plan Change.*

*The Plan Change is in keeping with this objective..*

*The Stormwater Management Plan ('SMP') prepared to support this Plan Change application demonstrates that mitigation measures can be put in place to manage any adverse effects of rezoning and developing the Plan Change area on the freshwater systems. The stormwater quality provisions included within Chapter E9 of the AUP will apply within the Plan Change area. Additionally, the Stormwater Management Area Flow 1 Control is proposed to apply to the areas of the site which will discharge to stream receiving environments. This will ensure that there are rules in place to manage the stormwater runoff quality from new impervious areas that have the potential to adversely affect waterways.*

*The Plan Change includes a riparian margin rule which requires a 10m planted riparian margin along identified streams which will assist with improving water quality. The Plan Change is in keeping with the relevant objectives and policies.*

#### Comment

148. These matters are discussed in paragraphs 76 to 79 above in respect of the NPS:FW.
149. Based on that assessment, there are aspects of PPC100 that will require change to adequately give effect to this aspect of the RPS.

#### **Conclusion RPS**

150. Overall it is my conclusion that PPC100 as notified does not give full effect to the RPS particularly in respect of the following matters;
- The provision of infrastructure (water, wastewater and transport infrastructure) in coordination with development.
  - The effects on flooding and ongoing resilience to the effects of climate change
  - The tension between providing a compact urban form and maintaining the existing character of Riverhead.

#### **4.5. Auckland Unitary Plan (AUP)**

151. The applicant has provided an assessment of PPC100 against the provisions of the AUP in Appendix 5. No overall conclusion is provided by the applicant in respect of the Auckland unitary plan.

152. It is not proposed here to undertake a full assessment of PPC100 as the provisions of the AUP apply regardless. The effects assessment below in section 5.1 of this report will refer to relevant parts of the Auckland unitary plan where necessary.

#### **4.6. The Auckland Plan**

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

154. The Auckland Plan 2050 prepared under section 79 of the Local Government (Auckland Council) Act 2009, is a relevant strategy document that the council should have regard to when considering PPC100

155. The applicant's assessment of the Auckland Plan notes that A key component of the Auckland Plan is the Development Strategy which sets out how future growth will be accommodated up to 2050. The Auckland Plan focusses new development in existing urban areas and provides for 'managed expansion' in future urban areas. This managed expansion is with reference to structure planning processes.

156. The applicants assessment is that the proposal is consistent with Auckland 2020 because;

- PPC100 will provide quality, compact neighbourhoods adjacent to Riverhead;
- The zoning pattern will enable a range of housing choice;
- Quality urban design will be achieved;
- Roads, connections and open space as anticipated by the structure plan will be achieved;
- There is public transport to Riverhead and SH16 Northwest Bus Improvements will also improve public transport accessibility;
- All modes of transport will be accommodated;
- Infrastructure upgrades will be provided.

#### Comment

157. I agree that PPC100 is not inconsistent with the Auckland Plan growth aspirations. However I consider that public transport to and from Riverhead is currently limited and the PPC100 does not significantly address this or enable significant improvements in public transport. Similarly I am also concerned that there is a gap in the timing of the planned provision of infrastructure and that any necessary upgrades may not be well integrated with the timing of development.

#### **4.7. Any relevant management plans and strategies prepared under any other Act**

158. The applicant has identified that the Council's Future Urban Land Supply Strategy (FULSS) is relevant to the consideration of PPC100.

159. However, in the period between the acceptance of the plan change request and now, the FULSS has been replaced with the Future Development Strategy 2023 (FDS) as required by the NPS:UD. Clause 3.13 of the NPS:UD states that the purpose of the FDS is:

*(a) to promote long-term strategic planning by setting out how a local authority intends to:*

*(i) achieve well-functioning urban environments in its existing and future urban areas; and*

*(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and*

*(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.*

160. Additionally clause 3.17 of the NPS:UD states that the Council must have regard to the FDS when preparing or changing RMA planning documents, which includes PPC100. Clause 3.8 relates to unanticipated or out of sequence plan changes. This states that the Council must have regard to the development capacity provided by the plan change if that development capacity:
- (a) Would contribute to a well-functioning urban environment; and
  - (b) Is well connected along transport corridors; and
  - (c) Meets the criteria set out in the RPS.<sup>3</sup>
161. The FDS makes substantial changes to the land release programme for Riverhead. Firstly the area to the north of the plan change area is no longer considered appropriate for urban development due to flooding. The proposed rural zoning (subject to the additional land recommended to be rezoned by Healthy Waters) of this area as proposed in PPC100 is consistent with the FDS.
162. The remainder of the plan change area is red flagged in the FDS. This means that Unless appropriately managed, development in 'red flagged' areas will likely exacerbate flood risk within the future urban area and existing urban area/ rural settlements downstream. Given this, specific requirements need to be considered. These requirements cover:
- Integrating land use change – identifying stormwater management solutions that service the sub-catchment long-term, holistic contaminant loading assessments, hydrologic and hydraulic modelling, erosion assessments and life-cycle costings.
  - Hydrology mitigation and erosion protection to streams and watercourses - erosive flows in streams and appropriate approaches.
  - Flooding – development within the 1% AEP floodplain, earthworks and modelling, and appropriate mitigation.
  - Stormwater infrastructure – sub-catchment servicing, reliance on public conveyance infrastructure and infrastructure to be vested to public ownership.
163. Based on the advice from Healthy Waters I have concluded that there is insufficient information and assessment to conclude that the matters above have been adequately provided for within PPC100. I have discussed this in more detail below in paragraphs 245 to 255.
164. In addition the timeframe for the rezoning of the remaining FUZ land at Riverhead has been amended to not before 2050. The infrastructure prerequisites for rezoning from FUZ are set out as;
- Brigham to Waimauku SH16 Upgrade
  - SH16 Main Road Upgrade
  - Alternative State Highway
  - Access Road upgrade
  - Coatesville-Riverhead Highway upgrades
  - Northwest Rapid Transit extension to Huapai
  - Riverhead separation from the KHR WW Main.

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<sup>3</sup> There are no specific criteria in the RPS in respect of out of sequence development.

165. At this time there is uncertainty about the timing of a number of these projects and there does not appear to have been funding allocated to a number of these projects.

166. The FDS also allows consideration of private provision of infrastructure as follows;

*Whilst this strategy sets infrastructure prerequisites that align with council's planned investment in future urban areas, it also signals a pathway for the private sector to fund infrastructure ahead of when the council can fund the required infrastructure.*

*Private sector infrastructure provision could consider:*

- *private sector funding to the council and it's CCOs to provide the infrastructure ahead of programme where it does not impact council's debt profile and fits with the financial position of the council and CCOs;*
- *private sector provision of infrastructure with deferred vesting in the council;*
- *independent standalone infrastructure, where it can be provided, funded and operated by the private sector pending delivery and connection of public infrastructure to a place.<sup>4</sup>*

167. The main constraint on future re-zoning identified in the FDS other than flooding is the transport and wastewater infrastructure. I consider that while some of this can be provided by the applicants (i.e. the Coatesville- Riverhead Highway upgrades), other items such as the alternative state highway and SH16 improvements cannot be provided independently and quickly. Overall I consider that PPC100 is only partially consistent with the FDS.

168. Due to the time of the approval of the FDS which was after the PPC100 request was accepted the application material does not include an assessment of PPC100 in respect of the FDS. This is something that should be addressed by the applicant in evidence at the hearing.

## **5. ANALYSIS OF THE SECTION 32 REPORT AND ANY OTHER INFORMATION PROVIDED BY THE APPLICANT**

169. Section 74 of the RMA requires that a plan change must have particular regard to an evaluation prepared in accordance with Section 32 of the RMA.

170. Section 32 of the RMA requires an evaluation report examining the extent to which the objectives of the plan change are the most appropriate way to achieve the purpose of the Act. Section 32 also requires the report to examine whether the provisions are the most appropriate way of achieving the objectives.

171. The applicant has prepared an assessment against Section 32 in the statutory assessment in Section 8 of the Plan Change request

172. The s32 report has identified a number of overall options on a thematic basis for PPC100. These are as follows:

173. Theme - extent of urbanisation in Riverhead;
- Option 1 – Do nothing – retain the FUZ zoning across the entire Plan Change area;
  - Option 2 – Urbanise the entire Plan Change area;

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<sup>4</sup> FDS P45

- Option 3 – Proposed plan change – Shift the RUB and apply a rural zone to the area of land subject to flooding constraints.
174. Theme 1.1– Timing of development in Riverhead
- Option 1 – Do nothing – wait for Council to rezone the land;
  - Option 2 – Proposed plan change – live zone the entire FUZ area.
175. Theme 1.2 – Residential land use pattern – Lower density residential area.
- Option 1 – Single house zone;
  - Option 2 – Mixed housing suburban zone;
  - Option 3 – Mixed housing urban zone;
  - Option 4 – Proposed plan change
176. Theme 1.3 – Residential land use pattern – higher density residential area
- Option 1 – Mixed housing urban zone
  - Option 2 – Terrace housing and apartment building zone
  - Option 3 – Proposed Plan Change
177. Theme 1.4 – Commercial land use pattern
- Option 1 - Rely on the existing Riverhead Local Centre and a new Neighbourhood Centre;
  - Option 2 – Establish a local centre north of Riverhead Road and a Neighbourhood centre on Coatesville – Riverhead Highway;
  - Option 3 – Establish a local centre opposite Hallertau and a Neighbourhood centre on Riverhead Road
  - Option 4. – Proposed Plan Change – establish a local centre south of Riverhead Road and a neighbourhood centre on Coatesville Riverhead Highway.
178. Theme 1.5 – Rural land use pattern
- Option 1 – Rural production zone;
  - Option 2 – Countryside living zone;
  - Option 3 – Proposed plan change Mixed Rural Zone.
179. Theme 2 – Coordinating the development of land with transport and three waters infrastructure in Riverhead;
- Option 1 – Do nothing – no staging requirements
  - Option 2 – Deferred zoning – when all the local infrastructure upgrades are operational;
  - Option 3 – Proposed plan change – coordinated delivery of infrastructure through rules and assessments.
180. Theme 3 – Achieving integrated and quality development;
- Option 1 – Rely on Auckland – Wide and zone provisions
  - Option 2 – Proposed plan change
181. Theme 4 -Natural environment;
- Option 1 – Rely on Auckland – Wide and zone provisions
  - Option 2 – Proposed plan change
182. Theme 5 – Mana Whenua Cultural landscape;
- Option 1 – Rely on Auckland – Wide and zone provisions
  - Option 2 – Proposed plan change

183. The s32 report concludes that;
- The proposed objectives in the Riverhead Precinct are considered to be the most appropriate way to achieve the purpose of the RMA by applying a comprehensive suite of planning provisions to enable appropriate urbanisation of the site;
  - The proposed provisions are considered to be the most efficient and effective means of facilitating the use and development of the subject land into the foreseeable future; and
  - The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed precinct, having regard to their efficiency or effectiveness and the costs and benefits anticipated from the implementation of the provisions
184. It is considered that the s32 report largely covers the range of matters that need to be addressed. However its conclusions should be assessed in light of the comments above in respect of the relevant plans and the environmental effects and the submissions discussed below.

#### **5.1. Assessment of Effects on the Environment (for private plan change requests)**

185. Clause 22 of Schedule 1 to the RMA requires private plan changes to include an assessment of environmental effects that are anticipated by the Plan Change, taking into account the Fourth Schedule of the RMA.
186. An assessment of actual and potential effects on the environment (“AEE”) is included in the Section 32 Evaluation Report. The submitted Plan Change request identifies and evaluates the following actual and potential effects:
- *Urban form*
  - *Centres hierarchy*
  - *Visual amenity*
  - *Natural character and landscape*
  - *Cultural values*
  - *Transport*
  - *Infrastructure and servicing*
  - *Existing infrastructure*
  - *Ecology*
  - *Natural hazards – Flooding*
  - *Natural hazards – Geotechnical*
  - *Land contamination*
  - *Heritage and archaeology*
  - *Reverse sensitivity*
187. These are discussed below in turn. I have also identified other effects that are relevant and I discuss these also.

##### *Urban Form*

##### *Applicant’s Assessment*

188. The applicant’s assessment of the proposed urban form concentrates on a number of structuring elements that will determine the urban form. These include the following;

- A north-south and east-west oriented multi-purpose green corridors which will integrate the provision of open space and stormwater management features.
- The identification of key collector and local roads where they provide for key connectivity outcomes, including internal connectivity within the Plan Change area and integration with the existing road network.
- The provision of a focal point at the centre of Riverhead, supported by the proposed local centre and Terraced Housing and Apartment Building ('THAB') zoning.

189. The application notes that these features which are included within the Precinct plans will be achieved through assessment criteria for subdivision applications.

#### Comment

190. I consider that while in principle the urban form proposed has value, there are likely to be a number of practical issues with its implementation.

191. The specialist memo from Douglas Sadlier in respect of parks provision has identified a number of implementation issues and a lack of clarity around the exact nature of the green corridors. These should be clarified by the requestor at the hearing. There also appear to be some inconsistencies between Precinct Plans 1 and 2 and a lack of clarity about the difference between the green corridor on Precinct plan 2 and the green route on Precinct Plan 1.

192. The precinct plan shows a layout of streets that are used to guide decision making on resource consent applications for subdivision. These roads and pedestrian connections will assist in creating well connected neighbourhoods. Mr Peake has not identified any conceptual deficiencies in the road layout proposed. I consider that Precinct Plan 2 should be amended to provide an additional connection mid-block to the north of Riverhead Road connecting the main collector road with Cambridge Road given the intensity of development enabled in this location.

193. The residential zoning patterns appears logical with the higher density development proposed close to the proposed local centre. The location of the local centre is discussed in the paragraphs 195 to 198 below.

194. The urban form proposed will introduce typically a greater density of development into Riverhead than currently exists. The existing residential area in Riverhead is zoned single house zone and the existing pattern of development largely reflects this zoning. As I have discussed above [paragraphs 109 to 119] there is a tension within the AUP between encouraging development that reflects the existing character of the town and providing for a compact urban form. In this instance the requestor appears to have taken greater heed of the compact urban form direction. The MHS zone, as modified by the precinct provisions, will provide for intensification but at a lower level than can be expected through the main urban area in Auckland if the MDRS standards are implemented as is currently planned. On balance I consider that the densities proposed are consistent with the relevant objectives and policies.

#### *Centres hierarchy*

#### *Applicant's Assessment*



195. The application includes a retail assessment undertaken by Market Economics that estimates the land requirement for the development of a new commercial centre to service Riverhead.
196. That report concludes that

*“The Westgate Metropolitan centre is well positioned to service the higher-order shopping needs of the Riverhead catchment and wider Northwest market. For this reason, any centre in Riverhead should service the immediate needs of the local residents with consideration for the likely loss of retail dollars to the other retail centres.*

*The strong population growth in the Riverhead catchment means additional retail floorspace will be required over the next 17 years and the advent of RLG’s residential development(s) would only catalyse this growth.*

*The current population of Riverhead is not well catered for at present in terms of convenience retail and commercial services provision. This results in the vast majority of locally generated convenience spend currently leaving the catchment and being spent elsewhere. Moving forward, and with the subject plan change development, this inefficiency would only be exacerbated in the future.*

*Although the current local centre covers 0.91ha of land and accommodate significantly more retail, two thirds of it is absorbed by existing non centre land uses and it is split across four separate sites. A new local centre in the Riverhead development therefore represents an opportunity to develop a more consolidated centre to better meet the convenience requirements and growth in this local market.*

*The Riverhead catchment is estimated to generate sufficient spend on an annualised basis to sustain around 6,850sqm of net additional retail / commercial GFA within the catchment on top of the 1,070sqm of existing provision. This equates to a supermarket and convenience retail centre land requirement of around 1.5ha. Without a supermarket a centre of circa 1ha can be sustained. This provision can be accommodated within a single commercial centre, or a slightly smaller (local) centre and supplementary smaller neighbourhood centre(s).*

*Additional to this land requirement is land for any public squares, community facilities, reserves, playgrounds, urban spaces, ay public transport facilities, etc. the developer may want to incorporate into the centre. If incorporated this could increase the land requirements to around 2ha and 1.5ha respectively.”*

#### Comment

197. PPC100 proposes a neighbourhood centre zone of approximately 1.8ha located at the corner of Coatesville Riverhead Highway and Riverhead Road. It would appear that this zone is well located and well shaped to serve the proposed development. It may however be less well located to serve the existing Riverhead area to the north. While the retail report explains that the existing centre in Riverhead has non-commercial land uses and is split over several sites, it does not address the extent to which those land uses can change nor does it consider the impact of a new centre within the existing centre land or the use of existing urban land between the existing centre and the Plan Change Area for expansion of the existing centre.
198. I therefore have concerns about the integration of PPC100’s business land use pattern with the existing zoning pattern. While the new proposed centre size appears to be suitable, its integration with the existing centre pattern is unclear. The existing centre

(which includes land zoned Neighbourhood Centre Zone and Mixed Use Zone) contain activities that do not utilise the land to the full extent and are thus open to change. The applicant should in my view examine more carefully whether greater use can be made of the existing business land or other urban land with the aim of better integrating the new development with the existing town.

#### *Visual amenity*

#### *Applicant's Assessment*

199. The applicant notes that a Landscape and Visual Assessment ('LVA') has been prepared by Boffa Miskell and a Neighbourhood Design Statement has been prepared by Urban Acumen.

200. The requestor's S32 report concludes that;

Overall, it is acknowledged that the Plan Change will introduce visual change to the Riverhead township and adjacent rural environment. In particular, the LVA concludes that visual effects within the immediate vicinity of the Plan Change area will be low-moderate while views from the wider context will be low to very low. Having regard to the analysis, conclusions, and recommendations of the LVA and Urban Design Statement, it is considered that the potential built form outcomes that will be enabled by the plan change will not create significant adverse visual amenity effects and will be appropriate in the context of the existing surrounding Single House and Mixed Rural zones environment, and national direction to enable housing choice and diversity.

#### Comment

201. The PPC100 land is currently mainly in rural land uses. Its use for urban development, which is anticipated by the AUP, will result in changes in the appearance of the area as an inevitable consequence of its urbanisation. The land is largely flat and contains no significant visual features that need retention or protection.

202. I therefore largely agree with the requestor's assessment that the visual outcomes of PPC100 will not create significant adverse effects taking into account the context of the land in the Future Urban Zone and the national and regional direction concerning achieving a compact urban form.

#### *Natural Character and Landscape*

#### *Applicant's assessment*

203. The requestor engaged Boffa Miskell to assess the impacts of PPC100 on natural character and landscape values. Based on this report it is the requestor's view that;

*Overall, having regard to the analysis of the LVA, the development outcomes that will be enabled by the proposed Plan Change are considered to be appropriate in terms of effects on natural character and landscape values.*

#### Comment

204. I generally agree with the conclusions of the requestor in respect of natural character and landscape largely for the reasons set out in paragraphs above.

#### *Cultural values*

### *Applicant's Assessment*

205. The applicant's assessment states that:

*...engagement correspondence was made to 19 iwi groups and a hui was subsequently held with Te Kawerau ā Maki and Ngāti Whātua o Kaipara to develop a cultural landscape map for the Riverhead Structure Plan area. The following features were identified to be of cultural significance:*

- Viewshafts to high points in Riverhead Forest to the north;*
- Viewshafts to high points near Kumeu to the west; and*
- Three east west orientated potential original portage routes.*

*These features have been incorporated into proposed Precinct Plan 1 through the identification and orientation of key local and collector roads and the multi-purpose green corridor. The proposed precinct provisions including objectives, policies, standards, matters of discretion, and assessment criteria also address the identified matters of importance to mana whenua and cultural values.*

*The proposed precinct provisions were discussed with Te Kawerau ā Maki and Ngāti Whātua o Kaipara at a hui held on 9 June 2022. Te Kawerau ā Maki have since been involved with drafting the precinct provisions which relate to managing the effects of the proposed plan change and future development on cultural values. Feedback provided by Te Kawerau ā Maki has informed the proposed precinct provisions, particularly with regard to managing the effects and impacts of future development on values associated with the Māori cultural landscape. It is anticipated that engagement with Te Kawerau ā Maki and Ngāti Whātua o Kaipara will be ongoing as the proposed plan change and precinct provisions are further developed.*

### Comment

206. I note that there have been no submissions received from any Mana Whenua groups.

207. Overall I consider that the requestor has undertaken adequate consultation with the relevant iwi. It would also appear that the Precinct provisions address the concerns of iwi expressed through that consultation process in a positive way.

### *Transport*

#### *Applicant's assessment*

208. The applicant notes that a ITA has been prepared by Flow Transportation for the plan change. The ITA identifies a number of transportation upgrades to enable development within the Plan Change area, has regard to potential trip generation, and provides an assessment on the appropriateness of internal road network with regard to roading hierarchy and design.

209. In respect of the required transport upgrades the requestor has identified the following;

- Riverhead Road: updates including widening of the road reserve to accommodate berms and dedicated footpaths and cycle paths. Detailed design will be determined at the time of resource consent, having regard to the layout of other existing roads.*

- *Coatesville-Riverhead Highway: upgrades including localised widening of the road reserve in places, to accommodate berms, dedicated footpaths and cycle paths, and public transport infrastructure. Detailed design will be determined at the time of resource consent, having regard to the layout of other existing roads.*
- *Lathrope Road: upgrades to provide a sealed carriageway and a footpath on the northern side.*
- *Cambridge Road: upgrades along the frontage of the Plan Change area (western side of Cambridge Road), including providing a formed sealed carriageway, and a new footpath on the western side of the road, in front of the Plan Change area.*
- *Queen Street: a new footpath is also proposed on the northern side of Queen Street between Cambridge Road and Coatesville-Riverhead Highway.*
- *Intersection upgrades: a number of intersection upgrades are proposed at existing intersections, as well as a new intersection, where access will be provided to the Plan Change area. The upgrade works include, but are not limited to, the provision of separated pedestrian and cycle paths, widening, and new priority controls.*
- *Speed limit reductions: speed limit reductions are proposed on Riverhead Road, Coatesville-Riverhead Highway, and Lathrope Road, including 50km/hour and 60km/hour along sections of Riverhead Road, and 50km/hour along sections of Lathrope Road and Coatesville Riverhead Highway. Speed limited reductions will lower vehicle speeds when entering the Plan Change Area and the existing Riverhead Village, providing a safer environment for existing and future road users, including pedestrians and cyclists. It is noted that the Speed Bylaw will apply to speed limit reductions at the time of development. The lower speed philosophy across and around the Plan Change area has been discussed with Auckland Transport and agreed to in principle.*
- *Right-turn bays: the intersections of Coatesville-Riverhead Highway / Old Railway Road and also Riverland Road require upgrading to include right-turn bays within Coatesville-Riverhead Road.*

210. The ITA also identifies other transportation works that are planned and funded including

- *State Highway 16 Brigham Creek to Waimauku upgrade: this project is proposed under the Regional Land Transport Plan 2021-2031 ('RLTP') and will deliver a range of safety and capacity improvements between Waimauku and the end of State Highway 16 at Brigham Creek Road. This is a fully-funded project, and the Notice of Requirement was lodged with Auckland Council in late 2022; and*
- *State Highway Northwest Bus Improvements: this project is also proposed under the RLTP and will allow a new express bus service to operate along State Highway 16, connecting Northwest Auckland to the city centre.*

211. In respect of trip generation the ITA identifies that it is anticipated that all intersections are able to perform well, without significant queue lengths or delays. In particular, the SH16 / Coatesville-Riverhead Highway intersection has been tested across multiple scenarios, including a worse case 100% buildout in 2038, with higher sensitivity trip

generation rates and the intersection is predicted to perform well for all of the scenarios tested.

212. In respect of the internal road network the requestor notes that;

*The proposed new roads include a series of local and connector roads to facilities trips within the Plan Change area, acknowledging that Riverhead Road and Coatesville-Riverhead Highway are existing arterial roads which provide higher movement functions, including catering for public transport services and general traffic.*

*Access to the Plan Change area from Riverhead Road and Coatesville-Riverhead Highway will be provided through new collector roads, which are proposed at locations to ensure safe sight distances and are identified on proposed Precinct Plan 1 to ensure that an integrated and connected movement network can be achieved. The proposed precinct provisions will also provide guidance on the key roading design outcomes of each road type, while the detailed design layout of roads will be determined at future resource consent stages.*

213. Overall the requestor's assessment is;

*The effects of the Plan Change on the existing and future transport network have been assessed in the ITA and are determined to be acceptable. The ITA has demonstrated that the extent of urban development enabled by the proposed Plan Change can be accommodated within the surrounding road network, subject to the proposed transportation upgrades.*

*The proposed precinct provisions include specific standards, matters of discretion and assessment criteria to ensure that the required transportation upgrades are provided in an integrated manner at the time of future development. An appropriate roading hierarchy is proposed within the Plan Change area in accordance with Auckland Transport's Roads and Streets Framework to support their intended place and movement functions and the location of key routes have been identified.*

*Overall, it is considered that the proposed Plan Change will not create significant adverse effects on the transportation network.*

#### Comment

214. The applicant's assessment has been reviewed for the Council by Martin Peake, Transportation Consultant. A copy of Mr Peake's assessment is contained in Appendix 6.
215. Mr Peake's assessment is detailed and should be read in its entirety. Mr Peake identifies the key transport issues as being;

- a) Alignment of PPC100 with traffic and transport plans and policies and Future Development Strategy;
- b) Appropriateness of SH16 and CRH traffic volumes used in the analysis;
- c) Access to the Wider Network for Active Modes and Public Transport;
- d) Reliance on design of SH16 / CRH roundabout;
- e) Extent and form of proposed road upgrades to be provided by PPS100;
- f) Access from CRH, Riverhead Road and road with separated cycle facilities;
- g) Trip rates and periods for analysis;

- h) Assumptions adopted in traffic volumes use for modelling traffic effects;
- i) Modelling of SH16 / CRH roundabout;
- j) Modelling of Riverhead Intersections; and
- k) Transport Infrastructure Upgrades and Activity Status.

216. The conclusions of Mr Peake's assessment are as

*PPC100 is being progressed in advance of the anticipated timing for development in Riverhead either in relation to FULSS or the replacement Future Development Strategy which indicates development in Riverhead from 2050+. The prerequisite transport infrastructure that the FDS identifies as being required for development in Riverhead is not currently in place and there is no funding or certainty over the timing. Of particular note is the NZTA Brigham to Waimauku SH16 upgrade and the Auckland Transport strategic network projects for upgrades to Coatesville-Riverhead Highway and Riverhead Road.*

*There are no current funded improvements to public transport for Riverhead.*

*The Plan Change proposes to go some way to either providing some of the prerequisite transport infrastructure through upgrades to part of the arterial roads directly affected (Coatesville-Riverhead Highway and Riverhead Road) or to limit occupation of development until specific transport infrastructure is constructed and operational (upgrade of SH16 / Coatesville-Riverhead Highway to a roundabout, and upgrade of the CRH intersections with Old Railway Road and Riverland Road).*

*I consider that PPC100 only partly aligns with the relevant traffic and transport Regional Policy Statement Objectives and Policies in relation to coordinating development with transport infrastructure. Until the full upgrades to Coatesville-Riverhead Highway, Riverhead Road and the Brigham to Waimauku SH16 are complete Riverhead will be reliant on private vehicle use to travel to the wider network as Riverhead will be surrounded by rural roads with no facilities for active modes (particularly cyclists) to travel to surrounding areas (Kumeu or Westgate). Any new or improved public transport will be subject to funding. These improvements may not occur for some time or development may require prerequisite transport projects to be brought forward.*

*I consider that subject to the identified transport infrastructure within Riverhead that PPC100 would have good connectivity for active modes within Riverhead itself. Access for active modes and public transport would be limited until the completion of the upgrades to Coatesville-Riverhead Highway and Riverhead Road resulting in a reliance on private vehicle use.*

*Given the above limitations on the transport infrastructure I consider that it is necessary that the essential parts of the infrastructure needed to support PPC100 are complete and operational prior to development being occupied and I generally support the Precinct Provisions Standard IX6.1 Staging of development with transport upgrades. However, I consider that where development or subdivision is not compliant with these Precinct Provisions that the activity status should either be Non-Complying in relation to upgrades to SH16 / Coatesville-Riverhead Highway intersection (IX6.1(1)) and as a minimum Discretionary for upgrades to the road directly affected by PPC100 (IX6.1(2) to (6)).*

*I have some concerns about the robustness of the traffic modelling in relation to the SH16 / Coatesville-Riverhead Highway roundabout and consider that further*

*assessment is required to demonstrate that the roundabout would operate at an acceptable level of performance with PPC100.*

*The traffic assessment has assumed a school and a retirement village will be constructed. However, there is no certainty that either of these facilities will be provided as there is no specific zoning or Precinct Provisions that would require either to be provided. If one or both of these were not to occur, this would affect the traffic analysis undertaken as the trip rates, particularly external to PPC100 would be affected.*

*As I have identified there are some gaps in the assessment where additional analysis is required to enable me to confirm my opinion on whether the traffic effects have been adequately assessed or effects can be sufficiently avoided, remedied, or mitigated. These matters are outlined below:*

- a) To understand the potential scale of traffic generation without the school or retirement village, analysis should be provided of the number of forecast trips with the land assumed for the school/retirement village used for housing. If there is a significant increase in the number of trips, particularly external to Riverhead, then updated modelling should be provided.*
- b) Provide analysis that demonstrates that the AM peak traffic volumes used for the modelling of the SH16 / Coatesville-Riverhead Highway roundabout have appropriately taken into account eastbound traffic demands (not throughput) along SH16.*
- c) The analysis of the SH16 / Coatesville-Riverhead Highway roundabout should be updated to include the proposed pedestrian crossing facilities on SH16 and Coatesville-Riverhead Highway and with any revised traffic figures for SH16.*
- d) Traffic modelling should be provided for the SH16 / Coatesville-Riverhead Highway roundabout for a weekend (Saturday).*
- e) An assessment of the need to connect Cambridge Road at its southern end with Coatesville-Riverhead Highway should be provided taking into account the legibility of the proposed road network and the connection of the Collector Road to Cambridge Road. If a connection is required, concept plans should be provided to demonstrate how an intersection between Cambridge Road and Coatesville-Riverhead Highway would operate with the adjacent Princes Street intersection and the access to the Caltex petrol station.*
- f) The extent of upgrade works to Cambridge Road between Queen Street and Coatesville-Riverhead Highway should be clarified and the Precinct Provisions updated to ensure there is consistency between the descriptions in Standard IX6.1(5) and the Precinct Plans. This should take into account any adjustments from e) above.*
- g) Provide details of how the traffic turning volumes used in the analysis of the local Riverhead intersections have been derived.*
- h) Provide details as to how upgrades to roads would be undertaken where land is in different ownership.*

*Subject to additional information from the items outlined above, I have the following recommendations.*

- a) The proposed upgrades to the SH16 / Coatesville-Riverhead Highway intersection to a roundabout should also include the provision of two eastbound lanes on SH16 between Coatesville-Riverhead Highway and Brigham Creek Road; this is required to accommodate traffic from PPC100 and for the efficiency of SH16.*

b) *To more appropriately address traffic effects identified, amend the Precinct Provisions as detailed in Section 6.*

217. Based on Mr Peake's assessment I am of the view that the additional assessments as specified by Peake are necessary and alterations to the plan change provisions are also required to ensure that the traffic effects of PC100 are adequately addressed.

218. The provision of transport infrastructure funding has also been assessed by Ian Kloppers, Head of Infrastructure Funding & Development Strategy at the Council. A copy of Mr Kloppers review is also set out in Appendix 6. Mr Kloppers note however that;

*There is currently no allocated funding for the SGA NOR R1 related to the private plan change area. In addition, Auckland Council are not collecting any development contributions against this project as it is not listed in the current LTP and sits outside of the Inner Northwest 30 -Year DC Policy which went out for public consultation at the end of September 2024.*

*The Infrastructure Funding & Development Strategy (IF&DS) team have had oversight of the negotiations between Auckland Transport (AT) and the applicants since early 2024 to ensure there is no potential impact on Councils funding and financing situation. While AT and the applicants have reached agreement on the extent of the transport upgrades to be included in an Agreement, some minor contractual stipulations have not yet been agreed on.*

*As indicated earlier the Infrastructure Agreement has not been fully settled and signed by all parties, however the fact the transport infrastructure requirements have been verbally agreed creates tangible level of certainty from a funding and financing point of view.*

219. I consider that the parties to any agreement should explain the extent of any agreement at the hearing in order for an informed decision to be made around the extent of infrastructure likely to be provided and when such infrastructure will be provided. These are significant matters that need to be addressed in evidence. At this time there is uncertainty about the funding and timing of some of the necessary infrastructure needed for the development within the plan change area to proceed. Mr Peake is also concerned about the lack of any funded public transport improvements to serve Riverhead.

*Infrastructure and servicing*

*Applicants Assessment*

220. The applicant's assessment of required infrastructure is set out in section 7.7 of the application document and is supported by stormwater assessments from CKL and water and wastewater assessments from GHD.

*Stormwater*

221. In respect of stormwater management the applicant proposes that the stormwater management plan (SMP) prepared by the applicant will be adopted into the region wide stormwater Network Discharge Consent. The identified requirements for managing stormwater quality and flow within the Plan Change include:

- Water quality treatment (90th percentile event) for all impervious areas; and



- Stormwater Management Area Flow ('SMAF') 1 retention and detention for all impervious areas other than those located within 1170 and 1186 Coatesville-Riverhead Highway (part of the Riverhead Point Drive catchment) as these areas are not proposed to discharge to a stream receiving environment.

222. The stormwater strategy proposed includes;

- *Installation of new piped networks for the primary conveyance of the 10% Annual Exceedance Probability ('AEP') flows;*
- *Directing overland flows to roads for the secondary conveyance of the 1% AEP flows;*
- *Communal and centralised devices, including raingardens and swales;*
- *The use of inert roofing and cladding materials for buildings; and*
- *Appropriate design of discharge outlets.*

223. Overall the applicant considers that the above methods will be sufficient to achieve hydrological mitigation of the effects of stormwater runoff generated by increased impervious areas enabled by the proposed plan change.

#### *Water Supply*

224. GHD's assessment identifies that there is capacity within an existing reservoir that services the existing Riverhead township to service the Plan Change area in the short term. A second supply main to the existing reservoir would be constructed to provide for capacity and ensure resilience. GHD's assessment identifies two available options to facilitate this upgrade. The later stages of development will require an upgrade to the transmission main and reservoir to provide sufficient water supply.

#### *Wastewater Servicing*

225. The application states that Modelling undertaken by GHD confirms that there is capacity within the existing Riverhead wastewater pump station to service the Plan Change area in the short term. In the long term, the planned diversion of Kumeu and Huapai from the Riverhead system will also provide sufficient capacity to service the entirety of the Plan Change area. Should development within the Plan Change area occur prior to this diversion, the GHD assessment identifies a number of available options to provide for additional capacity, including both localised upgrades relative to the Plan Change area and the construction of a new wastewater pump station.

#### *Other Utilities*

226. The applicant advises and includes correspondence with Chorus and Vector to the effect that the Plan Change area can be serviced for electricity and telecommunications.

#### *Other Utilities*

227. The application also notes that there are Transpower Transmission Lines which traverse the northern portion of the Plan Change area. These lines are covered by the National Grid Yard Overlay under the AUP which will restrict the location of new structures, extent of land disturbance, including earthworks and the operation of construction machinery in relation to those transmission lines. It is therefore considered that the effects of future development within the Plan Change area can be appropriately managed with respect to existing nationally significant infrastructure.

## Comment

228. The stormwater aspects of PPC100 have been assessed by Ms Li and Ms Tang on behalf of Healthy Waters. Other servicing matters have been commented on by Council's Development Engineer, Lavannya Ilinger. Copies of these assessments are set out in Appendix 6. My assessment of the water and wastewater aspects also relies on information contained in the submission from Watercare Services Limited (WSL) which is the Council Controlled Organisation responsible for the delivery of water and wastewater services to the Plan Change Area.
229. It's noted above the applicant has proposed a stormwater management policy and a stormwater quality standard. However Healthy Waters has identified that the wording and requirement of these provisions is not consistent with the stormwater management identified in the supporting CKL report provided by the applicant. Accordingly amendments to these provisions are required.
230. In respect of the stormwater management area control flow one Miss Li considers that the SMAF 1 overlay should cover the entire precinct and not just part of it. Greenfield development enabled by PPC 100 would increase imperviousness and will result in an increase in flow rate and volume off runoff into the receiving streams and increase the risk off stream erosion. For streams that are already subject to moderate or high risk of erosion, SMAF hydrology mitigation alone will not be sufficient. Miss Li has identified a number of places where additional assessment is required and she also recommends that a site specific water course assessment should be required at resource consent stage for streams within the Riverhead Precinct.
231. In respect of water supply Ms Ilinger notes that the transmission main and the reservoir from Riverhead will need to be upgraded to cater to the development. WSL has assessed the capacity and concluded that the exiting bulk supply water meter at the Riverhead and Kumeu – Huapai areas can service 4500DUEs. In excess of this the developer will have to propose an additional bulk meter. If the plan change goes ahead then the general network as required for subdivision would be constructed under Engineering Approval and as accepted by WSL. Additionally the capacity for fire fighting has not been addressed.
232. This opinion is supported by the submission from WSL. It is however unclear from the application material the extent to which the applicant is prepared to fund the necessary upgrades. There are no specific standards within the Precinct that require the installation of infrastructure prior to development other than in assessment criteria.
233. In respect of Wastewater Ms Ilinger notes that;
- The applicant proposes to provide the necessary pipe infrastructure to the pumpstations (Riverhead WWPS) they refer to pump stations Riverhead and Kumeu -Huapai. The Riverhead pump station currently has issues with household pumps tripping on high pressure. The developer proposes SMART pressure sewers to remedy this problem. The idea is to separate the Kumeu-Huapai catchment from Riverhead so that the Riverhead pumpstation can cater to the development's service lines. Their assessment is based on Torino PS being diverted to Slaughter house. The current projection is 2025 according to developer whilst WSL states its 2050.*
234. WSL in its submission notes that while up to 1000 household units could be supported by various rearrangements of existing infrastructure, upgrades including the separation of the Kumeu-Huapai- Riverhead (KHR) wastewater main, will be required for

development above this level. This is currently planned to be delivered in line with the timing as set out in the FDS which is post 2050.

235. In my view the full impact of water and wastewater servicing required for PC100 has not been fully explained and there remains uncertainty about whether it is practicable to service the entire Plan Change area. This should be addressed by the applicant in evidence.
236. It appears that there are no issues with providing electricity and telecommunications services.

### *Ecology*

#### *Applicant's assessment*

237. An Ecological Assessment prepared by RMA Ecology has been undertaken to support the Plan Change. This includes an assessment of ecological values of freshwater and terrestrial ecosystems. A combination of desktop assessments and site visits were carried out for the Plan Change area, during which, key terrestrial and aquatic habitat features were identified across the site. An arboriculture assessment of existing trees within the Plan area has also been carried out by Greenscene.
238. In respect of terrestrial ecology the applicant notes that;

*The Plan Change area is predominantly worked in pasture, with no presence of indigenous vegetation or species recognised to be threatened or at risk. A copper beech tree meeting the criteria to be nominated as a notable tree under the AUP is located at the western side of the Plan Change area at 298 Riverhead Road, Riverhead. ....*

*The Ecological Assessment finds that native wildlife across the Plan Change area is reflective of historic modification to the land, and comprises predominantly of exotic bird and lizard species. Native copper skinks are likely to be present in the northern parts of the site where there are a greater number of farming activities and farming debris that provide habitat. Due to the significantly modified nature of the land form, it is considered that the effects of future development on terrestrial ecological and biodiversity values can be appropriately managed under the existing provisions Auckland wide provisions of the AUP (OP) for land disturbance and any modification to or removal of vegetation.*

239. In respect of freshwater ecology the applicant notes that;

*Waterbodies are concentrated within the northern portion of the Plan Change area where there is an intermittent stream and four wetlands. The intermittent stream flows to an unnamed tributary of the Rangitopuni Stream, running along the northern boundary of the Plan Change Area, and has been assessed as having been highly modified, and having moderate ecological values. The four wetlands vary in size and quality, with the two smallest wetlands being botanically simplistic and the largest having been degraded by an extensive drain system, historic stock access, and exotic weeds.*

*The northern portion of the Plan Change area containing the largest sized wetland will predominantly be rezoned Mixed Rural and therefore not subject to urban development. Within the areas proposed to be urbanised, the proposed Precinct Plans demonstrate that key roading connection through the Plan Change area can be accommodated while avoiding the reclamation of and works in and around streams and natural wetlands. In particular, key infrastructure, including roads and pedestrian access connections are located clear of the stream and all natural wetlands. The intermittent stream and a*

*number of low-lying wetlands have also been incorporated into the multi-purpose green corridor, which forms one of the key structuring elements identified in the proposed precinct provisions, providing for the protection of these waterbodies. In addition, the proposed precinct provisions include a standard that provides for the protection and restoration of riparian margins, which will ensure positive effects as the land is developed. It is therefore considered that any future works that may affect streams and natural wetlands can be appropriately managed under the existing statutory framework with respect to freshwater and ecological values, including Chapter E3 Lakes, Rivers, Streams, and Wetlands under the AUP (OP), the NES-FW, and the NPS-FM.*

*The proposed stormwater management approach has been assessed by RMA Ecology to be appropriate in terms of stream and wetland values with regard to improving water quality and managing the quantity of discharge.*

*Overall, it is considered that the effects of the urbanisation of land within the Plan Change area can be appropriately managed with regard to the ecological values of freshwater bodies.*

#### Comment

240. The applicant's assessment has been reviewed for the Council by Alicia Wong, Senior Ecologist at Auckland Council. The trees within the Plan Change area have also been assessed by Regine Hoi Gok Leung – Senior Specialist Arborist at Auckland Council. Copies of these assessments are set out in Appendix 6 to this report.

241. Ms Wong's assessment can be summarised as follows;

*The private plan change is generally consistent with the direction and framework of the AUP:OP, requiring 10m riparian margins along streams in urban areas.*

*The private plan change is not, however, consistent with the direction and framework of the AUP:OP and NPS-FM for the protection of wetlands and providing buffers around wetlands. The four identified wetlands are not shown on the Riverhead Precinct Structure Plan, nor is the protection of wetlands provided for in the Policies and Standards of the Precinct Plan. Additionally, no buffers are proposed for the four identified wetlands. A 10m buffer for each of the for wetlands is recommended.*

*I am concerned with the stream assessment undertaken across the site. I disagree that all the watercourses identified as 'drains' do not meet intermittent or permanent stream definition under the AUP:OP. Further assessment should be undertaken to provide evidence required to conclusively understand the network of streams in the northern portion of the Plan Change area.*

*The one intermittent stream identified across the Plan Change area is not shown on the Precinct Plan. The private plan change appears inconsistent with National Policy Statement for Freshwater Management 2020 and National Environmental Standards for Freshwater Regulations 2023. I believe this is relevant as the two statutory considerations afford protection, maintenance, and preferable enhancement unless reclamation has no practicable alternative. The applicant has provided no evidence to support reclamation of some streams (referred to as 'drains') and wetlands in a green field development demonstrating "there is a functional need for the reclamation of the river bed in that location", and/or, "there is no practicable alternative location for the activity within the area of the development" in the case of wetlands.*

*Whilst the protection of one intermittent streams is provided, the plan change does not fully give effect to the AUP:OP in relation to indigenous biodiversity (B7.2), due to the absence of standards that give effect to indigenous vegetation (wetland), retention, and enhancement.*

*I suggest more assessment be undertaken to provide conclusive evidence of the presence and absence of streams and wetlands. I suggest that all existing wetlands and streams be retained, clearly identified in the Precinct Plan, and specifically referred to in the Policies and Standards.*

*I suggest that following further assessment and classification of the wetland and stream networks, that the area it encompasses be redesigned and rezoned from Residential – medium density to a Green Corridor.*

242. Ms Wong however advises that she is able to support PPC100 subject to a number of amendments set out in her memorandum. It is however unclear that there is scope to implement the changes recommended by Ms Wong in respect of wetlands.
243. In respect of the tree that is proposed to be listed as a notable tree Ms Leung supports the scheduling of the copper beech tree as proposed in PC100. Ms Leung also supports the retention of mature trees within the Plan Change area that are located within the margins of streams and wetlands and with road reserves.
244. Based in this advice I consider that subject to the changes recommended by Ms Wong and Ms Leung PPC100 will have acceptable ecological effects noting that some of Ms Wong's suggested changes may be beyond the scope of submissions.

#### *Natural Hazards Flooding*

#### *Applicants Assessment*

245. The applicant has provided a flooding assessment prepared by CKL. This assessment indicates that that urban development within the Plan Change area will not exacerbate existing flood hazards or create new flood hazards within the sub-catchments discharging to 'Riverhead Point Drive' and 'Southern Stream'.
246. However new development is likely to impact the Riverhead Forest Stream sub-catchment due to existing flooding issues that have the potential to be exacerbated by additional development and insufficient capacity within the existing Riverhead Road culvert. CKL identify that flood risks and hazards within this sub-catchment can be appropriately managed through the upgrade of the Riverhead Road culvert.
247. Overall the applicant's assessment concludes that;

*...there is a high degree of confidence that potential flood hazards associated with development within the portions of the Plan Change area proposed to be urbanised can be appropriately managed at the time of development and subject to detailed design. It is also noted that the provisions in Chapter E36 Natural Hazards and Flooding of the AUP would also apply to any development within identified flood plains and overland flow paths, which would manage the effects associated with new development in within flood hazards.*

#### Comment

248. The flooding effects of PPC100 have been assessment by Ms Li and Ms Tsang on behalf of Healthy Waters. A copy of their assessment is set out in Appendix 6.

249. The assessment provided by Ms Tsang and Ms Li assesses the impact of PPC100 on floodplain extent, property and backyard flooding, habitable floor flooding, road flooding the frequency of flooding, the duration of flooding and the mitigation of flood effects.

250. In respect of downstream flood effects their assessment is summarised as follows;

*Overall, the PPC model indicates increases in floodplain extent, property/backyard and road flooding in response to the proposed land use change. The increase of flooding as a consequence of the development PPC 100 seeks to enable will add to the existing downstream flood problem which is already significant. The flood issues exacerbate when the effects of the proposed land use change are considered together with the effects of climate change.*

*As stated in Section 9 of the CKL report, the Applicant's consultants consider that the indicated increase in flooding is small, and hence effects would be less than minor. However, in Ms Li's opinion, and as set out above, the assessment provided by the Applicant lacks sufficient evidence to confirm that this is the case.*

*Further information and assessment regarding property/backyard flooding, habitable floor flooding, road flooding, frequency and duration of flooding, and flood mitigation (as detailed above) are recommended to be provided by the Applicant in their hearing evidence to confirm the downstream flood effects and flood mitigation so that flooding risks to people, properties and infrastructure in the downstream areas will not increase.*

251. The assessment also notes that part of the PPC100 area which has been identified as being subject to moderate and high flood hazard by Healthy Waters this still being proposed to be zoned for urban zoning. It notes that placing urban development in moderate and high flood hazard areas will create new flooding risks to people, property, and infrastructure if those risks aren't properly managed. Therefore the assessment recommends that the 6ha area that is proposed to be rezoned MRZ be increased to 8.5 ha which is consistent with the flood plain extent and hazard mapping in Healthy Waters region wide model.

252. In respect of on-site flood management the applicants flood risk assessment report identifies a number of flood plains within the plan change area. Based on the indicative master plan these flood plains are located within the proposed development lots and there is no information provided on how these flood plains would be incorporated into the proposed urban layout. The earthworks to remove these flood plains would potentially have effects on the run off past downstream which could further exacerbate the existing flood risk. This should be addressed by the applicant at the hearing

253. The assessment also notes that the green corridors identified on precinct plan 2 do not match with the location and extent of the proposed treatment in detention areas identified in the CKL report. This should also be clarified at the hearing.

254. Miss Li also has concerns about whether the proposed primary network on site has outlets sufficient to cater for the 10% AEP events and the potential on side flood effects. Ms Li recommends that the applicant provide a detailed capacity assessment of the Duke Street culverts in their evidence.

255. Based on this assessment I'm of the view that the PPC 100 as notified has the potential to increase adverse flooding effects. The scale of effects does not appear to have been

sufficiently identified in the reporting provided as part of the plan change application. Accordingly I consider that these effects remain and are potentially significant.

#### *Natural Hazards - Geotechnical*

##### *Applicant's assessment*

256. The applicant has included a geotechnical assessment of the PPC100 area undertaken by Soil and Rock. This concludes that;

*.. the Plan Change area will be able to accommodate future urban development in accordance with the proposed zoning. In particular, no areas of significant geotechnical hazards that would require a lower intensity of development were identified. Detailed geotechnical investigations will be required as part of future resource consent applications regarding the management of earthworks, groundwater, and building foundation design.*

##### Comment

257. The geotechnical aspects of PC100 have been reviewed for the Council by Nicole Li, Engineering, Assets and Technical Advisory at Auckland Council. A copy of this review is set out in Appendix 6 to this report.

258. Ms Li advises that;

*We consider that the site is likely to be suitable from the geotechnical perspective to support the proposed private land change, provided that detailed geotechnical assessments, specific engineering designs of earthworks, associated remedial measures, structures, infrastructure and appropriate construction methodologies are submitted for proposed works once the scope is decided. We recommend that the resource consent stage is the most appropriate time to address the specific geotechnical issues on the site.*

259. Based on this assessment I have concluded that the land is likely to be suitable for the development enabled by PPC100.

#### *Land Contamination*

##### *Applicant's assessment*

260. The applicant has provided a detailed site investigation undertaken by Soil and Rock for the Plan Change area. This confirms the presence of contaminants on the land that exceed acceptable levels.

261. The assessment concludes that;

*The DSI concludes overall that the Plan Change area is suitable for future residential and commercial development, and there is no evidence to suggest that the presence of contamination would prevent the proposed rezoning of land as sought in the plan change.*

*Overall, it is considered that there is a high level of confidence that the Plan Change area can be remediated and that the potential adverse effects of land contamination associated with land disturbance and the change of use of the site can be appropriately*

*managed through the existing statutory framework with respect to the NES regulations and AUP for any discharges.*

#### Comment

262. The applicant's assessment has been reviewed for the Council by Sarah Pinkerton, Contaminated Land Consultant for Contaminated Land, Contamination, Air & Noise, Specialist Input, Planning and Resource Consents at Auckland Council. A copy of this review is set out in Appendix 6 to this report.

263. Ms Pinkerton's overall assessment is that;

*Overall, from the perspective of the current contamination status of the subject site and the potential effects on human health and the environment, I recommend that the proposed Private Plan Change be supported, subject to the following recommended actions to be taken prior to and during the proposed residential and commercial development:*

- Prior to any earthworks or redevelopment in the vicinity of the historical landfill area at 22 Duke Street property, further assessment is required to determine the area, volume and associated contaminants of the historical landfill during development planning of the property prior to Resource Consent, and that contaminated fill material must be remediated prior to any future redevelopment of the site.*
- Detailed site investigations to be undertaken on 1092 and 1170 Coatesville-Riverhead Highway and further delineation soil sampling is recommended on some properties prior to future redevelopment.*
- Prior to earthworks or site redevelopment, a site-specific Remediation Action Plan (RAP) /Site Management Plan (SMP) must be completed outlining remediation and control measures to be in place in order to ensure that site conditions are protective of human health and the environment.*
- Soil / fill material with heavy metals concentrations above applicable human health and / or environmental discharge criteria (AUP(OP) PA soil acceptance criteria) should be remediated (excavated and disposed of off-site or otherwise isolated).*
- Any fill material / soil with heavy metals concentrations above background levels and / or organic contaminants of concern (CoC) concentrations above analytical detection is not considered 'Cleanfill' for disposal purposes and must be disposed of at a facility licensed to accept such materials.*

264. Based on this assessment I am of the view that any contamination issues within the Plan Change are can be adequately managed at the time of development through resource consent processes.

#### *Heritage and Archaeology*

##### *Applicant's assessment*

265. An assessment of the archaeological and heritage values of the Plan Change area has been undertaken for the applicant by Clough & Associates.

266. While there are no existing records of archaeological or other historic heritage sites being recorded within the Structure Plan area, a detailed field survey identified two archaeological sites relating to early European settlement. These sites were not considered to be significant historic heritage places. The report notes that;



*In the event that subsurface remains are uncovered during future development, the archaeological provisions of the Heritage New Zealand Pouhere Taonga Act 2014 ('HNZPTA') will apply. It is also anticipated that standard accidental discovery protocols in the AUP will be implemented in the event that any archaeological material is uncovered during excavation works. The Precinct provisions include a Special Information Requirement which states that any future application for land modification on 22 Duke Street (the location of the mill race) must be accompanied by an archaeological assessment, including a survey. The purpose of this assessment would be to evaluate the effects on archaeological values associated with the Waitemata Flour Mill/Riverhead Paper Mill site R10\_721 prior to any land disturbance, and to confirm whether the development will require an Authority to Modify under the Heritage New Zealand Pouhere Taonga Act 2014.*

*The assessment prepared by Clough and Associates confirms that these measures under the HNZPTA and AUP are appropriate to manage and mitigate the potential adverse effects on archaeology values associated with future development within the Plan Change Area.*

#### Comment

267. The archaeological aspects of PPC100 have been reviewed by Mica Plowman Principal Heritage Advisor, Cultural Heritage Implementation, Heritage Unit, Planning and Governance Division for the Council while the historic heritage (built) aspects have been reviewed by Megan Walker – Specialist Built Heritage – Heritage Policy, Heritage Unit, Planning and Governance Division. Copies of these reviews are contained within Appendix 6 to this report.

268. In respect of the archaeological assessment Ms Plowman largely agrees with the assessment undertaken by the applicant. However she notes that

*To give effect to the recommendations made by Clough and Associates Ltd., amendment to the proposed Plan Change provisions are required to include further archaeological assessment for the Riverhead Mill water race (R10/721) within Lot 20 DP 499876 (22 Duke Street) and Lot 1 DP 499822 (30 Cambridge Road), and for the location of Ellis house (R10/1537) located on Lot 1 DP 164978 at 298 Riverhead Road.*

269. Based on this advice and noting and subject to the amendments recommended I consider that the effects of PPC100 on Archaeology will be acceptable.

270. Ms Walker advises that the consideration of built heritage is adequate and that no further consideration of built heritage is required in respect of PPC100.

271. Based on this advice I consider that PPC100 will have no adverse effects on built heritage.

#### *Reverse Sensitivity*

#### *Applicant's assessment*

272. The applicant's assessment notes that;

*The Plan Change area adjoins land that is zoned Mixed Rural to the north, south and west, which has the potential to create reverse sensitivity effects. The proposed Plan Change locates THAB zoning away from the Mixed Rural zone, and proposes the lower intensity Mixed Housing Suburban zoning at this interface. The Neighbourhood Design Statement ... recommends that a greater side and rear yard setback is applied. This will provide separation between future development and existing rural activities, as well as provide opportunities for future land owners to implement additional buffers and screening. The proposed precinct standards will require any Mixed Housing Suburban zoned site within the Plan Change area immediately adjoining the Mixed Rural zone to apply a 5m side and rear yard setback from common boundaries with this zone.*

*With regard to the potential for reverse sensitivity effects, it is noted that the purpose of the Mixed Rural zone is to provide for rural production and other non-residential activities at a scale that is compatible with typically smaller site sizes. In this case, the adjacent rural land uses include horticulture (greenhouses), lifestyle living, open pasture that is grazed, and a motor camp. The extent of land available for intensive rural production activities adjacent to the Plan Change area is also constrained by an existing permanent stream, which traverses the Mixed Rural zone in a north south direction. It is therefore considered that the proposed zoning pattern and Precinct Provisions provide appropriate opportunities within the Plan Change area to manage reverse sensitivity issues between residential and rural land.*

#### Comment

273. In my view the provisions within the Precinct will be sufficient to manage any reverse sensitivity effects in respect of rural land.

#### *Open Space.*

274. The open space and parks planning aspects of PPC100 have been assessed for the Council by Douglas Sadlier, Senior Planner – Parks Planning – Parks and Community Facilities. A copy of this review is contained in Appendix 6 to this report.
275. Mr Sadlier has identified a number of issues in respect of the practicality of the some of the open space provisions within the Precinct. These concerns relate chiefly to the practicability of achieving the proposed green corridor and the lack of some east-west pedestrian linkages towards the Riverhead Memorial Park. Mr Sadlier also has concerns regarding the proposed neighbourhood parks. Instead of the three proposed neighbourhood parks Mr. Sadler recommends that 2 additional neighbourhood parks with a minimum area of 5000 square metres each are required. Mr. Sadlier has recommended indicative locations of those parks which in his view meet the Council's requirements.
276. Accordingly Mr Sadlier recommends the following changes to PPC100.

*Request that the PC 100 applicant prepare a specific set of multi-purpose green corridor standards directed by the proposed precinct IX.2 objectives, and policies IX.3(13)(a)-(d), to provide open space outcomes that manage identified adverse effects.*

*IX.10.2 Riverhead: Precinct plan 2 – Structural Elements is to be amended to include two additional direct east to west pedestrian connections towards the Riverhead Memorial Park on that part of the PC100 map area north of Riverhead Road (on land owned by Matvin Group Limited).*

*IX.10.2 Riverhead: Precinct plan 2 – Structural Elements is to be amended to include one additional direct east to west key local road (indicative location) through 1092 Coatesville Riverhead Highway towards the Riverhead Memorial Park on that part of the PC100 map area north of Riverhead Road.*

*IX.10.2 Riverhead: Precinct plan 2 – Structural Elements is to be amended to delete the three proposed neighbourhood parks (indicative locations) and amend by illustrating the proposed locations of two neighbourhood parks as shown in **Figure 14** above. The legend, in relation to the neighbourhood parks, is to be amended as follows: Proposed neighbourhood park locations (having a minimum area of 5000m<sup>2</sup> each).*

*PCF support PC100 in relation to open space and recreation facilities within the Riverhead Plan Change area subject to adherence to conclusions 10.1, 10.2, 10.3, and 10.4 above.*

277. I consider that these changes are likely to sit within the general scope of the submissions. I also consider that the applicant should address in more detail how the green corridor concept can be implemented within the Council parks procurement processes or if these are not intended to be vested in Council, then exactly how they will be provided and maintained.

#### *Conclusion of Effects*

278. Overall, and based on the advice of the Council specialists I have concluded that some of the effects of PPC100 may be able to be avoided, remedied or mitigated through the plan change as notified or through the amendments recommended by Council specialists. However aspects of PPC100, including the potential inability to provide appropriate infrastructure and the effects of flooding have not currently been shown to be able to adequately avoided, remedied or mitigated.

## **6. CONSULTATION**

279. Section 5.2 of the Applicant's request document sets out the consultation undertaken by the applicant. This records that consultation has been undertaken with;
- Auckland Council and its Controlled Organisations, including
    - Plans and Places,
    - The Development Planning Office,
    - Parks,
    - Auckland Transport,
    - Healthy Waters; and
    - Watercare Services Limited;
  - Rodney Local Board;
  - Waka Kotahi NZ Transport Agency and Te Tupu Ngātahi (the Supporting Growth Alliance);
  - Mana Whenua groups, including Te Kawerau ā Maki and Ngāti Whātua o Kaipara in particular;
  - The Ministry of Education;
  - The local community and general public, including the Riverhead Community Association; and
  - Landowners within the Plan Change area.

280. The applicant supplied details about the extent of consultation with Mana Whenua. Engagement correspondence was sent to 19 iwi groups were contacted in September and October 2021. Six iwi groups responded confirming their interest in being involved: Te Kawerau a Maki; Ngāti Whātua o Kaipara; Te Rūnanga o Ngāti Whātua; Te Ākitai Waiohua; Ngāti Manuhiri; and Ngāti Whanaunga.
281. Several hui have been held with Te Kawerau a Maki and Ngāti Whātua o Kaipara, as well as the other iwi (either via hui or further email correspondence). In summary:
- Extensive engagement was carried out with Te Kawerau a Maki and Ngāti Whātua o Kaipara via several hui. Through their input, the Cultural Landscape map was developed as well as the associated Precinct provisions.
  - The other four iwi, Te Rūnanga o Ngāti Whātua; Te Ākitai Waiohua; Ngāti Manuhiri; and Ngāti Whanaunga, did express interest in the proposal and a summary of their engagement is provided in section 5.0 of the consultation report provided by the applicant.
282. The applicant advises that the key matters identified as being of importance to iwi are addressed through the proposed Precinct provisions, including the objectives, policies, standards, matters and criteria relating to the following:
- Respecting Mana Whenua cultural values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, waahi tapu, and other taonga;
  - Managing stormwater quality, including through riparian planting and stormwater treatment; and
  - Protecting ecological values of the wetland and stream habitats, including by riparian planting.
283. The applicant advises that the key themes that have arisen from public consultation include the following;
- The significance of transport and roading upgrades prior to development, and concerns for increased traffic congestion on Coatesville-Riverhead Highway and State Highway 16;
  - The significance of general infrastructure upgrades, including the management of stormwater and flooding;
  - There were concerns about multi-storey buildings;
  - A desire to retain the character of 'old' Riverhead;
  - The importance of creating green corridor connections to existing walkways; and
  - Strong support for additional education facilities, including primary and secondary schools.

## 7. COMMENTS FROM LOCAL BOARD

284. Comments on PPC100 have been received from the Rodney Local Board.
285. At its meeting of 17 September 2024 the Rodney Local Board resolved as follows;

*That the Rodney Local Board:*

- a) *whakarite / provide the following local board views on Private Plan Change 100 lodged by the Riverhead Landowner Group*
  - i) *note there is already insufficient council and Central Government funding for the infrastructure required for live-zoned greenfield areas*

*in Auckland, and out-of-sequence development will only worsen this funding gap and ultimately result in overcrowded schools, parks with no facilities, traffic congestion, and temporary waste and water solutions therefore council needs to ensure that there is a planned approach to delivering infrastructure as detailed in the Future Development strategy, not ad hoc developments that ultimately lead to urban sprawl and poor outcomes, therefore if the private plan change is granted the conditions of consent include liming the development, so that the following is delivered;*

- a) State highway 16 between Taupaki road / Old North road roundabout and Brigham Creek Road / Fred Taylor Drive roundabout is upgraded to a four lane highway, along with the Northwest Rapid Transit network.*
  - b) the storm water systems are upgraded to ensure no increased risk of flooding for the surrounding area.*
  - c) Watercare has confirmed they are able to provide water and sewer infrastructure to the site so that an interim tanker truck solution is not used*
- 
- ii) express concern that this out of sequence development is not scheduled to be developed until 2050 and if delivered decades earlier will have adverse effects on traffic safety, congestion on both State Highway 16 and Coatesville Riverhead Highway in both directions, flood risk, environment and rural character.*
  - iii) express concern that the infrastructure prerequisites identified in the Future Development Strategy for Riverhead including the Northwest Rapid Transit extension to Huapai, the alternative state highway and the Riverhead separation from the Kumeū Huapai Riverhead wastewater main are not funded projects and are not included in the infrastructure projects proposed to be delivered by the developer.*
  - iv) express concern that the area to be developed has several identified flood hazards and large areas of Riverhead, including in new urban areas, have been dangerously flooded on multiple times resulting in engineered solutions becoming overwhelmed in extreme weather events putting residents in harm's way and with limited resources we should be focussing our development on climate resilient areas.*
  - v) express concern that the rural character of Riverhead, currently dominated with single story dwellings, will be adversely affected by the proposed high density and multi-story buildings within this plan change*
  - vi) express concern that there are no upgrades proposed for Coatesville Riverhead Highway towards Coatesville as part of the plan change which will result in adverse effects on traffic safety and congestion which will not be mitigated*
  - vii) express concern that council does not have the funding to purchase parkland in live-zoned developments (such as Milldale), and this problem will only worsen if out-of-sequence developments are consented to.*
  - viii) request complete integrated stormwater planning for the Rangitopuni stream, Riverhead and Kumeū River catchments including all drainage sub-catchments be completed before any development occurs.*
  - ix) note that while the area proposed to be developed is on prime soil that should be protected for future generations, we recognise that this land*

*is not subject to the Government Policy Statement on elite and prime soils as it is zoned Future urban*

- x) request that while council cannot fully fund the renewals and maintenance of existing community facilities, and any developer-delivered gardens, pathways, rain gardens, park infrastructure etc. must be incorporated into future maintenance and renewal budgets*
  - xi) request that council's Parks and Community Facilities department review any developer- delivered plans with regards to impact on future maintenance and renewal budgets*
  - xii) request that off street parking/garaging is provided for proposed housing understanding increasing walking, cycling and public transport use are ultimate goals, the realities are that residents will also use vehicles to commute for employment, recreation and other services and the provision of off-street parking within each property boundary also enables safe plug-in vehicle charging.*
  - xiii) request that connections and integration with adjoining future urban zones is considered as part of this application.*
  - xiv) support the development of walking and cycling routes to enable connections with the Greenways Plan*
  - xv) request that all road widths enable emergency vehicle and public transport access*
- 
- b) kopou / appoint local board members L Johnston and G Wishart to speak to the local board views at a hearing on Private Plan Change 100*
  - c) tautapa/ delegate authority to the chairperson of the Rodney 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.*

286. These matters have generally been considered in the preparation of this report.

## **8. NOTIFICATION AND SUBMISSIONS**

### **Notification details**

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

Date of public notification for submissions	18 April 2024
Closing date for submissions	17 May 2024
Number of submissions received	254
Date of public notification for further submissions	12 July 2024
Closing date for further submissions	26 July 2024
Number of further submissions received	9

288. Two hundred and fifty four initial submissions were together with 9 further submissions were received. Copies of all the submissions are attached as **Appendix 4** to this report.

## 9. LEGAL AND STATUTORY CONTEXT RELEVANT TO SUBMISSIONS

289. There are no legal matters identified in relation to the submissions.

## 10. ANALYSIS OF SUBMISSIONS AND FURTHER SUBMISSIONS

290. The following sections address the submissions received on PPC100. It discusses the relief sought in the submissions and makes interim recommendations to the Hearing Commissioners based on PC100 as notified.

291. Submissions that address the same issues and seek the same relief have generally been grouped together in this report under the topic headings set out below. Some submissions will appear under more than one heading. The headings I have used are as follows:

- Submissions seeking that PPC100 be declined;
- Submissions seeking that the PPC100 be approved;
- Submissions seeking PPC100 be declined but seek alternative relief if it is approved and those seeking PPC100 be approved subject to changes.
- Submissions concerning infrastructure generally;
- Submissions concerning schools and education;
- Submissions concerning flooding;
- Submissions concerning parks/ reserves/ greenspaces;
- Submissions concerning zoning and specific provisions;
- Submissions concerning 22 Duke Street; and
- Miscellaneous submissions.

### 10.1 Submissions seeking that PPC100 be declined.

292. Where a submitter has asked that PPC100 be declined but has not asked for any other relief, the submission has been considered here. Where a submitter has asked that PPC100 be declined but has also sought alternative relief, I have considered the submission in section 10.3.

293. Table 10.1.1

Sub Point	Submitter Name	Summary of Decisions Requested	Further subs	S42A Recommendation
1.1	David Lyon	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
3.1	Alexandra Grace Roland	Decline the plan change	FS05 oppose FS06 Oppose	Accept

4.1	Michael Cushnie	Decline the plan change		Accept
5.1	Melissa Bramley	Decline the plan change		Accept
9.1	Kim Scoffin	Decline the plan change		Accept
11.1	Daniel Cohen	Decline the plan change		Accept
12.1	Michael Ferkins	Decline the plan change		Accept
13.1	Lesa van Bott	Decline the plan change		Accept
14.1	Paula Hogg	Decline the plan change		Accept
19.1	Malhar Panchwagh	Decline the plan change		Accept
21.1	Taimane Cohen	Decline the plan change		Accept
22.1	Katherine McCarthy	Decline the plan change		Accept
23.1	Jesse McBride	Decline the plan change		Accept
25.1	Nijo Jacob	Decline the plan change		Accept
26.1	Monique Masoe	Decline the plan change		Accept
27.1	Ali summers	Decline the plan change		Accept
28.1	Jane Sparnon	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
29.1	Renee Thrower	Decline the plan change		Accept
16.1	Phil Jackson	Decline the plan change		Accept
32.1	Stephen Nicholas	Decline the plan change		Accept



33.1	David Rice	Decline the plan change		Accept
34.1	Claire Jones	Decline the plan change		Accept
35.1	Anna Johnston	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
36.1	Claire Kathleen Jones	Decline the plan change		Accept
39.1	Thomas Osborne	Decline the plan change		Accept
40.1	Scott Page	Decline the plan change		Accept
44.1	Nicholas McKay	Decline the plan change		Accept
45.1	Glenn Gowthorpe	Decline the plan change		Accept
49.1	Allyson Shepherd	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
51.1	Sani Peter	Decline the plan change		Accept
52.1	Emma Davison	Decline the plan change		Accept
53.1	Keith Thomas	Decline the plan change		Accept
54.1	Michele Widdows	Decline the plan change		Accept
56.1	Kelly Hancock	Decline the plan change		Accept
57.1	Georgia Hill	Decline the plan change		Accept
58.1	Brent Allan Catton	Decline the plan change		Accept
59.1	Annika Doggett	Decline the plan change		Accept
60.1	Scott Vine	Decline the plan change		Accept

61.1	Poynter Family Trust	Decline the plan change		Accept
64.1	Casey Tierney	Decline the plan change		Accept
65.1	Acascia Steedman	Decline the plan change		Accept
68.1	Jenny Burnett	Decline the plan change		Accept
69.1	Lynne Fluker	Decline the plan change		Accept
70.1	Julie Tutton-Jones	Opposes the plan change		Accept
71.1	Michael Robert Brooke	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
73.1	Morie Yoshida	Decline the plan change		Accept
74.1	Sue James	Opposes the plan change		Accept
75.1	Bharat Sethi	Decline the plan change		Accept
76.1	Adolf Goldwyn	Decline the plan change		Accept
77.1	Lucy Goldwyn	Decline the plan change		Accept
79.1	Catherine Watson	Decline the plan change		Accept
82.1	Katie Richards	Decline the plan change		Accept
83.1	Kyle Munro	Decline the plan change		Accept
84.1	Rafael Garcia	Decline the plan change		Accept
86.1	Christopher Michael John Stafford	Decline the plan change		Accept
87.1	Melissa Keegan	Decline the plan change		Accept

88.1	Dan Fluker	Decline the plan change		Accept
89.1	Jainesh Kumar	Decline the plan change		Accept
92.1	Andrew Lorrey	Decline the plan change		Accept
93.1	Chris Harker	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
96.1	Albrecht von Wallmoden	Decline the plan change		Accept
102.1	Daimler Teves	Decline the plan change		Accept
103.1	Rose Worley	Decline the plan change		Accept
106.1	Robyn Moore	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
107.1	Matthew Archer	Decline the plan change		Accept
108.1	Chris Svendsen	Decline the plan change		Accept
110.1	Paul Svendsen	Decline the plan change		Accept
115.1	Oscar Fernando Barrero Lopez	Decline the plan change		Accept
117.1	Johan Vollebregt	Decline the plan change		Accept
118.1	Hazel Purcell	Decline the plan change		Accept
119.1	Stephen Tiney	Decline the plan change		Accept
120.1	Michelle Lynda Cushnie	Decline the plan change		Accept
121.1	Belay Professional Services Limited	Decline the plan change		Accept
123.1	Andrew Coombes and Tara Hatherley	Decline the plan change	FS05 Oppose FS06 Oppose	Accept

124.1	Michelle Marshall	Decline the plan change		Accept
125.1	Platinum Developments Ltd	Decline the plan change		Accept
126.1	Robyn Page	Decline the plan change		Accept
127.1	Kimberley Page	Decline the plan change		Accept
128.1	Minki Lee	Decline the plan change		Accept
130.1	Grant Hewison & Associates Ltd	Decline the plan change		Accept
131.1	John Olding	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
134.1	Mark and Joanne Robinson	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
136.1	Paul David James	Decline the plan change		Accept
137.1	Wayne Brown	Decline the plan change		Accept
138.1	Faye Spooner	Decline the plan change		Accept
139.1	Kim Spooner	Decline the plan change		Accept
140.1	Caroline Church	Decline the plan change	FS05 oppose FS06 oppose	Accept
143.1	Vincent Clifton Tiedt	Decline the plan change		Accept
144.1	Karen Chambers	Decline the plan change		Accept
145.1	Kim van Zuilen	Decline the plan change		Accept
146.1	Tracy Anne Murray and Keith James Insley	Decline the plan change		Accept

147.1	Mark Kimber	Decline the plan change		Accept
148.1	Christine Kimber	Decline the plan change		Accept
149.1	R D Joyce	Decline the plan change		Accept
150.1	Ruth Hirst	Decline the plan change		Accept
151.1	Edwin van Zuilen	Decline the plan change		Accept
152.1	Les Whale	Decline the plan change		Accept
153.1	Megan Lawrence	Decline the plan change		Accept
154.1	Melissa Taylor	Decline the plan change		Accept
155.1	Susannah Marshall	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
158.1	Karen Body	Decline the plan change		Accept
159.1	Peter Fredatovich	Decline the plan change		Accept
160.1	Derrick Davis	Decline the plan change		Accept
163.1	Heather Hernandez	Decline the plan change		Accept
164.1	Jennifer Caitlin Watson	Decline the plan change		Accept
165.1	Sara Wheeler	Decline the plan change		Accept
168.1	Angela Yelavich	Decline the plan change	FS05 oppose FS06 Oppose	Accept
170.1	Roderick Bruce Simpson	Decline the plan change		Accept
173.1	Nathan Brown	Decline the plan change		Accept

175.1	Tatiana Brown	Decline the plan change		Accept
176.1	Jade Lacey	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
177.1	Chris Ridley	Decline the plan change		Accept
178.1	Linda Margaret McFadyen	Decline the plan change	FS03 Support FS05 Oppose FS06 Oppose	Accept
179.1	Francesca Johnson	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
180.1	Marc Garratt	Decline the plan change		Accept
181.1	Priya Khatri	Decline the plan change		Accept
182.1	Shannon Malcolm	Decline the plan change		Accept
183.1	Danielle Davies	Decline the plan change		Accept
187.1	Kirsten Mills	Decline the plan change		Accept
188.1	Brett James Dickie	Decline the plan change		Accept
189.1	Anne Clarke	Decline the plan change		Accept
191.1	Glen MacKellaig	Decline the plan change		Accept
192.1	Kumeu Community Action officially known as The Kumeu-Huapai Residents and Ratepayers Association Incorporated	Decline the plan change		Accept
193.1	Christopher James Redditt	Decline the plan change		Accept

194.1	Rachel Spencer	Decline the plan change		Accept
195.1	Sandra Wyatt	Decline the plan change		Accept
196.1	Jen Mein	Decline the plan change		Accept
197.1	Christoper Wyatt	Decline the plan change		Accept
199.1	Racheal Wyatt	Decline the plan change		Accept
200.1	Danielle Jordan	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
206.1	Emma Pearson	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
208.1	Janelle Lisa Redditt	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
209.1	Wayne Mitchell	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
210.1	Terence L Klein	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
211.1	Benjamin David Pennell	Decline the plan change		Accept
212.1	Jann Olding	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
213.1	Natalie Vose	Decline the plan change		Accept
216.1	Chantelle	Decline the plan change		Accept
217.1	Barbara Lynn Chatfield	Decline the plan change		Accept
219.1	Muriwai Community Association Incorporated	Decline the plan change		Accept
220.1	Equal Justice Project	Decline the plan change	FS05 Oppose FS06 Oppose	Accept

221.1	Rebecca Stuart	Decline the plan change		Accept
222.1	Richard Allan	Decline the plan change		Accept
224.1	Chhitiza Basnet	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
225.1	Kelvin Stuart	Decline the plan change		Accept
226.1	John Cook	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
228.1	Sandi Gamon	Decline the plan change	FS05 Oppose FS06 Oppose	Accept
229.1	Dianne Allan	Decline the plan change		Accept
230.1	Emma Hood	Decline the plan change		Accept
231.1	Manav Vadhiparti	Decline the plan change		Accept
232.1	Trevor Gamon	Decline the plan change		Accept
233.1	Rachel Pickett	Decline the plan change		Accept
234.1	Philip Doughty	Decline the plan change		Accept
235.1	Christopher James Hull	Decline the plan change		Accept
236.1	Laura Roecoert	Decline the plan change		Accept
237.1	Heidi Copland	Decline the plan change		Accept
238.1	Steve Bloxham	Decline the plan change		Accept
239.1	Christina Doughty	Decline the plan change		Accept
240.1	Kathryn Stewart	Decline the plan change		Accept



241.1	Mark Gibson	Decline the plan change		Accept
242.1	Sarah McBride	Decline the plan change		Accept
243.1	Andrew and Tania Pegler	Decline the plan change		Accept
244.1	Tracy Smytheman	Decline the plan change		Accept
246.1	Jamie black	Decline the plan change		Accept
247.1	Deanne Chandler	Decline the plan change		Accept
249.1	Shontelle Fawkner	Decline the plan change		Accept

#### Discussion

294. These submissions seek that the plan change be declined. The reasons given in the submissions are varied including environmental effects, the lack of infrastructure, inappropriate density, character effects, congestion and overcrowding, and effects on flooding.
295. The interim conclusion of this report based on an assessment of the plan change and the submissions is that it should not be approved as it is, primarily because of uncertainty about whether the resulting urban development can be adequately serviced with required infrastructure and because of the effects of flooding. Given that further information may be provided at the hearing by both the applicant and the submitters I recommend that, on an interim basis, these submissions be accepted.

#### Interim recommendations on submissions

296. That submissions 1.1, 3.1, 4.1, 5.1, 9.1, 11.1, 12.1, 13.1, 14.1, 19.1, 21.1, 22.1, 23.1, 25.1, 26.1, 27.1, 28.1, 29.1, 16.1, 32.1, 33.1, 34.1, 35.1, 36.1, 39.1, 40.1, 44.1, 45.1, 49.1, 51.1, 52.1, 53.1, 54.1, 56.1, 57.1, 58.1, 59.1, 60.1, 61.1, 64.1, 65.1, 68.1, 69.1, 70.1, 71.1, 73.1, 74.1, 75.1, 76.1, 77.1, 79.1, 82.1, 83.1, 84.1, 86.1, 87.1, 88.1, 89.1, 92.1, 93.1, 96.1, 102.1, 103.1, 106.1, 107.1, 108.1, 110.1, 115.1, 117.1, 118.1, 119.1, 120.1, 121.1, 123.1, 124.1, 125.1, 126.1, 127.1, 128.1, 130.1, 131.1, 134.1, 136.1, 137.1, 138.1, 139.1, 140.1, 143.1, 144.1, 145.1, 146.1, 147.1, 148.1, 149.1, 150.1, 151.1, 152.1, 153.1, 154.1, 155.1, 158.1, 159.1, 160.1, 163.1, 164.1, 165.1, 168.1, 170.1, 173.1, 175.1, 176.1, 177.1, 178.1, 179.1, 180.1, 181.1, 182.1, 183.1, 187.1, 188.1, 189.1, 191.1, 192.1, 193.1, 194.1, 195.1, 196.1, 197.1, 199.1, 200.1, 206.1, 208.1, 209.1, 210.1, 211.1, 212.1, 213.1, 216.1, 217.1, 219.1, 220.1, 221.1, 222.1, 224.1, 225.1, 226.1, 228.1, 229.1, 230.1, 231.1, 232.1, 233.1, 234.1, 235.1, 236.1, 237.1, 238.1, 239.1, 240.1, 241.1, 242.1, 243.1, 244.1, 246.1, 247.1, 249.1, be **accepted**.
297. There are no changes resulting from this recommendation.

## 10.2 Submissions that seek that PPC100 be approved as notified

298. Table 10.2.1

Sub Point	Submitter Name	Summary of Decisions Requested	Further subs	S42A Recommendation
2.1	BA Kruse & SM Farley, Beverley Kruse family Trust	Approve the plan change without amendments	FS05 Support FS06 Support	Reject
6.1	Daniel Smyth	Approve the plan change without amendments		Reject
7.1	GBI Family Trust Limited	Approve the plan change without amendments		Reject
8.1	Maan Alzaher	Approve the plan change without amendments		Reject
10.1	Niki Buric	Approve the plan change without amendments		Reject
15.1	Hin San Li	Approve the plan change without amendments		Reject
18.1	Laura Storey	Approve the plan change without amendments		Reject
31.1	Jordanka Vitasovich	Approve the plan change	FS01 support	Reject
37.1	Jeremy Quiding	Approve the plan change without amendments		Reject
42.1	Fang Yang	Approve the plan change without amendments		Reject
47.1	Anthony Smith	Approve the plan change without amendments		Reject
63.1	Riverope Properties Ltd	Approve the plan change without amendments		Reject
97.1	Stephanie Gale	Approve the plan change without amendments		Reject
99.1	William Eastgate	Approve the plan change without amendments		Reject
100.1	Aidan Donnelly	Approve the plan change without amendments		Reject
122.1	Maraetai Land Development Limited	Approve the plan change without amendments	FS05 Support FS06 Support	Reject
190.1	Michelle Gillespie	Approve the plan change without amendments		Reject
207.1	Carole Paulus	Approve the plan change without amendments		Reject

215.1	Taraani Mohammed	Approve the plan change without amendments		Reject
253.1	The Botanic Limited Partnership	Seeks that Auckland Council approve the request to rezone the Future Urban Land as set out within the PC100 documentation or similar zoning that achieves the same or similar outcomes for urban residential land uses.		Reject
254.1	Matvin Group Limited	Seeks that Auckland Council approve the request to rezone the Future Urban Land as set out within the PC100 documentation or similar zoning that achieves the same or similar outcomes for urban residential land uses.		Reject

#### Discussion

299. The discussion above and to follow is that, at least as notified, PC100 should not be approved based on the range of effects likely to arise. If it is approved there are changes that are recommended to ensure the adverse effects are appropriately managed and to ensure consistency with the relevant statutory documents.

300. Accordingly it is not appropriate that the PPC100 be approved as notified.

#### Interim recommendations on submissions

301. That submissions 2.1, 6.1, 7.1, 8.1, 10.1, 15.1, 18.1, 31.1, 37.1, 42.1, 47.1, 63.1, 97.1, 99.1, 100.1, 122.1, 190.1, 207.1, 215.1, 253.1, and 254.1 be rejected.

302. There are no changes resulting from this recommendation.

#### **10.3 Submissions that have requested that PPC100 is declined but have also requested alternative relief or have requested approval subject to changes.**

303. Table 10.3.1

Sub Point	Submitter Name	Summary of Decisions Requested	Further subs	S42A Recommendation
17.1	Peter Wilding	Decline the plan change		Accept
20.1	Michelle Sandra Young	Decline the plan change		Accept
24.1	Kate Frances Lyon	Decline the plan change		Accept

41.1	Monte Neal	Decline the plan change		Accept
43.1	Ari King	Approve the plan change with amendments		Reject
46.1	Eanna Geoghegan	Approve the plan change with amendments		Reject
48.1	Michael Brent	Decline the plan change		Accept
50.1	Shanley Joyce	Decline the plan change		Accept
55.1	Branyn Bellaney	Decline the plan change		Accept
62.1	Craig Brock	Approve the plan change with amendments		Reject
66.1	Hawk Ellery Freight Services Ltd	Decline the plan change		Accept
67.1	Rebecca Englefield	Approve the plan change with amendments		Reject
78.1	Fiona Carter	Decline the plan change		Accept
81.1	Ed Stubenitsky	Approve the plan change with amendments		Reject
80.1	Matthew Fisher	Decline the plan change		Accept
85.1	Alan Macleod	Decline the plan change		Accept
90.1	Nicholas William Edward Bastow	Decline the plan change		Accept
91.1	Jenna Robinson	Approve the plan change with amendments		Reject
94.1	Thomas Michael Kelly	Decline the plan change		Accept
95.1	Ella McIntosh	Decline the plan change		Accept
98.1	Bridget Michelle Hill	Approve the plan change with amendments		Reject
101.1	Andy Nicol	Approve the plan change with amendments		Reject
104.1	Jan Henderson	Decline the plan change		Accept

105.1	Leo Floyd	Approve the plan change with amendments		Reject
109.1	Steve Pike	Decline the plan change		Accept
111.1	Lewellan Sclanders	Decline the plan change		Accept
112.1	Josette Barbara Haggren	Approve the plan change with amendments		Reject
113.1	Nathalie Lapuente Guzman	Decline the plan change		Accept
114.1	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Decline the plan change	FS07 Oppose	Accept
116.1	Mayson Day	Decline the plan change		Accept
129.1	Allan Irad Maclean	Approve the plan change with amendments		Accept
132.1	Declan Penfold	Decline the plan change		Accept
133.1	Duncan Whittaker	Decline the plan change		Accept
135.1	Paul Seymour	Decline the plan change		Accept
142.1	Tim Burborough	Approve the plan change with amendments		Reject
156.1	Gail Sclanders	Decline the plan change	FS05 Oppose in part FS05 Oppose in part	Accept
161.1	Auckland Transport	Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to Auckland Transport's satisfaction.	FS05 Oppose FS06 Oppose FS07 Oppose	Accept

161.2	Auckland Transport	Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to Auckland Transport's satisfaction.	FS05 Oppose FS07 Oppose FS06 Oppose	Accept
161.3	Auckland Transport	Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to Auckland Transport's satisfaction.	FS05 Oppose FS06 Oppose FS07 Oppose	Accept
162.1	Ryan Sclanders	Decline the plan change		Accept
169.1	Adrian Low	Approve the plan change with amendments		Reject
171.1	John Armstrong	Decline the plan change		Accept
174.1	Claire Walker	Decline the plan change	FS07 Oppose FS09 Support	Accept
184.1	Graham and Sunita Ramsey	Decline the plan change		Accept
185.1	Marcus Cook	Decline the plan change		Accept
186.1	Auckland Council	That the plan change is declined in its entirety, unless the matters raised in this submission are addressed.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose FS09 Oppose	Accept
201.1	Junaid Shaik	Decline the plan change		Accept
202.1	Boric Food Market, Blossoms Café	That the Plan Change is approved, subject to resolution of the		Reject

	and tenants/residents on the site	matters outlined in this submission.		
205.1	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Approve the plan change with amendments		Reject
218.1	Watercare Services Limited	Decline the plan change	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept
223.1	Kellie Christophersen	I am opposed to it until commitments are made to upgrade the storm water and proper traffic management is taken care of.		Accept
227.1	Timothy Mark Hillier	Approve the plan change with amendments		Reject
245.1	Rose-Muirie Cook	Decline the plan change		Accept
248.1	Linda Barton-Redgrave	Decline the plan change		Accept
250.1	Kit Boyes	Decline the plan change		Accept
252.1	Kathryn Boyes	Decline the plan change	FS05 Oppose FS06 Oppose	Accept

### Discussion

304. These submission points request that PPC100 be declined but the submitters have also requested alternative relief or have requested approval subject to changes. The alternative relief points and/or changes are discussed in the sections 10.4 to 10.10 below.
305. The interim conclusion of this report based on an assessment of the plan change and the submissions is that it should not be approved as it is, primarily because of uncertainty about whether the resulting urban development can be adequately serviced with required infrastructure and because of the effects of flooding. Given that further

information may be provided at the hearing by both the applicant and the submitters I recommend that, on an interim basis, the submission points requesting that PPC100 declined are accepted and those seeking it be approved be declined.

Interim recommendations on submissions

- 306. That submissions 17.1, 20.1, 24.1, 41.1, 48.1, 50.1, 55.1, 66.1, 78.1, 80.1, 85.1, 90.1, 94.1, 95.1, 104.1, 109.1, 111.1, 113.1, 114.1, 116.1, 129.1, 132.1, 133.1, 135.1, 156.1, 161.1, 161.2, 161.3, 162.1, 171.1, 174.1, 184.1, 185.1, 186.1, 201.1, 218.1, 223.1, 254.1, 248.1, 250.1, and 152.1 be accepted.
- 307. That submissions 43.1, 46.1, 62.1, 67.1, 81.1, 91.1, 98.1, 101.1, 105.1, 112.1, 142.1, 169.1, 202.1, 205.1, and 227.1 be rejected.
- 308. There are no changes resulting from this recommendation.

**10.4 Submissions concerning infrastructure.**

309. Table 10.4.1

<b>Sub Point</b>	<b>Submitter Name</b>	<b>Summary of Decisions Requested</b>	<b>Further subs</b>	<b>S42A Recommendation</b>
17.2	Peter Wilding	If approved make improvement to local infrastructure and especially roading conditional to change of zoning.		Accept
20.2	Michelle Sandra Young	If approved make improvements to infrastructure (flooding and transport).		Accept
24.5	Kate Frances Lyon	If approved provide a traffic management plan and a public transport plan	FS05 Oppose in part FS06 Oppose in part FS08 Support	Accept in part to the extent set out in Appendix 5 to the extent set out in Appendix 5
24.6	Kate Frances Lyon	If approved urgently improve infrastructure including power, water, sewerage		Accept
30.1	Jiayi Yu	Approve the plan change with the developer to bear part of transportation costs including road expansion, park and ride and walkways for children		Accept in part to the extent set out in Appendix 5



38.1	Danni-Lee Corkery	Build out the infrastructure in advance of new development in a complete manner so the area is ready for development before it commences.		Accept
41.2	Monte Neal	If approved make unspecified amendments - related to roading, schools and cycleways		Accept in part to the extent set out in Appendix 5
43.2	Ari King	Deliver road capacity increases both west and north of Riverhead		Accept
43.3	Ari King	Deliver stormwater and electricity capacity increases		Accept in part to the extent set out in Appendix 5
46.2	Eanna Geoghegan	No change should proceed until transport infrastructure is completed including the new round about at Boric and Brigham Creek.		Accept
46.3	Eanna Geoghegan	Upgrades to sewerage and water systems upgraded before work commencing		Accept
48.2	Michael Brent	If approved make significant upgrades to SH16 between Brigham Creek and Kumeu		Accept
50.2	Shanley Joyce	If approved upgrade the stormwater and sewerage infrastructure		Accept
50.3	Shanley Joyce	If approved make upgrades to roading including walkways, footpaths, bike paths for children		Accept
55.2	Branyn Bellaney	If approved build and upgrade roads to handle the traffic first.	FS05 Oppose in part FS06 oppose in part	Accept
62.2	Craig Brock	Ensure development is not occupied until all stated road improvements are complete.		Accept in part to the extent set out in Appendix 5

66.4	Hawk Ellery Freight Services Ltd	Address critical issues such as parks, stormwater management, transportation and village character		Accept
67.2	Rebecca Englefield	Build the new Kumeu bypass or make SH16 two lanes each way before allowing mass residential development		Accept in part to the extent set out in Appendix 5
72.1	John Armstrong	Plan change cannot not go ahead until junction at SH16 is sorted.		Accept
78.2	Fiona Carter	If approved increase lands on CR Highway, install round about a CRH/SH16 or merge lane from CRH to SH16 and put more lanes on SH16		Accept
80.2	Matthew Fisher	If approved increase public transport options		Accept
85.2	Alan Macleod	If approved upgrade the stormwater and sewerage infrastructure		Accept
85.3	Alan Macleod	If approved make significant upgrades to SH16 and other roads		Accept
90.4	Nicholas William Edward Bastow	If approved make significant upgrades to SH16 and have dedicated lane from CHR to SH16 Motorway		Accept in part to the extent set out in Appendix 5
91.2	Jenna Robinson	Increase road capacity and efficiency		Accept
94.2	Thomas Michael Kelly	If approved include clear rules around upgrades for roads		Accept
94.4	Thomas Michael Kelly	If approved include clear rules around upgrades for storm water		Accept
95.2	Ella McIntosh	If approved make significant upgrades to SH16 and other roads		Accept
98.2	Bridget Michelle Hill	Improve understanding of CRH and SH16 congestion and upgrade		Accept
98.3	Bridget Michelle Hill	Upgrade local roads prior to increased usage		Accept

101.2	Andy Nicol	Upgrade the CRH and SH16 intersection with a roundabout and extend northwestern motorway beyond Huapai and Waimauku.		Accept in part to the extent set out in Appendix 5
104.2	Jan Henderson	If approved upgrade the transportation system for extra capacity including public transport		Accept
104.4	Jan Henderson	If approved upgrade the wastewater infrastructure		Accept
105.2	Leo Floyd	Upgrade roading infrastructure before development allowed		Accept
109.2	Steve Pike	If approved upgrade CRH to SH16 to 2 lanes heading south, merge lane into SH16 and Taupaki round about to Brigham Creek should be 45 lanes.		Accept in part to the extent set out in Appendix 5
111.2	Lewellan Sclanders	If approved double road capacity		Accept in part to the extent set out in Appendix 5
113.2	Nathalie Lapuente Guzman	If approved make upgrades to roads		Accept
114.2	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.	FS07 Oppose	Accept
114.3	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed	FS07 Oppose	Accept in part to the extent set out in Appendix 5
114.4	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	The proposed retirement village creates roading pinch points that should be addressed by requirements for various road upgrades	FS05 Oppose FS06 Oppose FS07 Oppose	Accept in part to the extent set out in Appendix 5

		set out in the submission		
114.5	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.	FS07 Oppose FS08 Support	Accept in part to the extent set out in Appendix 5
114.23	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Include provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users	FS07 Oppose FS09 Support	Accept
116.2	Mayson Day	If approved greatly increase capacity of CR Highway		Accept
129.2	Allan Irad Maclean	Delay approval until certainty of central and local government commitment to traffic issues.		Accept in part to the extent set out in Appendix 5
132.2	Declan Penfold	Upgrade roading infrastructure before development allowed including cycle lanes and bus routes		Accept
133.2	Duncan Whittaker	If approved build and upgrade roads to handle the traffic flow before development		Accept
135.2	Paul Seymour	If approved that in table IX.4.1 the activity status for (A4) and (A5) be changed to Non Complying		Accept
135.3	Paul Seymour	If approved that the assessment criteria IX.8.2(4) (f) be modified to require assessment within the peak period and the weekend.		Accept
135.4	Paul Seymour	That notification rule IX5 (1) is only applicable to permitted activities.		Reject

135.5	Paul Seymour	Take into account that the wider transport effects of a lack of secondary high school facilities are significant in the peak commuter periods.		Reject
142.2	Tim Burborough	Delay the development construction start until after the upgrades to local roads and state highway 16 are complete.		Accept
156.2	Gail Sclanders	If approved upgrade roads		Accept
157.1	Rob Mitchell and Karina Mitchell	Decline plan change unless all changes in submission made		Accept in part to the extent set out in Appendix 5
157.2	Rob Mitchell and Karina Mitchell	Complete 2 lanes each way from Brigham Creek roundabout to Kumeu with additional route through or around Kumeu before developing Riverhead		Accept in part to the extent set out in Appendix 5
157.3	Rob Mitchell and Karina Mitchell	Provide a roundabout at CRH/ SH16 intersection before developing Riverhead		Accept
157.4	Rob Mitchell and Karina Mitchell	Provide safe cycleways in Riverhead and to Westgate before developing Riverhead.		Accept in part to the extent set out in Appendix 5
157.5	Rob Mitchell and Karina Mitchell	Address Albany village traffic pinch point before developing Riverhead		Accept
157.7	Rob Mitchell and Karina Mitchell	New development should provide new water and wastewater infrastructure needed.		Accept
161.5	Auckland Transport	Amend third to last paragraph as follows: 'The precinct includes provisions to ensure that the subdivision and development of land for development is coordinated with the construction of transport and infrastructure upgrades necessary to manage and mitigate potential adverse effects on the local and	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept

		wider transport network. Provision is also made for the future widening of Riverhead Road.'		
161.6	Auckland Transport	Amend Objective 4 as follows: '(4) Access to, and from and within the precinct for all modes of transport occurs in a safe, effective and efficient manner for all modes of transport that mitigates the adverse effects of traffic generation on the surrounding road network.'	FS07 Oppose	Accept in part to the extent set out in Appendix 5
161.7	Auckland Transport	Retain Objective 5	FS07 Oppose	Accept
161.8	Auckland Transport	Insert a new Objective as follows: '(x) Subdivision and development does not occur in advance of the availability of operational transport infrastructure, including regional and local transport infrastructure.'	FS05 Oppose in Part FS07 Oppose FS06 Oppose in part	Accept
161.9	Auckland Transport	Insert a new Objective as follows: '(x) Development provides for future road widening on Riverhead Road.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.10	Auckland Transport	Insert a new policy as follows: '(x) Require that subdivision and development in the Precinct does not occur in advance of the availability of operational transport infrastructure.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.11	Auckland Transport	Insert a new policy as follows: '(x) Require development with frontage to Riverhead	FS05 Oppose in Part FS06 Oppose in part	Accept

		Road to provide for future road widening.'	FS07 Oppose	
161.12	Auckland Transport	Amend Policy 4 as follows: '(4) Require subdivision and the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.13	Auckland Transport	Amend Policy 7 as follows: '(7) Require the main collector roads to be provided generally in the locations shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly-connected street layout that integrates with the surrounding existing and proposed transport network.'	FS07 Oppose	Accept
161.14	Auckland Transport	Amend Policy 8 as follows: '(8) Require the key local roads and pedestrian connections to be provided generally in the locations shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected street layout of streets and pedestrian connections that integrates with the collector road network within the precinct and the surrounding existing and proposed transport network.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept

161.15	Auckland Transport	Amend Policy 9 as follows: '(9) Ensure that subdivision and development provides a local road network that achieves a highly-connected street layout and integrates with the collector road network within the precinct and the surrounding existing and proposed transport network, and supports the safety and amenity of the open space network.	FS07 Oppose	Accept
161.16	Auckland Transport	Amend Policy 10 as follows: '(10) Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing for safe separated access for cyclists on arterial and collector roads; (x) providing upgrades to existing road frontages of the precinct to an urban standard and pedestrian connections to the existing Riverhead settlement;(x) providing safe crossing facilities for pedestrians and cyclists; (x) providing upgraded public transport facilities on Coatesville-Riverhead Highway; (b) providing a level of landscaping that is appropriate for the function of the street; and (c) providing for the safe and efficient movement of vehicles.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.17	Auckland Transport	Amend Table IX.4.1 so that either: a) All development activities are listed	FS05 Oppose in Part	Accept



		<p>under “Development” and all subdivision activities are listed under “Subdivision”, including (without limitation) so that activities (A4) to (A6) appear in both parts of the activity table; or</p> <p>b) Alternatively, subdivision and development headings are combined and include all activities.</p> <p>Activity Activity Status Subdivision and Development</p>	<p>FS06 Oppose in part FS07 Oppose</p>	
161.18	Auckland Transport	<p>Amend Table IX.4.1 Activity table - Precinct-wide activities, (A4) and (A5), so that non-complying activity status (rather than discretionary or restricted discretionary status) applies to 'Subdivision and development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades (other than in relation to specific design requirements in Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct)'. Make consequential amendments to the matters of discretion and assessment criteria to reflect the removal of the restricted discretionary activity.</p>	<p>FS05 Oppose in Part FS06 Oppose in part FS07 Oppose FS08 Support</p>	Accept
161.19	Auckland Transport	<p>Retain (A6) in Table IX.4.1 Activity table - Precinct-wide activities</p>	<p>FS07 Oppose</p>	Accept

		(subject to the submission point above concerning the location of this activity – which relates to both subdivision and development – in the table).		
161.24	Auckland Transport	Amend IX.6 Standards by deleting the listing of 'E27.6.1 - Trip Generation' as a standard that does not apply precinct-wide.	FS07 Oppose	Accept
161.25	Auckland Transport	Amend Standard IX.6.1 Staging of development with transport upgrades, so that it clearly links the requirements for transport upgrades with subdivision as well as development. This will require amendments to items (1) to (5) to require upgrades to be aligned with subdivision as well as the occupation of buildings. An example of appropriate drafting is provided in I451.6.2 of the AUP(OP). The further amendments to Standard IX.6.1 set out later in this submission are subject to this overarching request.	FS06 Oppose in part FS07 Oppose FS08 Support	Accept
161.26	Auckland Transport	Amend the title and purpose statement of Standard IX.6.1 as follows: 'IX.6.1. Staging of subdivision and development with transport upgrades Purpose: • To manage mitigate the adverse effects of traffic on the safety and efficiency of the surrounding local and wider road network for all modes of transport	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose FS08 Support	Accept

		by ensuring subdivision and development is coordinated with transport infrastructure. <ul style="list-style-type: none"> <li>• To achieve the integration of land use and transport.</li> <li>• To ensure that subdivision and development complies with Appendices 1 and 2 Road function and design elements tables.'</li> </ul>		
161.27	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(1) as follows: '(1) Prior to occupation of a dwelling any building within the Riverhead Precinct, the following transport infrastructure must be constructed and operational: (a) ...' Similarly, amend other clauses in IX.6.1 to refer to 'any building' rather than 'a building'.	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.28	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(2)(a) so that it clearly includes the public transport infrastructure and walking / cycling improvements (such as pedestrian crossings) identified in the ITA.	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.29	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(3)(a) so that it clearly includes the public transport	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept

		infrastructure and walking / cycling improvements (such as pedestrian crossings) identified in the ITA.		
161.30	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(3)(c) as follows: '(c) Upgrade and urbanise Riverhead Road, from the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.'	FS05 Oppose in Part FS07 Oppose	Accept
161.31	Auckland Transport	Retain Standard IX.6.2, subject to a minor amendment to (1) as follows: '(1) A 2m wide road widening setback must be provided along that part of the frontage of the land adjoining Riverhead Road shown as subject to the 'Required Indicative Road Widening Required' notation on the IX.10.3 Riverhead: Precinct plan 3.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.34	Auckland Transport	Amend Matters of Discretion IX.8.1(2) by amending (a) and (b), and adding two new matters as follows: '(a) Location and design of the collector roads, key local roads and connections with neighbouring sites to achieve an integrated	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept

		street network, and appropriately provide for all modes; (b) Provision of cycling and pedestrian networks and connections; (x) Upgrades to public transport infrastructure; (x) Design and sequencing of upgrades to the existing road network; ....'		
161.35	Auckland Transport	Make any further amendments to the matters of discretion to give effect to the general relief requested in relation to IX.6.1 above. For example, without limitation, if the Drury East 'model' (1451) is followed as suggested, then include a matter of discretion relating to the imposition of appropriate conditions.	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.36	Auckland Transport	Delete the reference to Standard IX.6.1(2) - (6) from Matters of Discretion IX.8.1(4). This is consequential from an earlier submission point seeking a non-complying status for non-compliance with this standard. If reference to Standard IX.6.1(2) - (6) is retained, amend as follows: '(4) For subdivision and occupation of dwellings buildings that does do not comply with Standard IX.6.1. Staging of development with transport upgrades.'  Insert the following matter of discretion for non-compliance with	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept

		Appendices 1 and 2: '(x) Road design and consistency with the transport related objectives and policies of the precinct'		
161.37	Auckland Transport	Amend Assessment Criteria IX.8.2(2)(e) and the preceding heading as follows: 'Location of roads and other transport connections (e) Whether the collector roads, key local roads and key pedestrian active mode connections are provided generally in the locations shown on IX.10.2 Riverhead: Precinct Plan 2 to achieve a highly connected street layout and active mode network that integrates with the surrounding transport network. Whether An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters: (a) Landownership patterns, The presence of natural features, natural hazards, or contours or other constraints and how this impacts the placement of roads and active mode connections; (ii) ... (iii) The constructability of roads and the ability for its them to be delivered by a single landowner and connected beyond any	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept

		property boundary within the precinct.'		
161.38	Auckland Transport	Amend Assessment Criteria IX.8.2(2)(f) as follows: '(f) Whether a high quality and integrated network of local roads (including collector and local roads) is provided within the precinct that has a good degree of accessibility and supports a walkable street network. Whether roads and active mode connections are aligned to provide visual and physical connections to open spaces, including along the stream network, where the site conditions allow.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.39	Auckland Transport	Amend Assessment Criteria IX.8.2(2) under the heading 'Design of roads' as follows: '(g) Whether the design of new collector and local roads or upgrade of existing roads accord with the road design details provided in IX.11.1 Appendix 1 and 2. (h) ... (x) Whether the public transport infrastructure improvements provided on Coatesville-Riverhead Highway in accordance with IX.6.1 Staging of subdivision and development with transport upgrades, are of a high standard and include bus stops, bus shelters, and pedestrian crossing facilities. (x) Whether upgrades to the Coatesville-Riverhead Highway intersections with Old Railway Road and	FS07 Oppose	Accept

		Riverland Road provide for safe right hand turns.'		
161.41	Auckland Transport	<p>Delete the reference to Standard IX.6.1(2)-(6) from Assessment Criteria IX.8.1(4). This is consequential from an earlier submission point seeking a non-complying status for non-compliance with this standard.</p> <p>If the reference to Standard IX.6.1(2)-(6) is retained, then the requirement for an Integrated Transport Assessment (in IX.8.2(4)(a)) should be specifically addressed by an addition to IX.9 Special Information Requirements.</p> <p>Insert new assessment criteria for non-compliance with the Road Function and Design Elements tables as follows:</p>	<p>FS05 Oppose in Part</p> <p>FS06 Oppose in part</p> <p>FS07 Oppose</p>	Accept
161.41 (cont.)	Auckland Transport	<p>'(x) For subdivision and / or development that does not comply with the Road Function and Design Elements tables in Appendices 1 and 2</p> <p>(a) Whether there are constraints or other factors present which make it impractical to comply with the required standards.</p> <p>(b) Whether the design of the road and associated road reserve achieves the relevant transport-related policies of the Precinct.</p> <p>(c) Whether the proposed design and road reserve:</p> <p>(i) incorporates measures to achieve the required design speeds;</p>	<p>FS07 Oppose</p>	Accept



		<p>(ii) can safely accommodate required vehicle movements;</p> <p>(iii) can appropriately accommodate all proposed infrastructure and roading elements including utilities and/or any stormwater treatment;</p> <p>(iv) assesses the feasibility of upgrading any interim design or road reserve to the ultimate required standard.</p> <p>(d) Whether there is an appropriate interface design treatment at property boundaries, particularly for pedestrians and cyclists.'</p> <p>Make consequential amendments to IX.8.2(4).</p>		
161.42	Auckland Transport	<p>Amend IX.9 Special information requirements, by adding the following:</p> <p>'(5) Transport Design Report</p> <p>Any proposed new key road intersection or upgrading of existing key road intersections illustrated on Precinct Plans 2 and 3 must be supported by a Transport Design Report and Concept Plans (including forecast transport modelling and land use assumptions), prepared by a suitably qualified transport engineer confirming that the location and design of any road and its intersection(s) supports the safe and efficient function of the existing and future (ultimate) transport network and</p>	<p>FS05 Oppose in Part</p> <p>FS06 Oppose in part</p> <p>FS07 Oppose</p>	Accept

		<p>can be accommodated within the proposed or available road reserves. This may be included within a transport assessment supporting land use or subdivision consents.</p> <p>In addition, where an interim upgrade is proposed, information must be provided, detailing how the design allows for the ultimate upgrade to be efficiently delivered.'</p> <p>Make consequential amendments to Precinct Plans 2 and 3 to clearly identify the key road intersections.</p>		
161.43	Auckland Transport	Amend the notation applying at the intersection of Lathrope Road / Riverhead Road to 'upgrade key intersection' instead of 'proposed roundabout'.	FS07 Oppose	Accept
161.44	Auckland Transport	<p>Amend IX.10.3 Riverhead: Precinct plan 3 - Transport upgrades to identify all of the key road intersection upgrades including:</p> <ul style="list-style-type: none"> <li>• Coatesville-Riverhead Highway / Old Railway Road</li> <li>• Coatesville-Riverhead Highway / Riverland Road</li> <li>• Riverhead Road / Coatesville-Riverhead Highway / Kaipara Portage Road</li> <li>• Riverhead Road / Collector Road</li> <li>• Riverhead Point Drive / Coatesville-Riverhead Highway / Collector Road.</li> </ul> <p>Also amend Precinct plan 3, as required, to reflect Precinct plan 2.</p>	FS07 Oppose	Accept

161.45	Auckland Transport	Amend the table in IX.11.1 Appendix 1 by deleting the references to '(Type 1)' and '(Type 2)' in the column headed 'Proposed role and function of road in the precinct area'	FS07 Oppose	Accept
161.46	Auckland Transport	Amend the table in IX.11.1 Appendix 1 by adding the following footnote to the column headed 'Minimum road reserve': 'Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.47	Auckland Transport	Amend the table in IX.11.1 Appendix 1 by adding the following footnote to the column headed 'Bus provision': 'Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.48	Auckland Transport	Amend the table in IX.11.2 Appendix 2 by adding the following footnote to the column headed 'Minimum road reserve': 'Typical minimum width which may need to be varied in specific locations where	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept

		required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'		
161.49	Auckland Transport	Amend the table in IX.11.2 Appendix 2 by adding the following footnote to the column headed 'Bus provision': 'Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.50	Auckland Transport	Amend the table in IX.11.2 Appendix 2 by: <ul style="list-style-type: none"> <li>• changing the entry about bus provision (final column) for Riverhead Road from 'no' to 'yes'.</li> <li>• changing the entry about access restrictions (column 7) for Riverhead Road from 'no' to 'yes'.</li> </ul>	FS07 Oppose	Accept
161.51	Auckland Transport	Amend the table in IX.11.2 Appendix 2 to include a row for Cambridge Road.	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
162.2	Ryan Sclanders	If approved upgrade road infrastructure for increased capacity and safety		Accept
166.2	Mary Midgley	If approved infrastructure first to provide for what is already in place		Accept in part to the extent set out in Appendix 5

167.2	NZ Transport Agency Waka Kotahi (NZTA)	To amend Table IX.4.1 (A4) to a Non-Complying Activity.	FS07 Oppose	Accept
169.2	Adrian Low	Postpone the plan change until 2028-2032 to allow for comprehensive infrastructure upgrades and planning.		Accept in part to the extent set out in Appendix 5
169.4	Adrian Low	Ensure critical infrastructure, particularly transport, water, wastewater, and educational facilities, is fully planned and funded before development.	FS02 Oppose	Accept in part to the extent set out in Appendix 5
174.2	Claire Walker	Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed. SH16 is already dysfunctional at high demand times.	FS07 Oppose	Accept
174.3	Claire Walker	Include provisions which state that development of the plan change area cannot proceed until comprehensive local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.	FS07 Oppose	Accept in part to the extent set out in Appendix 5
174.4	Claire Walker	The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. East/west road connections through	FS05 Oppose FS06 Oppose FS07 Oppose	Accept in part to the extent set out in Appendix 5

		this area are key – providing chose to residents, weather on foot, bike or car. These should be recognised and addressed by requirements for upgrades.		
174.5	Claire Walker	Other routes within the community need addressing. For example, the road and pedestrian network of Te Roera Place and Duke Street do not show any proposed connectivity improvements or in fact any connection to the new Plan Change 100 area. This will be the route of choice for anyone going to Riverhead School and for those going north to Albany for work or shopping. Cambridge Road, Queen Stret, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. Cambridge Terrace paper road should be completed as a connecting road giving people choice and allowing traffic to disperse through our community. The development is putting the pressure on this road connection, so surely the developer should pay for this upgrade.	FS07 Oppose FS09 Support	Accept in part to the extent set out in Appendix 5
174.6	Claire Walker	These roads, and further routes to Riverhead School all warrant assessment	FS05 Oppose FS06 Oppose	Reject

		<p>and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and horribly by the retirement village development. The supporting urban design report accurately describes War Memorial Park as the 'heart of Riverhead' but this recognition has not resulted in any meaningful response in PPC100. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings over CRH. The tension is that the CRH is a significant commuter route, and every move which benefits pedestrians puts more strain on the function of this route for people moving west and east between Albany Highway and SH16.</p>	<p>FS07 Oppose</p>	
174.7	Claire Walker	<p>Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing. Leaving upgrades to be required until residential occupation does not mitigate the adverse effects of heavy</p>	<p>FS07 Oppose</p>	<p>Accept</p>

		vehicles and construction traffic required for the formative and civil works which will adversely impact our local roads.		
174.23	Claire Walker	I want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.	FS07 Oppose FS09 Support	Accept
184.4	Graham and Sunita Ramsey	No development should commence before the transport improvements needed to address safety and capacity issues on State Highway 16, and the completion of the Northern Interceptor have been complete.		Accept in part to the extent set out in Appendix 5
184.5	Graham and Sunita Ramsey	The proposal lacks consideration about the long term suitability of the Coatesville-Riverhead Highway as an east-west link		Accept in part to the extent set out in Appendix 5
185.2	Marcus Cook	If PC 100 is not declined outright, I submit it should only be approved with the explicit condition that no development work of any kind is permitted to commence at all in the rezoned area until all the required infrastructure upgrades (not just those referred to in the proposal) are completed, unless that work is directly required for those upgrades.		Accept in part to the extent set out in Appendix 5
186.4	Auckland Council	Amend the Precinct description to identify that there are transport upgrades and bulk water supply and	FS05 Oppose in part	Accept



		wastewater infrastructure required prior to subdivision and development.	FS06 Oppose in part FS07 Oppose FS09 Oppose	
186.5	Auckland Council	Amend the Precinct to add new objectives and policies to only enable subdivision and development to occur once upgrades to transport infrastructure and necessary bulk water supply and wastewater infrastructure are operational.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose FS09 Oppose	Accept
186.6	Auckland Council	Amend the Precinct to add new rules and standards to classify subdivision and development in advance of transport upgrades and necessary bulk water supply and wastewater infrastructure as a non-complying activity.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose FS09 Oppose	Accept
186.8	Auckland Council	Amend the Precinct to add a special information requirement to require all applications for two or more dwellings and subdivision to provide a Wastewater Infrastructure Capacity Assessment.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose FS09 Oppose	Accept
201.2	Junaid Shaik	If approved provide more infrastructure before any housing development	FS05 Oppose FS06 Oppose	Accept
202.2	Boric Food Market, Blossoms Café and tenants/residents on the site	Replace the reference to 'dwelling' with 'building' at Standard IX.6.1(1)		Accept
202.3	Boric Food Market, Blossoms Café and	A non-complying activity status is appropriate in respect of Rule IX.4.1(A4).		Accept

	tenants/residents on the site			
202.4	Boric Food Market, Blossoms Café and tenants/residents on the site	Separately list subdivision and development in the activity table as per Spedding Block Precinct Table I616.4.1	FS04 Support	Reject
202.5	Boric Food Market, Blossoms Café and tenants/residents on the site	The full extent of works comprised in Stage 2 of the Waka Kotahi project referred as “SH16 Brigham Creek to Waimauku”, should be constructed and operational prior to occupation of the first dwelling (or ideally, building), and the triggers in PC100 should be updated accordingly.	FS04 Support	Accept in part to the extent set out in Appendix 5
202.6	Boric Food Market, Blossoms Café and tenants/residents on the site	Assessment criteria at IX.8.2(g) (in respect of an infringement to standards IX.6.1(2)-(4)) should require an assessment against the progress made towards the full suite of works within Stage 2, rather than simply the intersection of SH16 and Coatesville-Riverhead Highway.	FS04 Support FS08 Support	Accept in part to the extent set out in Appendix 5
202.7	Boric Food Market, Blossoms Café and tenants/residents on the site	Without further analysis, civil, infrastructure and construction work within the precinct should be delayed until the full suite of Waka Kotahi’s Stage 2 works are constructed and operational	FS04 Support	Accept
202.8	Boric Food Market, Blossoms Café and tenants/residents on the site	Update the Integrated Transport Assessment to make allowance in the traffic modelling for the pedestrian crossings proposed at the roundabout of SH16 and Coatesville-Riverhead Highway, as	FS04 Support FS08 Support	Accept

		part of the Stage 2 works.		
202.9	Boric Food Market, Blossoms Café and tenants/residents on the site	Undertake further analysis to understand the effects the proposal will have on weekend traffic volumes.	FS04 Support	Accept
203.1	Z Energy Limited	Z Energy seeks confirmation regarding the road changes proposed through PC100, noting that Precinct Plan 3 indicates that there is potential for the entirety of Cambridge Road to be 'upgraded'	FS04 Support in part	Accept
203.2	Z Energy Limited	Z Energy seeks to ensure that the future pedestrian crossing on the Coatesville-Riverhead Highway is not situated proximal to Caltex Riverhead, as this could result in an unsafe environment for vehicles and pedestrians.	FS04 Support	Accept
203.3	Z Energy Limited	Z Energy seeks confirmation regarding the nature of road changes on Cambridge Road and the Coatesville-Riverhead Highway proximal to the Caltex Riverhead site. Z Energy also requests to be consulted by the applicant and / or Auckland Transport when the relevant road upgrades are undertaken, to ensure that these do not unduly restrict the site's operation.	FS04 Support	Accept
214.5	Te Tāhuhu o te Mātauranga   Ministry of Education	That greater specificity and even strategic alignment with Auckland Transport be provided to ensure that the Plan Change outcomes can be	Oppose in part FS07 Oppose	Reject

		delivered where there is reliance upon this matter to mitigate some of the effects of the proposed rezoning.		
214.6	Te Tāhuhu o te Mātauranga   Ministry of Education	Required roading standards to be delivered for the surrounding roads (local and/or collector roads) with respect to any future school site and clarity on the responsibility for establishment of the surrounding roads and associated walking and cycling features;	Support in part FS07 Oppose	Reject
214.7	Te Tāhuhu o te Mātauranga   Ministry of Education	The inclusion (or otherwise) of the establishment of a safe cycle/walking facility across Coatesville-Riverhead Highway within the Implementation Plan (and triggering of this via the Plan Change provisions and threshold activity status).	Support FS07 Oppose	Accept
218.2	Watercare Services Limited	Without prejudice to its overall opposition to the Plan Change, if the Commissioners are minded to approve the Plan Change notwithstanding Watercare's opposition, Watercare seeks precinct provisions that require subdivision and development to be coordinated with the provision of adequate water supply and wastewater infrastructure. That is, subdivision and development must be precluded by under the precinct provisions from proceeding prior to completion of any	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept

		necessary bulk water supply and wastewater infrastructure projects required to service the development enabled by Plan Change 100.		
218.3	Watercare Services Limited	Non-complying activity status for any subdivision and/or development that precedes the provision of adequate bulk water supply and wastewater infrastructure.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept
218.4	Watercare Services Limited	All of the necessary water supply and wastewater infrastructure upgrades are located outside of the precinct boundaries.	FS07 Oppose	Accept
218.5	Watercare Services Limited	Amendments to the precinct description to include the purpose and function of the amended provisions.	FS07 Oppose	Accept
218.6	Watercare Services Limited	Amendments to Objective 5 to include the reference to 'capacity' and specify 'wastewater' and ensuring subdivision and development is coordinated with local infrastructure. This also supports the non-complying activity status.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept
218.7	Watercare Services Limited	New Objective 5(A) which addresses the coordination, provision and capacity of bulk water and wastewater infrastructure necessary to service the new precinct. This supports the non-complying activity status.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept in part to the extent set out in Appendix 5
218.8	Watercare Services Limited	Amendments to Policy 5 and addition of a new Policy 5A to support the non-complying activity status subdivision or development that precedes the provision	FS05 Oppose in part FS06 Oppose in part	Accept

		of adequate bulk water supply and wastewater infrastructure.	FS07 Oppose	
218.9	Watercare Services Limited	Amendments to include new standard IX6.16 Water and Wastewater Infrastructure to require development and subdivision to connect to functioning bulk wastewater and water supply infrastructure with sufficient capacity to service the development.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept
218.10	Watercare Services Limited	Amendments to Table IX4.1(A2A) to require up to 3 dwellings to comply with new standard IX6.16 Water and Wastewater Infrastructure.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept
218.11	Watercare Services Limited	Amendments to Table IX.4.1(A2B) to require more than three dwellings per site to comply with new standard IX6.16 Water and Wastewater Infrastructure	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept
218.12	Watercare Services Limited	Amendments to IX.5 Notification (1A) requiring Watercare to be limited notified where resource consents infringe new standard IX6.16 Water and Wastewater Infrastructure.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Reject
218.13	Watercare Services Limited	Amendments to include new standard IX.9(6) Water and Wastewater Servicing Plan as a special information requirement.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose	Accept
218.14	Watercare Services Limited	Ensure that subdivision and development is precluded by the Plan Change provisions from proceeding prior to completion of any	FS07 Oppose	Accept

		necessary bulk water supply and wastewater infrastructure projects required to service the development enabled by Plan Change 100;		
218.15	Watercare Services Limited	Include the proposed amendments to the precinct provisions as set out in Attachment 1, or similar provisions that will achieve the same outcomes as sought by Watercare.	FS07 Oppose	Accept in part to the extent set out in Appendix 5
245.2	Rose-Muirie Cook	If approved investments in infrastructure		Accept
248.6	Linda Barton-Redgrave	If approved we need an overall system of stormwater management to ensure there are no up or downstream flooding and adverse effects. This plan should take into account the worst possible flooding scenario and would include a large portion of land that is solely zoned for the purpose of managing water flow (and not able to be redesignated for residential).	FS09 Oppose	Accept
248.7	Linda Barton-Redgrave	If approved the Riverhead sewer system would definitely require significant upgrading to take further load.		Accept
250.2	Kit Boyes	If approved no development, sales or anything else until better infrastructure to support this growth is completed.		Accept in part to the extent set out in Appendix 5
252.2	Kathryn Boyes	If approved no development without infrastructure	FS05 Support in part FS06 Supporte in part	Accept

214.2	Te Tāhuhu o te Mātauranga   Ministry of Education	Retain; Policy 10: Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing for safe access for cyclists on collector roads. Policy 11: Provide safe connections to public transport facilities and social infrastructures such as open space and schools.	FS05 Neutral FS06 Neutral	Accept in part to the extent set out in Appendix 5
214.3	Te Tāhuhu o te Mātauranga   Ministry of Education	That the Plan Change provisions include the appropriate level of provision and design detail to facilitate potential school bus routes to and from any future school site, connecting with Riverhead Road and Lathrope Road and in a manner that ensures safety for all road users, especially pedestrians travelling to and from the school.	FS05 Neutral FS06 Neutral	Accept in part to the extent set out in Appendix 5
214.4	Te Tāhuhu o te Mātauranga   Ministry of Education	that the RDA status for consents ensures activities are appropriately assessed if they are delivered ahead of the Implementation Plan infrastructure items.	FS04 Support in part  FS05 Neutral FS06 Neutral FS07 Oppose	Reject
248.3	Linda Barton-Redgrave	If approved I would like to see a more realistic picture presented regarding traffic management, with further detail that shows how the traffic through the town and out onto highway 16 will be managed, how the main road will be crossed at different points, and what will be done to		Accept in part to the extent set out in Appendix 5



		enable more effective public transport.		
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### Discussion

310. These submissions seek changes to PPC100 in respect of infrastructure. Some of these submission points set out an alternative relief to a submitter's request that PPC100 be declined or approved subject to changes as noted in section 10.3 above. While the overall recommendation of this report is that PPC100 should be declined at this time, I have included recommendations on the changes sought in these submissions should the Commissioners decide to approve PPC100.
311. There are a wide range of submissions in respect of infrastructure issues. These relate to transport infrastructure both at the wider scale including issues in respect of upgrades needed to the surrounding road network and details of roading within Riverhead. The lack of provision for public transport is also a theme that occurs through the submissions. Other submissions points relate to concerns about the impacts of PPC100 on existing water, wastewater and stormwater infrastructure and the provision for future infrastructure. Some of the submissions are specific about the changes requested while others take a more general approach.
312. Given the large number of individual submissions a grouped approach is taken to the submissions.

### *Transport*

313. The submissions in respect of transport have been comprehensively assessed in some detail by Mr Peake. Rather than summarise again his assessment I have reproduced this below.

### Traffic and Traffic Congestion

5.5 *Of the submissions received, 96 submissions raised traffic or traffic congestion as the primary concern and were opposed to PPC100 seeking that the plan change be declined. Many of the submissions only referred to traffic as the concern with no elaboration.*

5.6 *Where submissions provided more detail, the issues raised can be summarised as:*

- a) general congestion in the area including CRH, SH16 and the surrounding road network;*
- b) Inadequate public transport to support the development;*
- c) Existing footpaths inadequate being inadequate; and*
- d) Construction traffic impacts.*

5.7 *I deal with each of these below.*

*a) General congestion in the area including CRH, SH16 and the surrounding road network*

- 5.8 *The ITA provides a detailed review of the existing traffic conditions within Riverhead and on surrounding roads. It also recognises the existing constraints on SH16 and that there are planned upgrades for SH16 (including the SH16 / CRH intersection).*
- 5.9 *To mitigate the effects of the plan change, the applicant has proposed to undertake upgrades to roads within Riverhead where these are directly affected by PPC100 (such as upgrading to urban standard, provision of footpaths and separated cycle paths), providing additional pedestrian crossings and upgrades to the CRH intersections with Old Railway Road and Riverland Road. The Precinct Provisions require the SH16 / CRH intersection to be upgraded to a roundabout prior to the occupation of any dwellings.*
- 5.10 *I consider that subject to my comments in Section 4 that the existing traffic conditions have been appropriately identified and the effects assessed.*
- b) Inadequate public transport to support the development*
- 5.11 *With regards to public transport, there are currently no funded improvement for additional public transport services within Riverhead in the current Regional Public Transport Plan 2024-2033 (RPTP). However, in the future greater frequency of services into Riverhead are anticipated by Auckland Transport but these are unlikely to occur until land has been rezoned and development is occurring.*
- 5.12 *Notwithstanding, the Applicant has proposed to provide improvements to public transport infrastructure, such as bus stops, and to improve connections to bus stops by way of footpaths and pedestrian crossings so that as public transport.*
- 5.13 *Planned (but unfunded) transport infrastructure by Auckland Transport, such as upgrades to CRH include separated cycle facilities. This will connect to the proposed SH16 upgrades and improve accessibility of Riverhead to the wider area, including Westgate (and Brigham Creek) where there are existing or planned public transport interchanges.*
- c) Existing footpaths inadequate being inadequate*
- 5.14 *It is concurred that there are current gaps in the footpath network within Riverhead with some roads having footpaths only on one side or none at all. These roads tend to be in the areas west of CRH. PPC100 proposes to provide some of the missing footpaths such as along the northern side of Queen Street. This would connect to a new footpath on the western side of Cambridge Road that would extend from Queen Street to Riverhead Road; PPC100 fronts onto Cambridge Road along this section and the road will be upgraded to urban standard. An additional pedestrian crossing is proposed between Edward Street and Princes Street. Footpaths are also proposed along the section of Riverhead Road and CRH to be upgraded.*
- 5.15 *I consider that PPC100 will provide sufficient footpaths both within PPC100 and externally to connect to existing facilities. Pedestrian crossing facilities are also proposed.*
- d) Construction traffic impacts*

- 5.16 *Construction traffic will include heavy vehicle movements as well as construction workers. These workers will generally be travelling in the opposite direction to the peak traffic flows (i.e. arriving in the morning and departing in the afternoon). For the scale of development proposed, I expect that any subdivision or resource consent conditions will require a Construction Traffic Management Plan (CTMP) to manage construction traffic effects. The CTMP will amongst other things be able to limit times of working and / or movement of heavy vehicles. This is considered to be the most appropriate mechanism to manage the construction traffic effects as the CTMP can take into account the road environment (such as any completed upgrades to SH16 or CRH) and the scale of the works being undertaken.*

*Lack of Infrastructure / Transport Infrastructure needed before development*

- 5.17 *97 of the submissions received identified lack of infrastructure or the need for transport infrastructure to be in place prior to development proceeding.*

- 5.18 *As for the submissions relating to traffic, many of the submissions were general in nature but where more detail was provided the key concerns are summarised as:*

- a) The need to upgrade SH16 (both the SH16 / CRH roundabout and four-laning of SH16 between Brigham and Old North Road) and / or for the Kumeu Bypass [Alternative State highway] to be constructed before development occurs;*
- b) Need for additional road capacity;*
- c) Requirement for improved public transport to Riverhead;*
- d) SH16 / CRH roundabout should have a dedicated left turn lane from CRH.*

*a) and b) Upgrade SH16 and / or Kumeu Bypass prior to development and need for additional road capacity*

- 5.19 *The Precinct Provisions for the plan change prevent the occupancy of any dwelling until the SH16 / CRH is upgraded to a roundabout and right turn bays on CRH at the Old Railway Road and Riverland Road intersections are constructed. Other roading upgrades within Riverhead relate to the works being completed prior to the occupancy of buildings where those building have vehicle access onto those roads where an upgrade is required.*

- 5.20 *The primary upgrades of the SH16 / CRH intersection and the two CRH intersections are considered to be the primary measures required to accommodate traffic from PPC100. However, as detailed in my assessment I also consider that the upgrades along SH16 to include two eastbound lanes is required (at least between CRH and Brigham Creek Road) to cater for the increased traffic volumes.*

- 5.21 *NZTA has recognised the need for increased capacity for SH16 and the Brigham to Waimauku SH16 upgrade includes four-laning SH16 between Brigham and Old North Road (Taupaki) roundabout. This project is currently paused as NZTA is seeking additional funding for its implementation. The*

NZTA submission states that the project is anticipated to be completed mid-2029.

- 5.22 *The Government's Position Statement on Transport 2024 (GPS) sets out Roads of National Significance (RoNS). These roads include the Northwest Alternative State highway (Kumeu Bypass). Whilst there is no timing as yet associated with the project this road is set out as a priority for Government to support development in the Northwest of Auckland. This project, once constructed, would result in the reduction of some traffic from the existing SH16 past CRH.*
- 5.23 *From the above it is evident that the need for additional capacity has been recognised and that there are projects planned that would provide that capacity. The Precinct Provisions prevent occupancy of development prior to some of those projects being delivered.*
- c) *Requirement for improved public transport to Riverhead*
- 5.24 *Some submitters considered that public transport in Riverhead should be improved. I discussed this matter in Paragraph 5.11.*
- d) *SH16 / CRH roundabout should have a dedicated left turn lane from CRH*
- 5.25 *Some submitters have questioned the design of the SH16 / CRH roundabout and consider that the roundabout should have a dedicated left turn lane from CRH to SH16. The proposed upgrade to a roundabout is a NZTA project and has not been developed or designed by the Applicant; the Applicant is reliant on the design that has been prepared by NZTA.*
- 5.26 *With regards to the design, it is understood that the design has taken into consideration the traffic volumes from future development with Riverhead. In addition, the Alternative State Highway project will reduce traffic travelling along SH16 in the future. Therefore, this traffic reduction will assist motorists exiting CRH onto SH16. The Alternative State Highway project is part of the RoNS. The timing of this new road is currently unknown, but it is acknowledged that there may be a period of time once the development within Riverhead is fully constructed and the completion of the Alternative State Highway project.*

#### Other Submission Points

- 5.27 *Some submissions (176.1 and 179.1) have raised concern that if the Retirement Village is not constructed, then there will be a lack of cross-site connectivity and local roads, or that there is a lack of connectivity east-west (184.5). Subdivision, including subdivision establishing private roads, is a Restricted Discretionary Activity (RDA). I consider that the Assessment Criteria associated with this RDA would ensure appropriate assessment is undertaken for the location and connectivity of roads within PPC100.*
- 5.28 *Submitters (176.1 and 179.1) raised concern about pinch points on the local road network around the retirement village. I discuss the issue of the connections from Cambridge Road in Paragraph 4.40*
- 5.29 *A submitter (Submission 157.4) considered that cycleways are required around Riverhead and to Westgate. The PPC100 would implement separated cycle ways on Riverhead Road and CRH as well as on the Collector Roads within*

the plan change area. Local roads would have low speeds and low traffic volumes such that cyclists should be able to use those roads without a dedicated facility. Auckland Transport's proposed CRH upgrade as well as NZTA's Brigham to Waimauku SH16 Upgrade includes separated cycle facilities which would provide connections from Riverhead to Westgate. Furthermore, Auckland Transport has also identified a project for the upgrade of Riverhead Road to provide a facility for active modes to travel from Riverhead to Kumeu. The timing of the Auckland Transport projects is currently uncertain.

- 5.30 One submitter (93.1) expressed concern about parking in the vicinity of the Riverhead Memorial Park (War Memorial Park). The plan change does not propose any specific measures at this stage that would affect parking. However, pedestrian crossing facilities are proposed on CRH between Princes Street and Edward Street. This crossing together with the other active mode facilities will enable residents to walk and cycle to the park. This would reduce demand for parking.
- 5.31 Submitter 251.5 raised concern that zoning the land at the northern end of PPC100 would result in the opportunities for improved road access along Duke Street being lost. It is recognised that Duke Street does not currently have footpaths on either side apart from the south side at its western end near relatively new residential development; this is an isolated footpath does not connect to the wider footpath network. The Plan Change could provide opportunities for active mode connections to Te Roera Place. It is considered that the rezoning of this land does not preclude upgrades to Duke Street occurring.

#### Response to Specific Submission Points

##### *Submitter 45.1 – Glenn Gowthorpe*

- 5.32 The submitter raises concerns that the traffic flows used in the traffic models from 2022 are flawed as traffic patterns have now changed with people returning to work back in the office rather than at home post-COVID 19. I discuss this in Paragraph 4.23 and consider that the traffic volumes were not affected by COVID 19.

##### *Submitter 135 – Paul Seymour*

- 5.33 In submission point 135.2, the submitter request that the Activity Status of (A4) and (A5) should be non-complying. I concur that Activity Status (A4) should be non-complying as this relates to Standard IX.6.1(1) for the upgrade of the SH16 / CRH intersection and the upgrades to the two CRH intersections with Old Railway Road and Riverland Road. These upgrades are necessary to support the traffic generated from PPC100 and for safety of CRH and these intersections. However, I acknowledge that the SH16 / CRH upgrade is outside of the control of the Applicant and that should this not proceed or be delayed further than mid-2029 as anticipated by NZTA then this would prevent dwellings being occupied. However, the non-complying status would not necessarily prevent an application being sought for earlier occupation; the Applicant would just need to demonstrate the effect of doing so or an alternative measures of managing the effects.

- 5.34 *For Activity Status (A5) I consider that this should be a Discretionary activity as they are under the control of the Applicant and are important transport measures to support the development. Discretionary status would enable the transport environment at the time of application to be taken into account. However, should they remain a Restricted Discretionary Activity I am comfortable that the assessment criteria in IX8.2(4) are sufficiently detailed to provide a robust assessment.*
- 5.35 *Submission point 135.3 requests that the Assessment Criteria IX8.2(4)(f) should refer to 'peak' rather than 'inter-peak' in relation to the operation of key local road intersections. I agree that the criteria should be amended to peak as it would be important for the intersections to operate at a good level of service to allow for the efficient movement of buses as well as for general traffic.*
- 5.36 *Submission point 135.5 states that schools are a critical piece of infrastructure that have wider transport effects. I concur that traffic associated with schools can have an effect on the safe and efficient operation of the transport network. Whilst the ITA has assumed a school would be included within PPC100, there is no requirement for one to be provided and there is no certainty that this would occur.*
- 5.37 *A school within PC100 would service both residential development within the plan change area and Riverhead at large. The network of roads and walking and cycling facilities would assist in enable students to use active modes to travel to school. Should the school not occur, this is likely to result in additional private vehicle trips outside of Riverhead.*
- 5.38 *I appreciate that there are procedures outside of the Plan Change process that the Ministry of Education would use for the designation of school land. Objective IX2.(8) refers to development being supported by education facilities and Policy IX.3.(6) refers to providing for education facilities, however these are not shown on the precinct plan nor on the Structure Plan that supports PPC100.*

#### 161 – Auckland Transport

- 5.39 *Auckland Transport has submitted a detailed submission.*
- 5.40 *The submission opposes PPC100 as the rezoning of the land occurs without the provision of identified upgrades to Riverhead Road and CRH to support growth in Riverhead. Auckland Transport recognise that the upgrades to some road frontages will be provided but also acknowledges that they do not provide the full extent of upgrade works. Auckland Transport is concerned about the lack of public transport within Riverhead and the active mode connections beyond Riverhead. It therefore considers that the plan change does not give effect to some NPS-UD and RPS objectives and policies.*
- 5.41 *Auckland Transport has sought a range of amendments to the Precinct Provisions to address concerns as to how the plan change would provide infrastructure, mitigate transport effects, and create a well-function environment.*
- 5.42 *I have reviewed the requested changes by Auckland Transport as they relate to traffic and transport and I support the requested changes proposed by Auckland Transport (submission points 161.5 through 161.51).*

5.43 *I do not have specific comments on each of the amendments sought other than as below:*

- a) *Submission point 161.18 seeks Activity (A4) and (A5) to be non-complying. I support (A4) being non-complying. Activity (A4) is the provision of the SH16 / CRH intersection upgrade and two intersection upgrades on CRH. Activity (A5) is for upgrades to the roads surrounding the plan change area. Auckland Transport has identified the need to upgrade CRH and Riverhead Road to support development and whilst the precinct would not provide the full upgrades, they go some way to doing so. Should they not be provided, this would impact on the safe and efficient operation of the road network within Riverhead. I consider that the Activity Status should be a Discretionary or Non-Complying activity as discussed in Paragraphs 4.83 to 4.86.*
- b) *Submission point 161.42 which requests an additional Special Information Requirement to require a Transport Design Report to accompany any proposed new key road intersection or upgrading of key road intersections. I support this addition as this has been commonly adopted in other recent Precinct Provisions for Private Plan Changes.*

Submitter 167 – NZ Transport Agency

- 5.44 *NZTA opposes PPC100 unless relief sought in its submission is addressed.*
- 5.45 *The NZTA supports the policies and standards in relation to buildings not being occupied prior to roading infrastructure being constructed and the Special Information Requirements that ensure NZTA would be consulted on an application for development prior to the upgrade of the SH16 / CRH intersection.*
- 5.46 *NZTA requests at submission point 167.2 that Activity Status (A4) for non-compliance with Standard IX.6.1(1) should be Non-Complying. I concur as the infrastructure is necessary to address effects of PPC100 on this key intersection that non-complying status is appropriate.*

Submitter 186 – Auckland Council as Submitter

- 5.47 *Auckland Council as Submitter (ACS) raises concern that PPC100 is progressing in advance of the required transport infrastructure but acknowledges that the Applicant has gone some way to providing some of that infrastructure or having provisions in place that require development to be staged with transport infrastructure. ACS considers that amendments are necessary to the Precinct Provisions to address the funding and delivery of transport infrastructure.*
- 5.48 *Submission point 186.4 requests that the Precinct Description be updated to identify that transport upgrades are required prior to subdivision and development.*
- 5.49 *The Precinct Description refers to the coordination of subdivision and development with transport infrastructure but is not directive that some of that*

*infrastructure would need to be in place prior to dwellings or buildings being occupied. I concur that the Precinct Description should be updated accordingly.*

- 5.50 *Submission point 186.5 requests that new objective and policies be updated to identify that transport upgrades are required prior to subdivision and development.*
- 5.51 *The Precinct Objectives and Policies (IX2.(5) and IX.3.(4)) refers to the coordination of subdivision and development with transport infrastructure but is not directive that some of that infrastructure would need to be in place prior to dwellings or buildings being occupied. I concur that the objective and policies should be refined.*
- 5.52 *Submission point 186.6 requests new rules and standards that classify subdivision or development that occur in advance of transport upgrades to be non-complying. I concur with this request and consider that Activity (A4) should have Non-Complying status rather than Discretionary.*

Submitter 202 – F Boric & Sons

- 5.53 *Submission point 202.2 requests that Standard IX.6.1(1) Staging of development with transport upgrades should refer to the occupation of 'buildings' rather than 'dwellings' so that commercial dwellings are not operational prior to the necessary transport infrastructure. I concur that the standard should be amended and this would be consistent with Policy IX.3(4) and the Standards IX.6.1(2) to (6) which all refer to buildings rather than dwellings.*
- 5.54 *Submission point 202.3 requests that Activity (A4) should be non-complying. As previously discussed, I agree that this should be non-complying.*
- 5.55 *Submission point 202.5 requests that the full extent of the Stage 2 works of the NZTA Brigham to Waimauku SH16 Upgrades required by Standard IX.6.1(1)(a) are complete and operational prior to the occupation of buildings. For the reasons I outline in Paragraph 4.74 and 4.75, I consider that at least the SH16 / CRH roundabout upgrade and the works east of the roundabout to Brigham Creek Road to provide two eastbound lane should be complete and operational.*
- 5.56 *Submission point 202.6 requests an amendment to Assessment Criteria IX.8.2(4)(g) as a consequence to submission point 202.5 so that the assessment refers to the whole of the Stage 2 works rather than just the roundabout. I concur that a consequential update to the criteria is required and the wording should be updated to match the extent of the upgrade required by Standard IX.6.1(1)(a) as discussed in the previous paragraph.*
- 5.57 *Submission point 202.7 requests that civil infrastructure and construction works be delayed until the Stage 2 upgrades to SH16 are complete. As I discussed in Paragraph 5.16, I consider that the construction can be left to the subdivision and consenting stage to be managed through Construction Traffic Management Plans as the direction of flow of construction traffic at peak times would be in the opposite direction of peak traffic flows travelling to / from Riverhead.*



- 5.58 *Submission point 202.8 requests that the traffic modelling should be updated to include the pedestrian crossings on CRH and on SH16. I concur that these facilities should be included in the traffic modelling as they have the potential to affect the operation of the roundabout. I discussed this in Paragraph 4.68 to 4.71*
- 5.59 *Submission point 202.9 requests that further analysis is required on weekend volumes on the operation of the SH16 / CRH intersection. I concur and recommended further analysis in Paragraph 4.58.*

Submission 203 – Z Energy

- 5.60 *Submission point 203.1 seeks clarification over the extent of works on Cambridge Road and how this may affect the access to the Caltex garage accessed from CRH. I concur that the information provided on the extent of the upgrade is ambiguous and that the works should be clarified (refer to Paragraph 4.39)*
- 5.61 *Submission point 203.2 seeks that the pedestrian crossing on CRH between Princes Street and Edward Street is located so that pedestrian and vehicle safety in the vicinity of the vehicle crossings for the Caltex station are not compromised. I concur that the crossing should be positioned safely and I consider that this is a matter of detail that can be addressed at subdivision or resource consent stage.*
- 5.62 *Submission point 203.3 seeks that Z Energy are consulted about any changes to the road in the vicinity of the Caltex site access. I concur that if site access to the Caltex station is affected that Z Energy should be consulted. However, there is no specific mechanism in the Precinct Provisions for this to occur, particularly as public and limited notification is not required by IX.5(1). This would be addressed if normal notification rules would apply for Restricted Discretionary Activities.*

Submission 205 – Luxembourg Development Company Limited

- 5.63 *This submission relates to a number of landowners and businesses that are directly affected by PPC100.*
- 5.64 *Submission Point 205.7 seeks deletion of specific measures on Precinct Plan 1 including key local roads, key pedestrian connections to the Collector Roads and the straightening of bends on the Collector Roads. I do not support the deletion of these items as these elements provide guidance to the users of the Precinct Provisions and identify measures required by Standard IX.6.1(2) to (6).*
- 5.65 *Submission point 205.10 raises concern about the timing of vesting of land for road widening and that land in different ownership may affect the ability to complete the works. I agree that further detail should be provided to confirm how upgrades would be undertaken where land is in different ownership.*
- 5.66 *Submission point 205.14 requests the deletion of Policy 8 which requires key local roads and pedestrian connections to be provided in general accordance with Precinct Plan 2. I do not support the deletion of Policy 8. The provision of roads and their design is a Restricted Discretionary Activity and therefore changes from the Precinct Plan can be assessed at subdivision / development stage.*

- 5.67 *Submission point 205.23 requests that the minimum Collector Road reserve width be reduced to 21m and that the local road width be reduced to 16m. I do not have concerns with the reduction in the road reserve widths. These would typically provide for the necessary transport infrastructure. These widths are minimums and therefore, if required, the roads could be wider.*
- 5.68 *Submission point 205.24 requests that road widening is to be determined through detailed design. I do not consider that the Precinct Provision needs to address this point.*

Submission 214 – Ministry of Education

- 5.69 *The Ministry of Education is neutral on PPC100.*
- 5.70 *Submission point 214.3 seeks that the Precinct Provisions provide the appropriate level of provision for buses (including school buses to any future school site) and providing for the safety of pedestrians travelling to and from school. I consider that the Precinct Provisions adequately address these matters with some amendments that I have recommended on the need for Riverhead Road to be designed for buses and for some roads to have vehicle access restrictions where there are separated cycle facilities.*
- 5.71 *Submission point 214.4 requests that in accordance with the Section 5.1 of the ITA that development in advance of the relevant supporting transport infrastructure should have a Restricted Discretionary Activity status to ensure that it is appropriately assessed. RDA status applies to all the local road upgrades within Riverhead (Activity (A5)). The Precinct Provisions have development in advance of the SH16 / CRH upgrade works or the upgrades to the CRH intersections as Old Railway Road and Riverland Road as Discretionary, although I recommend (as detailed above) that this should be Non-Complying. Therefore, I consider that the Precinct Provisions provide at least the minimum level of assessment requested by the Submitter.*
- 5.72 *Submission point 214.5 requests the Precinct Provision provide greater specificity and strategic alignment with Auckland Transport to ensure that the PPC outcomes can be delivered (such as speed limit reductions) where there is reliance on these matters to mitigate some of the effects of the proposed rezoning. The setting of speed limits requires changes to the bylaws and is a separate process to the RMA. Therefore, I do not consider it is appropriate to include specific measures in the Precinct Provisions in this regard.*
- 5.73 *Submission point 214.6 requests roading standards to be provided for the surrounding roads (local and/or collector roads) with respect to any future school site and clarity on the responsibility for establishment of the surrounding roads and associated walking and cycling features. The Precinct Provisions clearly sets out the road standards in the in Appendix 1 IX.11.1 and Appendix 2 IX.11.2 Road Function and Design Elements Tables for internal and external roads, respectively. The establishment of the roads is the responsibility of developers. It would not be appropriate to include for specific standards in relation to how roads should be designed adjacent to a school as a school is not currently included within the PPC100.*
- 5.74 *Submission point 214.7 requests the establishment of a safe cycle / walking connection across CRH within the Implementation Plan. Standard IX.6.1(5)(d) requires the provision of a pedestrian crossing facility on CRH between Edward*

*Street and Princes Street when Cambridge Road is upgraded. Other standards also require the provision of walking / cycling infrastructure at intersections. Therefore, I consider that the precinct currently addresses this request.*

314. I generally adopt this assessment and the recommendations from Mr Peake. I have included the changes I recommend in Appendix 5. These may vary slightly in some cases from the wording recommended by Mr Peake. In these instances I may have refined Mr. Peake's wording or I may have combined a number of submission points into a single change to the plan changed provisions. Nevertheless it is not my intention to disagree with the approach recommend by Mr Peake.

*Water and Wastewater Infrastructure*

315. As with the provision of transport infrastructure a number of submissions seek that if PC100 is approved, development does not occur until the necessary improvements and capacity expansion of the water and wastewater networks are made. There is an emphasis in the submissions that these improvements are made in advance of new development.
316. While most these submissions are general in nature, the submissions from WSL and Auckland Council include greater detail.
317. In the notified version of PC100, Objective IX.2(6) subdivision is to be co-ordinated with a range of infrastructure (not including wastewater) and policy IX(3)(5) requires subdivision and development to be co-ordinated with a range of infrastructure. There are no precinct standards that would require the provision of water and wastewater infrastructure ahead of development other than some assessment criteria. It appears that reliance is placed on assessment criteria and the relevant subdivision standards in Chapter E38 of the AUP.
318. In my view the objectives and policies are rather weak and the reliance on assessment criteria rather than specific standards is not sufficient to ensure that the necessary infrastructure will be in place. It is also unclear as to when the infrastructure should be ready in relation to development.
319. The WSL submission requests that development must be precluded by the precinct provisions from proceeding prior to completion of any necessary bulk water supply and wastewater projects required to service development enabled by PC100. To this end WSL request that non-complying activity status be applied to any subdivision and / or development that precedes the provision of adequate bulk water supply and waste water infrastructure. These requests are supported by changes requested to the relevant objectives, policies and other provisions of PC100 including specific rules precluding development and subdivision without the provision of water and wastewater infrastructure. I consider that these changes are necessary. WSL also seek that it be notified of applications for development in advance of the provision of water and wastewater infrastructure. I consider that this is unlikely to be provided for under the RMA but note that infrastructure providers are listed in Rule C1.13(4) which sets out those entities that the Council will give specific consideration to in making notification decisions. I consider specific reference to notifying WSL does not need to be included within the Precinct.
320. In my view due to uncertainties about when the entire plan change area will be able to be served by water and wastewater infrastructure and the possibility that some capacity will not be available for some years in the future, that the changes sought by WSL are

warranted. The changes sought align with similar changes sought by Auckland Council (and AT in respect of transport).

#### *Stormwater*

321. A number of submissions include references to stormwater infrastructure as well as the transport, water and wastewater infrastructure. Stormwater is discussed in section 10.5 Flooding below .

#### *Electricity and Telecommunications.*

322. While electricity and telecommunications do not appear to be the prime concern of submitters I note that the relevant bodies responsible for the delivery of these services have confirmed that the plan change area can be served for electricity and telecommunications.

#### *Integration of infrastructure and development*

323. If PPC100 is approved many of the submissions discussed above have requested that the infrastructure be provided ahead of development. I generally support this approach as adverse outcomes and inefficiencies result when there is a lag between subdivision and / or development and supporting infrastructure. I consider that the details of how the provisions are written to achieve the outcomes sought in these submissions is important. For example the provisions as notified generally refer to the occupancy of dwellings being the trigger point for when supporting infrastructure has to be complete. I consider that occupancy is a potentially ill-defined point in time, and it is not related to the subdivision of land and the issue of titles, which is more defined and when demand for services actually begins. In Appendix 5 I have set out draft changes to the notified provisions that respond to the submissions above but also clarify the points in time or the events by which infrastructure should be provided. This is approach is specifically requested in the submission from Auckland Transport.

#### Interim recommendations on submissions

324. That submissions 17.2, 20.2, 24.6, 38.1, 43.2, 46.2, 46.3, 48.2, 50.2, 50.3, 55.2, 66.4, 72.1, 78.2, 80.2, 85.2, 85.3, 91.2, 94.2, 94.4, 95.2, 98.2, 98.3, 104.2, 104.4, 105.2, 113.2, 114.2, 114.23, 116.2, 132.2, 133.2, 135.2, 135.3, 142.2, 156.2, 157.3, 157.5, 157.7, 161.5, 161.6, 161.7, 161.8, 161.9, 161.10, 161.11, 161.12, 161.13, 161.14, 161.15, 161.16, 161.17, 161.18, 161.19, 161.24, 161.25, 161.26, 161.27, 161.28, 161.29, 161.30, 161.31, 161.34, 161.35, 161.36, 161.37, 161.38, 161.39, 161.41, 161.42, 161.43, 161.44, 161.45, 161.46, 161.47, 161.48, 161.49, 161.50, 161.51, 162.2, 166.1, 167.2, 174.7, 174.23, 186.4, 186.5, 186.6, 186.8, 201.2, 202.2, 202.3, , 202.7, 202.8, 202.9, 203.1, 203.2, 203.3, 214.7, 218.2, 218.3, 218.4, 218.5, 218.6, 218.8, 218.9, 218.10, 218.11, 218.13, 218.14, 245.2, 248.6, 248.7, and 252.2 be accepted
325. That submissions 24.5, 30.1, 41.2, 43.3, 62.2, 67.2, 90.4, 101.2, 109.2, 111.2, 114.3, 114.4, 114.5, 129.2, 157.1, 157.2, 157.4, 166.2, 169.2, 169.4, 174.2, 174.3, 174.4, 174.5, 184.4, 184.5, 185.5, 202.5, 202.6, 218.7, 218.15, 250.2, 214.2, 214.3, and 248.3 be accepted in part to the extent set out in Appendix 5.
326. That submissions 135.4, 135.5, , 174.6, 202.4, 214.5, 214.6, 218.12, and 214.4 be rejected

327. Should PPC100 be approved the changes resulting from this recommendation are set out in Appendix 5

### 10.5 Submissions concerning schools and education

328. Table 10.5.1

Sub Point	Submitter Name	Summary of Decisions Requested	Further subs	S42A Recommendation
24.4	Kate Frances Lyon	If approved urgently provide a high school		Reject
46.4	Eanna Geoghegan	Provision of a high school is required		Reject
48.3	Michael Brent	If approved ensure adequate primary and secondary schools in the NW		Reject
94.3	Thomas Michael Kelly	If approved include clear rules around upgrades for schools		Reject
113.3	Nathalie Lapuente Guzman	If approved make upgrades to school infrastructure including a secondary school		Reject
133.3	Duncan Whittaker	If approved schooling to be put in place before any future development		Reject
162.4	Ryan Sclanders	If approved Work with the MOE to build new schools in the area		Reject
184.6	Graham and Sunita Ramsey	Any further development to Riverhead should address the lack of capacity for schools		Reject
214.1	Te Tāhuhu o te Mātauranga   Ministry of Education	Retain: Objective 8: Development is supported by social facilities, including education and healthcare facilities. Policy 6: Provide for new social facilities, including education facilities, that meet the needs of the community.		Accept
245.3	Rose-Muirie Cook	If approved a completed high school		Reject

248.8	Linda Barton-Redgrave	If approved Riverhead will need another primary school as the current site is too small. I'd like to see a long term plan for where the children from the proposed development will attend school.		Reject
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### Discussion

329. Most of the submissions above request that PPC100 provide for improved and / or additional school facilities within Riverhead. Some of these submission points set out an alternative relief to a submitter's request that PPC100 be declined or approved subject to changes as noted in section 10.3 above. While the overall recommendation of this report is that PPC100 should be declined at this time, I have included recommendations on the changes sought in these submissions should the Commissioners decide to approve PPC100.
330. The provision of schools is the responsibility of the Ministry of Education (MoE). In most cases the Ministry will use its power of designation to provide for new school sites but is also able to use the discretionary activity resource consent applications provided for in residential zones in the AUP. It is not necessary to provide land to be zoned for a school or schools. The AUP does include a special purpose school zone that applies to Auckland's independent and integrated schools and associated community facilities. However this does not apply to public schools which rely the designation processes under the RMA.
331. Accordingly there is no need for PPC100 to be amended to provide for schools. I do note that the plan change area is relatively large and is capable of providing land for a school should the MoE decide that one is needed for increased population.
332. The MoE submissions requests that the objectives and policies that support the provision of education facilities within the precinct be retained. This is supported for the reasons set out above.

### Interim recommendations on submissions

333. That submissions 24.4, 46.4, 48.3, 94.3, 113.3, 133.3, 162.4, 184.6, 245.3 and 248.8 be rejected.
334. That submission 214.1 be accepted.
335. There are no changes resulting from these recommendations

### **10.6 Submissions concerning flooding and stormwater**

336. Table 10.6.1

Sub Point	Submitter Name	Summary of Decisions Requested	Further subs	S42A Recommendation
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90.3	Nicholas William Edward Bastow	If approved develop outside of flood plains		Accept
98.4	Bridget Michelle Hill	Provide an up to date floodwater assessment before decisions are made and ensure rules are based on updated assessment.	FS09 Support	Accept
104.3	Jan Henderson	If approved upgrade the stormwater \ infrastructure		Accept
109.3	Steve Pike	If approved upgrade the stormwater infrastructure		Accept
111.3	Lewellan Sclanders	If approved address the flooding threat		Accept
113.4	Nathalie Lapuente Guzman	If approved upgrade the stormwater infrastructure		Accept
114.19	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Provide a robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.	FS07 Oppose FS09 Support	Accept
114.20	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Remove the clause 'as far as practicable' from Objective (6), for example: "Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment."	FS07 Oppose FS09 Support	Accept
156.3	Gail Sclanders	If approved address flooding		Accept
161.40	Auckland Transport	Amend Assessment Criteria IX.8.2(2)(n) under the heading 'Stormwater and flooding' as follows: '(n) The design and efficacy of infrastructure and devices with consideration given to the likely effectiveness, ease of access, operation, ongoing viability and maintenance, and integration with the surrounding environment		Accept

		including the road corridor where relevant.'		
162.3	Ryan Sclanders	If approved review and fix the Storm water issues in Riverhead so that we don't have to worry about our houses each time it rains		Accept
171.2	John Armstrong	If approved provide water control around the Wautati Stream		Accept
174.19	Claire Walker	I want robust peer review and an overall bottom-line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.	FS07 Oppose FS09 Support	Accept
174.20	Claire Walker	I want the clause of 'as far as practicable' to be removed from Objective (6), for example: "Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.". Stormwater and flooding is a serious matter and the objective should not include wording which makes achieving expected outcomes optional.	FS07 Oppose	Accept in part to the extent set out in Appendix 5
174.21	Claire Walker	I want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to align with development of the stormwater/green network	FS07 Oppose FS09 Support	Reject



		corridor necessary to support that development.		
184.7	Graham and Sunita Ramsey	Any further development to Riverhead must fully address community concerns regarding flooding		Accept
186.3	Auckland Council	Retain the extent of the Stormwater Management Flow 1 area.	FS07 Oppose FS09 Oppose	Accept in part to the extent set out in Appendix 5
186.9	Auckland Council	Amend the Precinct to address concerns in this submission relating to the adverse stormwater effects of urbanisation and downstream flooding.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose FS09 Oppose	Accept
186.10	Auckland Council	Any other alternative or consequential amendments to address the matters outlined in this submission.	FS05 Oppose in part FS06 Oppose in part FS07 Oppose FS09 Oppose	Accept
205.20	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Amend the stormwater flooding matters to address stormwater quality, quantity and flooding matters distinct from limiting mitigation measures to one solution in IX.8.2(2)(m)-(p).	FS09 Oppose	Reject
205.21	Luxembourg Development Company Ltd; Riverhead Treelife Trustee	Retain the remainder of IX.8.2 as notified except where consequential relief is necessary to		Accept

	Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	address matters otherwise addressed by this submission		
186.2	Auckland Council	a. Amend the zoning of the land within the plan change so that: i. The extent of the Rural – Mixed Rural zone encompasses all land in the plan change area that is within areas subject to significant risk of flooding and/or the National Grid Yard (Uncompromised).	FS05 Oppose FS06 Oppose in part FS07 Oppose FS09 Oppose	Accept
186.7	Auckland Council	Amend the Precinct to add new objectives, policies and rules to ensure downstream hazards are not exacerbated and to require appropriate mitigation.	FS07 Oppose FS09 Oppose	Accept

### Discussion

337. The majority of these submissions seek that additional information be provided around flooding, that new development should take place outside of flood plains and that the stormwater infrastructure is suitably upgraded to address the threat of flooding. Specific requests relate to removing the words as far as practicable from objective 6 which relates to stormwater management and adding additional text into assessment criteria IX.8.2(2)(n) particularly in respect of the operation of stormwater devices. Some of these submission points set out an alternative relief to a submitter's request that PPC100 be declined or approved subject to changes as noted in section 10.3 above. While the overall recommendation of this report is that PPC100 should be declined at this time, I have included recommendations on the changes sought in these submissions should the Commissioners decide to approve PPC100.
338. The submission from Luxembourg Development Company and others seeks that alternative means of addressing flooding and stormwater quality other than through an SMP be introduced or allowed in the assessment criteria IX.8.2, but that otherwise the criteria be retained.
339. In my view the majority of these requests seek similar outcomes as those set out in the Healthy Waters review in Appendix 6. These include additional assessments and if necessary additional mitigation to avoid flooding downstream or within the plan change area itself. I note that given the information provided to date it is considered that the flooding effects of PPC100 are such that it should not be approved unless the identified effects can be suitably managed. Healthy Waters have recommended a number of changes to the precinct provisions that will also assist in achieving the assurances regarding flooding sought by the submitters. These appear to fit within the scope of submissions and accordingly they are recommended to be included within PPC100 if it is approved.

340. The submission from Claire Walker requests that the overall stormwater corridor system and green network be agreed in advance prior to development rather than incrementally as development progresses. While the framework for this is provided within PPC100 I do not consider that it is practicable to design the details of the entire network in advance. Various landowners within the plan change area are free to develop their land when they see fit and it does not seem practicable to provide a detailed staging mechanism within the PPC100. The requirement for all development to take place in accordance with Precinct provisions and the SMP will in my view assist in integrating the stormwater management undertaken by each landowner and ensure that the overall stormwater management system integrates with the Council's network discharge consent.
341. In respect of the submission from Luxembourg and others, I consider that the assessment criteria provided (and as proposed to be modified) are necessary should the plan change be approved. It is necessary to show that development is in accordance with an approved SMP in order for the development to fit within the councils NDC. If a developer wished to apply for its own NDC, it is able to do that, But that would require a separate resource consent application. Assessment criterion(o) addresses with a proposal increases flooding with the inference that development should not increase flooding in all flood events up to the 100 year ARI flood event. I consider that this criterion is also necessary. Accordingly I consider that this submission should be rejected. Subject to any other changes recommended, I recommend that submission 205.21 which seeks retention of IX.8.2 assessment criteria be accepted.
342. The submission from Auckland Council supports the changes sought by Healthy Waters set out in paragraph 250 above. I consider that these submissions should be accepted.

Interim recommendations on submissions

343. That submissions 90.3, 98.4, 104.3, 109.3, 111.3, 113.4, 114.19, 114.20, 156.3, 161.40, 162.3, 171.2, 174.19, 174.20, 184.7, 186.9, 186.2, 186.7 186.10, and 205.21 be accepted
344. That submission 186.3 be accepted in part to the extent set out in Appendix 5
345. That submissions 174.21 and 205.20 be rejected.
346. Should PPC100 be approved the changes resulting from this recommendation are set out in Appendix 5

**10.7 Submissions concerning parks/ reserves/ greenspaces**

347. Table 10.7.1

Sub Point	Submitter Name	Summary of Decisions Requested	Further subs	S42A Recommendation
50.4	Shanley Joyce	If approved improve parking/ footpath around Riverhead Memorial Park		Reject
50.5	Shanley Joyce	If approved provide better greenspaces and single housing to reflect existing Riverhead community		Accept in part to the extent set out in Appendix 5

81.2	Ed Stubenitsky	Adequate provisions for quality parks and open spaces.		Accept
95.3	Ella McIntosh	If approved provide for greenspaces and parks		Accept
98.5	Bridget Michelle Hill	Provide a clear requirement to provide neighbourhood parks.	FS09 Support	Accept
98.6	Bridget Michelle Hill	A park should be provided at 298 Riverhead Road		Reject
98.7	Bridget Michelle Hill	Provide a contiguous green corridor that is offered to the Council for vesting.	FS09 Support	Accept
98.8	Bridget Michelle Hill	Provide a secondary pedestrian link to into Duke Street or Te Roera.		Reject
104.5	Jan Henderson	If approved clearly identify areas to be put aside for parks and reserves including 306 Riverhead Rd		Accept in part to the extent set out in Appendix 5
112.2	Josette Barbara Haggren	Include provisions to retain large trees		Accept
112.3	Josette Barbara Haggren	Provide for walkways		Accept
114.14	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy	FS07 Oppose FS09 Support	Accept
114.17	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Require the 20m margin of land from the stream in the MRZ to be zoned as public open space and vested to the council	FS07 Oppose FS09 Support	Reject
114.18	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	The green corridor to be extended to the open space esplanade reserve and be available for public access	FS07 Oppose FS09 Support	Reject
114.21	Riverhead Community	Require the overall stormwater corridor	FS07 Oppose	Reject

	Association (formerly Riverhead Residents and Ratepayers Association)	system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals	FS09 Support	
114.24	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Ensure the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development	FS07 Oppose FS09 Support	Accept in part to the extent set out in Appendix 5
114.25	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	That necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism .	FS07 Oppose FS09 Support	Reject
114.26	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Provide a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required	FS07 Oppose FS09 Support	Accept
114.27	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Extend the green corridor to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve	FS07 Oppose FS09 Support	Reject
114.28	Riverhead Community Association (formerly	Clear objectives, polices, standards and design/outcome expectations are required	FS07 Oppose FS09 Support	Accept

	Riverhead Residents and Ratepayers Association)	in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome		
114.29	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	A neighbourhood park to be located to include the Beech tree and the overall grove of high value trees	FS07 Oppose	Reject
132.3	Declan Penfold	The proposed development must prioritise the preservation and expansion of green spaces to sustain our community's beauty and environmental well-being		Accept
132.4	Declan Penfold	Proper parks infrastructure, including paved sidewalks, adequate drainage, and designated parking areas,		Accept in part to the extent set out in Appendix 5
135.6	Paul Seymour	Supports IX.6.3 Riparian Margins and consider this will encourage biodiversity within the stream network		Accept
157.6	Rob Mitchell and Karina Mitchell	New development must provide for public parks		Accept
174.16	Claire Walker	Overall, our community wants the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.	FS07 Oppose	Accept
174.17	Claire Walker	I want provision to require the 20m margin of land from the stream to be	FS07 Oppose	Reject

		zoned as public open space and vested to the council. Development should be required to deliver environmental restoration and improvements to the of 20m corridor.		
174.18	Claire Walker	I want the green corridor to be extended to establish an open space esplanade reserve and be available for public access. The river is an important taonga for our community.	FS07 Oppose FS09 Support	Reject
174.24	Claire Walker	I want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.	FS07 Oppose FS09 Support	Accept
174.25	Claire Walker	I seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).	FS07 Oppose FS09 Support	Reject
174.26	Claire Walker	I want a clear description the intended composition corridor to be set out in the plan, including an explanation of how the	FS07 Oppose FS09 Support	Accept

		multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.		
174.27	Claire Walker	I want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve, and require environmental improvements to the degraded margins.	FS07 Oppose FS09 Support	Reject
174.28	Claire Walker	Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted, will not achieve this outcome.	FS07 Oppose FS09 Support	Accept
174.29	Claire Walker	I want a neighbourhood park to be located to include the Beech tree and the adjacent grove of high value trees at this location. These trees represent remnant heritage features and are important to the Riverhead Community. They can provide a unique opportunity to establish some old Riverhead character in the new Riverhead development, along with established ecology and habitat.	FS07 Oppose	Reject
184.9	Graham and Sunita Ramsey	The proposal would benefit from the multi-purpose green corridor		Accept in part to the extent set out in Appendix 5



		linking the proposed network directly to the Memorial Park		
205.19	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Delete the multi-purpose green corridors in IX.8.2(2)(i)-(k).		Reject
248.5	Linda Barton-Redgrave	If approved I would like to see a clear green corridor established for the many native birds in our area, and for walkways alongside this corridor and connecting paths throughout the development.	FS09 Support	Accept

### Discussion

348. These submissions raise a number of issues concerning the provision of open space. In preparing this section of the report I have taken account of the assessment from Douglas Sadlier for the Council Parks department. Some of these submission points set out an alternative relief to a submitter's request that PPC100 be declined or approved subject to changes as noted in section 10.3 above. While the overall recommendation of this report is that PPC100 should be declined at this time, I have included recommendations on the changes sought in these submissions should the Commissioners decide to approve PPC100.

#### *Green Corridors*

349. A number of submissions request the provision of continuous green corridors. This concept has been proposed by the applicant. The assessment from Mr Sadlier has some support for the concept but considers that the objectives, policies and rules within the PPC100 are not adequate to achieve these in practice. There are also uncertainties around who will be responsible for the corridors in the long term.

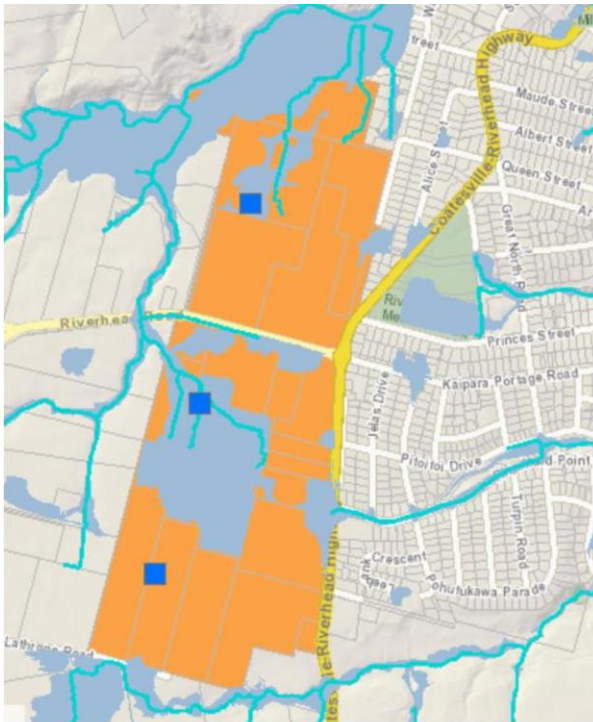
350. I consider that there are deficiencies in the objective and policy structure in respect of these corridors. Firstly there is no specific objective in respect of these and secondly the main policy (i.e. IX.3(13)) is relatively weak in that it only encourages the provision of the green corridors. The submissions provide the ability to provide objectives and policies that give greater certainty that these will be provided. However I note that the applicant should provide more evidence regarding how these green corridors will be managed in the long term, as currently Council's Parks and Community Facilities Department does not consider the current proposals to be feasible.

351. The submission from Luxembourg Development and others seeks that the green corridors be deleted, I consider that the green corridors should remain within PPC100

as they make up the structure of the plan change area and have been developed in consultation with iwi. However I agree that the mechanisms to ensure that they can be implemented require further development as discussed above.

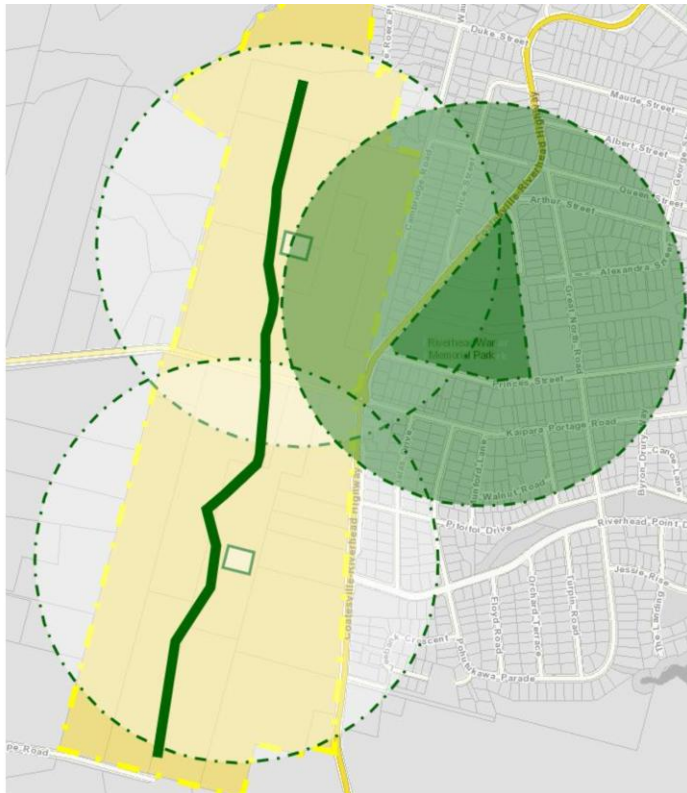
#### *Location of neighbourhood parks*

352. A number of submissions request that there should be clearer requirements to provide neighbourhood parks and the locations of these should be certain. A number of submissions also seek that the site at 306 Riverhead Road be a neighbourhood reserve. The Precinct Plan 2 shows the indicative locations of three neighbourhood reserves. Two of these are located within a flood plain as shown on the diagram below taken from Mr Sadler's review.



**Figure 11:** IX.10.2 Riverhead: Precinct plan 2 area (orange) and the three park locations

353. The review from Mr Sadler considers that only two neighbourhood reserves are required and sets the locations for these in the review. These locations are not located within flood plains and are better spread to provide easier access to more people. These are shown on the diagram taken from Mr Sadler's review.



**Figure 13:** 'Pedestrian shed' analysis best locations for two additional parks for PC100 precinct plan purposes with multi-purpose green corridor (Source: Rahman Bashir – Principal Property Provision Specialist)

354. I consider that these locations better fit with the Council's parks planning and avoid areas of flood plains.
355. The site at 306 Riverhead road is located adjacent to the western boundary of the plan change area on the south side of Riverhead Road. The site contains a number of mature trees including the beech tree that is proposed to be retained. However I consider that this site is not a good candidate for being a neighbourhood reserve. As it is located on the edge of the urban area, it is not in an efficient location in respect of its ability to serve the greatest number of people. Additionally parts of the site are located within a flood plain which also impacts negatively on its usefulness.

*Esplanade Reserves/ riparian planting*

356. A number of submissions seek that esplanade reserves of 20m and other connections be established through the land in the north of the plan change area that is proposed to be zoned Rural- Mixed Rural Zone.
357. I consider that it is not practicable to provide for these matters through the PPC100 process. Esplanade reserves are provided on subdivision of the land and are not generally required on sites greater than 4ha unless the Council is willing to pay for the land. As PPC100 does not provide for an urban zone for that land further subdivision is unlikely (particularly for sites of less than 4ha). This therefore does not allow the Council to require esplanade reserves.
358. The submitters suggestion that potential esplanade reserve areas be zoned open space zone is also not likely to be practicable. Zoning cannot be used to effectively acquire land for reserve purposes. If the Council is of the view that esplanade or other reserves

and or connections should be provided in this area in advance of subdivision then other mechanisms outside of PPC100 should be used such as the use of designations powers under the RMA.

359. However a number of these submissions appear to provide support for the amendments sought by Ms Wong in respect of riparian planting to streams and wetlands.

Interim recommendations on submissions

360. That submissions 50.4, 98.6, 98.8, 114.17, 114.18, 114.21, 114.27, 114.29, 174.17, 174.18, 174.25, 174.27, 174.29 and 205.19 be rejected.
361. That submissions 50.5, 104.5, 114.24, 132.4 and 184.9 be accepted in part to the extent set out in Appendix 5
362. That submissions 81.2, 95.3, 98.5, 98.7, 112.2, 112.3, 114.14, 114.25, 114.26, 114.28, 132.3, 135.6, 157.6, 174.16, 174.24, 174.26, 174.28 and 248.5 be accepted
363. Should PPC100 be approved the changes resulting from this recommendation are set out in Appendix 5.

**10.8 Submissions concerning zoning and specific provisions**

364. Table 10.8.1

Sub Point	Submitter Name	Summary of Decisions Requested	Further subs	S42A Recommendation
24.2	Kate Frances Lyon	If approved provide low density housing instead of medium with minimum 800m2 sections.		Reject
24.3	Kate Frances Lyon	If approved keep housing style as existing		Reject
66.2	Hawk Ellery Freight Services Ltd	Include provisions to retain Riverhead's rural village character		Reject
80.3	Matthew Fisher	If approved don't build apartments		Reject
81.3	Ed Stubenitsky	Appropriate provision for parking		Reject
85.4	Alan Macleod	If approved change provisions to ensure the current ambience in Riverhead is maintained.		Reject
85.5	Alan Macleod	If approved revisit / remove commercial area opposite Hallertau		Reject
90.2	Nicholas William Edward Bastow	If approved reduce to low density		Reject
95.4	Ella McIntosh	If approved review details of retirement village site	FS05 Oppose in part	Reject

			FS06 Oppose in part	
98.9	Bridget Michelle Hill	Provide two distinct approaches, one with the retirement village and one without.	FS05 Oppose FS06 Oppose	Reject
98.10	Bridget Michelle Hill	Have a considered approach to zoning and interface with existing Riverhead.		Accept in part to the extent set out in Appendix 5
98.11	Bridget Michelle Hill	Any new business zoning should be required to demonstrate a consolidated and legible town centre including removal of local centre opposite Riverhead Point Road.		Accept in part to the extent set out in Appendix 5
98.12	Bridget Michelle Hill	Increased residential density (MHS Zone) should be balanced with stronger requirements for good urban design.	FS09 Support	Reject
98.13	Bridget Michelle Hill	The THAB Zone should be based on a reasoned analysis to reflect the intent of the zone and transitions should be provided to the MHS zone.		Accept in part to the extent set out in Appendix 5
174.30	Claire Walker	It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place, or not. Requiring cross site connectivity and local roads for the scenario of the retirement village not being built. The interface with the residential community at Cambridge Road should be addressed in terms of appropriate built form and interface outcomes.	FS05 Oppose FS06 Oppose FS07 Oppose	Reject
112.4	Josette Barbara Haggren	Include a clause for no high fences		Accept

114.6	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.	FS05 Neutral FS06 Neutral FS07 Oppose	Accept in part to the extent set out in Appendix 5
114.7	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.	FS07 Oppose	Accept in part to the extent set out in Appendix 5
114.8	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.	FS07 Oppose	Accept in part to the extent set out in Appendix 5
114.9	Riverhead Community Association	MHS zoning should be balanced by good urban design and green	FS07 Oppose	Reject

	(formerly Riverhead Residents and Ratepayers Association)	infrastructure with graduated density provided.	FS09 Support	
114.10	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Front yards should be sized to be adequate for planting large trees, for example, 6 metres and a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.	FS07 Oppose FS09 Support FS09 Oppose	Reject
114.11	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.	FS07 Oppose	Accept
114.12	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.	FS07 Oppose FS09 Support	Accept
114.13	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Require minimum tree quantity outcomes for new roads	FS05 Oppose FS07 Oppose FS09 Support	Reject
114.15	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.	FS07 Oppose	Accept in part to the extent set out in Appendix 5
114.16	Riverhead Community Association (formerly Riverhead Residents and	The transition edge of THAB to the Mixed House Suburban zone should contain a local road to create a natural transition space	FS07 Oppose	Accept in part to the extent set out in Appendix 5

	Ratepayers Association)	between the different densities and building scale/forms.		
114.30	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	That the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built	FS05 Oppose FS06 Oppose FS07 Oppose	Reject
129.3	Allan Irad Maclean	Impose restrictions as to the type of housing to be permitted		Reject
129.4	Allan Irad Maclean	Do not allow ribbon development opposite Hallertau		Reject
135.7	Paul Seymour	The front yard set back should be increased to 3m, rather than the 2.5m proposed by Table IX.6.9.1.		Reject
157.8	Rob Mitchell and Karina Mitchell	Consult community on type and style of buildings in order to maintain current pleasant community feel		Reject
161.20	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by deleting (A7) as follows, together with the associated permitted activity status: 'Restaurants and cafes up to 250m <sup>2</sup> gross floor area per site' Make consequential amendments to the exclusions listed under Standard IX.4 Activity table, for Sub-precinct A.	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.21	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by deleting (A8) as follows, together with the associated permitted activity status: 'Retail up to 100m <sup>2</sup> gross floor area per site'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept



161.22	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by amending (A9) as follows: 'Healthcare facility up to 250m <sup>2</sup> gross floor area'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
161.23	Auckland Transport	Delete Standard IX.5 Notification (1) to enable the normal RMA notification tests to apply. Make a consequential amendment to IX.5(2) to delete reference to (1).	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose FS08 Support	Accept
161.32	Auckland Transport	Retain Standard IX.6.3(1)(a).	FS07 Oppose	Accept
161.33	Auckland Transport	Amend Matters of Discretion IX.8.1(1) to read: 'Healthcare facility up to 250m <sup>2</sup> gross floor area per site.'	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Accept
167.3	NZ Transport Agency Waka Kotahi (NZTA)	In order to remain consistent with the RMA, IX.5 Notification should be amended from enabling applications to be considered without public or limited notification from a restricted discretionary activity to a controlled activity.	FS07 Oppose	Accept
174.8	Claire Walker	I want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village (if it	FS05 oppose FS06 Oppose FS07 Oppose	Accept in part to the extent set out in Appendix 5

		happens) and commercial activities that can be undertaken in the THAB zone via resource consent.		
174.9	Claire Walker	I want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.	FS07 Oppose	Accept in part to the extent set out in Appendix 5
174.10	Claire Walker	I want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.	FS07 Oppose	Accept in part to the extent set out in Appendix 5
174.11	Claire Walker	Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be	FS07 Oppose	Reject

		considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.		
174.12	Claire Walker	I want front yards sized to be adequate for planting large trees. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.	FS07 Oppose	Reject
174.13	Claire Walker	I want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.	FS07 Oppose	Accept
174.14	Claire Walker	I want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.	FS07 Oppose FS09 Support	Accept
174.15	Claire Walker	To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, I request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.	FS07 Oppose FS09 Support	Reject
184.2	Graham and Sunita Ramsey	Any development should be primarily H3 Residential – Single House Zone in keeping the existing character of Riverhead.		Reject

184.3	Graham and Sunita Ramsey	Any request to rezone to H6 Residential - Terrace Housing and Apartment Buildings Zone should be rejected		Reject
184.8	Graham and Sunita Ramsey	The property bounded by Alice St and Coatesville-Riverhead Highway should be designated as the local centre to respect the existing town centre.		Accept in part to the extent set out in Appendix 5
205.2	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Amend the size of the Business - Local Centre Zone to better reflect the realistic opportunities in the short to medium term for retail and services.		Reject
205.3	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Delete or reduce the size of the Business - Neighbourhood Centre Zone		Reject
205.4	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Table IX.4.2 – Cap non-residential activities in Sub-precinct A to the sub precinct as a whole rather than on a per site basis.		Reject
205.5	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Amend the zones to either reduce the extent of Residential – Terrace Housing and Apartment Buildings Zone and/or utilise the Residential – Mixed Housing Urban Zone as a part or full replacement or alternative.		Reject

205.6	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Delete Precinct Plan 1 and the relevant supporting provisions in the Precinct.		Reject
205.7	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Amend Precinct Plan 2 to: <ul style="list-style-type: none"> <li>• Delete the Multi-purpose Green Corridor and replace it with an annotation for stormwater conveyance.</li> <li>• Straighten the “bends” in the Collector Roads.</li> <li>• Delete the “key local roads”.</li> <li>• Align the “key pedestrian connections” to the Collector Roads.</li> </ul>	FS04 Oppose	Reject
205.8	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Amend Objective 3 as follows: (3) Activities in the Business – Local Centre zone provide for the day-to-day needs of the community and local employment opportunities and complement the function, role and amenity of the City Centre Zone, Business – Metropolitan centre Zone and Business – Town Centre Zone		Reject
205.9	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad	Amend the policies, activity table and provisions (standards) to avoid the creation of opportunities where third parties or other landowners could	FS04 Oppose	Reject

	Tahir, Boman Zakeri	prevent the development of the Precinct.		
205.10	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Clarify that road widening relates to the vesting of land for that purpose at the time of subdivision and development of that site.	FS04 Oppose	Reject
205.11	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Amend Policy 3 as follows: (3) Encourage appropriately-scaled office activities, including co-working spaces, to establish in the Local Centre zone to provide for the day-to-day needs of the community, local employment opportunities and support the surrounding land uses in Riverhead Precinct		Reject
205.12	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Reference to subdivision should be deleted from Policy 5.	FS02 Oppose  FS04 Oppose	Reject
205.13	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	The activity table at IX.4.1 should be amended to separate subdivision from development. Subdivision should have blanket RD status.	FS02 Oppose  FS04 Oppose in part  FS08 Oppose	Reject
205.14	Luxembourg Development Company Ltd; Riverhead Treelife Trustee	Delete Policy (8)	FS04 Oppose	Reject

	Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri			
205.15	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Delete Policy (13)	FS09 Oppose	Reject
205.16	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Amend Policy 17 to <ul style="list-style-type: none"> <li>• delete references to the multipurpose green corridor; and</li> <li>• focus on appropriate solutions for stormwater conveyance, along with treatment and retention/detention.</li> </ul>	FS09 Oppose	Reject
205.17	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Retain IX.8.1 Matters of Discretion as notified except where consequential relief is necessary to address matters otherwise addressed by this submission.	FS09 Oppose	Accept
205.22	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Delete IX.9(3) Retain the remainder of IX.9 as notified.		Reject
205.23	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad	Reduce the width of Collector Roads (without adjacent reserve) to 21m and Local Road to 16m as minimums.	FS04 Oppose	Accept

	Tahir, Boman Zakeri			
205.24	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Identify that road widening is to be determined through detailed design.	FS04 Oppose	Reject
205.25	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Retain the remainder of the table IX.11.1 Appendix 1: as notified.		Reject
205.18	Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri	Delete reference to streets in IX.8.2(2) and Policy IX.3(19) and limit the provisions to the design of public open spaces.		Reject
227.2	Timothy Mark Hillier	No THAB zoning		Reject
227.3	Timothy Mark Hillier	Height overlays applied to all areas limiting building heights to two stories		Reject
227.4	Timothy Mark Hillier	Protections around existing character/rural character		Reject
227.5	Timothy Mark Hillier	More comprehensive zoning around town centres for both sides of highway, not just developers land.		Accept in part to the extent set out in Appendix 5
248.2	Linda Barton-Redgrave	If approved I would like consideration to be given to linking the design and layout of the proposed subdivision with the existing Riverhead village character as part of the		Reject



		requirements for the proposed subdivision (similar to that of Riverhead South).		
248.4	Linda Barton-Redgrave	If approved I'd like to see a more thorough plan for the proposed commercial zone, a business case that justifies if we need it, and detail about what sort of retail or commercial spaces are envisioned, and where shoppers will park so that the commercial area doesn't add to yet more traffic congestion.		Accept
161.4	Auckland Transport	Amend the plan change by including precinct provisions (an objective, policy, a standard, matter(s) of discretion, and assessment criteria) to require that future developments and alterations to existing buildings mitigate potential road traffic noise effects on activities sensitive to noise from the existing arterials being Coatesville-Riverhead Highway and Riverhead Road.	FS07 Oppose	Reject

### Discussion

365. These submissions seek changes to the zoning or aspects of the precinct provisions applying within the plan change area. Some of these submission points set out an alternative relief to a submitter's request that PPC100 be declined or approved subject to changes as noted in section 10.3 above. While the overall recommendation of this report is that PPC100 should be declined at this time, I have included recommendations on the changes sought in these submissions should the Commissioners decide to approve PPC100.

### *Density/ Character*

366. A number of submissions request that PC100 provisions enable development that reflects the character of the existing Riverhead village. Others are more specific including submissions that request certain site sizes (i.e.>800m<sup>2</sup>) or seek that the Residential – Single House Zone applied instead of the MHS zone. Others request that the THAB zone be deleted.
367. I have discussed above in paragraphs 109 to 119 above the tension that exists in the overarching planning documents between achieving a compact urban form and in

achieving new development that reflects the character of existing rural towns. In that discussion I concluded that in this instance weight should be put on achieving a compact urban form. To this end it is my view that the MHS zone (as modified) is appropriate. While it will provide for a compact urban form it provides for a lower form of development than the MHU or THAB zones and is more compatible with the SHZ nature of development in the existing Riverhead village area.

368. I consider that a small area of THAB zone is appropriate to provide for a diversity of living environments. I discuss the location of the THAB zone in conjunction with the discussion of commercial centres below.

#### *Urban Design*

369. A number of submissions seek that if the MHS zone is retained, then additional urban design standards are applied. Examples in the submissions include greater front yard setbacks, greater setbacks to the rural interface, the provision for low fencing and a requirement to plant trees in the street at the time of subdivision.
370. The PPC100 precinct provisions contain many of the provisions requested in these submissions. For example Standard IX.6.5 requires 5m setbacks from rear and side boundaries where the boundary adjoins the Rural- Mixed Rural Zone. Standard IX.6.6 requires low fencing or visually permeable fencing on boundaries adjoining public accessible open space. Standard H4.6.14 in respect of low front fencing (in the MHS Zone) remains applicable. While there are no standards in respect of street tree planting, this is required to be considered at the time of subdivision and is subject to various codes of practice adopted by the Council and Auckland Transport (i.e. AT's Transport Design Manual).
371. In my view PC100 contains sufficient additional standards to take into account interfaces with the rural area and with open space including the roads as sought by the submitters. I also consider that specific standards are not required for street tree planting as there are multiple factors required to be considered when choosing locations for tree planting within roads.

#### *Location of Business Zones*

372. A number of submissions question the location of the commercial zones within PC100. Some submissions request that the new business zoning demonstrate a consolidated and legible town centre rather than the proposed approach where the new business area is separated from the existing business area. Other submissions request that the neighbourhood centre opposite Riverhead Point Road be deleted while other seek a general reduction of the business zones.
373. I have discussed this matter in paragraphs 195 to 198 of this report .
374. I consider that the submissions concerning the fragmentation of the Local Centre zone make a good point. At this stage I do not have a recommendation to make concerning this, but as I have noted, I consider that more evidence about the appropriateness of the proposed location for the Local Centre Zone is required.
375. I support the location of the Neighbourhood Centre as proposed as this will provide local shopping opportunities for residents in the southern part of Riverhead, both in the existing urban area and the proposed urban area.

### *Terrace Housing and Apartment Building Zone/ Retirement Village*

376. Some submissions are concerned about the location of the THAB zone to the north of Riverhead Road. Some do not consider the density is appropriate while others are concerned about the effects of a potential retirement village on this site would have with access through the area zoned.
377. In my view it is appropriate to have an area of THAB zoning within PC100 as this contributes to a compact urban form and provides a diversity of living options for residents. The location proposed is also appropriate if the LCZ is maintained in the proposed location. However this location is not well integrated with the existing village zoning and if this is maintained it will result in an area of single house zone on Cambridge Road, effectively sandwiched between the more intense development that can be located on the THAB zone and the Mixed Use Zone in the triangle facing Alice Street. In my view it would have been better to have integrated these either by extending the THAB zone into the block between Cambridge Road and Alice Street or by using this block for the Local Centre zone.
378. In respect of the potential for a retirement village on the THAB land the following background is relevant. Matvin Group Limited sought to establish a retirement village at 1092 Coatesville Road. The application for consent was considered by an expert panel appointed under the COVID-19 Recovery (Fast-Track Consenting) Act 2020 (FTA). This consent was granted on 29 March 2023. The Council appealed that decision to the High Court. On 6 September 2023 the High Court issued a decision quashing the Panel's decision and referring the matter back to the Panel for reconsideration. At this time no further decision has been issued by the Panel. There is therefore no consent for a retirement village in the plan change area.
379. If the land is given an urban zone any future retirement village may be consented. However PPC100 does not in itself give rise to a retirement village. In respect of submissions that request specific connections through a retirement village I consider that these can be considered at the time of any consent. However I do agree that additional connections can be shown on the Precinct plan. I also consider that the transition to the MHS zone should over a local road as this will ensue transitional effects are reduced. This this should be shown on the Precinct plan also.

### *Parking*

380. One submission seeks that adequate parking standards be included in PPC100.
381. It is not possible for the Council to specify required parking in the AUP as this is precluded by the NPS:UD 2020 which required all such rules to be removed from district plans.

### *Activities in Sub-precinct A*

382. The submissions from AT request the removal of permitted activity status for restaurants and cafes up to 250m<sup>2</sup> and retail up to 100m<sup>2</sup> in Sub-precinct A. It also seeks that healthcare facilities up to 250m<sup>2</sup> be made a restricted discretionary activity, rather than a permitted activity.
383. Sub-precinct A is zoned THAB in PPC100. In that zone restaurants and cafes up to 100m<sup>2</sup> are restricted discretionary activities, dairies up to 100m<sup>2</sup> are restricted

discretionary activities and Healthcare facilities up to 200m<sup>2</sup> are also restricted discretionary and above 200m<sup>2</sup> are discretionary.

384. It is unclear why the applicant wishes to have different activity status's for these activities. It may be that these activities are likely to be part of a retirement village and that the applicant wishes to avoid making additional applications for these activities. However there is no difference in my view between this THAB zone and any other in the AUP. Without additional evidence as to why this location requires additional commercial activities I recommend accepting these submissions. I also note that resource consent applications for these activities can be bundled with any application for a retirement village which requires consent for a restricted discretionary activity.

#### *Notification*

385. Auckland Transport requests that standard IX.5 be amended or deleted so that the normal Resource Management Act notification tests apply in the precinct. NZTA also has made a similar request.
386. PPC101 currently provides their applications for restricted discretionary activities will be considered without public or limited notification or the need to obtain written approval from affected persons.
387. It is my view that there may be instances with restricted discretionary activities should well be notified to affected persons. That is the approach that is taken in the majority of residential zones in the AUP. I consider that there are no unusual features or special circumstances in respect of this plan change that would distinguish it from any other residential development in Auckland. Therefore I consider the consistent approach of utilising the normal tests for notification set out in the Resource Management Act is appropriate in this location also. Accordingly I support this submission.

#### *Changes sought in submission 205*

388. Submission 205 from Luxembourg development and others requests a wide range of changes to PPC101. The changes sought are extensive and in my view effectively rewrite many of the precinct provisions. The submission requests amongst other things that the green corridors be deleted, the collector roads be straightened, the key local roads be deleted and the pedestrian connections be aligned to the collector roads. It requests changes to the business zoning and associated objectives and policies including the potential deletion of the neighbourhood centre zone. In respect of the residential zones, the submission requests that the THAB zone be reduced in extent and/or that the MHU zone be used as a replacement. The submission also requests the deletion of Precinct plan 1 and any supporting provisions within the precinct. The submission also requests that there be policies and standards to avoid the creation of opportunities for third parties or other landowners that would prevent development of the precinct.
389. I consider that many of the changes requested are inconsistent with the approach taken throughout the plan change and the Section 32 report that provides justification for the plan change. For example to the green corridors and routes for green infrastructure, which have been developed in response to and in conjunction with Iwi would be removed if this submission was accepted.
390. The submission provides limited justification for the changes sought. It is my view that for such a wide-ranging submission to be accepted, it will be necessary for a more complete assessment of the type that is required under section 32 of the Resource

Management Act to be undertaken. In my view the submitter should provide a fuller explanation of why the changes sought are necessary, at the hearing in evidence. Without such an explanation I am unable to recommend that this submission be accepted.

*Road noise.*

391. The submission from Auckland Transport requests that the precinct be amended to include a range of objectives policies and provisions in respect of mitigating the potential noise affects from road traffic on sensitive activities. It is requested that these provisions would apply to the Coatesville Riverhead highway and Riverhead Rd both of which are arterial roads.
392. Any such provisions would require dwellings in particular to be designed and potentially insulated against traffic noise where they're located close to major roads. Similar rules have been included in some precincts in the AUP but these are not present in respect of most arterial roads and in all precincts.
393. In my view, while such an approach may be warranted to manage reverse sensitivity effects from major roads, a region wide approach is necessary to achieve consistency and comprehensive management of such effects. The provision of these standards, particularly in respect of the Coatesville Riverhead Highway would result in different standards (i.e. no standards to the east) applying on each side of the road. The noise conditions would be the same on either side of the road yet different district plan rules in respect of that noise would apply.
394. I consider that a region wide approach would enable such effects to be managed consistently across the region which would avoid anomalies of the sort that would be created if this submission was accepted. AT or the Council could initiate a region wide plan change that would achieve a consistent approach. It is my view that this submission should be rejected on that basis.

Interim recommendations on submissions

395. That submissions 112.4, 114.11, 114.12, 161.20, 161.21, 161.22, 161.23, 161.32, 161.33, 167.3, 174.13, 174.14, 205.17, 205.23 and 248.4 be accepted.
396. That submissions 98.10, 98.11, 98.13, 114.6, 114.7, 114.8, 114.15, 114.16, 174.8, 174.9, 174.10, 184.8, and 227.5 be accepted in part to the extent set out in Appendix 5.
397. That submissions 24.2, 24.3, 66.2, 80.3, 81.3, 85.4, 85.5, 90.2, 95.4, 98.9, 98.12, 174.30, 114.9, 114.10, 114.13, 114.30, 129.3, 129.4, 135.7, 157.8, 174.11, 174.12, 174.15, 194.2, 184.3, 205.2, 205.3, 205.4, 205.5, 205.6, 205.7, 205.8, 205.9, 205.10, 205.11, 205.12, 205.13, 205.14, 205.15, 205.16, 205.22, 205.24, 205.25, 205.18, 227.2, 227.3, 227.4, 248.2, and 161.4 be rejected.
398. Should PPC100 be approved the changes resulting from this recommendation are set out in Appendix 5.

**10.9 Submissions concerning 22 Duke Street**

399. Table 10.9.1

<b>Sub Point</b>	<b>Submitter Name</b>	<b>Summary of Decisions Requested</b>	<b>Further subs</b>	<b>S42A Recommendation</b>
141.1	Aberdeen Adventures Ltd	Apply the Mixed Housing Suburban Zone over the whole of the site at 22 Duke Street	FS04 Oppose FS09 Support	Reject
114.22	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Provide clarity of the intended use and function of 22 Duke Street with regard to stormwater	FS07 Oppose FS09 Support	Accept in part to the extent set out in Appendix 5
174.22	Claire Walker	I want clarity of the intended use and function of 22 Duke Street with regard to stormwater, public access and environmental improvements.	FS07 Oppose FS09 Support	Accept in part to the extent set out in Appendix 5
251.1	Desmond John Reid	Accept the plan change with amendments		Reject
251.2	Desmond John Reid	Retain the existing RUB unchanged.	FS04 Oppose	Reject
251.3	Desmond John Reid	The whole of 22 Duke Street to remain the current Future Urban Zone	FS04 Oppose	Reject
251.4	Desmond John Reid	Include 22 Duke Street in PC100	FS02 Oppose  FS04 Oppose	Reject

### Discussion

400. These submissions relate to land in the north of the plan change area that is proposed to be zoned Rural Mixed Rural Zone in PPC100. Some of these submissions set out an alternative relief to a submitter's request that PPC100 be declined or approved subject to changes as noted in section 10.3 above. While the overall recommendation of this report is that PPC100 should be declined at this time, I have included recommendations on the changes sought in these submissions should the Commissioners decide to approve PPC100.

401. .

402. By way of background to this, when the plan change request was received by the Council, this land (which is currently zoned FUZ) was included within the area to be zoned for residential purposes. The Council initially rejected the plan change request under clause 25 of Schedule 1 to the RMA, largely for reasons relating to flooding. The applicant appealed this decision to the Environment Court. Subsequently the Environment Court allowed the appeal in part by way of a consent order. The consent

order provided that the area to the north of the plan change area be zoned MRZ and the area be excluded from the RUB.

403. These submissions seek that the land at 22 Duke Street be included within PPC100 as urban land or retain the current future urban zone.
404. Based on the advice from Healthy Waters this land is not suitable for urban development due to the high risk and adverse effects of flooding. I consider that it is not practicable to zone this land for urban development now. Technically however the land remains part of PPC100 as this is necessary to change the zone from FUZ to MRZ.
405. The submitters appear to suggest that the land should retain its FUZ zoning rather than revert to a rural zone. This is presumably on the basis that in the future the land may become suitable for urban development in the future. If this is the case, the submitter should provide evidence of how the land could be made suitable for urban development. The evidence from Healthy Waters is that the land (and other land) should not be developed for urban development because of the flooding hazard. For this reason I consider that a rural zone is the most suitable for the land.
406. A number of submitters are concerned that environmental improvements such as connections to the Wautaiti Stream will not be possible unless the land is given an urban zone. If the land is zoned MRZ then it will remain as private land and will not be available for such environmental improvements unless otherwise negotiated.

Interim recommendations on submissions

407. That submissions 141.1, 251.1, 251.2, 251.3 and 251.4 be rejected.
408. That submissions 144.22 and 174.22 be accepted in part to the extent set out in Appendix 5.
409. These are no changes resulting from this recommendation.

**10.10 Miscellaneous submissions**

410. Table 10.10.1

Sub Point	Submitter Name	Summary of Decisions Requested	Further subs	S42A Recommendation
66.3	Hawk Ellery Freight Services Ltd	Undertake comprehensive community consultation and develop a structured consultation plan.		Reject
98.14	Bridget Michelle Hill	The plan change should have better consultation so that a more seamless extension of the old Riverhead is able to be made.		Reject
114.31	Riverhead Community Association (formerly Riverhead	The opportunity to conference with the requestors to resolve any matters of difference pre-hearing	FS07 Oppose FS09 Support	Noted

	Residents and Ratepayers Association)			
167.1	NZ Transport Agency Waka Kotahi (NZTA)	No relief sought	FS05 Oppose in Part FS06 Oppose in part FS07 Oppose	Noted
167.4	NZ Transport Agency Waka Kotahi (NZTA)	No relief sought	FS07 Oppose	Noted
167.5	NZ Transport Agency Waka Kotahi (NZTA)	No relief sought	FS07 Oppose	Noted
174.31	Claire Walker	Improve consultation	FS07 Oppose	Reject
169.3	Adrian Low	Widen the scope of the plan change to include all of the existing village and surrounding rural areas		Reject
169.6	Adrian Low	Redesign plans to emphasize low to medium-density development, maintain rural character, and protect ecological and historical assets.		Reject
169.7	Adrian Low	Expand the plan change to include broader community benefits and integrate surrounding rural areas into the development vision.		Reject
169.5	Adrian Low	Extend and deepen community engagement to ensure the plan reflects current needs and concerns.		Reject
172.1	Bernard Tye	Supports and endorses Riverhead Community Association submission and requests (submission 114)		Treat the same as 114
198.1	James Anthony Hendra	Decline the plan change		Accept
198.2	James Anthony Hendra	Seeks same relief as RCA submission (Submission 114).		Treat the same as 114



204.1	New Zealand Defence Force	<p>Amend the Precinct chapter to reference Designation 4311 requirements.</p> <p>Amend IX.1 Precinct description to add a sentence referencing Designation 4311 (additions underlined):  All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.  <u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u></p>	FS05 Oppose in part FS06 Oppose in part	Reject
204.2	New Zealand Defence Force	<p>Amend IX. Activity table to add a sentence referencing Designation 4311 (additions underlined):  Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.  <u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or</u></p>	FS06 Oppose in part	Reject

		<u>temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u>		
251.5	Desmond John Reid	Requests diligent consultation with the applicants of PPC100 to rationalise flood management, particularly around their proposed green corridor and to optimise traffic and propel movement within the wider catchment.		Reject

### Discussion

411. This group of submissions seek changes not categorised elsewhere or are submission points without specific requests. The latter are simply recorded in these recommendations as being noted. Some of these submission points set out an alternative relief to a submitter's request that PPC100 be declined or approved subject to changes as noted in section 10.3 above. While the overall recommendation of this report is that PPC100 should be declined at this time, I have included recommendations on the changes sought in these submissions should the Commissioners decide to approve PPC100.
412. Several submissions request that there should be better consultation about the proposals within PPC100. The consultation undertaken by the applicant is set out in Section 6 of this report. As this is a private plan change, and not a Council initiated plan change, it is the responsibility of the applicant to undertake consultation. In addition the notification and hearing process is part of the consultation process and gives submitters the ability to comment on PPC100 directly to the decision makers and if necessary appeal the decision of the Commissioners.
413. I consider that the consultation has been adequate and is ongoing in accordance with the processes set out in RMA.

414. The Riverhead Community Association request the opportunity to conference with the applicant ahead of the hearing. This can be achieved in several ways. Firstly the submitter could on its own initiative seek to meet with the applicant to resolve matters between themselves and present a combined approach at the hearing. That would, of course, require the agreement of the applicant. Secondly the submitter could request the Commissioners to direct that expert conferencing or other alternative dispute resolution mechanism be put in place prior to or following the hearing. It will be up to the Commissioners to decide whether any conferencing or other mechanism is warranted and I make no recommendation in that regard.
415. The submission 169.3 from Adrian Low seeks that the plan change be widened to include all of the existing village and surrounding rural areas. The scope of this type of plan change (i.e. a rezoning proposal) is largely set by the extent of the plan change as notified. In my view it is out of scope to now expand the plan change to include the whole of Riverhead. Residents and landowners within the existing village would not expect PPC100 to now cover the whole of the village and surrounding area, and there has been no assessment provided of the effects and statutory context of an expansion (including no s32 analysis). In addition there has not been an opportunity for affected persons to understand what an expansion of PPC100 would entail and how it would affect them and to make submissions accordingly.
416. A number of submissions seek to endorse the submission of the Riverhead Community Association. That submission contains a number of submission points that range over a number topics. These have all been discussed in the preceding sections of this report. It can be noted that the submission from Mr Tye and Mr Hendra have been assessed in the same way as the Community Associations submission.
417. The submissions from the NZ Defence Force seek that references to existing designations in respect of the Whenuapai Airfield Approach and Departure Path Protection be included in the activity tables within the Precinct provisions. In my view such references are not required as the designation layers are clearly visible on the AUP maps and will affect all of Riverhead and beyond. Including such references also has the potential to potentially confuse readers as the other areas affected by the designation do not have the references (including the existing urban area at Riverhead).

#### Interim recommendations on submissions

418. That submissions 66.3, 98.1, 169.3, 169.5, 169.7, 169.6, 174.31, 204.1, 204.2, and 251.5 be rejected.
419. That submission 198.1 be accepted.
420. That submissions 114.31, 167.1, 167.4, and 167.5 be noted
421. That submissions 172.1, and 198.2 be treated the same as submission 114.
422. These are no changes resulting from this recommendation.

## **11. OVERALL CONCLUSIONS**

423. Having considered PPC100 and the application material supplied by the applicant, the memoranda from relevant specialists engaged by the Council and the submissions I do not at this time recommend that PPC100 be approved.

424. I remain concerned about the following fundamental matters which remain outstanding;

- a) The extent to which PPC100 is integrated with the provision of infrastructure and in particular the provision of water supply and wastewater disposal and treatment and the required upgrading of transport infrastructure. There is in my view too much uncertainty about whether much of the required infrastructure will be available in the near term. To this end PPC100 may be premature.
- b) The effects of urbanisation of the plan change area on flooding downstream and within the plan change area have not been adequately assessed and the Council/ Health Waters specialists have advised that they consider the effects are likely to more than minor.
- c) The extent to which PPC100 gives effect to the NPS-UD and the RPS in respect of the provision of public transport.
- d) The inconsistency with the Auckland Future Development Strategy and the lack of an assessment against that document.
- e) I have identified throughout this report a number of areas where additional assessments is required. These assessments are required in order to make a fully informed decision on PPC100.
- f) A number of matters have been raised by Council specialists. Should the commissioners approve PPC100 I have suggested some changes to PPC100 to address these where they are considered to sit within the scope of submissions received.

425. In the instance that the commissioners decide to approve PPC100, I have attached in Appendix 5 recommended changes to PPC100 as a result of my assessment of the submissions received. I note that this does not encompass changes where the reporting requests that additional detail be supplied in evidence so this is at this stage incomplete. At this stage, because I do not recommend that PPC100 be approved, these changes are not a recommendation from me, but are a useful summary of how PPC100 could be changed if the matters set out above were resolved or if the Commissioners otherwise find that the PPC100 can be approved.

426. I anticipate that the Commissioners will set an evidence exchange timetable prior to the hearing. That will give the applicant and submitters the opportunity to respond to matters raised in this report. It is therefore likely that an addendum s42A report will be produced that will address additional analysis or changes to PPC100 suggested in the evidence.

## **12. SECTION 32AA ANALYSIS OF RECOMMENDED CHANGES**

427. S32AA of the RMA requires a further analysis of any recommended changes to be undertaken. Given my conclusions above this assessment may be undertaken as part of the addendum report as I have not at this stage made recommendations for change.

## **13. INTERIM RECOMMENDATION**

428. That, the Hearing Commissioners decline PPC100.

## 15. SIGNATORIES

Name and title of signatories	
Author	 David Wren – Planning Consultant 10 March 2025
Reviewer / Approver	 Peter Vari Team Leader Planning Planning, Regional , North, West and Islands 10 March 2025



**APPENDIX 2**  
**SECTION 32 REPORT**







# Riverhead

## Private Plan Change Request

Section 32 Assessment Report

4 October 2023

**B&A**

Urban & Environmental

Prepared for:  
Riverhead Landowner Group

B&A Reference:

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Date:

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## 1.0 Applicant and Property Details

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To:	Auckland Council
Site Location:	Riverhead Road, Coatesville-Riverhead Highway, Cambridge Road, and Duke Street, Riverhead
Applicant Name:	Riverhead Landowner Group
Address for Service:	Barker & Associates Ltd PO Box 1986 Shortland Street Auckland 1140 Attention: Karl Cook / Sarah Rendle
Plan Change Area:	Approximately 80.5ha
Unitary Plan:	Auckland Unitary Plan (Operative in Part) ('AUP')
AUP Zoning:	Future Urban
Locality Diagram:	Refer to <b>Figure 3</b> .
Brief Description of Proposal:	Private plan change request to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions. The request also seeks to shift the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.

## 2.0 Executive Summary

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The Riverhead Landowner Group ('RLG') is applying for a plan change to the Auckland Unitary Plan (Operative in Part) ('AUP') to rezone approximately 75.5ha of land in Riverhead from Future Urban to a mix of urban and rural zones. In particular 6 ha in the northern portion of the Plan Change area will be rezoned to Rural- Mixed Rural Zone due to the significant flooding constraints. It is also proposed to shift the Rural Urban Boundary to align with the boundary of the Rural- Mixed Rural Zone. 75.5 ha of Future Urban land will be rezoned to a mixture of residential zones with a small Local Centre and Neighbourhood Centre, consistent with the Riverhead Structure Plan. The rezoning proposal provides capacity for approximately 1450-1750 dwellings.

The Plan Change also includes a precinct, which details refined residential standards for the Residential Terrace Housing and Apartment Building and Residential – Mixed Housing Suburban zones and in response to the locational attributes of the Plan Change area. The precinct also details the indicative road and open space network, stormwater management, provisions to recognise Mana Whenua values including the provision of a cultural landscape map, and ensure that development progresses with the availability of infrastructure.

The Future Urban Land Supply Strategy ('FULSS') identifies Kumeu, Huapai and Riverhead together as being collectively 'development ready' in 2028-2032, with potential to accommodate 6,600 new dwellings. The FULSS is a non-statutory document and is a high-level staging plan for Auckland's future urban areas. The more detailed analysis undertaken as part of this proposal supports an earlier release of Riverhead for development. The reasons for this are summarised as follows:

- The FULSS assumes that Riverhead is subject to the same infrastructure constraints as Kumeu and Huapai, when there is generally sufficient infrastructure capacity to accommodate future development in Riverhead now, without the need for significant upgrades;
- The entities which form the RLG (Fletcher Residential Limited, The Neil Group, and Matvin Group) have an established track record in commercial and residential development and are uniquely placed to deliver a significant volume of housing in Riverhead at pace and to a high standard;
- The technical analysis undertaken in support of this Plan Change, in particular the Integrated Transport Assessment and Water and Wastewater Servicing Strategy, demonstrates that the land can be developed with targeted upgrades in place; and
- Rules are included within the Plan Change to coordinate the release of development capacity within the Plan Change area with the delivery of required transport infrastructure. Additionally, assessment criteria will ensure development can be serviced by water and wastewater infrastructure. This allows much needed residential capacity to be available in the short to medium term. It also allows for consenting and development for preliminary works to proceed without creating any additional demand on infrastructure.

For these reasons, and in the context of the staging criteria set out in Appendix 1 of the FULSS and Appendix 1 of the Regional Policy Statement ('RPS'), the proposal is consistent with sound resource management practice and Part 5 of the Resource Management Act ('RMA').

Further, the proposed Plan Change responds to the specific characteristics of the site and the surrounding area, with reference to the regional context and gives effect to the relevant planning documents for the following reasons:

- A variety of residential typologies and densities would be enabled and these respond to locational attributes and constraints. Generally higher residential densities are proposed close to the Local Centre and the intersection between Coatesville-Riverhead Highway and Riverhead Road;
- The Local Centre is located within a walkable distance and will provide for the day to day needs of the local community that will establish in the proposed residential areas;
- The zoning pattern enables a connected and high-quality road network to be established that provides appropriately for all modes of transport, including walking and cycling;
- The adverse effects of urban development on the natural environment, including the stream and wetlands within and near the site, can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced; and
- The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades ensured through the proposed Plan Change provisions.

For these reasons, the proposal is consistent with sound resource management practice and Part 5 of the RMA. Therefore, the Council can accept the Plan Change for processing.

The proposed land uses have been assessed to be the most optimal to achieve the objectives of the Unitary Plan, and the purpose of the RMA, in this location. The zoning layout is consistent with the Riverhead Structure Plan. The detailed site and context analysis completed as part of this Plan Change demonstrates that the proposed use will be an efficient and effective method for achieving the sustainable management purpose of the RMA and the Regional Policy Statement.

On this basis, it is considered that the proposed zonings are the most appropriate uses for the land.



### 3.0 Introduction

#### 3.1 Background

Riverhead Landowner Group ('RLG') is comprised of Fletcher Residential Limited, The Neil Group, and Matvin Group, who collectively own (or are prospective purchasers) of the majority of the landholdings within the Plan Change area, as shown in **Figure 1** below.

The RLG have an established track record in commercial and residential development.

RLG seeks to rezone approximately 80.5ha of land in Riverhead. 75.5 of land will be rezoned from Future Urban to a mix of residential zones with a small Local Centre and Neighbourhood Centre, along with provision for future open space areas. RLG envisages that the Plan Change will provide quality, compact neighbourhoods adjacent to the existing Riverhead rural/coastal town. The proposed zoning pattern will encourage a range of housing choice with the more intensive housing development located around the proposed Local Centre.

Approximately 5ha of land within the north which is subject to natural hazards – flooding is proposed to be rezoned to Rural – Mixed Rural zone to align with the adjoining rural properties. The Rural Urban Boundary (RUB) is also proposed to be shifted accordingly.

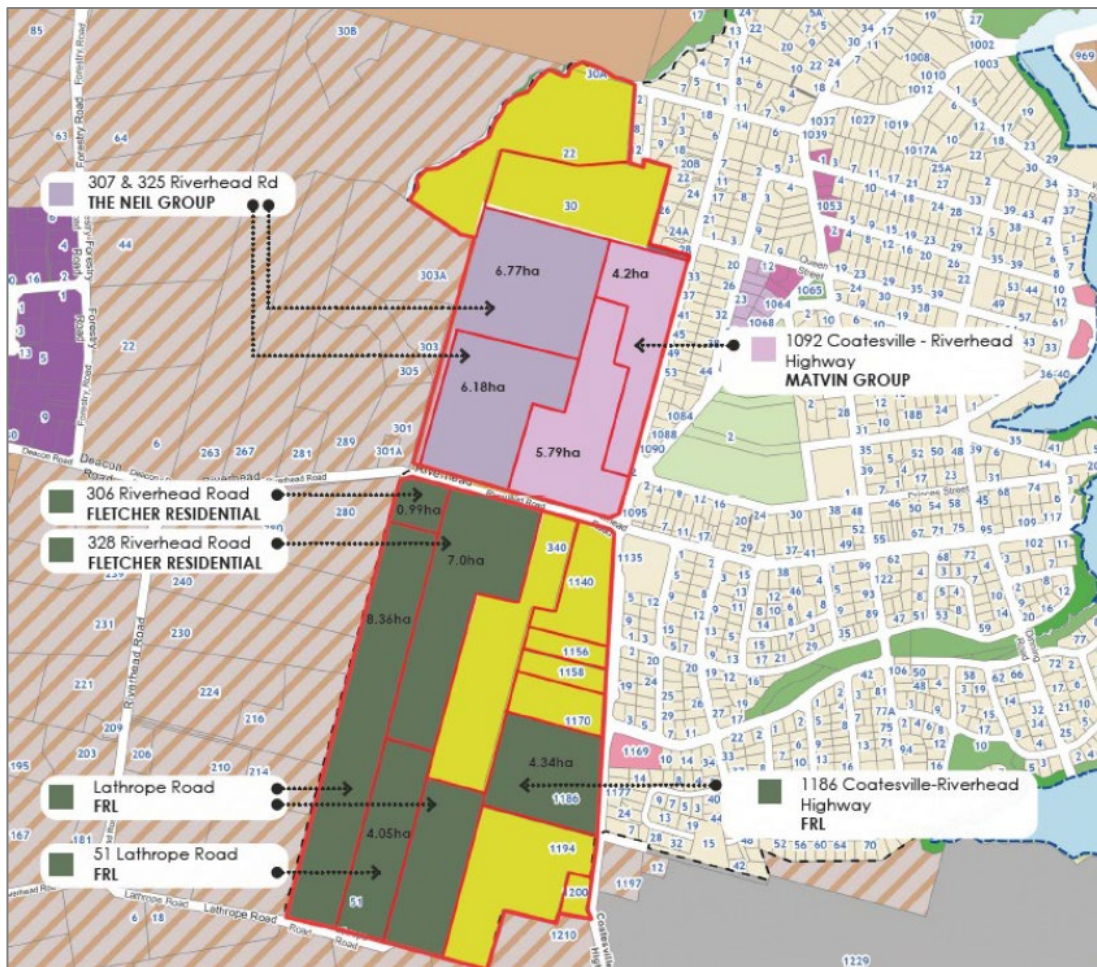


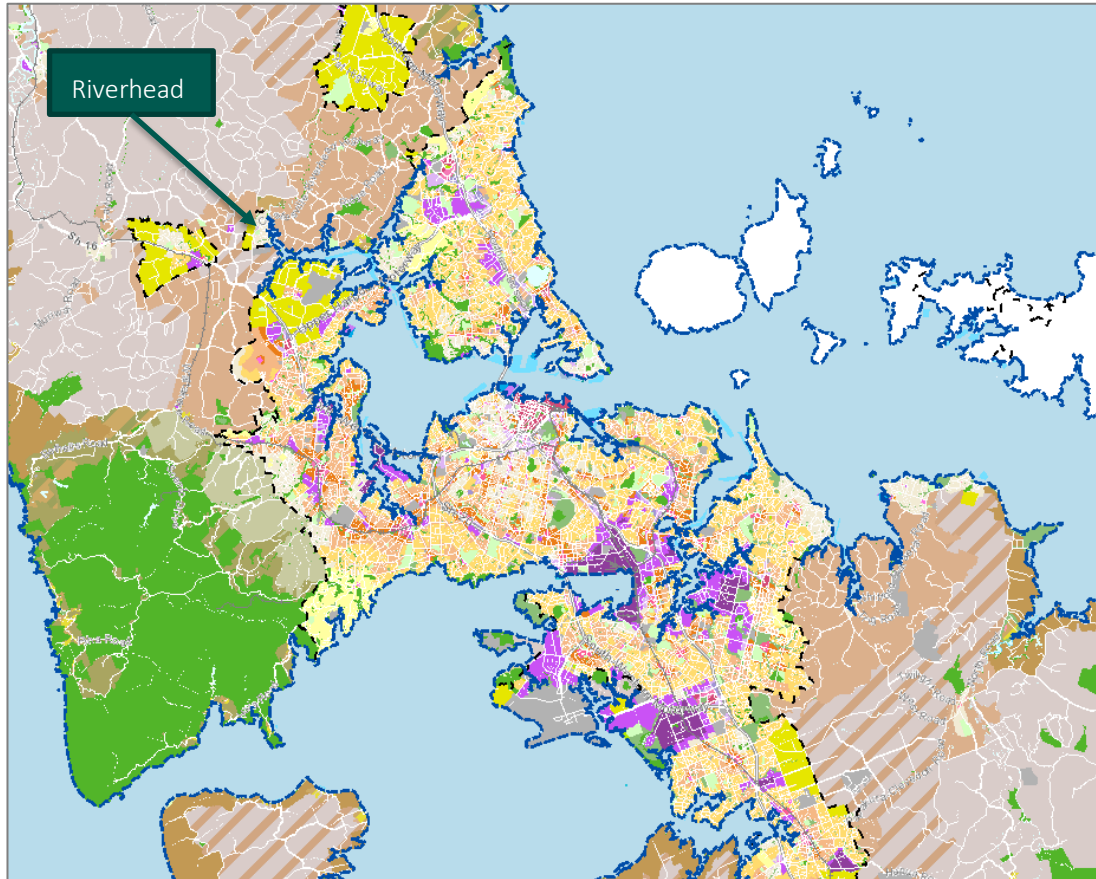
Figure 1: RLG landholdings within the Plan Change area.



## 3.2 Site Location and Description

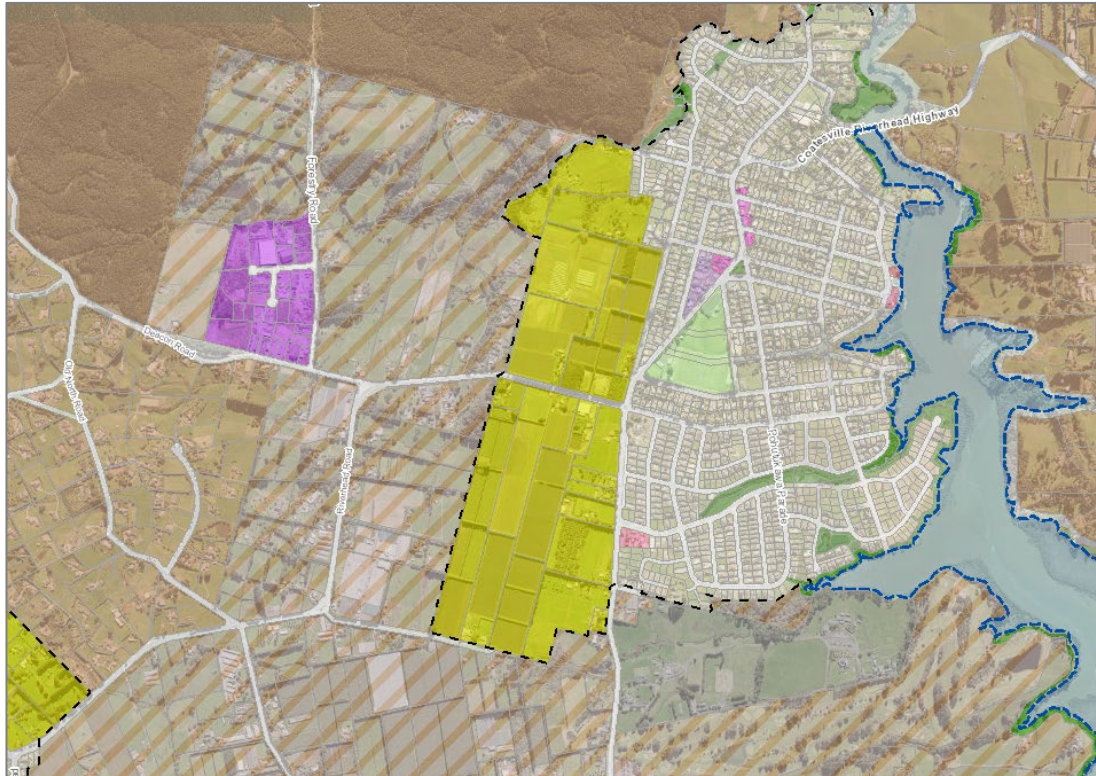
### 3.2.1 Site Description

The Plan Change area consists of 80.5ha of Future Urban zone land within the rural coastal settlement of Riverhead. Riverhead is located in the North West of Auckland 30km/30min drive from Auckland's City Centre. **Figure 2** shows Riverhead in a wider regional context.



**Figure 2: Riverhead's location within the wider Auckland region.**

The Plan Change area is a physically well-defined area bound by Coatesville-Riverhead Highway and Cambridge Road to the east, the Rangitopuni Stream to the north, and rural-zoned land to the west and south. The Plan Change area is regular in shape, with individual land parcels creating a geometric pattern of shelterbelts and other farm boundary definitions. A locality plan of the Plan Change area is included as **Figure 3** below.



**Figure 3: Zoning map of the Structure Plan area.**

The current land use within the Plan Change area is predominantly horticulture with some agriculture (grazing). Various residential and commercial (horticulture-related) buildings are present across the Plan Change area.

The topography of the Plan Change area is largely flat with the land in the northern portion of the Plan Change area sloping gently towards the north. Horticultural and past farming activities have removed all existence of indigenous vegetation from the Plan Change area. The few native trees or shrubs that exist have either been self-sown by birds or wind, or have been planted as part of amenity plantings associated with dwellings. There are no significant ecological areas mapped within the Plan Change area.

Waterbodies are concentrated within the northern portion of the Plan Change area where there is a large historic wetland across the extensive flat northern terrace, which would have once been a river floodplain. Vegetation within the wetland comprises of exotic species and native purei. In addition, there are two small wetlands to the north-east of the Plan Change area, both are dominated by a single native wetland plant and are botanically simplistic. There is one extensively modified intermittent stream on the site which receives flow from the northern-central part of the site and directs it to the northern low-lying floodplain/wetland area. The stream discharges from the wetland to the unnamed tributary of the Rangitopuni Stream, which sits just outside the northwest boundary of the Structure Plan area, via an excavated drain (which is also classed as intermittent stream).

There are a number of overland flow paths that traverse the Plan Change area. In addition, the northern portion of the Plan Change area is subject to flooding.

SH16 is located approximately 2km south of the Plan Change area and can be accessed via Coatesville-Riverhead Highway, Old North Road or Riverhead Road. SH16 provides connections to

Kumeu to the west, and Westgate to the south. It also provides a connection to SH18 (via Brigham Creek Road or Trig Road) which provides a connection to Albany and the North Shore.

There is a bus service that operates along the Coatesville-Riverhead Highway connecting Riverhead to the Westgate and Albany Metropolitan Centres. The SH16 Northwest Bus Improvements project will also improve public transport accessibility from Westgate to the City Centre.

### 3.2.2 Surrounding Area and Local Context

In terms of land use and built form in the immediate locality, the surrounding area is characterised by a mix of activities and building types. To the west and the south of the Plan Change area are large rural landholdings. To the north is the Riverhead State Forrest. The existing Riverhead township is located to the east.

Riverhead township has a current population of approximately 3,000 people, and is predominantly comprised of lower-density suburban residential properties. The northern part of the existing township, north of the Riverhead War Memorial Park, is an older and more established area with allotments typically around 800m<sup>2</sup> or larger and single-storey detached dwellings. To the east and south of the park, development is more recent, but the pattern of development is also typically 800m<sup>2</sup> sections with single-storey detached dwellings.

In the wider context, the Plan Change area forms part of the extensive growth area in Auckland's North-West. In particular, Riverhead is located to the east of Kumeu/Huapai and west of Whenuapai which have both experienced significant growth in recent years transforming from small settlements into large residential communities with a range of housing densities. Kumeu/Huapai and Whenuapai will continue to transform as both settlements are surrounded by significant areas of land zoned for Future Urban use. There are opportunities to leverage from infrastructure to support development within these significant growth areas within Riverhead.

In terms of employment opportunities, the Plan Change area is strategically located in proximity to several major business hubs in the north west of Auckland. Massey/Westgate is the nearest metropolitan centre, located approximately 10km to the south, via State Highway 16.

The Plan Change area is also accessible to a range of social infrastructure including Waitakere Hospital within a 15 km radius. Riverhead School is within a 2-3 km distance of the Plan Change area, as well as a series of community facilities including Early Learning Centres, community hall, open spaces and amenities.

## 4.0 Description of the Plan Change Request

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### 4.1 Description of the Proposal

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#### 4.1.1 Approach to the Planning Framework with Riverhead

The intention of the Plan Change is to rely largely on standard zones and Auckland-wide provisions to manage the way in which the Plan Change area is used and developed.

Consistent with other greenfield precincts within the AUP, the proposed precinct will apply to the area proposed to be urbanised and includes place-based provisions that create a spatial framework for development. The precinct provisions are appropriately focused on the layout of development necessary to achieve the objectives of the AUP, including:

- Recognising Mana Whenua values, including the provision of a cultural landscape map;
- Achieving an appropriate urban layout;
- Providing an integrated and connected street network;
- Enhancing the riparian margins of streams;
- Ensuring the built form character integrates with the existing Riverhead settlement and the surrounding rural land; and
- Ensuring development coordinates with the required infrastructure upgrades.

On balance, this approach enables the Plan Change area to develop to a scale and intensity which is broadly consistent with areas of similar zoning patterns across the region. The precinct will, however, include some variation to the standard Auckland-wide and zone provisions to introduce more tailored standards, matters of discretion and assessment criteria. This will support the development of a quality built environment within this locality that creates a distinctive sense of place.

#### 4.1.2 Overview of the Proposed Zoning

This Plan Change seeks to rezone approximately 6 hectares of Future Urban Land within the north to Rural – Mixed Rural zone. The RUB is also proposed to be shifted accordingly. The stormwater assessment that has been undertaken by CKL to support his Plan Change application has identified that this land is subject to significant natural hazard – flooding and is not suitable for urbanisation. The Rural – Mixed Rural zone is proposed to be applied for consistency with the adjoining rural sites.

This Plan Change seeks to rezone approximately 75.5 hectares of Future Urban zoned land for urban development, which will comprise approximately:

- 1.8ha Business – Local Centre zone;
- 0.7ha Business – Neighbourhood Centre zone;
- 4.3ha Residential – Terrace Housing and Apartment Building zone; and
- 69ha Residential – Mixed Housing Suburban zone; and

The proposed zoning pattern is shown in **Figure 4** below. The intention of the proposed urban zoning is to provide for the establishment of a new residential area in Riverhead that offers more housing choice than the current settlement, which is predominantly low density residential. At the same time the zoning pattern seeks to respond to the local rural and low density context.

Residential – Terrace Housing and Apartment Building zone has been applied surrounding the Local Centre zone to reinforce the village heart. It would accommodate the proposed Botanic Retirement Village. The Residential – Terrace Housing and Apartment Building ('THAB') zone provides the opportunity for a wide variety of housing typologies including low rise walk ups and apartments within a walkable distance to the centre.

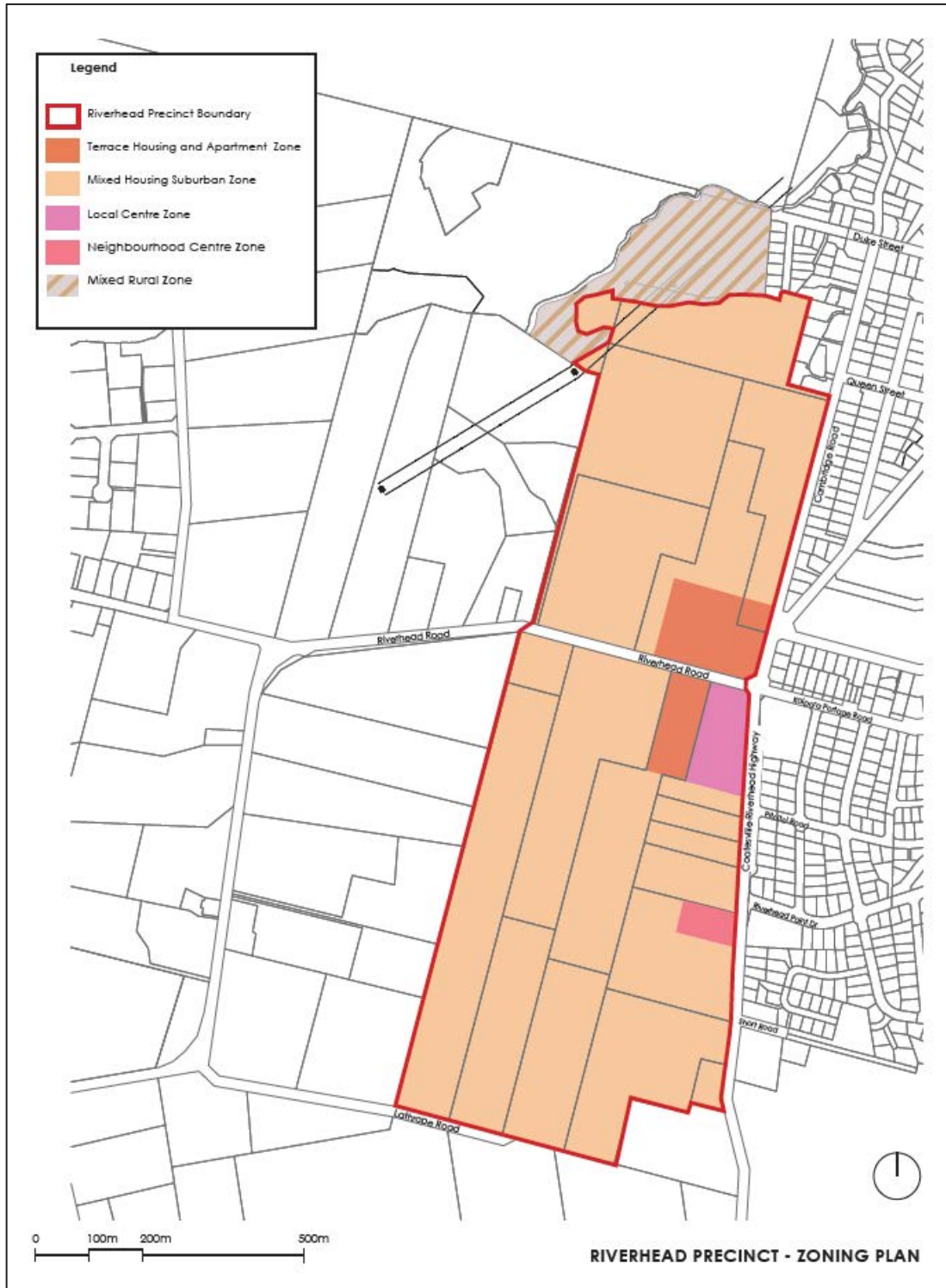
The Residential – Mixed Housing Suburban ('MHS') zone has been applied around the periphery of the THAB zone, with a three storey height limit, in order to transition down to the two-storey development throughout the remainder of the plan change area.

The MHS zone has been applied throughout the remainder of the residential area, but with amended development standards (achieved by way of a sub-precinct). This is to enable more alignment with the Medium Density Residential Standard.

Two centres are proposed to serve the plan change area as well as offer the existing village residents greater choice and convenience. The Local Centre zone is applied at the intersection of Riverhead Road and Coatesville-Riverhead Highway as this location has the highest visibility and passing trade. It is also the most appropriate from a traffic perspective and reinforces the memorial park as the centre of Riverhead.

A neighbourhood centre is proposed along Coatesville-Riverhead Highway, close to the Hallertau Brewery and a future key east-west connection.





**Figure 4: Proposed zoning.**

#### 4.1.3 Other Unitary Plan Controls

In relation to stormwater, it is proposed to apply the Stormwater Management Area Control – Flow 1 ('SMAF 1') across the majority of the Plan Change area to manage the increase in stormwater discharge to sensitive stream environments. The SMAF 1 control is not applied to 1170 and 1186 Coatesville-Riverhead Highway, as shown in **Figure 5** below, because this area is not

proposed to discharge to streams (instead it is part of the Riverhead Point Drive network which is a piped network with secondary conveyance via overland flow within Riverhead Point Drive road).



**Figure 5: Proposed SMAF 1 control.**

Additionally, the Council’s recently approved Network Discharge Consent includes requirements to prepare a Stormwater Management Plan (‘SMP’) and meet defined outcomes. This requirement will be triggered as part of future consent processes.

#### 4.1.4 Proposed Precinct Provisions

RLG propose to apply the 'Riverhead Precinct' to the portion of the Plan Change area proposed to be urbanised to manage the effects of urbanisation on the local environment and to ensure that a quality built environment is achieved. The 'Riverhead Precinct' comprises two sub-precincts summarised below, and shown on the Riverhead Precinct Plan at **Figure 6**:

- Sub-Precinct A is zoned Residential - Terrace Housing and Apartment Building and provides for the greatest height and residential densities at a key intersection adjacent to the Local Centre Zone and public transport facilities. A wider range of non-residential activities is provided for at ground floor; and
- Sub-Precinct B is zoned Residential – Mixed Housing Suburban and provides for a transition in building height between Sub-Precinct A and the surrounding Mixed Housing Suburban area where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.

A package of provisions, including policies, activity standards, development standards, and associated matters of discretion and assessment criteria are proposed to achieve the objectives of the precinct and the wider Unitary Plan. The full set of provisions is set out within Appendix 1 however a summary is provided below:

- More permissive activity statuses for restaurants, cafes, retail, and healthcare facilities within the Residential – Terrace Housing and Apartment Building zone;
- A transport infrastructure staging rule to coordinate the occupation of buildings with the delivery of required infrastructure;
- A road widening setback rule along Riverhead Road to provide for future widening;
- A riparian planting rule requiring a 10m native vegetation riparian buffer each side of a permanent or intermittent stream to mitigate the effects of urbanisation on water;
- A stormwater quality rule to ensure impervious areas are treated and that development incorporates inert building materials to increase the quality of stormwater runoff;
- A rural interface setback rule to provide a buffer between residential activities within the precinct and the neighbouring Mixed Rural zone;
- A fencing rule to require lower height/greater permeability fences where adjoining publicly accessible open space, to ensure development positively contributes to the visual quality and interest of those spaces;
- A height rule that increases height within Sub-Precinct B to 11m (three-storeys) to enable a transition in height from the Terrace Housing and Apartment Building zone and the Local Centre zone;
- Height in relation to boundary, yard, maximum impervious area, building coverage, landscaped area, outlook space and outdoor living space rules to replace those of the underlying zone with those set out in the MDRS.
- Additional assessment criteria to ensure there is adequate wastewater/water supply infrastructure to service development;



- Additional assessment criteria for open space to ensure that the open space network integrates with natural features and delivers the multi-purpose green corridor: a key structuring element for the precinct and required for stormwater conveyance purposes;
- Additional assessment criteria for the layout and design of roads to ensure a highly connected street layout that integrates with the wider Riverhead area and provides for all modes of transport; and
- Additional assessment criteria to recognise and the spiritual connections and key views of cultural significance to of Te Kawerau a Maki and Ngāti Whātua o Kaipara and other interested iwi to ensure hononga to ancestors, the connection and leadership, and whakapapa are all preserved to honour the special significance of this cultural history.

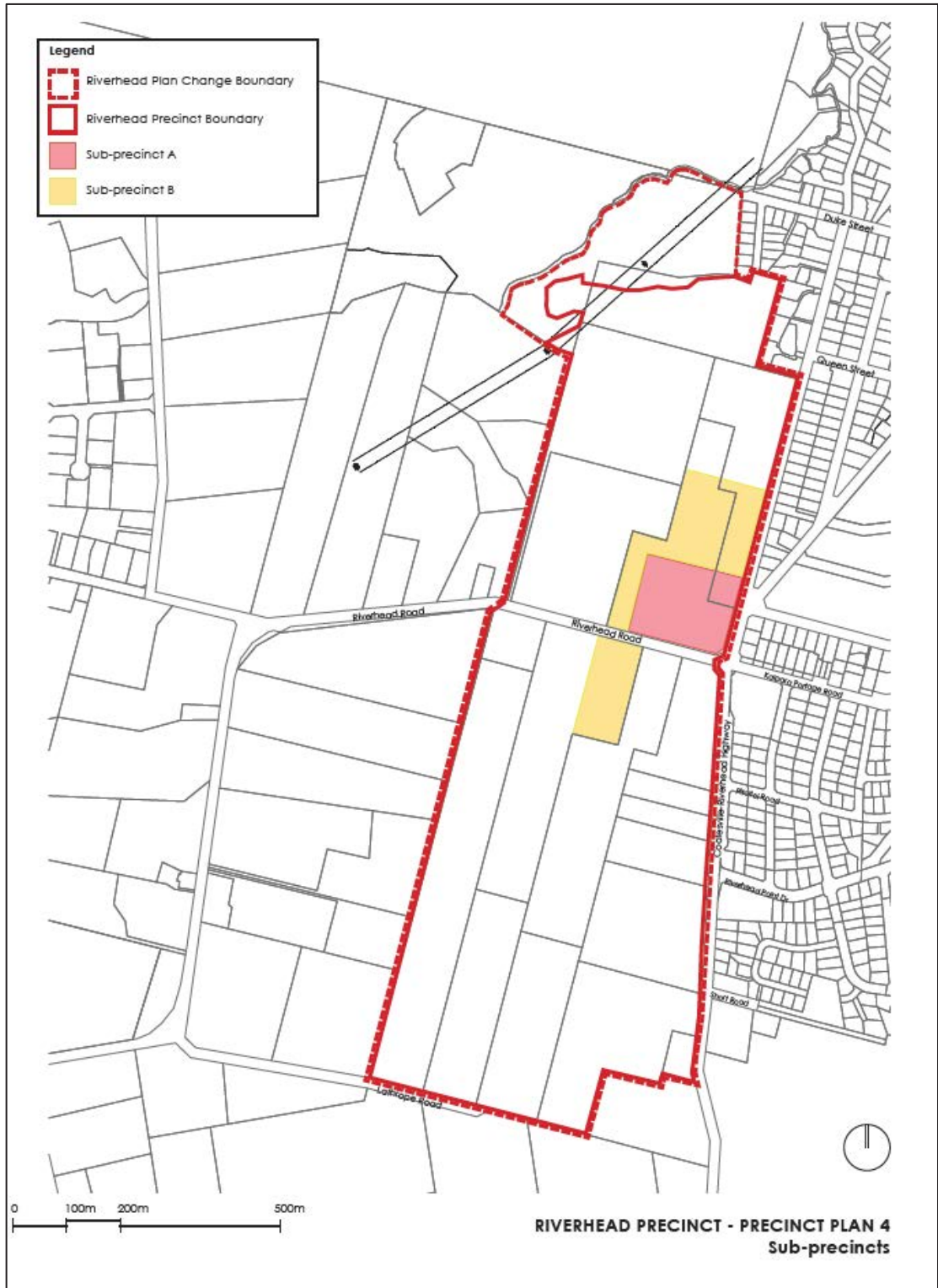


Figure 6: Riverhead Precinct Plan.

## 4.2 Purpose and Reasons for the Plan Change

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

The purpose of the Plan Change is to enable the provision of additional housing in Riverhead along with a Local Centre, a Neighbourhood Centre and a network of open spaces. The Applicant is the majority owner of the Plan Change area and intends to develop their landholdings in a manner consistent with the proposed zoning framework, which this Plan Change request will enable.

The Plan Change is consistent with the objectives of the Council's planning documents and, in this regard, the reasons for the Plan Change are justified and consistent with sound resource management practice.

## 5.0 The Riverhead Structure Plan

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### 5.1 Structure Planning

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The RPS and the AUP provisions support and require a structure planning process to assess whether land is suitable for urbanisation. The structure plan process is embedded within the FULSS provisions and Appendix 1 of the AUP. Accordingly, as a prerequisite to enabling the urbanisation of Riverhead, RLG has undergone a detailed structure planning process to enable the release of land for growth. The Structure Plan covers the same area as the Plan Change.

As part of the Structure Planning process, a comprehensive assessment of the land has been undertaken to determine the constraints and opportunities within the Plan Change area and to identify the most logical and desirable development pattern. This process has resulted in the Riverhead Structure Plan (refer **Appendix 4**).

Through the CKL stormwater assessment to support the Structure Planning process and Plan Change application it has been identified that the northern portion of the Plan Change area is subject to significant natural hazard – flooding and is not suitable for urbanisation.

The Riverhead Structure Plan provides indicative collector and key local roading patterns, positioning of key access points, roading connections and public open spaces and distribution of land use activities. The proposed zoning pattern for the Plan Change area and the Riverhead Precinct Plans have been informed by the Riverhead Structure Plan to ensure that the outcomes sought for Riverhead are able to be successfully implemented.

The structure planning process requires consideration as to whether the land is adequately serviced (or can be serviced) by infrastructure (including transport), and achieves appropriate environmental, social, cultural and economic planning outcomes. Further, this assessment analyses impacts on the transport network and whether urbanisation can be accommodated within the existing transport network or whether transport improvements are required.

The Riverhead Structure Plan has confirmed that there are infrastructure solutions to service urbanisation of the land. These infrastructure solutions are either existing funded projects, are otherwise necessary upgrades based on existing conditions, or are localised upgrades which can be funded and delivered by the applicant without requiring funding from Auckland Council. A breakdown of the infrastructure cost and funding details has been provided within this Structure Plan.

Wastewater will be serviced by an extension of the existing pressure sewer system servicing Riverhead Village, with interim upgrades as development progresses if required to provide additional capacity prior to proposed separation of the Kumeu / Huapai wastewater system from the Riverhead WWPS. In relation to water supply, the existing main has immediate capacity, however a second main will be required and two options for this second main have been identified. In terms of transport infrastructure, only localised improvements and upgrades to the transport network are required and these improvements will be fully funded and delivered by the applicant. Other upgrades are otherwise already funded projects or are necessary based on existing conditions.

The FULSS identifies Riverhead as being development ready in Decade 2 (2028-2032). Investigations into infrastructure availability and demand through the structure plan process however, have confirmed that capacity exists to commence in advance of 2028, subject to sequencing. The Structure Plan proposes to base the sequencing of development within the Riverhead Structure Plan area to align with the timing of transport improvements needed to address safety and capacity issues on State Highway 16, and the completion of the Northern Interceptor. These are both funded projects due to be complete in 2025. Beyond 2025 the Structure Plan indicates that development within the Structure Plan area can be progressed in a coordinated manner with the completion of localised infrastructure upgrades to service development. The proposed plan change includes rules to stage development with these required upgrades.

Structure Plan process is the means by which this growth is enabled and planned for. The Council describes structure planning as to “refine the staging and timing of development and identify the mix and location of housing, employment, retail, commercial and community facilities” (source: Auckland Plan 2050 website).

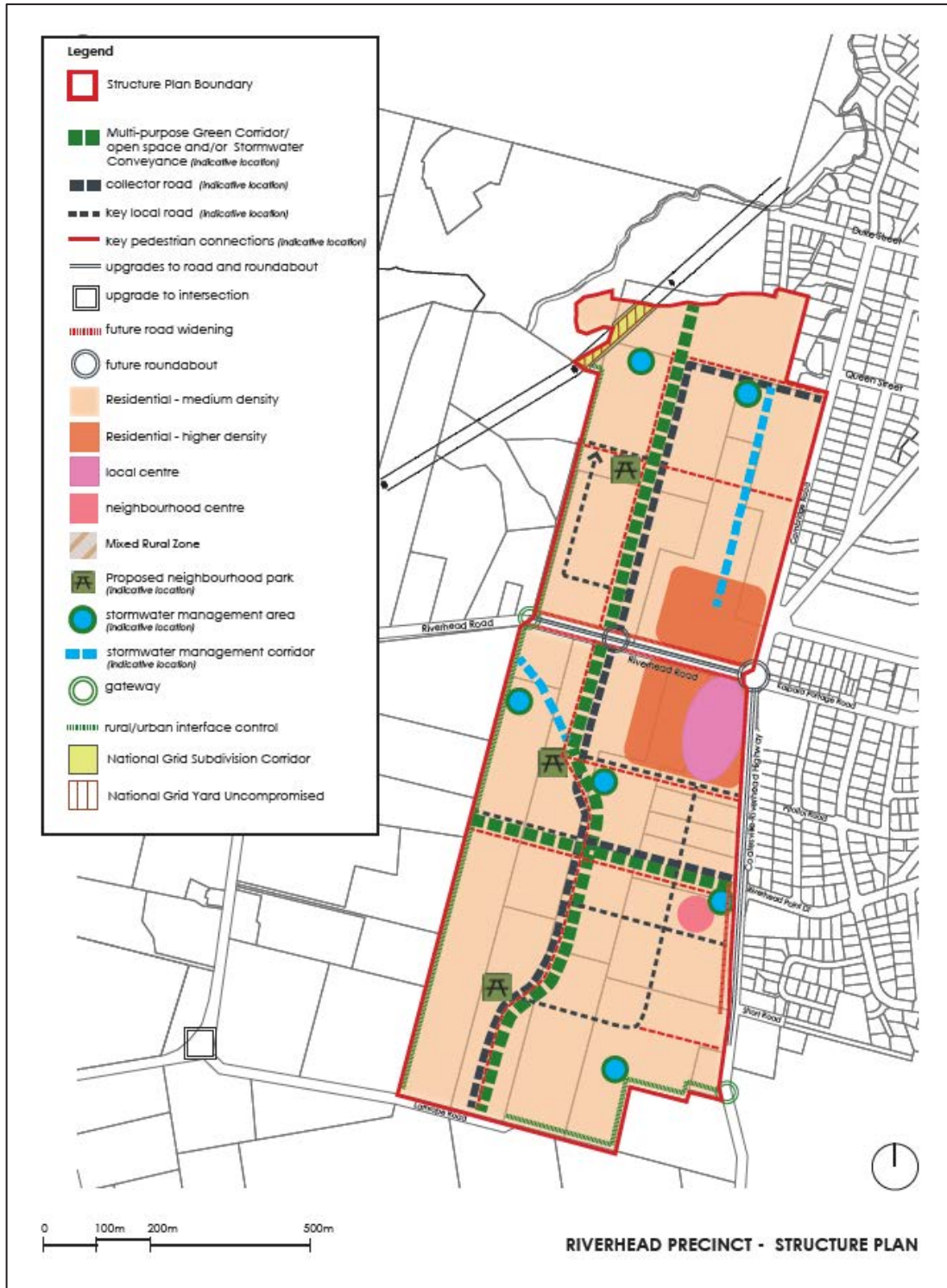


Figure 7: Riverhead Structure Plan.

## 5.2 Consultation and Engagement

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The Structure Plan and Plan Change were subject to extensive engagement with a number of persons/organisations. These include the following:

- Auckland Council and its Controlled Organisations, including Plans and Places, the Development Planning Office, Parks, Auckland Transport, Healthy Waters and Watercare Services Limited;
- The Local Board;
- Waka Kotahi NZ Transport Agency and Te Tupu Ngātahi (the Supporting Growth Alliance);
- Mana Whenua groups, including Te Kawerau ā Maki and Ngāti Whātua o Kaipara in particular;
- The Ministry of Education;
- The local community and general public, including the Riverhead Community Association; and
- Landowners within the Plan Change area.

A report summarising the consultation undertaken to-date is provided as **Appendix 18**.

In respect of Mana Whenua, engagement correspondence was sent to 19 iwi groups were contacted in September and October 2021. Six iwi groups responded confirming their interest in being involved: Te Kawerau a Maki; Ngāti Whātua o Kaipara; Te Rūnanga o Ngāti Whātua; Te Ākitai Waiohua; Ngāti Manuhiri; and Ngāti Whanaunga.

Several hui have been held with Te Kawerau a Maki and Ngāti Whātua o Kaipara, as well as the other iwi (either via hui or further email correspondence). In summary:

- Extensive engagement was carried out with Te Kawerau a Maki and Ngāti Whātua o Kaipara via several hui. Through their input, the Cultural Landscape map was developed as well as the associated Precinct provisions.
- The other four iwi, Te Rūnanga o Ngāti Whātua; Te Ākitai Waiohua; Ngāti Manuhiri; and Ngāti Whanaunga, did express interest in the proposal and a summary of their engagement is provided in section 5.0 of the consultation report (**Appendix 18**).

The key matters identified as being of importance to iwi are addressed through the proposed Precinct provisions, including the objectives, policies, standards, matters and criteria relating to the following:

- Respecting Mana Whenua cultural values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, waahi tapu, and other taonga;
- Managing stormwater quality, including through riparian planting and stormwater treatment; and
- Protecting ecological values of the wetland and stream habitats, including by riparian planting.

In terms of public consultation, two public drop-in sessions (referred to as ‘community days’) were held at the Riverhead School Hall on Friday 6<sup>th</sup> and Saturday 7<sup>th</sup> May 2022. The purpose of the sessions was to gain feedback on the proposed land use scenarios, infrastructure and roading initiatives, development concepts, and to provide opportunities to better understand views of



the local Riverhead community. A series of 12 panels were displayed on the day, to set out key information for the public. Attendees were able to view the displays boards and discuss any issues or aspects of the project with the RLG and key consultants including traffic, urban design, and planning consultants.

While different views are held within the community, the following key themes have come through in the consultation had to-date:

- The significance of transport and roading upgrades prior to development, and concerns for increased traffic congestion on Coatesville-Riverhead Highway and State Highway 16;
- The significance of general infrastructure upgrades, including the management of stormwater and flooding;
- There were concerns about multi-storey buildings;
- A desire to retain the character of 'old' Riverhead;
- The importance of creating green corridor connections to existing walkways; and
- Strong support for additional education facilities, including primary and secondary schools.

The ways in which it is considered that this feedback has been incorporated into the Plan Change are described in section 7.4 the consultation report (**Appendix 18**).

Consultation has been wide ranging and RLG will continue to work with stakeholders as the project progresses.

### 5.3 Accepting the Plan Change Request (Clause 25)

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The Council has discretion to accept or reject a Plan Change request in accordance with Clause 25 of Schedule 1 of the RMA, subject to the matters set out in Clause 25(4)(a)-(e). Given that the AUP has now been operative for more than two years, the Council is able to reject the Plan Change request only on the following grounds:

- The Plan Change request is frivolous or vexatious (clause 25(4)(a));
- The Plan Change request is not in accordance with sound resource management practice (clause 25(4)(c)); or
- The Plan Change request would make the plan inconsistent with Part 5 – Standards, Policy Statements and Plans (clause 25(4)(d)).

In relation to (a), considerable technical analysis has been undertaken to inform the Plan Change, which is detailed in the report below. For this reason, the proposal cannot be described as frivolous or vexatious.

In relation to (c), 'sound resource management practice' is not a defined term under the RMA, however, previous case law suggests that the timing and substance of the Plan Change are relevant considerations. This requires detailed and nuanced analysis of the proposal that recognises the context of the Plan Change area and its specific planning issues.

In this context, the Plan Change is considered to be in accordance with sound resource management practice for the following reasons:

- The proposed zoning supports a compact urban form and integrated urban development;

- While the proposed timing of the rezoning differs from Council’s current proposed staging set out in the FULSS, the more detailed technical analysis undertaken as part of this proposal and as detailed throughout this report, demonstrates that there is no planning reason for preventing development occurring earlier;
- All necessary statutory requirements have been met, including an evaluation in accordance with S32 of the RMA with supporting evidence, and consultation with interested iwi is on-going; and
- The Plan Change is considered to be consistent with the sustainable management purpose of the RMA as discussed in the report below.

The RPS places a strong emphasis on ensuring that urban development delivers a compact urban form and integrated urban development (B2.2.1(2)). The proposed zoning pattern will contribute to a compact urban form through ensuring that future urban growth is contiguous with the urban area and within close proximity to public transport. The technical analysis prepared to support this Plan Change demonstrates that the area can be serviced with targeted infrastructure upgrades in place. In terms of funding as outlined above, the required upgrades are either existing funded or necessary projects or localised upgrades which can be funded and delivered by the applicant without requiring funding from Auckland Council.

Rules are included within the Plan Change to stage the development within the Plan Change area with the delivery of required local transport upgrades. This approach to releasing the land for urbanisation is very common throughout the AUP and has been used in many greenfield precincts including at Redhills, Puhinui and Wainui Precincts to name a few.

In relation to (d), given that the Plan Change area has been identified for future residential use in the Council’s FULSS, then the proposed zoning is not inconsistent with Part 5.

On this basis, the merits of the proposal should be allowed to be considered through the standard Schedule 1 process.

## 6.0 Strategic Planning Framework

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

### 6.1 Resource Management Act

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The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 is designed to improve housing supply in New Zealand’s five largest cities by speeding up implementation of the National Policy Statement on Urban Development (‘NPS-UD’) and enabling more medium density homes. Tier 1 urban authorities are required to apply the medium density residential standard (‘MDRS’) to all relevant residential zones.

Auckland Council notified Plan Change 78 (‘PC 78’) in August 2022 to give effect to the Amendment Act. The key proposed zoning amendments within PC 78 include the following:

- The Terrace Housing and Apartment Building zone is proposed to be amended to enable six storey development within walkable catchments from centres and the existing and proposed rapid transit network;



- The MDRS are proposed to be incorporated into the Mixed Housing Suburban zone. This zone would become the most widespread residential zone, covering most of Auckland outside of walkable catchments;
- The Single House zone and Mixed Housing Suburban zones are proposed to be retained for settlements of less than 5,000 people in rural or coastal locations, where, as discussed below, the MDRS do not have to be applied; and
- A new zone, the Low Density Residential zone, is proposed to be introduced to areas with Qualifying Matters (effectively replacing the Single House and Mixed Housing Suburban zones in main urban areas).

The Amendment Act gives Tier 1 urban authorities discretion whether to apply the MDRS to settlements predominantly urban in character with a population under 5,000<sup>1</sup>, as these are not captured by the definition of a “relevant residential zone”. This discretion applies to Riverhead which at the 2018 Census, had a population of 2,802<sup>2</sup>. Under PC78 the Council is proposing to retain the current zoning of smaller settlements (less than 5,000 population)<sup>3</sup>. The stated explanation is that the smaller settlements are separated from the main urban area, where public transport is limited and increased density of development will add to vehicle travel distances and associated greenhouse gas emissions. As such, the MDRS are not proposed to be applied to 23 settlements across the Auckland region, including settlements such as Maraetai, Kawakawa Bay, Omaha, and Clevedon. MDRS are proposed to apply to the four settlements of Pukekohe, Waiuku, Beachlands, and Warkworth.

It is noted that the submissions period closed on 28 September 2022, and the plan change is currently being heard. A number of submitters have sought that the MDRS be implemented across these settlements.

While the legislation currently provides for discretion as to the application of the MDRS within Riverhead, the development of the Plan Change area will increase the population of Riverhead to over the 5,000 population threshold for the application of the MDRS. Notwithstanding this, the structure planning process that has informed the Plan Change has demonstrated that the density enabled by the MDRS is appropriate within the Plan Change area:

- Development enabled by the Plan Change can be serviced existing infrastructure with targeted upgrades in place;
- Riverhead is currently serviced by a bus service that operates along the Coatesville- Riverhead Highway connecting Riverhead to the Westgate and Albany Metropolitan Centres. There are opportunities for services to increase in frequency with a greater population to service; and
- The scale of development enabled by the Plan Change will enable social amenities such as schools, open spaces, ecological corridors, a retirement village and a village centre to be established. This creates opportunities for residents to live and work closer to home, thereby reducing the need for travel to nearby centres for both residents of the existing settlement and future residents within the Plan Change area.

<sup>1</sup> As recorded at the time of the 2018 Census.

<sup>2</sup> Stats.govt.nz <https://www.stats.govt.nz/tools/2018-census-place-summaries/riverhead>

<sup>3</sup> Pages 32-33 of IPI Section 32 Overview Report, version 5, 10 August 2022

In this case, noting the above, it is considered appropriate to apply an MHS zoning to the Plan Change area, with specific provisions to enable development of a density provided for under the MDRS.

## 6.2 National Policy Documents

### 6.2.1 The National Policy Statement – Urban Development

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

#### Well-Functioning Urban Environment

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

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

The components of a well-functioning urban environment that the Riverhead Precinct will support include:

- Enabling a variety of housing choices across the Plan Change area, including medium density housing within the Mixed Housing Suburban zone and more intensive forms of housing like apartments in accessible areas, like those close to the Local Centre, where there are employment opportunities and public transport connections;
- Respecting Mana Whenua values associated including the key views and connections identified on the Mana Whenua cultural landscape map;
- Promoting good accessibility between housing, jobs, community services and open spaces by enabling more people to live in accessible locations close to public and active transport, which also supports a reduction in greenhouse gas emissions through reduced car dependence;

- Supporting the competitive operation of land and development markets by providing a broadly enabling zone framework and providing flexibility for the market to take up those opportunities; and
- Being resilient through the likely current and future effects of climate change through flooding and promoting a compact and efficient urban form.

### Development Capacity

Under Policy 2 Tier 1 authorities are required to provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. The Plan Change will enable the development of an additional 1450-1750 dwellings (including a retirement village) and additional commercial and retail capacity, significantly adding to Auckland's development capacity within the North-West. The propensity for this development to occur is markedly higher because it is being proposed, planned and project managed by a group of nationally recognised, credible developers who have a track record of delivering new large-scale communities. Therefore, the Plan Change will make a significant contribution to realisable development capacity and competitive land markets. This will better enable the Council to meet Policy 2 given that the current progress in releasing greenfield land to provide additional capacity is falling behind with many of the live zoned greenfield areas and Future Urban zone areas that are planned to be 'development ready' in 2018-2022 not progressing. This is discussed further at Section 6.3.2 below.

### Planned Urban Built Form and Amenity Values

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

The Plan Change will enable development of greater height and density throughout Riverhead than what has previously been provided for. This will result in significant change over time in the built character and may detract from the current amenity values currently enjoyed by some residents, related to the spacious and suburban qualities of Riverhead. The Plan Change will enable a different set of amenity values to be realised over time, when compared to those currently associated with suburban environments. In particular, the amenity values offered within medium and higher density urban environments include more vibrant areas with additional amenities which residents able to access amenities easily and largely via active modes of transport. Policy 6 essentially recognises and gives weight to these changing amenity values.

### Responsive Planning

Local authority decisions are required to ensure development is integrated with infrastructure planning and funding as well as being responsive, particularly in relation to proposals that would add significantly to development capacity and add to well-functioning urban environments even if the development capacity is unanticipated by RMA planning documents or is out of sequence with planned land release (Objective 5 and Policy 6). As discussed in Section 6.3.2, the urbanisation of land within the Plan Change area is out of sequence with the FULSS however, there is a need to

urbanise this land now to overcome growth challenges and there is funded infrastructure available to service the Plan Change area.

### Reduction in Greenhouse Gas Emissions

Objective 8 supports a reduction in greenhouse gas emissions and resilience to the current and future effects of climate change. The subject land forms an extension of Riverhead; a satellite town in the north-west of Auckland. The Plan Change area is currently zoned Future Urban and therefore has already been identified by Council as being appropriate for urbanisation through its Future Urban zoning. Therefore, in respect of how the proposed zone and precinct provisions will facilitate urban development that achieved Objective 8 of the NPS-UD, the following is noted:

- The Plan Change proposes a comprehensive and integrated development over a large land holding that is contiguous with existing urban development on the opposite side of Coatesville Riverhead Highway. This scale of development will enable social amenities such as schools, open spaces, ecological corridors, a retirement village and a village centre to be established. This creates opportunities for residents to live and work closer to home, thereby reducing the need for travel to nearby centres for both residents of the existing settlement and future residents within the Plan Change area; and
- The Plan Change will result in a street network that provides for walking and cycling infrastructure, as well as improving connectivity to the existing settlement such as adding additional pedestrian crossings on Coatesville-Riverhead Highway.

### Summary

Overall, it is considered that the Riverhead Structure Plan gives effect to the NPS:UD.

## 6.2.2 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement 2010 ('**NZCPS**') contains objectives and policies relating to the coastal environment to achieve the purpose of the RMA. The NZCPS is applicable to this Structure Plan as the Waitemata Harbour is the ultimate receiving environment for the streams which drain the Structure Plan area.

This Structure Plan and development of the identified area for urban land uses will give effect to the NZCPS in that any future land use activities will need to comply with the Auckland-wide stormwater quality and stormwater management provisions which will manage sediment and contaminant runoff, which could make its way into the coastal receiving environment. Further mitigation measures will be considered as part of a future resource consent process via the certification requirements of the Council's regional-wide Network Discharge Consent.

## 6.2.3 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 ('**NPS-FM**') sets a national policy framework for managing freshwater quality and quantity. Of relevant to the proposed plan change, the NPS-FM seeks to:

- *Manage freshwater in a way that 'gives effect to Te Mana o te wai through involving tangata whenua, and prioritising the health and wellbeing of water bodies, then the essential needs of people, followed by other uses.*
- *Improve degraded water bodies.*

- *Avoid any further loss or degradation of wetlands and streams.*
- *Identify and work towards target outcomes for fish abundance, diversity and passage and address in-stream barriers to fish passage over time.*

It is proposed to apply the Stormwater Management Area Control – Flow 1 (**'SMAF 1'**) across the portions of the Plan Change area proposed to be urbanised to manage the increase in stormwater discharge to sensitive stream environments. Accordingly, an integrated stormwater management approach has been proposed and a number of best practicable options have been identified in the SMP included at **Appendix 10**. The SMP incorporates a range of measures to manage potential effects on water quality and quantity associated with the proposed change in land use.

The intermittent stream and wetlands present within the Plan Change area have been identified by RMA Ecology (refer to **Appendix 9**) and are largely concentrated within the northern portion of the Plan Change area and are highly degraded. Key structuring elements are identified within proposed Precinct Plan 1, including roads, pedestrian connections, and open spaces. These features are located clear of existing freshwater bodies and it is anticipated that the delivery of works will not result in the loss of extent or value associated with the stream and wetland within the Plan Change area. Existing waterbodies will also be protected in accordance with the provisions of Chapter E3 Lakes, rivers, streams and wetlands and relevant regulations of the National Environmental Standard for Freshwater Management (**'NES-FW'**). The Plan Change will also enhance streams as Riparian enhancement along the identified streams is required under the proposed Riverhead Precinct.

As the proposed plan change excludes works that would result in a loss of freshwater body extent or value, and stormwater runoff will be appropriately managed it is considered that the implementation of the proposed stormwater strategy in conjunction with the enhancement of riparian margins will be sufficient to manage the potential adverse effects associated with changes in water quality and provide for enhancement of ecological values.

#### 6.2.4 National Policy Statement on Electricity Transmission 2008

The National Policy Statement on Electricity Transmission (**'NPS-ET'**) sets out the objective and policies to manage the effects of the electricity transmission network. The NPS-ET recognises the importance of the National Grid network by enabling its operation, maintenance, and upgrade, and establishing new transmission resources to meet future needs.

The National Grid Corridor overlay applying under the AUP gives effect to the NPS by controlling the location of activities, and the extent of subdivision and development near the National Grid Line. The north-western portion of the Plan Change area is traversed by the National Grid Corridor overlay and a 110kv Transpower Transmission Line, and the measures in D26 National Grid Corridor Overlay will be adhered to in order to avoid reverse sensitivity effects on the National Grid Corridor.

#### 6.2.5 National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land (**'NPS-HPL'**) came into effect on 17 October 2022. The purpose of the proposed NPS-HPL is to improve the way that highly productive land is managed under the RMA. It does not provide absolute protection of highly productive land, but rather it requires local authorities to proactively consider the resource in their region or district to ensure it is available for present and future primary production. The proposal does not impact

on existing urban areas and land that councils have identified as future urban zones in district plans.

As the Plan Change area is currently within the Future Urban Zone, the policies contained within the NPS-HPL do not apply.

## 6.2.6 National Planning Standards

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

## 6.2.1 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB) seeks to respond to the ongoing decline of biodiversity in Aotearoa New Zealand by aiming to protect, maintain and restore indigenous biodiversity. It sets out a range of regulated measures that require Local Government to take a more proactive role in protecting indigenous biodiversity. In broad terms, the NPS-IB requires every territorial authority to undertake a district-wide assessment in accordance with Appendix 1 of the NPS-IB to determine if an area is significant indigenous vegetation and/or significant habitat of indigenous fauna.

The Riverhead Plan Change area is currently an active horticultural site. Land within the site has been intensively worked for many years and all past existence of indigenous vegetation has long since been removed.

## 6.2.2 National Environmental Standards

The National Environmental Standards ('NES') that are relevant to this Plan Change include:

- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 ('NESCS'); and
- NES for Freshwater 2020 ('NES-FW').

These NES documents have been taken into account in the preparation of the relevant expert reports and are further discussed in Section 9 of the report below. Assessments undertaken to date confirm that the NESCS will apply at the time of development to manage contaminated land, to be appropriately addressed as part of future resource consent processes. As discussed above, the delivery of key structuring elements within the Plan Change area is unlikely to require resource consent under the NES-FW, however the relevant regulations will apply at the time of future development and will also be appropriately assessed through future resource consent processes.

## 6.3 Auckland Council Strategic Plans

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### 6.3.1 The Auckland Plan 2050

The Auckland Plan is the key strategic document which sets the Council's social, economic, environmental and cultural objectives. A key component of the Auckland Plan is the Development Strategy which sets out how future growth will be accommodated up to 2050. The Auckland Plan

focuses new development in existing urban areas and provides for 'managed expansion' in future urban areas. This managed expansion is with reference to structure planning processes.

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

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

The proposed residential zoning pattern at Riverhead will provide quality, compact neighbourhoods adjacent to the existing Riverhead settlement. The proposed zoning pattern will encourage a range of housing choice with the more intensive housing development adjoining and adjacent to the Local Centre, and overlooking public open spaces. The proposed Terrace housing and Apartment Building and Mixed Housing Suburban zoning, along with the proposed precinct provisions, will make efficient use of greenfield land while ensuring appropriate transitions to the surrounding land uses.

The Plan Change introduces a planning framework that seeks to achieve quality urban design outcomes for the Plan Change area. To ensure development is consistent with the overall design strategy and the land use anticipated through the Structure Plan, the precinct incorporates a package of development standards that control residential built form, onsite amenity and the amenity of adjoining sites. The provisions also seek to integrate development with the surrounding land use and built form.

The precinct also includes provisions to ensure development and subdivision provides the collector and local road networks, cycle and pedestrian networks, open spaces and riparian margins as envisioned in the Structure Plan. The activity status of some land uses are proposed to be modified in Sub-Precinct A, to enable greater non-residential use to provide local amenities.

Riverhead is currently serviced by public transport. There is a bus service that operates along the Coatesville- Riverhead Highway connecting Riverhead to the Westgate and Albany Metropolitan Centres. The SH16 Northwest Bus Improvements project will also improve public transport accessibility from Westgate to the City Centre.

The future road network within the precinct will accommodate all modes of transport to promote walkability and cycling.

New open spaces to serve the new residential neighbourhoods will be developed in accordance with the provisions in E38 Subdivision – Urban.

Infrastructure upgrades are required to service the Riverhead precinct. As previously discussed, these upgrades are either funded or otherwise necessary based on existing conditions, or localised upgrades that will be funded by the developers. To ensure that the upgrades are in place prior to development occurring the Plan Change contains provisions to ensure that development progresses in a coordinated manner with the required upgrades.



These strategic objectives of the Auckland Plan are reflected in the AUP objectives and policies, which are assessed in detail below.

### 6.3.2 Future Urban Land Supply Strategy 2017

The FULSS, refreshed in July 2017, implements the Auckland Plan and gives effect to the NPS on Urban Development Capacity by identifying a programme to sequence future urban land over 30 years. The strategy relates to greenfield land only and ensures there is 20 years of supply of development capacity at all times and a seven year average of unconstrained and ready to go land supply. 'Ready to go' land is land with operative zoning and bulk services in place such as the required transport and water infrastructure.

The FULSS identifies Riverhead/Huapai and Kumeu as having capacity to accommodate approximately 6,600 dwellings and centres. It stages development in Riverhead for Decade 2 (2028-2032) to time with transport improvements needed to address safety and capacity issues on State Highway 16, and the completion of the Northern Interceptor. The FULSS states that alternative staging may be considered appropriate through the structure planning process<sup>4</sup>. This illustrates an intent by Council to be open to new development opportunities, subject to more detailed analysis and evaluation through a future structure planning process.

The detailed analysis that has occurred through the Riverhead Structure Plan supports bringing the staging of the Plan Change area forward relative to the timing in the FULSS. This is largely due to the fact that the key bulk infrastructure upgrades which determined the staging originally to 2028 are either not required for development of the Riverhead Structure Plan area or will be complete by 2025 (SH16 improvements and Northern Interceptor Stage 2). The localised upgrades that are required can be funded by the developer.

In addition, commencing the development of the Riverhead Structure Plan area will provide much needed greenfield development capacity in Auckland's north-west. **Figure 8** below shows Council's progress with zoning Future Urban land in Auckland. This illustrates that many of the live-zoned greenfield areas and Future Urban zone areas that are planned to be 'development ready' in 2018-2022 are, in fact, not. For example, land at Whenuapai and Paerata (outside of Paerata Rise) which was planned for 2018-2022, has not been rezoned. In the case of Paerata, there do not appear to be any plans on the horizon for this to occur. Of the 2018-2022 FULSS areas, only parts of Warkworth North and Drury West have been rezoned and these have been privately initiated. The lack of progress being made to implement the FULSS, in addition to the demand for additional housing in the northwest FUZ, is creating a growth challenge.

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<sup>4</sup> Future Urban Land Supply Strategy Page 10



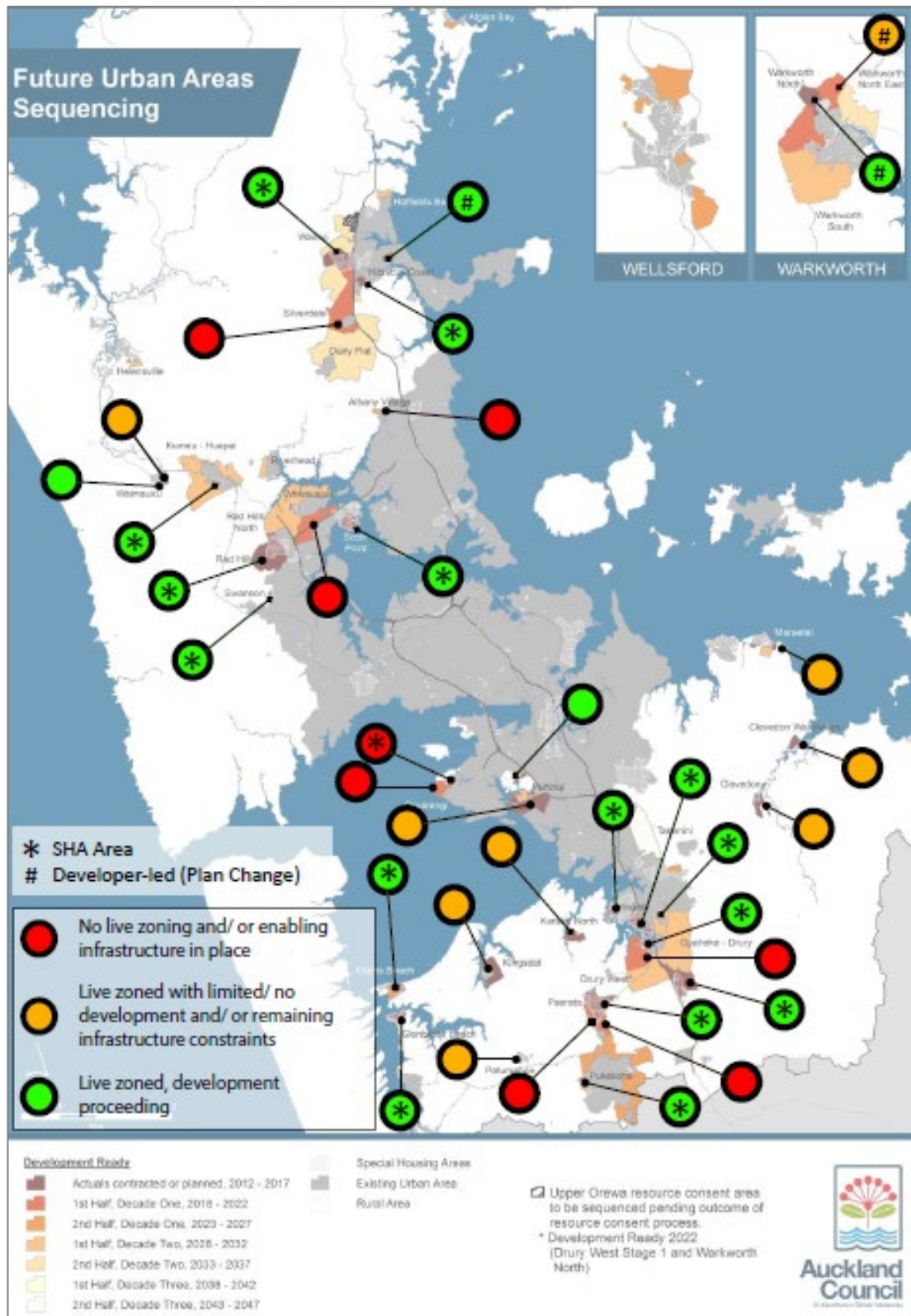


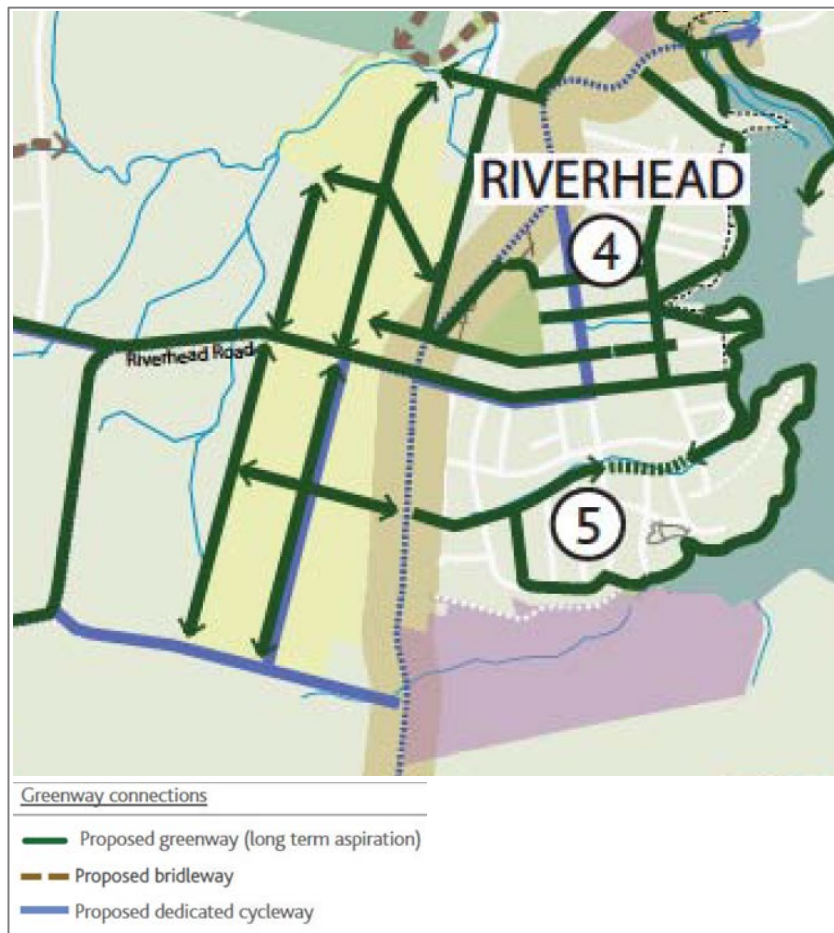
Figure 8: Showing the Council’s progress with live-zoning land in line with the FULSS.

### 6.3.3 Open Space and Community Facilities

#### 6.3.3.1 Rodney Greenways Plan

The aim of the Rodney Greenways Local Paths Plan for Kumeu, Huapai, Waimauku and Riverhead (December 2016), is to *'provide cycling and walking connections which are safe and pleasant, while also improving local ecology and access to recreational opportunities'*.

The proposed Structure Plan is generally consistent with this objective and the Greenways Plan which is shown in **Figure 9** below:



**Figure 9: Greenway connection aspirations for Riverhead.**

The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.

The proposed east-west green corridor aligns with Riverhead Point Drive as indicated by the Greenways Plan and both the proposed Structure Plan and the Greenways Plan show connection to Riverhead Forest in the north. Two key east-west pedestrian connections are also proposed north of Riverhead Road.

In line with the Greenways Plan, dedicated cycleways are anticipated along Riverhead Road and Coatesville Riverhead Highway and the proposed Plan Change provides for road widening to enable this to be delivered.

The following is noted in respect of inconsistencies with the above Greenways Plan:

- No direct greenway connection is provided within the Structure Plan to Princes Street/Memorial Park, although the retirement village proposes a pedestrian link from the end of the Cambridge Road/Princes Street intersection through to a central landscaped corridor and thereafter through to the rest of the northern plan change area. As noted above, this would include a public access easement for day-time access;
- Although Cambridge Road lies outside the Plan Change area, the Plan Change does include an upgrade to the road (from rural to urban profile) and includes a new footpath;
- No greenway is proposed along the western boundary of the Plan Change area which is the rural-urban interface. Future development is likely to “back on” to this boundary and provide privacy and security fencing which is unlikely to provide adequate surveillance/safety of a pedestrian/cycle route. There is also no existing ecological corridor in this location nor desire lines to existing or proposed destinations; and
- The Greenways Plan proposes a dedicated cycleway along the southern boundary of the Plan Change area, along Lathrope Road and connecting to Coatesville-Riverhead Highway. Due to topographical constraints in this area which render this linkage unfeasible, the Structure Plan proposes a more accessible and safer linkage within the southern portion of the plan change area.

It is noted that the Greenways Plan was likely prepared with a lesser understanding of the existing constraints across the site, whereas the Plan Change has been developed with these in mind. In this way, the intent of the Greenways Plan is considered to have been achieved within the Structure Plan and the proposed Precinct.

### 6.3.3.2 General Policies and Action Plans

The Council has prepared various policies and action plans regarding the provision of community facilities and open space in Auckland, including:

- Open Space Provision Policy 2016;
- Parks and Open Space Acquisition Policy 2013; and
- Community Facilities Network and Action Plan 2015.

These policies have been taken into account in preparing the open space strategy for the Plan Change area and determining future community facility needs. This is discussed further in Section 9 of the report below.

## 6.4 Regional Policy Statement and Plans

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### 6.4.1 Auckland Unitary Plan (Operative in Part)

The AUP is the primary statutory planning document for Auckland. It is comprised of the Regional Policy Statement, Regional Coastal Plan, Regional Plan and District Plan. The AUP provides the regulatory framework for managing Auckland’s natural and physical resources while enabling growth and development and protecting matters of national importance.

The RPS sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. The RPS broadly gives effect to the

strategic direction set out in the Auckland Plan. Section 75(3)(c)16 states that a District Plan must give effect to any Regional Policy Statement and Section 75(4)(b)17 states that a District Plan must not be inconsistent with a Regional Plan for any matter specified in Section 30(1)18.

A comprehensive assessment of the proposed rezoning against the relevant objectives and policies of the RPS are provided at **Appendix 5**. This demonstrates that the proposed rezoning will give effect to the RPS.

Of particular relevance to this Plan Change is section B2 of the RPS, which identifies the issues, objectives and policies governing urban growth and form within the Auckland Region. In particular, sections B2.2 and B2.6 which set out provisions relating to urban growth and rural and coastal towns and villages. A detailed assessment of these objectives and policies is provided below:

## 6.4.2 B2.2 Urban Growth and Form

### *B2.2.1 Objectives*

- (1) *A quality compact urban form that enables all of the following:*
  - (a) *a higher-quality urban environment;*
  - (b) *greater productivity and economic growth;*
  - (c) *better use of existing infrastructure and efficient provision of new infrastructure;*
  - (d) *improved and more effective public transport;*
  - (e) *greater social and cultural vitality;*
  - (f) *better maintenance of rural character and rural productivity; and*
  - (g) *reduced adverse environmental effects.*
- (2) *Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).*
- (3) *Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.*
- (4) *Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.*
- (5) *The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.*

### *B2.2.2 Policies*

#### *Development capacity and supply of land for urban development*

- (1) *Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years' projected growth in terms of residential, commercial and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.*
- (2) *Ensure the location or any relocation of the Rural Urban Boundary identifies land suitable for urbanisation in locations that:*
  - (a) *promote the achievement of a quality compact urban form*
  - (b) *enable the efficient supply of land for residential, commercial and industrial activities and social facilities;*

- (c) *integrate land use and transport supporting a range of transport modes;*
- (d) *support the efficient provision of infrastructure;*
- (e) *provide choices that meet the needs of people and communities for a range of housing types and working environments; and*
- (f) *follow the structure plan guidelines as set out in Appendix 1;*

*While:*

- (g) *protecting natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character;*
- (h) *protecting the Waitākere Ranges Heritage Area and its heritage features;*
- (i) *ensuring that significant adverse effects from urban development on receiving waters in relation to natural resource and Mana Whenua values are avoided, remedied or mitigated;*
- (j) *avoiding elite soils and avoiding where practicable prime soils which are significant for their ability to sustain food production;*
- (k) *avoiding mineral resources that are commercially viable;*
- (l) *avoiding areas with significant natural hazard risks and where practicable avoiding areas prone to natural hazards including coastal hazards and flooding; and*
- (m) *aligning the Rural Urban Boundary with:*
  - i. *strong natural boundaries such as the coastal edge, rivers, natural catchments or watersheds, and prominent ridgelines; or*
  - ii. *where strong natural boundaries are not present, then other natural elements such as streams, wetlands, identified outstanding natural landscapes or features or significant ecological areas, or human elements such as property boundaries, open space, road or rail boundaries, electricity transmission corridors or airport flight paths.*

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

*Quality compact urban form*

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



- (b) *at a local level through local and neighbourhood centres that provide for a range of activities to support and serve as focal points for their local communities.*
- (7) *Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following:*
- (a) *support a quality compact urban form;*
- (b) *provide for a range of housing types and employment choices for the area;*
- (c) *integrate with the provision of infrastructure; and*
- (d) *follow the structure plan guidelines as set out in Appendix 1.*
- (8) *Enable the use of land zoned future urban within the Rural Urban Boundary or other land zoned future urban for rural activities until urban zonings are applied, provided that the subdivision, use and development does not hinder or prevent the future urban use of the land.*
- (9) *Not applicable*

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

- The proposed shift in the RUB will ensure that urbanisation of land that is subject to significant natural hazard risk from flooding is avoided in accordance with B2.2.2(2)(l). The proposed shift in RUB will align with the floodplain extent which is a strong natural boundary in accordance with B2.2.2(2)(m)(i).
- The Plan Change supports a quality compact urban form, by enabling urbanisation of land that is immediately adjacent to the existing Riverhead urban area and contained within the existing Rural Urban boundary. The proposed zoning pattern will enable provision of a range of housing types, and the proposed centres will provide local employment opportunities;
- The Plan Change has been informed by the Riverhead Structure Plan which has been developed in accordance with the structure plan guidelines set out in Appendix 1 and therefore gives effect to policy B2.2.7(d);
- The Plan Change includes infrastructure-related provisions to ensure the provision of infrastructure is coordinated with development and therefore gives effect to policy B2.2.7(c);
- The proposal will facilitate improved social outcomes through including provisions that enable the establishment of neighbourhood and local centres, open spaces, a variety of housing types (which will result in a variety of occupants ranging from families with children and working professionals as well as empty nesters and the elderly). This in turn will lead to greater social and cultural vitality. This gives effect to Objective B2.2.1(1)(e) and Policy B2.2.2(2)(e); and
- The development will provide for greater productivity and economic growth through providing for residential growth and commercial activities. Residential growth would be provided for adjacent to an existing residential area and the proposed neighbourhood and local centres would provide local services for the community. This gives effect to Objective B2.2.1(1)(b) and Policy B2.2.2(5) and (6).

### 6.4.3 B2.6 Rural and Coastal Towns and Villages

#### *B2.6.1 Objectives*

(1) *Growth and development of existing or new rural and coastal towns and villages to be enabled in ways that:*

(a) *avoid natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character unless growth and development protects or enhances such values; and:*

The potential development of the land does not affect any scheduled items, any significant ecological areas or Mana Whenua sites. The development will enhance and retain non-scheduled natural and physical resources of the site including the streams, wetlands and a beech tree at 298 Riverhead Road with recognised amenity value. The land is not located within immediate proximity to the coastal marine area.

(b) *avoid elite soils [LUC 1] and where practicable prime soils [LUC 2 or 3] which are significant for their ability to sustain food production:*

The subject land is identified as being Land Use Capability ('LUC') 2 soil or 'prime soil'<sup>5</sup>, however it is currently already zoned as Future Urban and located within the Rural Urban boundary. The appropriateness of the urbanisation of this land was considered at the time it was zoned Future Urban by Council, in accordance with Policy B2.2.2 which requires that the location of the Rural Urban Boundary identifies land for urbanisation that avoids prime soils 'where practicable'.

(c) *avoid areas with significant natural hazard risks:*

A geotechnical assessment and flood assessment (refer to **Appendix 15** and **Appendix 10**) have been undertaken as part of the technical evaluation of the Plan Change area. The land in the northern portion of the Plan Change area is subject to extensive flood risk and is proposed to be retained for rural land use to avoid urbanisation of this area. To the extent that natural hazard risks have been identified on the land that is to be developed under this PPC, the provisions in E36 of the AUP will ensure such risks of development are appropriately managed.

With regard to general geotechnical matters, the assessments to date confirm that structural stability construction methodologies will ensure any structures are safely constructed and therefore natural hazard risk can be avoided.

With regard to potential flooding and overland flow natural hazards, the stream, watercourse and overland flow channels proposed as part of future development will ensure such events are minimised. The proposed Stormwater Management Plan confirms this.

Therefore, it is considered that any areas with significant natural hazard risks are avoided and other natural hazard risks are appropriately addressed.

(d) *are consistent with the local character of the town or village and the surrounding area; and*

The current Riverhead township is characterised by suburban detached dwellings on single lots. The Plan Change will enable a variety of building height and form for new residential and commercial development. The proposed zoning and precinct standards for height have been coordinated to ensure complementarity to the character of the existing town while also enabling opportunities for greater housing capacity and choice to promote efficient use of greenfield land. The Neighbourhood Design Assessment prepared for the Plan Change (refer to **Appendix 6**)

<sup>5</sup> NZLRI Land Use Capability 2021 website.

confirms that the proposed development outcomes will integrate with the character of Riverhead and will result in positive design outcomes for not only the Plan Change land but also the wider locality.

*(e) enables development and use of Mana Whenua resources for their economic well-being.*

Refer to section 5.2 above.

*(2) Rural and Coastal towns and villages have adequate infrastructure.*

The technical analysis to inform the Plan Change confirms that there are infrastructure solutions that can service the Plan Change area. These infrastructure solutions are either existing funded/necessary projects or localised upgrades which can be funded and delivered by the applicant without requiring funding from Auckland Council. Wastewater will be serviced by an extension of the existing pressure sewer system servicing Riverhead Village, with interim upgrades as development progresses if required to provide additional capacity prior to proposed separation of the Kumeu / Huapai wastewater system from the Riverhead Wastewater Pump Station. In relation to water supply the existing main has immediate capacity however, a second main will be required and two options for this second main have been identified. The proposed Riverhead Precinct includes additional assessment criteria to ensure there is adequate wastewater/water supply infrastructure to service development.

In terms of transport infrastructure, only localised improvements and upgrades to the transport network are required and these improvements will be fully funded and delivered by the applicant. The proposed Riverhead Precinct includes rules to stage development with the required transport infrastructure upgrades.

#### ***B2.6.2 Policies***

*(1) Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that:*

- (a) maintains or enhances the character of any existing town or village*
- (b) incorporates adequate provision for infrastructure*
- (c) avoids locations with significant natural hazard risks where those risks cannot be adequately remedied or mitigated*
- (d) avoids elite soils [LUC 1] and avoids where practicable prime soils [LUC 2 and LUC 3] which are significant for their ability to sustain food production*
- (e) maintains adequate separation between incompatible uses*
- (f) is compatible with natural and physical characteristics including the coastal environment*
- (g) provides access to the town or village through a range of transport options including walking and cycling*

The majority of the above policies give effect to the matters raised in objectives relating to urban growth of rural towns, that are addressed above. The Plan Change provisions and analysis undertaken within the associated technical reports ensure the above policy outcomes are achieved. The Plan Change provisions and plans identify individual sub-precincts, proposed land use zoning, pedestrian and roading networks, as well as the proposed and indicative open space network.



Additionally, the above policy requires consideration of access through a range of transport options. Transport options such as improved roads and enhanced walking/cycling facilities have been considered (in addition to roading upgrades) and form part of the Integrated Transport Assessment (refer to **Appendix 8**) and are included in the Plan Change.

The Plan Change also ensures adequate separation distances are provided for potentially incompatible uses. For example, urban development is adequately separated from streams and their margins. Specific methodologies will be employed to ensure any construction-related effects (including erosion and sediment management measures) and stormwater discharges are avoided, remedied or mitigated to ensure the protection of sensitive receiving environments and habitats.

The provision of yard standards to the western and northern edge of the Plan Change, adjoining the Mixed Rural zone, will establish adequate separation between potentially incompatible rural and urban uses, and reverse sensitivity issues.

- (2) *Avoid locating new or expanding existing rural and coastal towns and villages in or adjacent to areas that contain significant natural and physical resources, that have been scheduled, unless growth and development protects or enhances such resources by including any of the following measures:*
- (a) *the creation of reserves*
  - (b) *increased public access*
  - (c) *restoration of degraded environments*
  - (d) *creation of significant new areas of biodiversity*
  - (e) *enablement of papakainga, customary use, cultural activities and appropriate commercial activities.*

There are no scheduled items within or in proximity to the land that is proposed to be rezoned for urbanisation. Regardless, the Plan Change includes provision for the measures listed in this policy, by providing for reserves and the potential for increased public access including public roads/footpaths/cycle paths over land that is currently private property.

Further, from an ecological perspective, the AUP, NPS-FM and NES-FW include provisions to ensure that identified streams and riparian margins are protected, with the Plan Change including provisions for native planting in riparian margins to ensure they are restored and enhanced as part of the development of the land. The restoration of these areas will create significant new areas of biodiversity through the removal of pests and weeds, replanting, maintenance and protection.

- (3) *Enable the establishment of new or significant expansions of existing rural and coastal towns and villages through the structure planning and plan change process in accordance with Appendix 1 Structure Plan guidelines.*

The Riverhead Structure Plan is attached to this Plan Change request (refer to **Appendix 4**) and it addresses the structure planning requirements set out in Appendix 1 of the AUP. The Structure Plan maps and technical reports address the Appendix 1 Structure Plan guidelines and support the expansion of the Riverhead town. The Plan Change is in accordance with the Structure Plan and provides additional detailed technical assessment that supports the expansion of the Riverhead township and ensures the required infrastructure and transport upgrades are coordinated with development within the precinct.

*(4) Enable small scale growth of and development of rural and coastal towns without structure planning.*

Small scale growth is not proposed within the Plan Change and therefore this policy does not apply.

### Summary

Overall, in terms of the relevant objectives and policies of B2.6, it is considered that an expansion of the Riverhead town gives effect to these RPS provisions. The policies enable significant expansions to existing rural towns through the structure plan process and subsequent plan changes. This approach is being followed for Riverhead. Therefore, it is concluded that the urbanisation of Riverhead as proposed within this Plan Change is consistent with the RPS and will give effect to it.

## 6.5 Other Plans

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### 6.5.1 Iwi Planning Documents

As described in section 5.2 above, engagement correspondence was sent to 19 iwi groups were contacted in September and October 2021. Six iwi groups responded confirming their interest in being involved: Te Kawerau ā Maki; Ngāti Whātua o Kaipara; Te Rūnanga o Ngāti Whātua; Te Ākitai Waiohua; Ngāti Manuhiri; and Ngāti Whanaunga. Several hui have been held with Te Kawerau a Maki and Ngāti Whātua o Kaipara, as well as the other iwi (either via hui or further email correspondence).

Of these six interested iwi, none have publicly available iwi management plans or planning documents. Notwithstanding this, the feedback received during the consultation process, in particular from Te Kawerau a Maki and Ngāti Whātua o Kaipara who have engaged more extensively, has been taken into account in the Structure Plan and Plan Change.

## 7.0 Assessment of Effects

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

### 7.1 Urban Form

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An Urban Design Statement has been prepared by Urban Acumen and is included as **Appendix 6** of this report. The following structuring elements are identified within the proposed precinct plan and will determine the built urban form within the Plan Change area:

- A north-south and east-west oriented multi-purpose green corridors which will integrate the provision of open space and stormwater management features. The north-south corridor will align with a key collector road, and their location will reflect a potential portage routh of cultural significance and to promote views to high points in Riverhead Forest; The policy framework proposed in the precinct sets out the desired outcomes for this corridor;

- The identification of key collector and local roads where they provide for key connectivity outcomes, including internal connectivity within the Plan Change area and integration with the existing road network. The identified road networks are predominantly north south oriented and will promote good solar orientation for future development; and
- The provision of a focal point at the centre of Riverhead, supported by the proposed local centre and Terraced Housing and Apartment Building ('THAB') zoning. This focal point will complement existing neighbourhood scale business activities within the Riverhead township.

The proposed precinct assessment criteria seek to ensure that the above key features and elements are delivered at the time of future subdivision and development. Overall, it is considered that the proposed plan change will enable the development of positive urban form outcomes that contribute to a quality compact urban form and well-functioning urban environment.

## 7.2 Centres Hierarchy

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A Centres Assessment for the plan change has been undertaken by Property Economics and this is enclosed as **Appendix 7**.

In terms of commercial growth, the Riverhead Retail catchment generates around \$100m in annual retail expenditure. Based on the future development of Riverhead Precinct (plus expected growth elsewhere in the catchment), retail spending is expected to grow to \$161m by 2038. A significant portion of the retail expenditure is expected to occur in higher order centres such as Westgate, which is well positioned to service the higher-order shopping needs of Riverhead. In this regard, any retail development within Riverhead is considered to be complementary to these centres and the overall centres hierarchy.

The Economic Assessment also states that the following is sustainable within Riverhead:

- Approximately 6,850m<sup>2</sup> GFA of retail and commercial services (including a 3,200m<sup>2</sup> supermarket) with a supermarket;
- Approximately 3,970m<sup>2</sup> GFA of retail and commercial services without a supermarket; and
- Approximately 1-1.5 hectares of business zoned land to accommodate the above.

Based on this advice, the most appropriate zone for the Riverhead Centre is Local Centre because this often takes the form of a small to medium sized centre anchored by an appropriately-sized supermarket. This would provide for the development of mainly convenience retail and commercial services and some office activity.

Overall, it is considered that the proposed Business – Local Centre and Business – Neighbourhood centre zoning of the Village Centre of Riverhead is considered to be consistent with the centres hierarchy of the AUP and will not compromise the economic viability of the existing business centres or result in an out of context centre. The limited size of the centre within the plan change area will ensure that it remains complementary to the centres hierarchy and will not grow to a size that creates future inconsistencies challenging the centres approach of the AUP.

## 7.3 Visual Amenity

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Zoning within the Plan Change area includes Business – Local Centre and Business – Neighbourhood Centre to support local business development and Residential – THAB and Residential – Mixed Housing Suburban within residential areas. A Landscape and Visual Assessment

(‘LVA’) has been prepared by Boffa Miskell (refer **Appendix 16**) and a Neighbourhood Design Statement has been prepared by Urban Acumen (refer **Appendix 6**).

The Local Centre is proposed at the intersection of Riverhead Road and Coatesville-Riverhead Highway and the Neighbourhood Centre is proposed at along Coatesville-Riverhead Highway, opposite Riverhead Point Drive and the existing Neighbourhood Centre within the Riverhead township. Existing standards within the AUP Local Centre and Neighbourhood Centre zones will apply, including total building heights of 18m and 13m respectively. THAB zoning is proposed to the east of the Plan Change area adjacent to Cambridge Road and Riverhead Road and the proposed local centre. The remainder of the Plan Change areas is proposed to be zoned Mixed Housing Suburban. The proposed precinct standards include heights of up to 18m in the Local Centre zone, , 16m in the THAB zone, 11m in the Mixed Housing Suburban zone immediately adjoining THAB (Sub-precinct B), and 8m plus 1m roof height in the remainder of the Mixed Housing Suburban zone.

While greater heights will be permitted in the proposed local centre and THAB zones when compared to the existing Riverhead township, this area will act as a focal point within Riverhead, providing for variation in building height and form. The LVA finds that this area will act as an appropriate landmark to signify the centre of the Riverhead township, with the enabled built form contributing positively to visual interest, diversity, and legibility. The proposed neighbourhood centre is considered to be viewed as a logical extension to the existing neighbourhood centre within the Riverhead township.

As discussed above, the location of the THAB zone will complement the proposed local centre as a focal point within the Plan Change area and has also been located within close proximity to existing public transport networks. The THAB zone will enable a variety of housing choice and typologies, including a retirement village for which a separate resource consent is being sought concurrently. Where the THAB and Local Centre zones interface with the Coatesville-Riverhead Highway, the width of the road corridor in conjunction with zoning provisions will provide an appropriate transition between The Site and residential properties to the east of the Coatesville-Riverhead Highway.

The remainder of the Plan Change area is proposed to be zoned Mixed Housing suburban with varying height limits. Immediately around the THAB, a height limit of 11m will apply (through Sub-Precinct B), while the remainder of the zone is subject to the 8m height limit underlying height limit, which responds to the existing built character of the Riverhead Settlement. This approach to height enables a transition in height from the THAB and Local Centre down to the two-storey. The MHS zone is considered to enable the efficient use of greenfield land and support a greater variety of housing choice within Riverhead, while also responding to the existing Single House and rural zoning adjacent to the Plan Change area.

Overall, it is acknowledged that the Plan Change will introduce visual change to the Riverhead township and adjacent rural environment. In particular, the LVA concludes that visual effects within the immediate vicinity of the Plan Change area will be low-moderate while views from the wider context will be low to very low. Having regard to the analysis, conclusions, and recommendations of the LVA and Urban Design Statement, it is considered that the potential built form outcomes that will be enabled by the plan change will not create significant adverse visual amenity effects and will be appropriate in the context of the existing surrounding Single House and Mixed Rural zones environment, and national direction to enable housing choice and diversity.

## 7.4 Natural Character and Landscape

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The LVA prepared by Boffa Miskell considers the potential effects of development within the Plan Change area on natural character and landscape values.

The LVA finds that the Plan Change area does not contain any areas or features that are considered to be of high landscape value. In addition, there are no outstanding natural features or landscapes as identified under the AUP within the Plan Change area, with the closest being the Paremoremo Escarpment landscape feature located over four kilometres to the east.

Natural features identified within the Plan Change area include the stream and associated riparian vegetation located to the eastern side, a tree with intrinsic age, health, and character attributes located on the western side, pastoral grassland, and shelter belts that have been established within the existing rural environment. Proposed Precinct 1, which identifies the indicative location of key structural elements provides the opportunity to retain the existing stream and tree with identified value. In addition, the proposed precinct standards will provide for enhancement planting within the riparian margins of the stream (10m either side). The LVA concludes that the pastoral grasslands and shelter belts are not considered to have high natural character values. While development within the Plan Change area will result in visual changes and the clearance of some existing natural features, it is considered that this can be anticipated as Future Urban zoned land is utilised to accommodate urban development.

In terms of landscape character, it is acknowledged that the development of the Plan Change area will change the existing character of the landscape, which is currently rural in character and includes a number of rural production activities including horticulture, and some rural lifestyle blocks. In particular, development will include earthworks which will alter the undulating nature of the topography urban built features, including roading open spaces, and residential and commercial buildings. While these changes will be visible to viewing audiences within the immediate vicinity of the existing Riverhead township and road users passing the site, they are considered to be in keeping with the development of greenfield land and will not be out of character within a Future Urban zoned environment. As discussed above, visual effects associated with development of the Plan Change area have been assessed to range for very low to low-moderate.

With regard to the wider landscape context, of significance is the Riverhead Forest is located to the north. While greater building heights and densities will be enabled within the proposed THAB and centre zones and have the potential to restrict views towards the Riverhead Forest, it is noted that there are limitations to existing views due to the relatively flat landscape. Some views will also be retained through the north south oriented multi-purpose green corridor identified within proposed Precinct Plan 1, which has been positioned to reflect a potential portage route of cultural significance and to promote views to high points in Riverhead Forest. It is considered that the Riverhead Forest will provide a well-defined landscape and visual backdrop that is complementary to the development of the Plan Change area.

Overall, having regard to the analysis of the LVA, the development outcomes that will be enabled by the proposed Plan Change are considered to be appropriate in terms of effects on natural character and landscape values.

## 7.5 Cultural Values

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As discussed in Section 5.2 above and set out in the consultation report provided as **Appendix 18**, engagement correspondence was made to 19 iwi groups and a hui was subsequently held with Te Kawerau ā Maki and Ngāti Whātua o Kaipara to develop a cultural landscape map for the Riverhead Structure Plan area. The following features were identified to be of cultural significance:

- Viewshafts to high points in Riverhead Forest to the north;
- Viewshafts to high points near Kumeu to the west; and
- Three east west orientated potential original portage routes.

These features have been incorporated into proposed Precinct Plan 1 through the identification and orientation of key local and collector roads and the multi-purpose green corridor. The proposed precinct provisions including objectives, policies, standards, matters of discretion, and assessment criteria also address the identified matters of importance to mana whenua and cultural values.

The proposed precinct provisions were discussed with Te Kawerau ā Maki and Ngāti Whātua o Kaipara at a hui held on 9 June 2022. Te Kawerau ā Maki have since been involved with drafting the precinct provisions which relate to managing the effects of the proposed plan change and future development on cultural values. Feedback provided by Te Kawerau ā Maki has informed the proposed precinct provisions, particularly with regard to managing the effects and impacts of future development on values associated with the Māori cultural landscape. It is anticipated that engagement with Te Kawerau ā Maki and Ngāti Whātua o Kaipara will be ongoing as the proposed plan change and precinct provisions are further developed.

## 7.6 Transport

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An Integrated Transport Assessment ('ITA') has been prepared by Flow Transportation for the Plan Change and is included as **Appendix 8** to this report.

The ITA identifies a number of transportation upgrades to enable development within the Plan Change area, has regard to potential trip generation, and provides an assessment on the appropriateness of internal road network with regard to roading hierarchy and design.

These matters are addressed in turn below.

### 7.6.1 Transportation Upgrades

A number of localised transportation measures and upgrades are identified within the ITA. In summary, these include:

- **Riverhead Road:** updates including widening of the road reserve to accommodate berms and dedicated footpaths and cycle paths. Detailed design will be determined at the time of resource consent, having regard to the layout of other existing roads.
- **Coatesville-Riverhead Highway:** upgrades including localised widening of the road reserve in places, to accommodate berms, dedicated footpaths and cycle paths, and public transport infrastructure. Detailed design will be determined at the time of resource consent, having regard to the layout of other existing roads.

- **Lathrope Road:** upgrades to provide a sealed carriageway and a footpath on the northern side.
- **Cambridge Road:** upgrades along the frontage of the Plan Change area (western side of Cambridge Road), including providing a formed sealed carriageway, and a new footpath on the western side of the road, in front of the Plan Change area.
- **Queen Street:** a new footpath is also proposed on the northern side of Queen Street between Cambridge Road and Coatesville-Riverhead Highway.
- **Intersection upgrades:** a number of intersection upgrades are proposed at existing intersections, as well as a new intersection, where access will be provided to the Plan Change area. The upgrade works include, but are not limited to, the provision of separated pedestrian and cycle paths, widening, and new priority controls.
- **Speed limit reductions:** speed limit reductions are proposed on Riverhead Road, Coatesville-Riverhead Highway, and Lathrope Road, including 50km/hour and 60km/hour along sections of Riverhead Road, and 50km/hour along sections of Lathrope Road and Coatesville Riverhead Highway. Speed limited reductions will lower vehicle speeds when entering the Plan Change Area and the existing Riverhead Village, providing a safer environment for existing and future road users, including pedestrians and cyclists. It is noted that the Speed Bylaw will apply to speed limit reductions at the time of development. The lower speed philosophy across and around the Plan Change area has been discussed with Auckland Transport and agreed to in principle.
- **Right-turn bays:** the intersections of Coatesville-Riverhead Highway / Old Railway Road and also Riverland Road require upgrading to include right-turn bays within Coatesville-Riverhead Road.

The above transportation works will also align with the aspirations of the Te Tupu Ngātahi Supporting Growth Programme, which identifies roading and safety improvements for Coatesville-Riverhead Highway between State Highway 16 and Riverhead, with hearings currently underway for new designations on Coatesville-Riverhead Highway.

The following transportation works are also planned and funded within the surrounding area, creating additional transportation benefits for Riverhead in terms of improving roading safety, capacity, alleviating congestion, and increasing mode choice:

- **State Highway 16 Brigham Creek to Waimauku upgrade:** this project is proposed under the Regional Land Transport Plan 2021-2031 ('RLTP') and will deliver a range of safety and capacity improvements between Waimauku and the end of State Highway 16 at Brigham Creek Road. This is a fully-funded project, and the Notice of Requirement was lodged with Auckland Council in late 2022; and
- **State Highway Northwest Bus Improvements:** this project is also proposed under the RLTP and will allow a new express bus service to operate along State Highway 16, connecting Northwest Auckland to the city centre.

## 7.6.2 Trip Generation

The ITA includes modelling of the expected traffic generation predicted as a result of development within the Plan Change area.



The ITA finds that while the proposed Plan Change will generate new trips, a number of trips will be local and internal within Riverhead due to the range of activities provided in the existing Riverhead township and Plan Change area.

The effects of the proposed Plan Change on the wider roading network are assessed in ITA relative to key intersections surrounding the Plan Change area. In summary, it is anticipated that all intersections are able to perform well, without significant queue lengths or delays. In particular, the SH16 / Coatesville-Riverhead Highway intersection has been tested across multiple scenarios, including a worse case 100% buildout in 2038, with higher sensitivity trip generation rates and the intersection is predicted to perform well for all of the scenarios tested.

Taking the above into account, it is considered that the trip generation effects at this intersection will be acceptable.

### 7.6.3 Internal Road Network

The proposed new roads include a series of local and connector roads to facilities trips within the Plan Change area, acknowledging that Riverhead Road and Coatesville-Riverhead Highway are existing arterial roads which provide higher movement functions, including catering for public transport services and general traffic.

Access to the Plan Change area from Riverhead Road and Coatesville-Riverhead Highway will be provided through new collector roads, which are proposed at locations to ensure safe sight distances and are identified on proposed Precinct Plan 1 to ensure that an integrated and connected movement network can be achieved. The proposed precinct provisions will also provide guidance on the key roading design outcomes of each road type, while the detailed design layout of roads will be determined at future resource consent stages.

### 7.6.4 Transport Summary

The effects of the Plan Change on the existing and future transport network have been assessed in the ITA and are determined to be acceptable. The ITA has demonstrated that the extent of urban development enabled by the proposed Plan Change can be accommodated within the surrounding road network, subject to the proposed transportation upgrades.

The proposed precinct provisions include specific standards, matters of discretion and assessment criteria to ensure that the required transportation upgrades are provided in an integrated manner at the time of future development. An appropriate roading hierarchy is proposed within the Plan Change area in accordance with Auckland Transport's Roads and Streets Framework to support their intended place and movement functions and the location of key routes have been identified.

Overall, it is considered that the proposed Plan Change will not create significant adverse effects on the transportation network.

## 7.7 Infrastructure and Servicing

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The proposed stormwater management strategy and SMP is set out in the stormwater management assessment prepared by CKL, included as **Appendix 10** of this report.

The wastewater and water supply servicing strategy within the Plan Change area is set out in the water and wastewater servicing strategy prepared by GHD, included as **Appendix 11** of this report.



### 7.7.1 Stormwater Management

The proposed SMP sets out the best practicable options for managing stormwater within the Plan Change area and confirms that the proposed maximum allowable impervious area is appropriate, being 65% in residential areas and 90% in business areas.

It is proposed that the SMP will be adopted into the region-wide stormwater Network Discharge Consent and provisional approval for the SMP will be sought during the plan change process.

The identified requirements for managing stormwater quality and flow within the Plan Change include:

- Water quality treatment (90<sup>th</sup> percentile event) for all impervious areas; and
- Stormwater Management Area Flow ('SMAF') 1 retention and detention for all impervious areas other than those located within 1170 and 1186 Coatesville-Riverhead Highway (part of the Riverhead Point Drive catchment) as these areas are not proposed to discharge to a stream receiving environment.

A stormwater management strategy for the Plan Change area has been developed to address the above requirements. The stormwater management strategy demonstrates the overarching principles of how stormwater is to be managed, and has the objective of minimising or mitigating any detrimental effects of urban development on the receiving environment.

The stormwater management strategy includes:

- Installation of new piped networks for the primary conveyance of the 10% Annual Exceedance Probability ('AEP') flows;
- Directing overland flows to roads for the secondary conveyance of the 1% AEP flows;
- Communal and centralised devices, including raingardens and swales;
- The use of inert roofing and cladding materials for buildings; and
- Appropriate design of discharge outlets.

Overall, it is considered that the above methods will be sufficient to achieve hydrological mitigation of the effects of stormwater runoff generated by increased impervious areas enabled by the proposed plan change.

### 7.7.2 Water Supply

GHD's assessment identifies that there is capacity within an existing reservoir that services the existing Riverhead township to service the Plan Change area in the short term. A second supply main to the existing reservoir would be constructed to provide for capacity and ensure resilience. GHD's assessment identifies two available options to facilitate this upgrade. The later stages of development will require an upgrade to the transmission main and reservoir to provide sufficient water supply.

### 7.7.3 Wastewater Servicing

Modelling undertaken by GHD confirms that there is capacity within the existing Riverhead wastewater pump station to service the Plan Change area in the short term. In the long term, the planned diversion Kumeu and Huapai from the Riverhead system will also provide sufficient capacity to service the entirety of the Plan Change area. Should development within the Plan

Change area occur prior to this diversion, the GHD assessment identifies a number of available options to provide for additional capacity, including both localised upgrades relative to the Plan Change area and the construction of a new wastewater pump station.

#### 7.7.4 Other Utilities

In terms of telecommunications, Chorus has confirmed that the Plan Change area can be serviced by the existing fibre network.

Communications with Vector confirm that the Plan Change area can be serviced by Vector's reticulated electrical unit, subject to the installation of new cables and equipment which will provide the Plan Change area with points of supply.

Correspondence with Chorus and Vector in relation to the Plan Change area is included at **Appendix 12**.

#### 7.7.5 Infrastructure and Servicing Summary

It has been demonstrated that infrastructure solutions for three waters servicing and utilities are available to service the immediate development of the Plan Change area. In terms of water supply, wastewater, and electricity, upgrades to provide additional capacity would be required as development progresses, and several suitable options to facilitate these upgrades have been identified.

The detailed design of infrastructure provision will therefore be determined at the time of future development, noting that the AUP Auckland-wide chapters and provision for infrastructure servicing and stormwater management will apply. Appropriate provision has also been made within the proposed Precinct matters of discretion and assessment criteria to consider whether appropriate arrangements are in place for infrastructure servicing at the time of subdivision and development.

### 7.8 Existing Infrastructure

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There are Transpower Transmission Lines which traverse the northern portion of the Plan Change area. These lines are covered by the National Grid Yard Overlay under the AUP which will restrict the location of new structures, extent of land disturbance, including earthworks and the operation of construction machinery in relation to those transmission lines. It is therefore considered that the effects of future development within the Plan Change area can be appropriately managed with respect to existing nationally significant infrastructure.

### 7.9 Ecology

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An Ecological Assessment prepared by RMA Ecology has been undertaken to support the Plan Change and is included at **Appendix 9** to this report. This includes an assessment of ecological values of freshwater and terrestrial ecosystems. A combination of desktop assessments and site visits were carried out for the Plan Change area, during which, key terrestrial and aquatic habitat features were identified across the site. An arboriculture assessment of existing trees within the Plan area has also been carried out by Greenscene and is included at **Appendix 17** of this report.

### 7.9.1 Terrestrial Ecology

The Plan Change area is predominantly worked in pasture, with no presence of indigenous vegetation or species recognised to be threatened or at risk. A copper beech tree meeting the criteria to be nominated as a notable tree under the AUP is located at the western side of the Plan Change area at 298 Riverhead Road, Riverhead. This tree has been assessed by Greenscene to have a score of 23, where a score of 20 is needed to meet the threshold for nomination in accordance with Auckland Council guidelines.

The proposed precinct provisions provide recognition of the copper beech tree through identification in proposed Precinct Plan 2 and as a distinctive site feature in the proposed precinct policies and assessment criteria, which will apply to future consideration of the overall layout and design of development and provide opportunities to retain the tree.

The Ecological Assessment finds that native wildlife across the Plan Change area is reflective of historic modification to the land, and comprises predominantly of exotic bird and lizard species. Native copper skinks are likely to be present in the northern parts of the site where there are a greater number of farming activities and farming debris that provide habitat. Due to the significantly modified nature of the land form, it is considered that the effects of future development on terrestrial ecological and biodiversity values can be appropriately managed under the existing provisions Auckland wide provisions of the AUP (OP) for land disturbance and any modification to or removal of vegetation.

### 7.9.2 Freshwater Ecology

Waterbodies are concentrated within the northern portion of the Plan Change area where there is an intermittent stream and four wetlands. The intermittent stream flows to an unnamed tributary of the Rangitopuni Stream, running along the northern boundary of the Plan Change Area, and has been assessed as having been highly modified, and having moderate ecological values. The four wetlands vary in size and quality, with the two smallest wetlands being botanically simplistic and the largest having been degraded by an extensive drain system, historic stock access, and exotic weeds.

The northern portion of the Plan Change area containing the largest sized wetland will predominantly be rezoned Mixed Rural and therefore not subject to urban development. Within the areas proposed to be urbanised, the proposed Precinct Plans demonstrate that key roading connection through the Plan Change area can be accommodated while avoiding the reclamation of and works in and around streams and natural wetlands. In particular, key infrastructure, including roads and pedestrian access connections are located clear of the stream and all natural wetlands. The intermittent stream and a number of low-lying wetlands have also been incorporated into the multi-purpose green corridor, which forms one of the key structuring elements identified in the proposed precinct provisions, providing for the protection of these waterbodies. In addition, the proposed precinct provisions include a standard that provides for the protection and restoration of riparian margins, which will ensure positive effects as the land is developed. It is therefore considered that any future works that may affect streams and natural wetlands can be appropriately managed under the existing statutory framework with respect to freshwater and ecological values, including Chapter E3 Lakes, Rivers, Streams, and Wetlands under the AUP (OP), the NES-FW, and the NPS-FM.

The proposed stormwater management approach has been assessed by RMA Ecology to be appropriate in terms of stream and wetland values with regard to improving water quality and managing the quantity of discharge.

Overall, it is considered that the effects of the urbanisation of land within the Plan Change area can be appropriately managed with regard to the ecological values of freshwater bodies.

### 7.10 Natural Hazards – Flooding

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The Plan Change area is subject to flood plains, flood prone areas, and overland flow paths.

A flood risk assessment has been prepared by CKL, and is included as **Appendix 10** of this report. The modelling considers pre and post-development scenarios and has accounted for the proposed impervious area coverages proposed within the Precinct Provisions.

In summary, this assessment includes modelling undertaken in relation to three downstream catchments being 'Riverhead Point Drive', 'Southern Stream', and 'Riverhead Forest Stream'. The modelling results indicate that urban development within the Plan Change area will not exacerbate existing flood hazards or create new flood hazards within the sub-catchments discharging to 'Riverhead Point Drive' and 'Southern Stream'.

It has been assessed that new development is likely to impact the Riverhead Forest Stream sub-catchment due to existing flooding issues that have the potential to be exacerbated by additional development and insufficient capacity within the existing Riverhead Road culvert. CKL identify that flood risks and hazards within this sub-catchment can be appropriately managed through the upgrade of the Riverhead Road culvert.

Overall, there is a high degree of confidence that potential flood hazards associated with development within the portions of the Plan Change area proposed to be urbanised can be appropriately managed at the time of development and subject to detailed design. It is also noted that the provisions in Chapter E36 Natural Hazards and Flooding of the AUP would also apply to any development within identified flood plains and overland flow paths, which would manage the effects associated with new development in within flood hazards.

### 7.11 Natural Hazards – Geotechnical

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With regard to geotechnical constraints, the Plan Change area is considered to be generally near-level, with moderate slopes on the edge of erosional gully features located to the south east. A preliminary geotechnical assessment has been prepared by Soil and Rock and a copy is included as **Appendix 15** of this report.

The geotechnical assessment has considered the suitability of the Plan Change area for urban development with regard to soil qualities and the condition of topsoil and fill areas, groundwater, slope stability, and expansivity. Overall, it is concluded that the Plan Change area will be able to accommodate future urban development in accordance with the proposed zoning. In particular, no areas of significant geotechnical hazards that would require a lower intensity of development were identified. Detailed geotechnical investigations will be required as part of future resource consent applications regarding the management of earthworks, groundwater, and building foundation design.

Based on these findings, it is considered that the land conditions are generally suitable for urban development and can be appropriately managed through the resource consent process and the provisions of Chapter E36 Natural Hazards and Flooding of the AUP (OP).

## 7.12 Land Contamination

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A Detailed Site Investigation ('DSI') has been undertaken by Soil and Rock for the Plan Change Area, and is included at **Appendix 14** of this report. This DSI confirms the presence of contaminants exceeding acceptable concentrations include heavy metals (arsenic, metal, zinc) and asbestos within the Plan Change area. The regulations of the National Environmental Standard for Assessing and Managing Contaminants in the NESCS therefore apply.

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

The DSI concludes overall that the Plan Change area is suitable for future residential and commercial development, and there is no evidence to suggest that the presence of contamination would prevent the proposed rezoning of land as sought in the plan change.

Overall, it is considered that there is a high level of confidence that the Plan Change area can be remediated and that the potential adverse effects of land contamination associated with land disturbance and the change of use of the site can be appropriately managed through the existing statutory framework with respect to the NES regulations and AUP for any discharges.

## 7.13 Heritage and Archaeology

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An assessment of the archaeological and heritage values of the Plan Change area has been undertaken by Clough & Associates, and their report is included as **Appendix 13** of this report. While there are no existing records of archaeological or other historic heritage sites being recorded within the Structure Plan area, a detailed field survey identified two archaeological sites relating to early European settlement.

These sites include the mid-19<sup>th</sup> century Riverhead Mill water race at Lot 20 DP 499876 and the former late 19<sup>th</sup> century Ellis house at Lot 1 DP 164978. Clough and Associates have assessed the significance of these places in accordance with the AUP criteria. In this case, the assessment of the relevant criteria identifies significance evaluations of 'little' for the majority of the criteria, with 'moderate' for several. None of the classifications are 'considerable' or 'outstanding'. Therefore, it is considered that the objectives and policies of RPS B5.2 are not applicable as these sites are not 'significant historic heritage places'. As such, additional protection of these sites with 'little' or 'moderate' value is not required. Although there are no present known features or structures of significance in relation to these sites, there is the possibility that subsurface remains of archaeological value due to their information potential are located during land development.

In the event that subsurface remains are uncovered during future development, the archaeological provisions of the Heritage New Zealand Pouhere Taonga Act 2014 ('HNZPTA') will apply. It is also anticipated that standard accidental discovery protocols in the AUP will be implemented in the event that any archaeological material is uncovered during excavation works. The Precinct provisions include a Special Information Requirement which states that any future application for land modification on 22 Duke Street (the location of the mill race) must be accompanied by an

archaeological assessment, including a survey. The purpose of this assessment would be to evaluate the effects on archaeological values associated with the Waitemata Flour Mill/Riverhead Paper Mill site R10\_721 prior to any land disturbance, and to confirm whether the development will require an Authority to Modify under the Heritage New Zealand Pouhere Taonga Act 2014.

The assessment prepared by Clough and Associates confirms that these measures under the HNZPTA and AUP are appropriate to manage and mitigate the potential adverse effects on archaeology values associated with future development within the Plan Change Area.

#### 7.14 Reverse Sensitivity

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The Plan Change area adjoins land that is zoned Mixed Rural to the north, south and west, which has the potential to create reverse sensitivity effects. The proposed Plan Change locates THAB zoning away from the Mixed Rural zone, and proposes the lower intensity Mixed Housing Suburban zoning at this interface. The Neighbourhood Design Statement (refer **Appendix 6**) recommends that a greater side and rear yard setback is applied. This will provide separation between future development and existing rural activities, as well as provide opportunities for future land owners to implement additional buffers and screening. The proposed precinct standards will require any Mixed Housing Suburban zoned site within the Plan Change area immediately adjoining the Mixed Rural zone to apply a 5m side and rear yard setback from common boundaries with this zone.

With regard to the potential for reverse sensitivity effects, it is noted that the purpose of the Mixed Rural zone is to provide for rural production and other non-residential activities at a scale that is compatible with typically smaller site sizes. In this case, the adjacent rural land uses include horticulture (greenhouses), lifestyle living, open pasture that is grazed, and a motor camp. The extent of land available for intensive rural production activities adjacent to the Plan Change area is also constrained by an existing permanent stream, which traverses the Mixed Rural zone in a north south direction. It is therefore considered that the proposed zoning pattern and Precinct Provisions provide appropriate opportunities within the Plan Change area to manage reverse sensitivity issues between residential and rural land.

#### 7.15 Summary of Effects

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

## 8.0 Section 32 Analysis

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### 8.1 Appropriateness of the Proposal to achieve the purpose of the Act

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

### 8.1.1 Objectives of the Plan Change

The purpose or overarching objective of the plan change is to deliver a comprehensively developed residential environment through the expansion of the existing Riverhead settlement to primarily provide additional land for housing. The plan change will achieve medium and high density residential activities serviced by a local centre to provide for local convenience needs and some limited employment opportunity. A smaller neighbourhood centre is proposed along Coatesville-Riverhead Highway to provide for daily needs within a walkable catchment. The plan change will also achieve a connected multi-modal transport network which integrates with the existing settlement. In addition, the plan change will retain and enhance key ecological features to improve ecological outcomes, and respect Mana Whenua values. Overall, the plan change is considered to be complementary to the Riverhead Structure Plan.

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

- The extension of Riverhead rural town to create a comprehensively developed residential environment that integrates with the existing settlement, the natural environment and respects Mana Whenua values;
- Development provides a variety of housing types and sizes, including Integrated Residential Development, to meet demand;
- Local employment opportunity is provided in the Local Centre and Neighbourhood Centre, while complementing higher order centres;
- Development is coordinated with the provision of infrastructure, transport upgrades and social facilities;
- Adverse effects on receiving waterbodies are minimised or mitigated;
- The protection, restoration, enhancement and maintenance of ecological habitats within the Plan Change area including riparian margins is achieved; and
- The relationship of Mana Whenua with the Māori cultural landscape is recognised, protected, and enhanced.

The proposed precinct objectives enable a comprehensive and integrated urban development outcome whilst also achieving positive environmental outcomes. The requirement for growth and transport/infrastructure upgrades to be developed together will also ensure development progresses in a coordinated manner.

### 8.1.2 Assessment of the Objectives against Part 2

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





**Table 1: Assessment of Objectives against Part 2 of the RMA.**

Objective	RMA S5 Purpose	RMA S6 Matters of National Importance	RMA S7 Other Matters	RMA S8 Treaty of Waitangi
<b>Theme 1: Well-functioning Urban Environment</b>				
(2) A variety of housing types and sizes that respond to: (a) Housing needs and demand; and (b) The neighbourhoods planned urban built character. (3) Activities in Business – Local Centre zone do not compromise the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone.	These objectives seek to enable future communities of Riverhead to meet their social, economic, and cultural well-being by: <ul style="list-style-type: none"> <li>Ensuring that a selection of housing is available to meet the diverse needs of the community; and</li> <li>Providing opportunity for local employment while respecting the higher order centres and the role these have within the wide community.</li> </ul>	This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The PPC and the AUP contain a suite of objectives which will appropriately manage matters of national importance within the Plan Change area.	This objective does not compromise the recognition of, or the provision of other matters.	These objectives will not offend against the principles of the Treaty of Waitangi.
<b>Theme 2: Coordinating the development of land with infrastructure in Riverhead</b>				
(5) Subdivision and development are coordinated with the supply of sufficient transport, water, energy and telecommunications infrastructure. (8) Development is supported by social facilities, including education and healthcare facilities.	The alignment of social and physical infrastructure and land use planning will ensure development occurs in a sustainable manner through ensuring that there is adequate infrastructure to service staged growth and mitigate the adverse effects of development on the receiving environment.	This objective does not compromise the recognition of, or the provision of these matters of national importance. The AUP contains existing objectives that manages any potential conflict between matters of national importance and infrastructure and social facilities.	These objectives do not compromise the recognition of, or the provision of other matters. In particular the alignment of infrastructure and land use planning will ensure development makes efficient use of land where there are funded infrastructure solutions available.	These objectives will not offend against the principles of the Treaty of Waitangi.
<b>Theme 3: Achieving integrated and quality development</b>				
(1) Riverhead is a well-functioning urban environment that integrates with the existing Riverhead settlement, the natural environment and respects Mana Whenua values. (4) Access to and from the precinct occurs in a safe, effective and efficient manner for all modes of transport.	The emphasis of the proposed objectives on achieving a connected development which integrates with the existing settlement will enable future communities of Riverhead to meet their social, economic, and cultural well-being.	This objective does not compromise the recognition of, or the provision of these matters of national importance. The AUP contains existing objectives that manages matters of national importance.	The objectives have regard to the maintenance and enhancement of amenity values and the quality of the environment through ensuring development is connected and integrated with the existing Riverhead development and the natural environment.	These objectives are consistent with the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
<b>Theme 4: Natural Environment</b>				
(7) Identified ecological values within wetland and stream habitats are protected, restored and enhanced. (6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate adverse effects on the receiving environment.	The emphasis of the proposed objectives on the protection and enhancement of natural and ecological features as well as the adverse effects on receiving water bodies will ensure that the natural resources within the Plan Change area are sustained for future generations.	The objectives recognise and provide for the preservation of the natural character of wetlands and rivers and their margins through ensuring the maintenance and enhancement of the ecological values within stream, and wetland habitats.	The objectives have regard to the intrinsic value of ecosystems and the maintenance and enhancement of the quality of the environment through ensuring the maintenance and enhancement of the ecological values within stream, and wetland habitats. Additionally, the objectives have particular regard to the effects of the quality of receiving waters through ensuring that	The precinct is framed by two awa which have cultural value to mana whenua. These objectives recognise that guiding principles for enables Te Kawerau a Maki and Ngati Whatua Kaipara identified through ongoing engagement on the PPC include the protection of taonga and the restoration of mana to taonga. These objectives are consistent with the

Objective	RMA S5 Purpose	RMA S6 Matters of National Importance	RMA S7 Other Matters	RMA S8 Treaty of Waitangi
			stormwater quality is managed to avoid, minimise or mitigate effects.	principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
<b>Theme 5: Mana Whenua Cultural Landscape</b>				
(9) Mana Whenua cultural values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, waahi tapu, and other taonga, in the Riverhead Precinct are identified, recognised, protected, and enhanced.	Recognising and protecting the Māori cultural landscape enables Te Kawerau a Maki and Ngati Whatua Kaipara to meet their own cultural well-being while ensuring these resources are sustained for future generations.	The Riverhead area is notable for its continued association with Te Kawerau a Maki and Ngati Whatua Kaipara and other iwi since pre-European times. Fundamental guiding principles for mana whenua include the protection of taonga, the restoration of mana to taonga and the retention of wahi tapu and sites of cultural significance. These objectives recognise and protect these values and therefore provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taonga as matter of national importance.	These objectives will support the recognition of, or the provision of other matters. In particular the recognition and protection of the Māori cultural landscape is consistent with kaitiakitanga.	These objectives recognise the Māori cultural landscape plan which has been developed in partnership with Te Kawerau a Maki and Ngati Whatua Kaipara consistent with the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

## 8.2 Appropriateness of the Provisions to Achieve the Objectives

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### 8.2.1 The Objectives

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

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

As the proposed Plan Change is amending the AUP (District Plan), the above assessment must relate to the provisions and objectives of the proposed Plan Change, and the objectives of the AUP to the extent that they are relevant to the proposed Plan Change and would remain if the Plan Change were to take effect<sup>6</sup>.

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

Within the RPS:

- A quality compact urban form that enables a higher quality urban environment, better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects (B2.2.1(1));
- Ensure there is sufficient development capacity to accommodate growth and require the integration of land use planning with the infrastructure to service growth (B2.2.1(3) and B2.2.1(5));
- Urbanisation is contained within the Rural Urban Boundary, towns and rural and coastal towns and villages (B2.2.1(4));
- A quality-built environment where subdivision, use and development respond to the intrinsic qualities and physical characteristics of the area, reinforce the hierarchy of centres and corridors, contribute to a diverse mix of choice and maximise resource and infrastructure efficiency (B2.3.1(1));
- Ensure residential intensification supports a quality compact urban form and land within and adjacent to centres and corridors or in close proximity to public transport is the primary focus for residential intensification (B2.4.1(1) and B2.4.1(3));
- An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population (B2.4.1(4));
- Ensure employment and commercial and industrial opportunities meet current and future demands (B2.5.1(1));
- Ensure growth and development of existing or new rural and coastal towns and villages is enabled in ways that avoid natural and physical resources that have been scheduled, avoid elite soils and avoid where practicable prime soils, avoid areas with significant natural hazard

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<sup>6</sup> RMA s32(3)

risks, are consistent with the local character of the town or village and the surrounding area and enables the development and use of Mana Whenua's resources for their economic well-being (B2.6.1(1));

- Ensure rural and coastal towns and villages have adequate infrastructure (B2.6.1(2));
- Ensure recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities and that public access to streams is maintained and enhanced (B2.7.1(1) and B2.7.1(2));
- Ensure the mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall (B6.3.1(2));
- Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring (B7.2.1(2));
- Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced (B7.3.2(5)); and
- Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring (B7.2.1(1)).
- Rural areas make a significant contribution to the wider economic productivity of, and food supply for, Auckland and New Zealand (B9.2.1(1)).
- Auckland's rural areas outside the Rural Urban Boundary and rural and coastal towns and villages are protected from inappropriate subdivision, urban use and development (B9.2.1(4)).

Within the Residential Zones:

- Within the Terrace Housing and Apartment Building zone - land adjacent to centres and near the public transport network is efficiently used to provide high-density urban living that increases housing capacity and choice and is in keeping with the planned urban character of predominantly five, six or seven storey buildings in a variety of forms (H6.2(1) and H6.2(2)); and
- Within the Mixed Housing Suburban zone - enable a range of housing types and in a manner that is in keeping with the planned suburban built character of the zone (H4.2(1) and H4.2(2)).

Within the Business Zones:

- Provide a strong network of centres that are attractive environments and attract ongoing investment, promote commercial activity, and provide employment, housing and goods and services, all at a variety of scales (H12.2(1) and (H11.2(1)); and
- Ensure business activity is distributed in locations, that is accessible and is of a form and scale that provides for the community's social and economic needs (H12.2(4) and (H11.2(4))).

Within the Rural Zones:

- Within the Mixed Rural Zone - Rural character and amenity values of the zone are maintained while anticipating a mix of rural production, non-residential and rural lifestyle activities (H19.4.2(3)).

Within the Auckland-wide Provisions:

- Auckland-wide objectives relating to lakes, rivers, streams and wetland, water quality, stormwater, land disturbance and vegetation management and biodiversity seek to avoid adverse effects where possible but recognise the need to use land identified for future urban land uses efficiently;
- Auckland-wide objectives relating to subdivision seek to ensure that subdivision has a layout which is safe, efficient, convenient and accessible and that Infrastructure supporting subdivision and development is planned and provided for in an integrated and comprehensive manner; and
- Auckland-wide objectives relating to transport seek to ensure that an integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.

The objectives and provisions of the Plan Change and the relevant objectives of the AUP can be categorised into the following themes:

- Theme 1: Timing of urbanisation and land use pattern;
  - Theme 1.1: Extent of urbanisation in Riverhead;
  - Theme 1.2: Timing of Development in Riverhead;
  - Theme 1.3: Residential land use pattern;
  - Theme 1.4: Commercial land use pattern; and
  - Theme 1.5: Rural land use pattern.
- Theme 2: Coordinating the development of land with infrastructure;
- Theme 3: Achieving integrated and quality development;
- Theme 4: Natural Environment; and
- Theme 5: Mana Whenua Cultural Landscape.

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

## 8.3 Other Reasonably Practicable Options for Achieving the Objectives

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### 8.3.1 Theme 1: Timing of Urbanisation and Land Use Pattern




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

- B2.2.1(1): A quality compact urban form that enables a higher quality environment, better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects;
- B2.2.1(3): Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth;
- B2.2.1(4): Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages;

- B2.2.1(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.
- B2.3.1(1): A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change;
- B2.4.1(1): Residential intensification supports a quality compact urban form;
- B2.4.1(3): Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification;
- B2.4.1(4): An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population;
- B2.4.1(5): Non-residential activities are provided in residential areas to support the needs of people and communities;
- B2.5.1(1): Employment and commercial and industrial opportunities meet current and future demands;
- B2.6.1(1): Growth and development of existing or new rural and coastal towns and villages is enabled in ways that: (a) avoid natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character unless growth and development protects or enhances such values; and (b) avoid elite soils and avoid where practicable prime soils which are significant for their ability to sustain food production; and (c) avoid areas with significant natural hazard risks; (d) are consistent with the local character of the town or village and the surrounding area; and (e) enables the development and use of Mana Whenua's resources for their economic well-being;
- B2.6.1(2): Rural and coastal towns and villages have adequate infrastructure;
- H6.2 (1): Land adjacent to centres and near the public transport network is efficiently used to provide high-density urban living that increases housing capacity and choice and access to centres and public transport;
- H4.2(1) Housing capacity, intensity and choice in the zone is increased;
- H19.4.2(3) Rural character and amenity values of the zone are maintained while anticipating a mix of rural production, non-residential and rural lifestyle activities.
- H11.2(4) & H12.2(4): Business activity is distributed in locations, and is of a scale and form, that: (a) provides for the community's social and economic needs; (b) improves community access to goods, services, community facilities and opportunities for social interaction; and (c) manages adverse effects on the environment, including effects on infrastructure and residential amenity.

In accordance with Section 32(1)(a) and (1)(b), **Table 2** and **Table 3** below provide an evaluation of options in respect of the extent of urbanisation at Riverhead.

**Table 2: Evaluation of Provisions – Theme 1.1: Extent of urbanisation in Riverhead.**

	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
Description of Option	<p>This option involves retaining the Future Urban zone.</p> 	<p>This option involves urbanising the entire Plan Change area.</p> 	<p>This option will shift the RUB and rezone the northern portion of the plan change area rural to avoid urbanising land subject to extensive flooding constraints.</p> 
Benefits			
Environmental	<p>While this option avoids urban development of land subject to extensive flooding the Future Urban Zone does not provide certainty regarding future land use.</p> <p>This option will maintain the existing rural character of the Plan Change area.</p> <p>There is no change to the AUP provisions proposed through this option. Existing rules will apply.</p>	<p>This option will have the least environmental benefits of all the options as it involves urbanisation of land in the northern portion of the plan change area which is subject to significant natural hazards.</p>	<p>This option will ensure that land subject to significant natural hazard risk from flooding is not urbanised.</p> <p>This option will maintain the existing rural character of the northern portion of the Plan Change area, utilising the flood plain as a natural boundary which forms a suitable urban edge.</p>
Economic	<p>This option provides the least economic benefit of all the options as it is</p>	<p>This option will provide the greatest capacity for residential and commercial</p>	<p>This option will provide the additional capacity for</p>

	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
	essentially a transition zone. While there are constraints to urban development in the northern portion of the Plan Change area the technical analysis in support of the Structure Plan and Plan Change application demonstrates that the balance of the Plan Change area is suitable for urbanisation.	development however this is theoretical only given there is limited ability to develop the land in the north subject to flooding.	residential and commercial development
<b>Social</b>	This option provides the least social benefit of all the options as the FUZ zone does not enable additional development opportunity. Therefore this option will not provide population growth to support additional social facilities for Riverhead.	This option will result in a scale of development that provides opportunity to provide for social amenities to meet the diverse demographic and cultural needs of the future and existing Riverhead community in a coordinated manner. Given the limited ability to develop the land to the north there maybe opportunities to provide additional open space in this area however, there would be funding constraints to purchasing and maintaining such a large area of open space.	This option will result in a scale of development that provides opportunity to provide for social amenities to meet the diverse demographic and cultural needs of the future and existing Riverhead community in a coordinated manner.
<b>Cultural</b>	This option defers further intensification and development of land where there is cultural, spiritual and historical values and associated with the Māori cultural landscape.	The proposed precinct provisions to recognise and protect the cultural landscape do not extend to the entire Plan Change area. That may result in development of land around sites of significance and development which	This option includes precinct provisions that will holistically recognise and protect the cultural landscape and sites of significance.



	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
		compromises the cultural landscape. .	
<b>Costs</b>			
<b>Environmental</b>	This option is less likely to result in the environmental improvements provided for through Option 3, including the protection and restoration of riparian margins.  Environmental impacts associated with ongoing rural use and on-going uncontrolled sediment discharge to the CMA.	This option will result in the urbanisation of land in the northern portion of the plan change area that is subject to extensive flooding.  Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Riverhead.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Riverhead.
<b>Economic</b>	This option does not make efficient use of land where there are funded infrastructure and transport solutions to service growth.  Does not add to Auckland’s housing and business land supply to accommodate growth in the short term and is therefore likely to have a negative impact on economic growth and employment.	Costs involved in undertaking the development and delivery of transport infrastructure necessary to service a larger live zoned area.	Costs involved in undertaking the development and delivery of infrastructure.  Costs for the property owners to the north who will not benefit from urban zonings being applied to their land and the associated increase in land value.
<b>Social</b>	This option does not provide for any additional community facilities or open spaces to meet the diverse demographic and cultural needs of the	The scale of development delivered through this option may be considered by some members of the community to be not in keeping with the community’s expectations	The scale of development delivered through this option may be considered by some members of the community to be not in keeping with the community’s expectations

	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
	future and existing Riverhead community.	given the current rural land use.	given the current rural land use.
<b>Cultural</b>	There is no change to the cultural environment through this option. However, has the potential to result in rural use which may compromise cultural landscape values. Option 3 includes precinct provisions that will recognise and protect the cultural landscape.	May result in development of land that is not in keeping with the mana whenua cultural landscape.	May result in development of land that has significant association to Iwi however, the mana whenua cultural landscape is recognised and protected through proposed precinct provisions.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or consistent with B2.2.1(3) and the requirements of the NPS- UD as no additional business and residential capacity is enabled in the short – mid-term despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.6(1) and B2.2.1(1).	This option is not efficient and effective at achieving B2.6(1)(c) as it seeks to urbanise land subject to significant natural hazards.	This option efficient and effective at achieving B2.6(1)(c) as it avoids urbanising land subject to significant natural hazards.  This option is efficient and effective at achieving B2.2.2(2) as it relocates the RUB to avoid urbanising land subject to significant natural hazards. The realignment of the RUB aligns with the flooding extent forming a strong natural boundary consistent with B2.2.2(2)(m).  This option is efficient and effective at achieving B2.2.1(3) as it will enable the development of 1,500-1800 dwellings which represents a significant opportunity to increase residential

	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
			development capacity within the short term.
<b>Summary</b>	Option 3 is preferred. The proposed shift in the RUB and rezoning of the northern portion of the Plan Change area from FUZ to Mixed Rural avoids urbanising land subject to significant natural hazards consistent with B2.6(1)(c) and B2.2.2(2).		

**Table 3: Evaluation of Provisions – Theme 1.1: Timing of Development in Riverhead.**

	Option 1 – Do nothing (wait for Council to rezone the land in accordance with the FULSS)	Option 2 – Proposed plan change Live zone the entire FUZ area
<b>Description of Option</b>	This option involves retaining the Future Urban zone and waiting for the Council to initiate a Plan Change to rezone the Plan Change area in accordance with the FULSS.	This option brings forward the release of land for urban development in Riverhead in accordance with the Plan Change.
<b>Benefits</b>		
<b>Environmental</b>	This option will maintain the existing rural character of the Plan Change area. There is no change to the AUP provisions proposed through this option. Existing rules will apply.	This option provides an opportunity to take a holistic view on urban growth and form of Riverhead providing the essential elements that contribute to a successful rural town consistent with the planning framework of the Regional Policy Statement. The Riverhead Structure Plan has assessed the suitability of the Plan Change area for urbanisation and the Plan Change is consistent with the Structure Plan. Infrastructure solutions are available and funded and therefore there are no significant constraints to urban development of the Plan Change area.
<b>Economic</b>	There is no economic benefit for this option.	Enables the staged development of the Plan change area as infrastructure is available, providing additional business and residential capacity from the short term. Provides greater certainty for the council, community, developers and landowners

	Option 1 – Do nothing (wait for Council to rezone the land in accordance with the FULSS)	Option 2 – Proposed plan change Live zone the entire FUZ area
		about the nature, extent and pace of development of Riverhead.
<b>Social</b>	This option does not facilitate any improved social outcomes.	This option proposes a comprehensive and integrated development over a large land holding that is contiguous with existing urban development on the opposite side of Coatesville Riverhead Highway. This scale of development will enable social amenities such as schools, open spaces, ecological corridors, a retirement village and a village centre to be established.
<b>Cultural</b>	This option defers further intensification and development of land where there is cultural, spiritual and historical values and associated with the Māori cultural landscape.	This option has been developed in consultation with Te Kawerau a Maki and Ngati Whatua Kaipara includes precinct provisions that will holistically recognise and protect the cultural landscape
<b>Costs</b>		
<b>Environmental</b>	This option is less likely to result in the environmental improvements provided for through Option 2, including the protection and restoration of riparian margins.  Environmental impacts associated with ongoing rural use and on-going uncontrolled sediment discharge to the CMA.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Riverhead.
<b>Economic</b>	This option does not make efficient use of land where there are funded infrastructure and transport solutions to service growth.  Does not add to Auckland’s housing and business land supply to accommodate growth in the short term and is therefore likely to have a negative impact on economic growth and employment.	Costs involved in undertaking the development and delivery of infrastructure.
<b>Social</b>	This option does not provide for any additional community facilities or open spaces to meet the diverse demographic and cultural needs of the future and existing Riverhead community.	The scale of development delivered through this option may be considered by some members of the community to be not in keeping with the community’s expectations given the current Single House zoning throughout Riverhead.

	<p>Option 1 – Do nothing (wait for Council to rezone the land in accordance with the FULSS)</p>	<p>Option 2 – Proposed plan change Live zone the entire FUZ area</p>
<p><b>Cultural</b></p>	<p>There is no change to the cultural environment through this option. However, has the potential to result in rural use which may compromise cultural landscape values. Option 2 includes precinct provisions that will recognise and protect the cultural landscape.</p>	<p>May result in development of land where there is cultural, spiritual and historical values to mana whenua, however, the mana whenua cultural landscape is recognised and protected through proposed precinct provisions.</p>
<p><b>Efficiency &amp; Effectiveness</b></p>	<p>This option is not efficient or consistent with B2.2.1(3) and the requirements of the NPS-UD as no additional business and residential capacity is enabled in the short – mid-term despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.6(1) and B2.2.1(1).</p>	<p>This option is efficient and effective at achieving B2.6(1) as the potential development of the land does not affect any scheduled items and natural hazards. Additionally, the effects of built form enabled by the Plan Change are largely consistent with and complementary to the local character of Riverhead with interface controls to manage the relationship with the higher density development and existing single house development along Coatesville Riverhead Highway. Precinct provisions are also proposed to protect the mana whenua cultural landscape.</p> <p>This option is efficient and effective at achieving B2.6(2) as analysis undertaken as part of this Plan Change request confirms there are infrastructure solutions available and able to be funded.</p> <p>This option is efficient and effective at achieving B2.2.1(1) as it supports a high quality environment that is integrated with public transport use and reduce adverse effects.</p> <p>This option is efficient and effective at achieving B2.2.1(3) as it will enable the development of 1,500-1800 dwellings which represents a significant opportunity to increase residential development capacity within the short term.</p>
<p><b>Summary</b></p>	<p>Option 2 is preferred. The extension of the settlement at Riverhead within the Plan Change area is consistent with B2.6.1. Analysis undertaken as part of this Plan Change request confirms there are infrastructure solutions available and able to be funded, without reliance on funding from Council. Furthermore, this option is efficient and effective at</p>	

	Option 1 – Do nothing (wait for Council to rezone the land in accordance with the FULSS)	Option 2 – Proposed plan change Live zone the entire FUZ area
	achieving B2.2.1(3) as it will enable the development of 1,500-1800 dwellings increasing residential development capacity.	

In accordance with Section 32(1)(a) and (1)(b), the below tables provide an evaluation of options in respect to land use pattern:

- **Table 4** addresses the lower density residential zoning;
- **Table 5** addresses the higher density residential zoning;
- **Table 6** addresses the commercial zoning; and
- **Table 7** addresses the rural zoning.



**Table 4: Evaluation of Provisions – Theme 1.3: Residential Land Use Pattern – Lower Density Residential Area.**

	Option 1 – Single House Zone	Option 2 – Mixed Housing Suburban Zone	Option 3 – Mixed Housing Urban Zone	Option 4 – Proposed Plan Change
<b>Description of Option</b>	<p>This option involves applying the Single House zone to enable residential development at lower densities.</p>	<p>This option involves applying the Mixed Housing Suburban zone to enable medium density residential development while retaining a suburban built character of predominantly two storeys.</p>	<p>This option involves applying the Mixed Housing Urban zone to enable medium density residential development while retaining a urban built character of predominantly three storeys throughout the lower density area.</p>	<p>This option involves a refined zoning approach to enable medium density residential development by applying the Mixed Housing Suburban zone to retain a suburban built character of predominantly two storeys, and providing for three storeys adjacent to the higher density residential areas only. The residential standards have been tailored within the precinct to incorporate the standards that apply to the Mixed Housing Urban zone/Medium Density Residential Standard to provide more flexibility and efficient use of land while retaining an overall suburban built character defined by the two storey height limit.</p>
<b>Benefits</b>	<p><b>Environmental</b> This option retains the low-density nature of the existing development within Riverhead.</p>	<p>This option retains the suburban character of Riverhead while allowing greater capacity and choice.</p>	<p>This option will provide the greatest capacity for residential development however, the extent of the MHU zoning has not been sized to align with the provision of infrastructure which could lead to a dispersed pattern of residential development.</p>	<p>This proposed zoning layout includes opportunities for different housing types and intensity that are complementary to the residential character of the area and has been informed by a structure planning exercise.</p>

	Option 1 – Single House Zone	Option 2 – Mixed Housing Suburban Zone	Option 3 – Mixed Housing Urban Zone	Option 4 – Proposed Plan Change
			Other benefits include greater proximity of residential to support the Local Centre.	This option makes efficient use of greenfield land through enabling medium density development. Sub-Precinct B provides for a three-storey height limit to enable a transition in building height between the higher density THAB land and the surrounding Mixed Housing Urban area, where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.
<b>Economic</b>	This option will provide for in the least residential capacity within Riverhead compared with the other options and is likely to result in a dispersed pattern of residential development.	This option will provide the opportunity for increased housing typologies such as duplexes and terraces which will enable housing for different price points.	This option will provide for the greatest level of residential capacity of all the options, supporting competitive development markets. However, a dispersed and lower density pattern of development is likely to arise due to insufficient infrastructure provision.	This option will provide the opportunity for increased housing typologies, such as duplexes and terraces, which will enable housing for different price points.
<b>Social</b>	This option will not provide the range of housing typologies and choice provided for through option 2 - 4.	This option provides for a range of housing typologies and choice to meet the diverse needs of the Riverhead population.	This option provides for a range of housing typologies and choice to meet the diverse needs of the Riverhead population. It will enable development yields that can support the development of additional community facilities.  The scale of development will increase the long-term population and consequently the social benefits associated with intensification and use of community facilities.	This option provides for a range of housing typologies and choice to meet the diverse needs of the Riverhead population. It will enable development yields that can support the development of additional community facilities.
<b>Cultural</b>	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.
<b>Costs</b>				
<b>Environmental</b>	The proposed zoning layout will result in low density residential development which is an inefficient use of land, particularly in areas of the Plan Change area that are within walking distance to the proposed local centre.	The proposed zoning layout will result in medium density residential development which is a greater density than the existing Riverhead area however, the similarities in the core development standards will ensure that development results in a suburban character which is in keeping.	This proposed zoning layout provides for development at an intensity and scale which is different to the residential character of the existing Riverhead area.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height (within Sub-Precinct B) and density than currently provided for within Riverhead.
<b>Economic</b>	This option will limit the range of housing types and price points available within Riverhead.  Costs involved in undertaking the development and delivery of infrastructure.	Costs involved in undertaking the development and delivery of infrastructure.	This option will result in the application of residential zones that have not been sized to meet the short-medium term market demand and infrastructure availability.  Costs involved in undertaking the development and delivery of transport infrastructure necessary to service a higher density lived zoned residential area.	Costs involved in undertaking the development and delivery of infrastructure.



	Option 1 – Single House Zone	Option 2 – Mixed Housing Suburban Zone	Option 3 – Mixed Housing Urban Zone	Option 4 – Proposed Plan Change
<b>Social</b>	This option does not make efficient use of land and therefore may not result in the development yields to support the development of additional community facilities to support the growing population within Riverhead.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the community’s expectations given the current single house zoning.	While this zoning pattern that enables the greatest density of development compared to the other options, the scale of development will actually be of a reduced density due to infrastructure limitations and consequentially reduce the long-term population. This will reduce social benefits associated with intensification.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the community’s expectations, given the current Single House zoning of the existing settlement.
<b>Cultural</b>	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.
<b>Efficiency &amp; Effectiveness</b>	<p>This option is not efficient and effective at achieving B2.3.1 (1) as the zoning pattern is not consistent with the Riverhead Structure Plan and therefore does not respond to the intrinsic qualities and physical characteristics of the site and area.</p> <p>This option does not efficiently use land within a walkable catchment to the proposed local centre and therefore is not consistent with B2.3.1 (1).</p>	This option is efficient and effective at achieving B2.3.1 (1) as the zoning has been informed by a structure plan however, not to the same degree as Option 4 where the zoning has been more specifically tailored to respond to the intrinsic qualities and physical characteristics of the site and area.	This option is not efficient and effective at achieving B2.3.1(1) as applying the three-storey development enabled by the Mixed Housing Urban throughout the Plan Change area is not in keeping with the existing Riverhead settlement.	<p>This option will effectively and efficiently achieve B2.3.1(1) as the two storey development enabled by the refined Mixed Housing Suburban zone is in keeping with the existing Riverhead settlement.</p> <p>This option is efficient and effective at achieving B2.3.1 (1) as the refined zoning has been informed by a structure plan and therefore responds to the intrinsic qualities and physical characteristics of the site and area.</p> <p>This option will efficiently and effectively achieve B2.4.1 (4) as it enables the development of 1450-1750 dwellings and a variety of typologies to support greater housing capacity and choice.</p>
<b>Summary</b>	Option 4 is preferred. The proposed zoning layout has been informed by a structure plan to respond to the characteristics of the Plan Change area and enables two-storey development in keeping with the existing Riverhead settlement, while delivering additional residential capacity.			


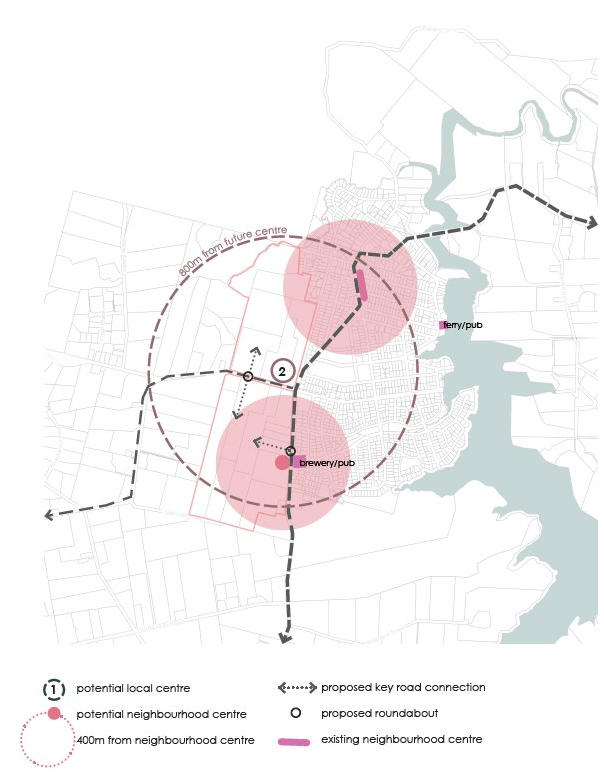

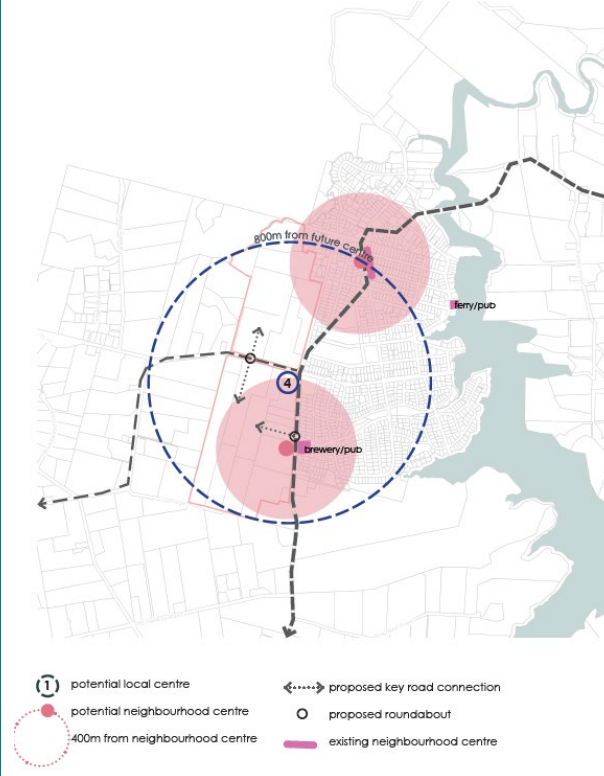
**Table 5: Evaluation of Provisions – Theme 1.4: Residential Land Use Pattern – Higher Density Residential Area**

	Option 1 – Mixed Housing Urban Zone	Option 2 – Terrace Housing and Apartment Buildings Zone	Option 3 – Proposed Plan Change
<b>Description of Option</b>	<p>This option involves applying the Mixed Housing Urban zone to enable residential development at medium density.</p>	<p>This option involves applying the Terrace Housing and Apartment Building zone to enable residential development at higher densities, with an urban built character of 16m.</p>	<p>This option involves applying a refined set of provisions to enable residential development at higher densities, with an urban built character of 16m-18m.</p>
<b>Benefits</b>			
<b>Environmental</b>	<p>This option provides for medium density development close to the proposed centre which is more in keeping with existing Riverhead settlement.</p>	<p>This option provides for high density development to make efficient use of land in close proximity to the proposed local centre and public transport. This proposal enables high density development around the local centre, while applying the MHU zone to land adjacent to existing properties along Cambridge Road to minimise effects on the Single House zoned properties.</p>	<p>This option provides for high density development to make efficient use of land in close proximity to the proposed local centre and public transport. This proposal enables high density development around the local centre, while applying the MHU zone to land adjacent to existing properties along Cambridge Road to minimise effects on the Single House zoned properties. This option provides for a transition in height between the THAB zone and the surrounding Mixed Housing Urban zoned land subject to the proposed two storey height limit to manage amenity and built form effects.</p>
<b>Economic</b>	<p>This option will provide for the least residential capacity within Riverhead compared with the other options.</p>	<p>This option will provide for the greatest level of residential capacity of all the options, supporting competitive development markets.</p>	<p>This option provides for a range of housing typologies that will result will result in a range of housing prices, some of which will be affordable for the area.</p>
<b>Social</b>	<p>This option will provide some opportunity for terraces and walk-up apartments within the Mixed Housing Urban zone however, it will not</p>	<p>This option provides for a range of housing typologies and choice to meet the diverse needs of the Riverhead population. It will enable a package of</p>	<p>This option provides for a range of housing typologies and choice, including a retirement village, to meet the diverse needs of the Riverhead population.</p>

	provide the range of housing typologies and choice provided for through Option 2 or 3.	provisions that can support the development of a retirement village and development yields that can support the development of additional community facilities.  The scale of development will increase the long-term population with a greater area of high density residential zoning, and consequently the social benefits associated with intensification and use of community facilities.	It will enable development yields that can support the development of additional community facilities.
<b>Cultural</b>	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.
<b>Costs</b>			
<b>Environmental</b>	The proposed zoning layout will result in medium density residential development which is an inefficient use of land in areas of the Plan Change area that are within walking distance to the proposed local centre and public transport.	This option does not provide for a transition in height between the THAB zone and the surrounding Mixed Housing Urban zoned land subject to the proposed two storey height limit. This could result in adverse amenity and built form effects.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than what is currently provided for within Riverhead but not to the same extent as Option 2. The extent of THAB adjacent to the existing Riverhead settlement has been limited in order to manage the interface to Single House development along Cambridge Road.
<b>Economic</b>	This option will limit the range of housing types and price points available within Riverhead.  Costs involved in undertaking the development and delivery of infrastructure.	This option will result in the application of residential zones that have not been sized to meet the short to medium-term market demand and infrastructure availability.  Costs involved in undertaking the development and delivery of transport infrastructure necessary to service a higher density lived zoned residential area.	Costs involved in undertaking the development and delivery of infrastructure.
<b>Social</b>	This option will limit the range of housing types including the ability to develop a retirement village to meet the community's diverse needs within Riverhead.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the community's expectations, given the Single House zoning that currently applies within Riverhead.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the community's expectations given the Single House zoning that currently applies within Riverhead. This scale of development is potentially not as great as Option 2 and the extent of THAB adjacent to the existing Riverhead settlement has been limited in order to manage the interface to Single House development along Cambridge Road.
<b>Cultural</b>	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient and effective at achieving B2.3.1 (1) as the zoning pattern has not been informed by a Structure Plan and therefore does not respond to the intrinsic qualities and physical characteristics of the site and area.  This option does not efficiently use land within an 800m walkable catchment to the proposed local centre and therefore is not consistent with B2.3.1 (1).	This option is not efficient and effective at achieving B2.3.1 (1) as the zoning pattern has not been informed by a masterplan and therefore does not respond to the intrinsic qualities and physical characteristics of the site and area.	This option is efficient and effective at achieving B2.4.1 (1) and B2.4.1 (3) as the THAB zone has been applied to support the efficient use of land within an 800m walkable catchment to the proposed local centre and public transport. This will support quality compact urban form outcomes.  This option is efficient and effective at achieving B2.3.1 (1) as the zoning pattern has been informed by a masterplan and therefore responds to the intrinsic qualities and physical characteristics of the site and area.  This option will efficiently and effectively achieve B2.4.1 (4) as it enables the development of a variety of typologies to support greater housing capacity and choice.
<b>Summary</b>	Option 3 is preferred. The proposed zoning layout has been informed by a Structure Plan to respond to the characteristics of the Plan Change area and enables efficient use of land around the proposed Local Centre, supporting transport mode shift and quality compact outcomes while delivering additional residential capacity.		



**Table 6: Evaluation of Provisions – Theme 1.5: Commercial Land Use Pattern**

	Option 1 – Rely on the existing Riverhead Local Centre and a new Neighbourhood Centre	Option 2 – Establish a Local Centre north of Riverhead Road and a Neighbourhood Centre on Coatesville-Riverhead Highway	Option 3 – Establish a Local Centre opposite Hallertau and a Neighbourhood Centre on Riverhead Road.	Option 4 – Proposed Plan Change – Establish a Local Centre south of Riverhead Road and a Neighbourhood Centre on Coatesville-Riverhead Highway
Description of Option	<p>This option involves relying largely on the existing Local Centre within Riverhead (possibly expanded) to service the Plan Change area, with the addition of a Neighbourhood Centre.</p> 	<p>This option involves applying a Local Centre within the Plan Change area to the north of Riverhead Road, with a supporting Neighbourhood Centre on Coatesville-Riverhead Highway.</p> 	<p>This option involves applying a Local Centre within the Plan Change area opposite Hallertau, with a supporting Neighbourhood Centre on Riverhead Road.</p> 	<p>This option involves applying a Local Centre within the Plan Change area to the south of Riverhead Road, with a supporting Neighbourhood Centre on Coatesville-Riverhead Highway.</p> 
Benefits				
Environmental	<p>This option will utilise the existing Local Centre which is visible to passers-by, has on-street parking and is part of the existing community; within good proximity to Riverhead Tavern, the existing community hall and the coastal environment.</p>	<p>Most of the Plan Change area falls into an accessible 800m walkable catchment to the Local Centre and Neighbourhood Centre. The centres can access the upgraded walking network and cycleways which will be delivered as part of the Plan Change.</p>	<p>This option will enable the development of a Local Centre that can be accessed via pedestrian and cycle paths to be delivered as part of the Plan Change.</p>	<p>Most of the Plan Change area falls into an accessible 800m walkable catchment to the Local Centre and Neighbourhood Centre. The centres can access the upgraded walking network and cycleways which will be delivered as part of the Plan Change.</p>
Economic	<p>Future development will support the existing centre within Riverhead, however there is limited opportunity for growth and economic analysis undertaken in support of this Plan Change identified the need for an additional Local Centre.</p>	<p>A full size centre can be planned/accommodated as well as a future Neighbourhood Centre to service growth within the Plan Change area. The sizing of the centre may, however, in reality, be limited within this location due to the presence of the planned retirement village.</p>	<p>A full size centre can be planned/accommodated as well as future Neighbourhood Centre to service growth within the Plan Change area.</p>	<p>A full size centre can be planned/accommodated as well as future Neighbourhood Centre to service growth within the Plan Change area.</p>
Social	<p>The current Local Centre is within close proximity to existing social facilities, including the childcare facility.</p>	<p>The Local Centre has been sized to meet the needs of the local community, however, in reality, the size of the centre may be limited within this location due to the proposed retirement village.</p>	<p>The Local Centre has been sized to meet the needs of the local community. This option co-locates the centre with the Hallertau Brewery which is an existing</p>	<p>The Local Centre has been sized to meet the needs of the local community.</p>

	Option 1 – Rely on the existing Riverhead Local Centre and a new Neighbourhood Centre	Option 2 – Establish a Local Centre north of Riverhead Road and a Neighbourhood Centre on Coatesville-Riverhead Highway	Option 3 – Establish a Local Centre opposite Hallertau and a Neighbourhood Centre on Riverhead Road.	Option 4 – Proposed Plan Change – Establish a Local Centre south of Riverhead Road and a Neighbourhood Centre on Coatesville-Riverhead Highway
	There is an established sense of place within the existing Local Centre.		landmark within Riverhead, to foster a sense of place and identity.	This option is adjacent to a proposed retirement village increasing the accessibility to retail and commercial services for elderly residents.
<b>Cultural</b>	There are no cultural benefits associated with this option.	There are opportunities within a new centre to incorporate Te Aranga design principles into the design of publicly accessible spaces.	There are opportunities within a new centre to incorporate Te Aranga design principles into the design of publicly accessible spaces.	There are opportunities within a new centre to incorporate Te Aranga design principles into the design of publicly accessible spaces.
<b>Costs</b>				
<b>Environmental</b>	The existing Local Centre within Riverhead is not within an 800m walkable catchment of the southern portion of the Plan Change area, resulting in increased car reliance and associated environmental costs. The existing centre is not connected to cycleways and upgraded walking network which will be delivered as part of the Plan Change.	The roundabout at Coatesville- Riverhead Highway and Riverhead Road will need to be designed to prioritise the safety of pedestrians accessing the centre.	The northern portion of the Plan Change area is not within an accessible catchment to the proposed Local Centre, resulting in increased car reliance and associated environmental costs.	The roundabout at Coatesville- Riverhead Highway and Riverhead Road will need to be designed to prioritise the safety of pedestrians accessing the centre.
<b>Economic</b>	The current Local Centre is constrained, and economic analysis undertaken in support of this Plan Change identified the need for an additional Local Centre.	The sizing of the Local Centre may be limited due to the planned retirement village on this site. Therefore, it is unlikely the Local Centre will meet the size requirements for Riverhead as indicated in the economic analysis ( <b>Appendix 7</b> ) within this location.	The existing Local centre may decline, however it is currently constrained and economic analysis undertaken in support of this Plan Change identified the need for an additional Local Centre to service growth within the Riverhead catchment.	The existing Local centre may decline, however it is currently constrained and economic analysis undertaken in support of this Plan Change identified the need for an additional Local Centre to service growth within the Riverhead catchment.
<b>Social</b>	The current Local Centre is constrained, and therefore there will be less opportunity for supporting social facilities to establish within the centre. Expansion would occupy land currently used for residential purposes.	The ability to achieve the required size of the Local Centre specified within the economic report is constrained within this location. Therefore, there will be less opportunity for supporting social facilities to establish within the centre.	The Local Centre within this option is less accessible for the proposed retirement village residents.	This option does not co-locate the proposed Local Centre with existing community facilities or landmarks and therefore will not benefit from an established sense of place.
<b>Cultural</b>	There is less opportunity to incorporate Te Aranga design principles into the design of publicly accessible spaces within the centre.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.
<b>Efficiency &amp; Effectiveness</b>	This option is inefficient as the commercial zones are not sized to meet current and future demands (B2.5.1(1)). This option is less effective at achieving H11.2(4) and H12.2(4) than the other options as the existing Local Centre is not within an 800m walkable catchment for the southern portion of the Plan Change area.	This option is inefficient as the proposed retirement village will constrain the development of a Local Centre to a size that is not sufficient to meet current and future demands (B2.5.1 (1)).	This option is not as effective at achieving H11.2(4) and H12.2(4) as the other options, as the proposed Local Centre is not within an 800m walkable catchment for the northern portion of the Plan Change area.	This option is efficient as the proposed Local Centre zone has been sized to meet current and future demands (B2.5.1(1)). This option is effective at achieving H11.2(4) and H12.2(4) as most of the Plan Change area falls into an accessible 800m walkable catchment to the Local Centre and Neighbourhood Centre.
<b>Summary</b>	Option 4 is preferred. The proposed zoning layout has been informed by a Structure Plan to respond to the characteristics of the Plan Change area. The Local Centre zone has been sized to meet current and future demands (B2.5.1(1)) and most of the Plan Change area falls within an accessible 800m walkable catchment to improve community access to good, services and community facilities in accordance with H11.2(4) and H12.2(4).			



**Table 7: Evaluation of Provisions – Theme 1.6: Rural Land Use Pattern**

	Option 1 – Rural Production Zone	Option 2 – Countryside Living Zone	Option 3 – Proposed Plan Change
<b>Description of Option</b>	<p>This option involves applying the Rural Production zone to provide for the use and development of land for rural production activities and rural industries and services.</p>	<p>This option involves applying the Countryside Living Zone to enable opportunities for rural lifestyle living.</p>	<p>This option involves applying the Mixed Rural Zone to enable rural production, generally on smaller rural sites and non-residential activities of a scale compatible with smaller site sizes.</p>
<b>Benefits</b>			
<b>Environmental</b>	<p>This option will maintain the existing rural character of the northern portion of the Plan Change area.</p>	<p>This option will maintain the existing rural character of the northern portion of the Plan Change area.</p>	<p>This option is consistent with the zoning of the adjoining rural sites and therefore will result in a consistent zoning pattern.</p> <p>This option will maintain the existing rural character of the northern portion of the Plan Change area.</p>
<b>Economic</b>	<p>This option will maintain the ability to undertake rural production activities which will result in economic benefits.</p>	<p>While the current Countryside Living zoning enables some further development opportunity and consequential economic benefit, this is very limited. Further development under the Countryside Living zoning is more likely to result in the fragmentation of land for countryside living purposes which will compromise the economic use of the land for rural production, while not adding significantly to residential capacity.</p>	<p>This option will maintain the ability to undertake rural production activities at a smaller scale more suited to the size of the land parcel than Option 1, which will result in economic benefits.</p>
<b>Social</b>	<p>There are no social benefits associated with this option.</p>	<p>There are no social benefits associated with this option.</p>	<p>There are no social benefits associated with this option.</p>

	Option 1 – Rural Production Zone	Option 2 – Countryside Living Zone	Option 3 – Proposed Plan Change
<b>Cultural</b>	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.
<b>Costs</b>			
<b>Environmental</b>	This option will introduce a different rural zoning to the surrounding sites and therefore will result in a “spot zoning”.	<p>The Countryside Living zoning will result in some limited development opportunity on land that is subject to significant natural hazard risk from flooding.</p> <p>This option will introduce a different rural zoning to the surrounding sites and therefore will result in a “spot zoning”.</p>	Potential effects on adjoining properties and surrounding land uses as a result of ongoing rural use on properties that adjoin rural zones. This is managed however, through additional development setbacks in the Riverhead Precinct provisions.
<b>Economic</b>	Does not add to Auckland’s housing and business land supply to accommodate growth in the short term to the same extent of Option 2 however, any additional capacity provided under Option 2 will be very limited.	This option will potentially result in greater fragmentation of rural land reducing productive benefits.	Does not add to Auckland’s housing and business land supply to accommodate growth in the short term to the same extent of Option 2 however, any additional capacity provided under Option 2 will be very limited.
<b>Social</b>	There are no social costs associated with this option.	There are no social costs associated with this option.	There are no social costs associated with this option.
<b>Cultural</b>	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.
<b>Efficiency &amp; Effectiveness</b>	This option is efficient and effective at achieving B9.2.1(1) as the zoning pattern will contribute to economic productivity through enabling ongoing rural uses.	This option is not efficient and effective at achieving B9.2.1 (4) as it will enable increased subdivision opportunity when compared with option 1 and 2 which could result in greater fragmentation of rural land.	This option will most efficiently and effectively achieve B9.2.1(1) as the zoning pattern will contribute to economic productivity through enabling ongoing rural uses at the same scale currently enabled on the surrounding rural properties.
<b>Summary</b>	Option 3 is preferred. The proposed zoning layout is consistent with the surrounding rural properties and enables ongoing rural production activity on a site not suitable for urban development due to the presence of significant natural hazards.		





### 8.3.2 Theme 2: Coordinating the development of land with transport and three waters infrastructure

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

- B2.2.1(5): The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure;
- B3.2.1(5): Infrastructure and land use planning are integrated to service growth efficiently;
- B3.3.1(1)(b): Effective, efficient and safe transport that integrates with and supports a quality compact urban form;
- E27.2(1): Land use and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; and (b) the adverse effects of traffic generation on the transport network to be managed; and
- IX.2(5): Subdivision and development are coordinated with the supply of sufficient transport, water, energy and communications infrastructure.



**Table 8: Evaluation of Provisions Theme 2: Coordinating the development of land with transport and three waters infrastructure in Riverhead.**

	Option 1 – Do nothing – no staging provisions	Option 2 - Deferred zoning – when all the local infrastructure upgrades are operational	Option 3 – Proposed Plan Change
<b>Description of Option</b>	This option involves putting in place urban zoning and coordinating the development of land with transport and three waters infrastructure through processes and agreements which sit outside of the AUP.	This option involves putting in place urban zonings with a precinct that applies the Future Urban Zone provisions until a certain date from which the urban zone provisions will take effect. The date will be based on the point in time when all required local infrastructure upgrades are projected to be complete.	This option coordinates development with the delivery of required infrastructure within the AUP through: <ul style="list-style-type: none"> <li>• Transport infrastructure staging rules to coordinate the occupation of buildings with the delivery of required infrastructure; and</li> <li>• A road widening setback rule along Riverhead Road to provide for future widening; and</li> <li>• Additional assessment criteria to ensure there is adequate wastewater/water supply infrastructure to service development.</li> </ul>
<b>Benefits</b>			
<b>Environmental</b>	Potentially avoids the complexity in the planning provisions associated with Options 2-3, although relying on existing operative zone provisions will also add complexities	This option will ensure that no development occurs prior to the necessary infrastructure being in place to service growth.	This option provides for interim development to increase residential and commercial capacity which can be serviced without the final infrastructure upgrades required to support a full build out of the Plan Change area.
<b>Economic</b>	Removes the cost of developing rules for the applicant.	The administration of this rule is less complex than Option 3.	This option enables consenting to progress for land modification or development, which would will reduce unnecessary delays in the development process. This option allows for staged development to proceed, providing associated economic benefits.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	This option provides more certainty to the community than option 1 as there is assurance that development cannot occur until infrastructure is in place.	This option provides the most certainty to the community as the scale of development is tied to specific infrastructure upgrades. This option allows for staged development to proceed, providing associated social benefits, including the potential provision of a school and other social facilities.
<b>Cultural</b>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
<b>Costs</b>			
<b>Environmental</b>	The lack of recognition within the AUP of the required infrastructure may result in significant environmental costs if development was to proceed the required infrastructure upgrades. Management of environmental issues would be reliant on the requirement for an ITA under clause E27.3(2) and E27.9(5) and three waters issues under criteria E38.11.2(2)(6)(a)(ii), E38.11.2(2)(7)(b)(i), H6.8.2(2)(a)(j), and H4.8.2(2)(h) and provides less certainty than Options 2 and 3.	This option does not provide for interim development to increase residential and commercial capacity despite the traffic modelling determining the timing of the transport infrastructure upgrades and how these can be coordinated with the release of residential, retail, light industrial and commercial development capacity.  This option does not provide for interim development to increase residential and commercial capacity despite the engineering analysis identifying a number of solutions for three water infrastructure.	This option is informed by transport modelling that has determined the timing of the transport infrastructure upgrades and how these can be coordinated with the occupation of residential, retail, light industrial and commercial buildings.  This option is informed by engineering analysis identifying a number of solutions for three water infrastructure.

	Option 1 – Do nothing – no staging provisions	Option 2 - Deferred zoning – when all the local infrastructure upgrades are operational	Option 3 – Proposed Plan Change
<b>Economic</b>	This option is heavily reliant on infrastructure/funding agreements that sit outside the AUP. There is nothing in the AUP to tie the release of development capacity with the delivery of transport infrastructure.	This option is blunt and does not enable consenting to progress for land modification or development, which would create unnecessary delays in the development process.	This is a more complex set of provisions which will require greater monitoring by Council than Options 1 & 2. Although there are risks with this approach Council has the ability and technology to monitor this it will just be a matter of putting a system in place.
<b>Social</b>	This option provides no certainty to the community as there is no transparency within the AUP regarding when development will occur.	This option will result in costs to the community as the future urban zoning will not facilitate the development of community facilities to service the existing or future community which can be serviced without the final infrastructure upgrades required to support a full build out of the Plan Change area.	Some members of the community may be disappointed with an increase in traffic volumes. This issue will ultimately arise however, with all options.
<b>Cultural</b>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
<b>Efficiency &amp; Effectiveness</b>	This option is ineffective as there are no provisions within the plan to decline applications for development which cannot be serviced by infrastructure, which would not achieve B2.21(5), B3.2.1(5), B3.3.1(1)(b) or E27.2(1).	This option is highly inefficient as traffic modelling shows that the release of residential and commercial development capacity can be coordinated with the transport infrastructure upgrades required to service this growth Therefore, as this option allows for no additional capacity in the interim prior to the completion of the complete infrastructure upgrades it is not in keeping with B3.2.1(5).	This option will efficiently coordinate development with infrastructure and achieve the policy direction of B2.21(5), B3.2.1(5) and B3.3.1(1)(b), because the provisions stage the occupation of buildings with the delivery of required infrastructure.
<b>Summary</b>	Option 3 is preferred. Coordinating the occupation of buildings within the precinct with the delivery of required infrastructure through the inclusion of a transport staging rule and servicing assessment criteria is the most appropriate mechanism for achieving the objectives of the AUP. The proposed provisions will stage the release of development capacity with the delivery of required infrastructure and therefore is consistent with B2.21(5), B3.2.1(5) and B3.3.1(1)(b).		

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

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

- B2.3.1(1): A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change;
- B2.3.1(3): The health and safety of people and communities are promoted;
- B3.3.1(1): Effective, efficient and safe transport that: (a) supports the movement of people, goods and services... (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community;
- E27.2(2): An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for;
- E27.2(5): Pedestrian safety and amenity along public footpaths is prioritised;
- E38.2(6) Subdivision has a layout which is safe, efficient, convenient and accessible;
- IX.2(1) Riverhead is a well-functioning urban environment that integrates with the existing Riverhead settlement, the natural environment and respects Mana Whenua values.
- IX.2(2) A variety of housing types and sizes that respond to: (a) Housing needs and demand; and (b) The neighbourhood's planned urban built character.
- IX.2(4) Access to and from the precinct occurs in a safe, effective and efficient manner for all modes of transport.

**Table 9: Evaluation of Provisions Theme 3: Achieving Integrated and Quality Development**

	Option 1 – Rely on Auckland-Wide and Zone Provisions	Option 2 – Proposed Plan Change
<p><b>Description of Option</b></p>	<p>The street network and the provision of open spaces are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions (E38 Subdivision – Urban, E27 Transport).</p> <p>This option does not include bespoke provisions to manage the interface between the existing rural environment and development within the Plan Change area.</p> <p>This option does not include bespoke provisions to manage the relationship of development within the Plan Change area to the built character of the existing Riverhead settlement.</p>	<p>The proposed Riverhead Precinct includes a bespoke set of provisions to guide the development of buildings, roads and open spaces within the precinct:</p> <ul style="list-style-type: none"> <li>• Assessment criteria and precinct plans that guide the layout and design of key structuring elements including the street network and open space.</li> <li>• A policy that encourages the provision of a continuous and connected multi-purpose green corridor through the Plan Change area that integrates stormwater management, passive recreation opportunities and active transport mode connections, to promote the efficient use of land; provides additional amenity for the key north-south and east-west movement networks; promotes ecological linkages through the Precinct; and co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space;</li> <li>• A policy that encourages higher buildings which will act as marker buildings at the Coatesville-Riverhead Highway and Riverhead intersection, support the legibility of a new centre and reinforce the role of Memorial Park as the heart of the settlement;</li> <li>• A policy that provides for three-storey development within Sub-Precinct B to enable a transition in height between the five and two storey development in the adjacent areas; and enables three storey development within the Mixed Housing Suburban zone where sites overlook public open space to take advantage of amenity and outlook of public open spaces and promote passive surveillance;</li> </ul>

Option 1 – Rely on Auckland-Wide and Zone Provisions	Option 2 – Proposed Plan Change
	<ul style="list-style-type: none"> <li>• More permissive activity statuses for restaurants, cafes, retail, and healthcare facilities within the Residential – Terrace Housing and Apartment Building zone;</li> <li>• A height rule that limits height within the majority of the Mixed Housing Suburban zone to 8m (two-storeys) to respond to the existing Riverhead settlement, with three storey development adjoining the Terrace Housing and Apartment Building zone and the Local Centre zone to enable a transition in height between the five and two-storey development in the adjacent areas;</li> <li>• A rural interface setback rule to provide a buffer between residential activities within the precinct and the neighbouring Mixed Rural zone;</li> <li>• Additional assessment criteria for open space to ensure that the open space network integrates with natural features and delivers the north-south and east-west multi-purpose green corridors which are a key structuring element for the precinct and required for stormwater conveyance purposes; and</li> <li>• Additional assessment criteria for the layout and design of roads to ensure a highly connected street layout that integrates with the wider Riverhead area and provides for all modes of transport.</li> </ul>

Option 1 – Rely on Auckland-Wide and Zone Provisions		Option 2 – Proposed Plan Change
<b>Benefits</b>		
<b>Environmental</b>	The street network, the provision of open spaces and the design and layout of development are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide and zone provisions.	<p>The precinct provisions implement key structuring elements of the Riverhead Structure Plan, which has been developed to ensure a high-quality development outcome result.</p> <p>The tailored precinct provisions and assessment criteria which implement the Riverhead Structure Plan will result in a built form which reinforces the unique sense of place within Riverhead.</p> <p>The planned open spaces and connected street network will support transport mode shift to active transport modes, as they provide safe and convenient movement to and through the precinct.</p>
<b>Economic</b>	A less complex set of planning provisions will apply within the Plan Change area.	The Plan Change will deliver variety of housing types, which supports competitive markets.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	<p>Expectations and requirements of key stakeholders, landowners and land developers can be clearly set out within the proposed precinct.</p> <p>The provisions increase the amenity values of the Plan Change area as the future residents will enjoy the planned open spaces and connected street network which offers safety to pedestrians and cyclists.</p>
<b>Cultural</b>	This option does not facilitate any improved cultural outcomes.	The precinct provisions implement key structuring elements of the Riverhead Structure Plan which has been informed by ongoing engagement with Te Kawerau a Maki and Ngati Whatua Kaipara.
<b>Costs</b>		
<b>Environmental</b>	No requirement to implement the key structuring element of the Riverhead Structure Plan which responds to the specific characteristics of the Plan Change area and the unique sense of place.	This option will not result in any environmental costs.



	Option 1 – Rely on Auckland-Wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Economic</b>	Landowners, developers, the Council and community will not have clear expectations about where the future street and open space network will be located.	Cost to future applicants to prepare resource consent applications assessing additional planning provisions and implementing the requirements.
<b>Social</b>	Reduced amenity values as the provisions will not achieve an integrated and quality-built environment which responds to the characteristics of the Plan Change Area to the same extent as Option 2.	This option will not result in any social costs.
<b>Cultural</b>	Reduced cultural values as the provisions will not implement the key structuring elements of the Riverhead Structure Plan which has been informed by ongoing engagement with Te Kawerau a Maki and Ngati Whatua Kaipara.	This option will not result in any cultural costs.
<b>Efficiency &amp; Effectiveness</b>	<p>Ineffective as the indicative primary road network and open space network are not shown in the plan, so piecemeal and ad hoc development may occur.</p> <p>Without the guidance of a precinct, the Plan Change area is unlikely to be developed in a comprehensive and coordinated manner.</p> <p>Area-specific approaches are not considered, which is less effective in achieving B2.3.1(1)(a).</p>	<p>This option is effective as the provisions seek to ensure adequate provision of public open space in accordance with B2.7.1(1).</p> <p>This option is effective as the provisions seek to ensure development provides a connected street network which promotes safe cycling and a walkable urban form, in accordance with B3.3.1(1) and B2.3.1(3).</p> <p>The proposed precinct meets B2.3.1(1)(a) as it ensures that subdivision, use and development will respond to the intrinsic qualities and physical characteristics of the site.</p>
<b>Summary</b>	Option 2 is the preferred option. The inclusion of a refined set of provisions to implement the structuring elements of the Riverhead Structure Plan and require quality-built form outcomes that respond to the unique sense of place enables the Plan Change to efficiently and effectively achieve B2.7.1(1), B3.3.1(1), B2.3.1(3) and B2.3.1(1)(a).	

### 8.3.4 Theme 4: Natural Environment

The existing AUP and proposed precinct objectives which have particular relevance for Theme 4 include:

- B7.2.1(2): Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring;
- E3.2(2): Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced;
- E15.2(2): Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring;
- IX.2(6): Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate adverse effects on the receiving environment; and
- IX.2(7): Identified ecological values within wetland and stream habitats are protected, restored, maintained and enhanced.

**Table 10: Evaluation of Provisions Theme 4: Natural Environment**

	Option 1 – Rely on Auckland-wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Description of Option</b>	The natural environment and stormwater quality are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions.	<p>The proposed Riverhead Precinct includes provisions to enhance the natural environment:</p> <ul style="list-style-type: none"> <li>• The requirement of a planted riparian margin along permanent and intermittent streams;</li> <li>• A stormwater quality rule to ensure impervious areas are treated and that development incorporates inert building materials to increase the quality of stormwater runoff; and</li> <li>• Additional assessment criteria for open space to ensure that the open space network integrates with natural features and delivers the north-south and east-west multi-purpose green corridors which provide a green connection between the two riparian and coastal environments.</li> </ul>

Option 1 – Rely on Auckland-wide and Zone Provisions		Option 2 – Proposed Plan Change
<b>Benefits</b>		
<b>Environmental</b>	It is possible to achieve good environmental outcomes under this approach but this will rely largely on non-statutory mechanisms.	This option will enhance the ecological values of streams through requiring planted riparian margins along both sides of permanent and intermittent streams and is consistent with the rule included in other greenfield precincts within the AUP.  The requirement to improve stormwater quality will enhance the water quality of receiving environments.
<b>Economic</b>	Less costs associated with developing along streams as there is no requirement to provide riparian planting.  A less complex set of planning provisions will apply within the Plan Change area.	This option will not result in any economic benefits.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	Increased aesthetic and amenity values for communities as a result of riparian planting along streams.
<b>Cultural</b>	This option does not facilitate any improved cultural outcomes.	This option will enhance Mana Whenua values associated with water and the natural environment.
<b>Costs</b>		
<b>Environmental</b>	No requirements to provide riparian planting along streams within the Plan Change area and therefore the ecological values of streams will not be enhanced.  No requirement to improve stormwater quality could result in the degradation of ecological values of receiving environments.	This option will not result in any environmental costs.
<b>Economic</b>	This option will not result in any economic costs.	The requirement for riparian planting will increase the costs when developing along streams.  The requirement to manage stormwater quality through treating impervious areas and incorporating inert building material will increase development costs.

	Option 1 – Rely on Auckland-wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Social</b>	Reduced aesthetic and amenity values for communities from a lack of riparian planting along streams.	This option will not result in any social costs.
<b>Cultural</b>	Reduced cultural values associated with a lack of indigenous biodiversity along streams.	This option will not result in any cultural costs.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or effective and will not achieve B7.2.1(2), E3.2(2) and E15.2(2) as there is no requirement to plant riparian margins along streams and therefore there is no assurance that indigenous biodiversity along streams will be restored to enhance the ecological values of streams.	This option is efficient at achieving B7.2.1(2), E3.2(2) and E15.2(2) as they ensure that indigenous biodiversity along streams is restored to enhance the ecological values of streams while maintaining flexibility for appropriate development of cycle and pedestrian paths.
<b>Summary</b>	Option 2 is the preferred option. The inclusion of a bespoke set of provisions to enhance the natural environment enables the PPC to efficiently and effectively achieve B7.2.1(2), E3.2(2), E15.2(2), IX.2(6) and IX.2(7).	

### 8.3.5 Theme 5: Mana Whenua Cultural Landscape

The existing AUP and proposed precinct objectives which have particular relevance for Theme 4 include:

- B2.6.1(1): The mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall; and
- IX.2(9): Mana Whenua cultural values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, wāhi tapu, and other taonga, in the Riverhead Precinct are identified, recognised, protected, and enhanced.

**Table 11: Evaluation of Provisions Theme 5: Mana Whenua Cultural Landscape**

	Option 1 – Rely on Auckland-wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Description of Option</b>	The Mana Whenua Cultural Landscape within the precinct is controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions.	The proposed Riverhead Precinct includes a bespoke set of provisions to enhance the Mana Whenua Cultural Landscape: <ul style="list-style-type: none"> <li>• The Riverhead precinct recognises and respects these values of Te Kawerau a Maki and Ngati Whatua Kaipara by incorporating an objective, policy, assessment criteria and precinct plan seeking to recognise and protect the Mana Whenua cultural landscape; and</li> <li>• The Cultural Landscape Plan on Precinct Plan 1 recognises spiritual connections and key views of cultural significance to Te Kawerau a Maki and Ngāti Whatua Kaipara.</li> </ul>
<b>Benefits</b>		
<b>Environmental</b>	There is no change to the AUP provisions proposed through this option. Existing rules will apply which will not cover any additional features identified by Te Kawerau a Maki and Ngati Whatua Kaipara on Precinct Plan 1.	This option will protect additional features identified by Te Kawerau a Maki and Ngāti Whatua Kaipara on Precinct Plan 1 not currently protected through the AUP provisions.
<b>Economic</b>	A less complex set of planning provisions will apply within the Plan Change area.	The maintenance and enhancement of many of the values recognised through the Cultural Landscape Plan, such as key views, are likely to have wider benefits in terms of establishing a unique sense of place which will contribute to the identity of Riverhead, attracting visitors into the area.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	The maintenance and enhancement of many of the values recognised through the Cultural Landscape Plan, such as key views, are likely to have wider social benefits.

Option 1 – Rely on Auckland-wide and Zone Provisions		Option 2 – Proposed Plan Change
<b>Cultural</b>	This option does not facilitate any improved cultural outcomes.	The Riverhead area is notable for its continued association with Te Kawerau a Maki and Ngāti Whatua Kaipara. Fundamental guiding principles for Mana Whenua include the protection of taonga, the restoration of mana to taonga and the retention of wahi tapu and sites of cultural significance. This option recognises and protect these values, resulting in much greater cultural benefits than Option 1.
<b>Costs</b>		
<b>Environmental</b>	This option will not result in any environmental costs.	This option will not result in any environmental costs.
<b>Economic</b>	This option will not result in economic costs.	A more complex set of planning provisions will apply within the Plan Change area. The provisions may restrict development within some areas or result in a more complex design process.
<b>Social</b>	The maintenance and enhancement of many of the values recognised through the Cultural Landscape Plan, such as key views, are likely to have wider social benefits which this option does not provide for.	This option will not result in any social costs.
<b>Cultural</b>	This option does not specifically provide for the protection of taonga, the restoration of mana to taonga and the retention of wahi tapu and sites of cultural significance to Mana Whenua within the Plan Change area to the same extent as Option 2.	This option will not result in any cultural costs.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or effective and will not achieve B2.6.1 (1), and IX.2(9) as there is no recognition and protection of the Mana Whenua Cultural Landscape unique to Riverhead.	This option is efficient and effective at achieving B2.6.1 (1), and IX.2(9) as it will ensure Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected.
<b>Summary</b>	Option 2 is preferred as it will ensure Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected and enhanced and it is most efficient and effective at achieving B2.6.1 (1) and IX.2(9).	

#### 8.4 Risk of acting or not acting

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

#### 8.5 Section 32 Analysis Conclusion

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

- The proposed objectives in the Riverhead Precinct are considered to be the most appropriate way to achieve the purpose of the RMA by applying a comprehensive suite of planning provisions to enable appropriate urbanisation of the site;
- The proposed provisions are considered to be the most efficient and effective means of facilitating the use and development of the subject land into the foreseeable future; and
- The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed precinct, having regard to their efficiency or effectiveness and the costs and benefits anticipated from the implementation of the provisions.

### 9.0 Conclusion

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This report has been prepared in support of the RLG's request for a Plan Change to the provisions of the AUP to rezone 80.5 hectares of land to the west of the existing Riverhead settlement for urban activities.

The request has been made in accordance with the provisions of Schedule 1 and Section 32 of the Resource Management Act 1991, and the preparatory work has followed Appendix 1 of the AUP – Structure Plan Guidelines.

Based on an assessment of environmental effects and specialist assessments, it is concluded that the proposed Plan Change will have positive effects on the environment in terms of the social and economic well-being of the community as well as the enhancement and protection of waterways. Other potential effects are able to be managed through the application of the AUP zone and Auckland-wide provisions.

An assessment against the provisions of section 32 of the RMA is provided in section 7.0 of the report. This includes an analysis with respect to the extent to which the objectives of the plan change are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the plan change are the most appropriate way to achieve the objectives.

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





## **APPENDIX 3**

# **ENVIRONMENT COURT DECISION TO ACCEPT PLAN CHANGE 100**



IN THE ENVIRONMENT COURT  
AT AUCKLAND

I TE KŌTI TAIAO O AOTEAROA  
KI TĀMAKI MAKĀURAU

Decision No. [2024] NZEnvC049

IN THE MATTER

of an appeal under cl 27(1) of the First  
Schedule to the Resource Management  
Act 1991 ("RMA")

BETWEEN

FLETCHER RESIDENTIAL LTD,  
THE NEIL GROUP LTD and  
MATVIN GROUP LTD

(ENV-2023-AKL-061)

Appellants

AND

AUCKLAND COUNCIL

Respondent

Court: Alternate Environment Judge L J Newhook

Hearing: In Chambers at Auckland, on the papers

Date of Decision: 20 March 2024

Date of Issue: 20 March 2024

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DECISION OF THE ENVIRONMENT COURT

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Orders made by consent that the respondent's decision of 4 May 2023 refusing to accept the appellants' plan change request is set aside; and that the respondent accept the plan change request as modified by agreement with the appellants as described in Appendix A hereto and proceed to notify it under clause 26 Schedule 1 RMA. No orders as to costs.



## REASONS

### Introduction

[1] This decision concerns a potential jurisdictional issue that arose during the Court's consideration of a consent order lodged by the parties to this appeal.

[2] Fletcher Residential Ltd, the Neil Group Ltd and Matvin Group Ltd (together referred to as the Riverhead Landowner Group) lodged a private plan change request, proposing to rezone approximately 80.5ha of land in Riverhead from Future Urban Zone to a mix of residential zones with a small Local Centre and Neighbour Centre. The Council's decision rejected the private plan change request under cl 25(4)(c) of Schedule 1 RMA, on the basis that the request or part of the request was not in accordance with sound resource management practice. The Riverhead Landowner Group appealed the Council's decision. The relief sought is:

- (a) The Decision is set aside;
- (b) The Riverhead South PC request be accepted in whole under clause 25(2)(b) of Schedule 1 of the RMA and the request be notified under clause 26 of Schedule 1 of the RMA;
- (c) Any such further or other consequential relief as the Court deems appropriate; and
- (d) Costs.

[3] The Riverhead Landowner Group and the Council held discussions about the issues on appeal and reached agreement about the basis upon which the appeal can be settled. The parties lodged a consent memorandum, seeking that the Court make orders that:

- 17.1 The Council's decision that rejected the Private Plan Change request from Fletcher Residential Limited, The Neil Group Limited and Matvin Group Limited is set aside.
- 17.2 The Council will accept the modified Private Plan Change request from Fletcher Residential Limited, The Neil Group Limited and Matvin

Group Limited as set out in Appendix A to the draft consent order accompanying this memorandum and proceed to publicly notify it.

- [4] The modifications were described in this way:
- 12.1 Approximately 6 hectares of land subject to flooding in the north-west of the private plan change area being rezoned from FUZ to the Rural - Mixed Rural Zone rather than the Residential - Mixed Housing Urban (**MHU**) Zone originally proposed and an accompanying request to move the Rural Urban Boundary in the AUP.
  - 12.2 The Residential - Mixed Housing Suburban (**MHS**) Zone (with modifications) being applied across the majority of the plan change area rather than the MHU Zone originally proposed. This will mean that buildings in the MHS zone other than in sub-precinct B will have an 8 metre height limit and the extent of the proposed Residential - Terrace Housing and Apartment Buildings (**THAB**) Zone initially proposed will be reduced.
  - 12.3 Subdivision and development that does not comply with the “staging of development with transport upgrades” Standard IX.6.1 (1) being a discretionary activity rather than a restricted discretionary activity as originally proposed. Standard IX.6.1 (1) concerns specified upgrades of the Coatesville-Riverhead Highway, which must be constructed and operational prior to occupation of a dwelling within the Riverhead Precinct.

- [5] The Court issued a minute dated 27 November 2023, raising these issues:

[2] As the Appellants and Council have agreed an amended proposal might be accepted, it is at least implicit that they also accept that the Council’s original decision was correct. It is therefore not clear on what basis the Court would set the decision aside.

[3] Having considered sch 1, cls 25 and 27, and also s 290 RMA, it is also unclear what jurisdiction the Court has to direct the Council to accept a modified request. The Court would appreciate submissions on this matter.

- [6] The parties responded by way of joint memorandum dated 1 December 2023.

## Discussion

- [7] The Council rejected the private plan change request under cl 25 of Schedule 1 to the RMA, which relevantly provides:

### 25 Local authority to consider request

- (1) A local authority shall ... decide under which of subclauses (2), (3), and (4), or a combination of subclauses (2) and (4), the request shall be dealt with.

...

- (4) The local authority may reject the request in whole or in part, but only on the grounds that—

...

- (c) the request or part of the request is not in accordance with sound resource management practice; ...

[8] Clause 27 of Schedule 1 to the RMA provides the right to appeal the Council's decision under cl 25(4)(c):

## **27 Appeals**

- (1) A person who requests a plan change under clause 21 may appeal to the Environment Court against a decision referred to in subclause (1A) within 15 working days of receiving the decision.

(1A) The decisions that may be appealed under subclause (1) are decisions—

- (a) to adopt or accept the request in part only under clause 25(2);  
 (b) to reject the request under clause 23(6);  
 (c) to deal with the request under clause 25(3);  
 (d) to reject the request under clause 25(4) in whole or in part.

- (2) The Environment Court may make such decision on any such appeal as it thinks fit.

[9] The parties rely on *Gillman Wheelans Ltd v Selwyn District Council* which, they submitted, confirms under s 290 of the RMA that at a de novo hearing the Court exercises the power, duty and discretion of the relevant Council in respect of the decision appealed.<sup>1</sup> The Court in *Gillman* held that, on a cl 27 appeal, the Court had power to confirm or cancel the decision to reject the plan change.<sup>2</sup>

[10] The parties also referred to *Malory Corporation Ltd v Rodney District Council*, where

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<sup>1</sup> *Gillman Wheelans Ltd v Selwyn District Council* (2009) 15 ELRNZ 298 at [26] (*Gillman*). See submissions dated 1 December 2023 at [9]-[15].

<sup>2</sup> *Gillman* at [32].

the High Court observed that, on administrative law principles, it was hard to see how the discretion conferred on the Environment Court on appeal under cl 27(2) could confer any discretionary power beyond that exercised by a local authority.<sup>3</sup>

[11] The parties also referred to *Orakei Point Trustee Ltd v Auckland Council*, where the Court ordered (by consent) that the Council's decision rejecting a private plan change request be set aside and that the Council accept the request and proceed to publicly notify it.<sup>4</sup>

[12] The parties submit that on appeal, the Court has the same power, duty and discretion the Council had in respect of its decision, and that the Court could confirm or cancel the Council's decision to reject the plan change request.<sup>5</sup>

[13] The parties also note that, under cl 24 of Schedule 1, the Council may (as a result of further or additional information, commissioned reports or other matters, and with the agreement of the person who made the request), modify a plan change request. On that basis, the parties submit that the Court would have the power to determine that a modified plan change should be accepted, where this was agreed to by the requestor.<sup>6</sup>

[14] I have no difficulty with the submission that if the appeal had proceeded to a hearing, the Court could confirm or cancel the Council's decision to reject the plan change request.

[15] It has however been necessary to ponder the parties' submission about cl 24. Clauses 24, 25 27 are expressed somewhat disjunctively on their face, with clause 27(1A) limiting appeals to the Court to particular strands of clauses 23 and 25. 27(1A) omits any mention of clause 24. However, subclause (2) of clause 27 describes the

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<sup>3</sup> *Malory Corporation Ltd v Rodney District Council* [2010] NZRMA 392 (HC) at [59]. See submissions dated 1 December 2023 at [16].

<sup>4</sup> *Orakei Point Trustee Ltd v Auckland Council* [2019] NZEnvC 117 at [18]. See submissions dated 1 December 2023 at [17].

<sup>5</sup> See submissions dated 1 December 2023 at [18].

<sup>6</sup> See submissions dated 1 December 2023 at [19].

discretion of the Court in broad terms and does not circumscribe jurisdiction in the manner the rights of appeal in (1A) are.

[16] It is also worth considering what the council could have done at first instance, which necessarily imports the operation of clause 24 to its consideration of matters under clause 25. It would be artificial and contrary to sensible interpretation and good practice, for the council's clause 24 power to be capable of exercise only at its first instance level but not during a later appeal, where to employ a key element of clause 24, the requestor agrees to modification of the request. "Agreement" is after all an element also underpinning a consent order.

[17] For that reason, I find that the Court has jurisdiction to direct that the Council to accept a modified plan change request agreed to by the requestor and notify it under clause 26.

## **Outcome**

[18] I make orders in the terms requested in the memoranda of the parties since they settled their differences in the appeal, in the following terms.

[19] The council's decision dated 4 May 2023 that rejected the appellants' private plan change request is set aside.

[20] The council is directed to accept the private plan change request as modified by agreement with the appellants as set out in Appendix A to this decision.

[21] As an aside, I note from the memoranda that flood hazard issues on the subject land have, at least in part, driven the modifications to zoning provisions. The merits



are not before the Court at this stage, and the council now having been ordered (with its agreement) to accept the plan change, issues about natural hazards should be considered and dealt with after promulgation of the plan change.



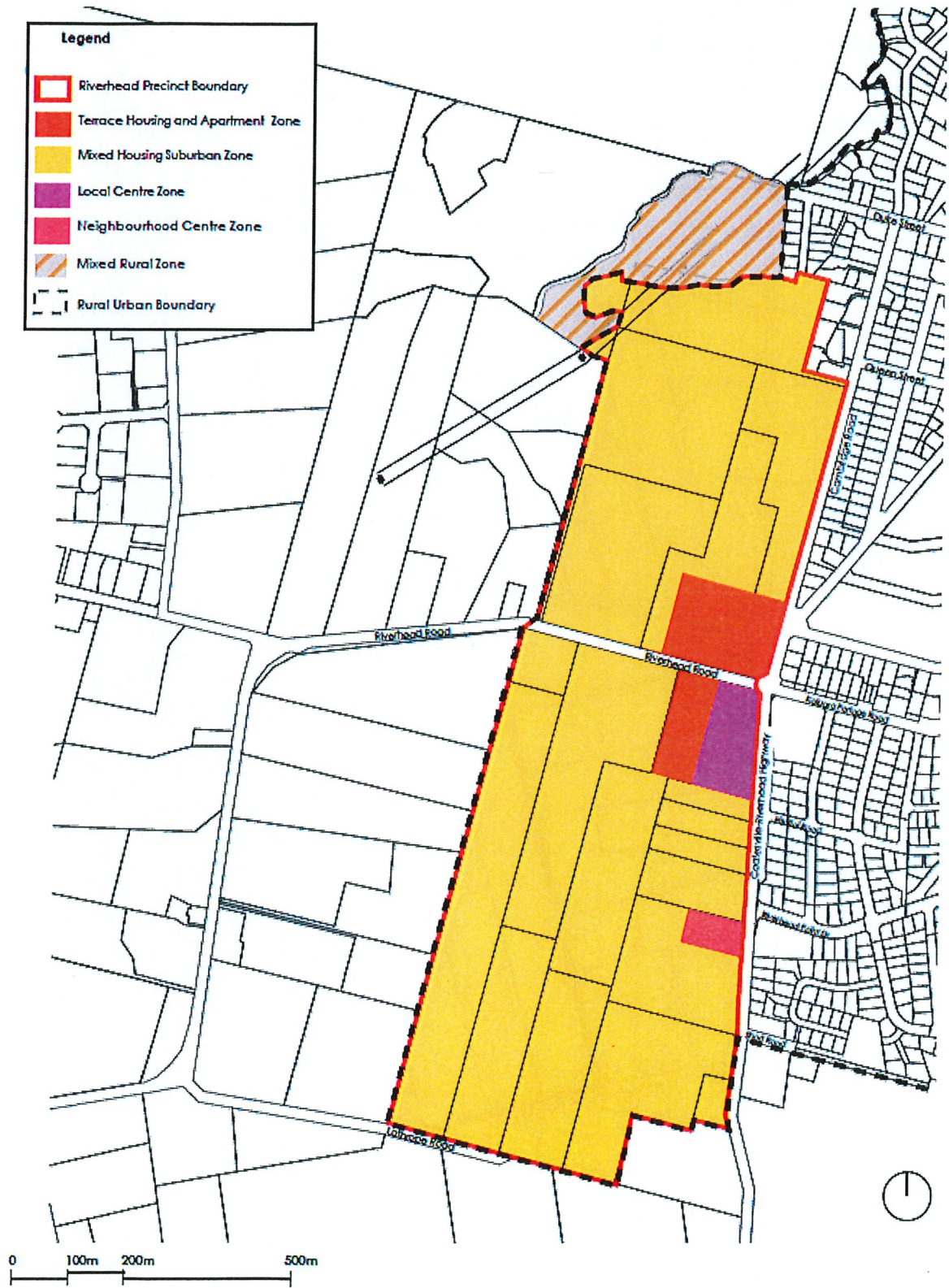
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**L J Newhook**  
Alternate Environment Judge

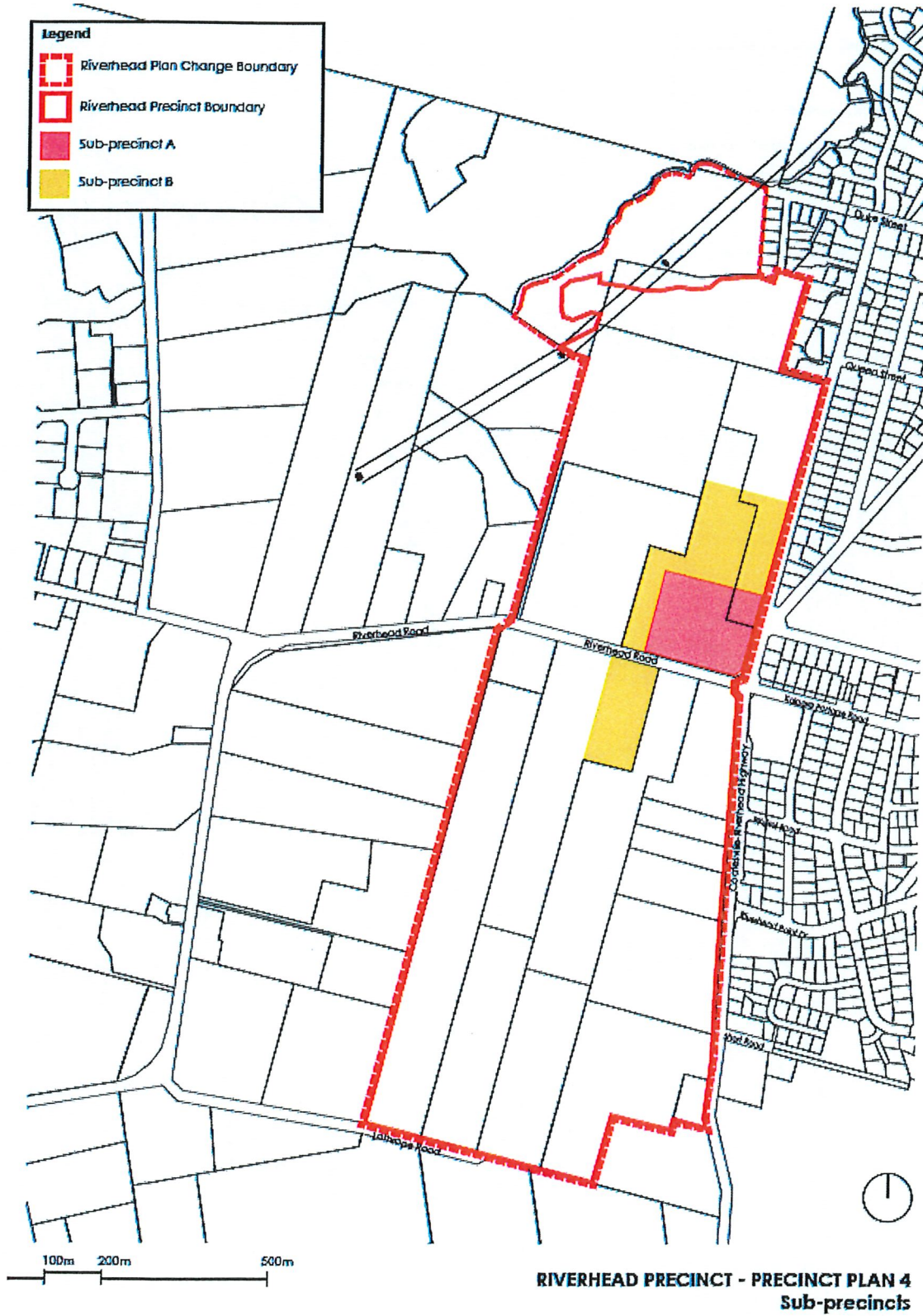


APPENDIX A – MODIFIED PLAN CHANGE REQUEST

# Riverhead zoning plan

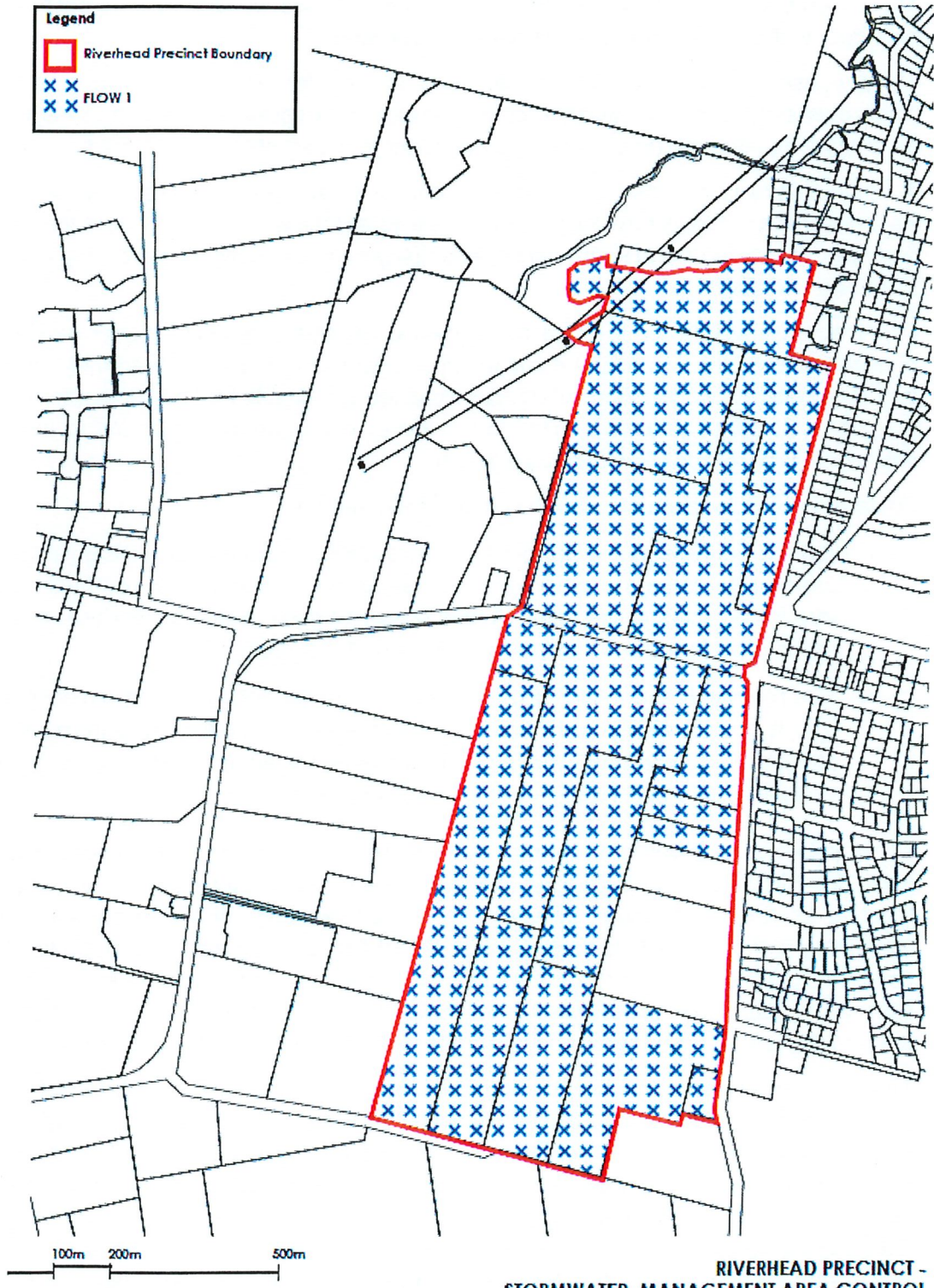


# Riverhead precinct plan





# Riverhead Stormwater Management Area Control (Flow 1)



## IX.1. Precinct description

The Riverhead Precinct applies to approximately 75.5ha of land with a contiguous boundary to the existing urban settlement of Riverhead.

The purpose of the Riverhead Precinct is to provide for the development of a new, comprehensively planned residential community as an extension to Riverhead Village that supports a well-functioning urban environment and a quality compact built form.

A Local Centre is provided at the intersection of Coatesville-Riverhead Highway and Riverhead Road. This centre will provide for the establishment of retail to meet the day to day needs of residents and some increased employment opportunities in a central location to enhance walkability.

The precinct provides for a range of residential densities, including higher residential densities close to the Local Centre and the intersection of Coatesville-Riverhead Highway and Riverhead Road. Medium residential densities are enabled in the remainder of the precinct, with height generally limited to two storey development to respond to the built character of the existing Riverhead settlement.

There are two Sub-precincts within the Riverhead Precinct:

- Sub-precinct A is zoned Residential - Terrace Housing and Apartment Building and provides for the greatest height and residential densities at a key intersection location adjacent to the Local Centre Zone and public transport facilities. A wider range of non-residential activities is provided for at ground floor.
- Sub-precinct B is zoned Residential Mixed Housing Suburban and provides for a transition in building height between Sub-precinct A and the surrounding Mixed Housing Suburban area where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.

The precinct emphasises the need for development to contribute to a unique sense of place for Riverhead acknowledging the presence of Riverhead Forest, the unnamed tributary of the Rangitopuni Stream and the surrounding rural environment, while integrating with the existing settlement at Riverhead and realising the opportunity to establish green corridors through the precinct. In particular, there is a need to manage stormwater, meet open space needs, and establish connections for all modes of transport through the precinct, and between the precinct and the existing settlement of Riverhead.

The precinct seeks to enable the transition from rural to urban development, while recognising the cultural values and relationships that Te Kawerau ā Maki, Ngāti Whātua o Kaipara and other interested iwi have with the land in Riverhead as part of the Māori cultural landscape. The wider Riverhead area is an important cross-roads to different cultural districts being situated between Te Awa Kumeū (Kumeū River) and Manga Rangitōpuni (Rangitōpuni Stream) on the productive alluvial plains between Pukeharakeke and Te Ahu (the Riverhead Forest hillcountry) and Nga Rau Pou ā Maki (the Waitākere Ranges). This wider area contains important historical kāinga, pā, ara and tōanga (travel routes), wāhi tapu, and food and resource gathering areas. This includes peacemaking areas such as Rangitōpuni between Te Kawerau ā Maki and Te Taou, important Te Kawerau pūrakau such as related to Ruarangi hāerere, and Treaty Settlement assets including the adjacent Riverhead Forest.

Cultural values and associations encompass the geological, ecological, and wāhi tupuna within and adjoining the precinct. In particular Te Tōangaroa (Kaipara Portage) which crosses east-west near the southern part of the precinct and the Papakoura Awa in the north.

The transport and other infrastructure networks within Riverhead will be progressively upgraded over time to support development in the precinct. The precinct includes provisions to ensure that the subdivision and development of land for development is coordinated with the transport and infrastructure upgrades necessary to manage potential adverse effects on the wider transport network.

The zoning of land within this precinct is Residential – Terrace Housing and Apartment Building, Residential – Mixed Housing Suburban, Business – Local Centre and Business – Neighbourhood Centre.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

## **IX.2. Objectives**

- (1) Riverhead Precinct is a well-functioning urban environment that integrates with the existing Riverhead settlement, the natural environment and respects Mana Whenua values.
- (2) A variety of housing types and sizes are provided that respond to:
  - (a) Housing needs and demand; and
  - (b) The neighbourhood's planned built character.
- (3) Activities in the Business – Local Centre zone provide local employment opportunities and complement the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone.
- (4) Access to and from the precinct occurs in a safe, effective and efficient manner for all modes of transport.
- (5) Subdivision and development are coordinated with the supply of sufficient transport, water, energy and communications infrastructure.
- (6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.
- (7) Identified ecological values within wetland and stream habitats are protected, restored and enhanced.
- (8) Development is supported by social facilities, including education and healthcare facilities.
- (9) Te Kawerau ā Maki and Ngāti Whātua ō Kaipara (as well as any other relevant tangata whenua) cultural values and their relationship associated with the Māori cultural landscapes, including ancestral lands, water, sites, wāhi tapu, and other taonga, in the Riverhead Precinct are identified, recognised, protected, and enhanced.

### **IX.3. Policies**

#### *Land Use*

- (1) Provide for high density residential development and supporting non-residential activities compatible with residential amenity values in Sub-precinct A.
- (2) Enable a variety of housing types with a mix of densities within the precinct including attached and detached dwellings, and apartments.
- (3) Encourage appropriately-scaled office activities, including co-working spaces, to establish in the Local Centre zone to provide local employment opportunities and support the surrounding land uses in Riverhead Precinct.

#### *Transport, infrastructure and staging*

- (4) Require the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.
- (5) Require subdivision and development in the precinct to be coordinated with the provision of sufficient stormwater, wastewater, water supply, energy and telecommunications infrastructure.
- (6) Provide for new social facilities, including education facilities, that meet the needs of the community.

#### *Street network, built form and open space*

- (7) Require the main collector roads to be generally in the location shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly-connected street layout that integrates with the surrounding transport network.
- (8) Require the key local roads and pedestrian connections to be generally in the location shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected street layout that integrates with the surrounding transport network.
- (9) Ensure that development provides a local road network that achieves a highly-connected street layout and integrates with the collector road network within the precinct and the surrounding transport network, and supports the safety and amenity of the open space network.
- (10) Require streets to be attractively designed and to appropriately provide for all transport modes by:
  - (a) providing for safe access for cyclists on collector roads;
  - (b) providing a level of landscaping that is appropriate for the function of the street;  
and
  - (c) providing for the safe and efficient movement of vehicles.
- (11) Provide safe connections to public transport facilities and social infrastructure such as open space and schools.



- (12) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place and a quality network of open spaces for Riverhead, including by incorporating natural features such as:
- (a) Wetlands and streams;
  - (b) The Beech tree identified on IX.10.2 Riverhead: Precinct plan 2, where possible; and
  - (c) Any other mature trees that are worthy of retention, where possible.
- (13) Encourage the provision of a continuous and connected multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2, which achieves the following outcomes:
- (a) Integrates stormwater management, passive recreation opportunities and active transport mode connections, to promote the efficient use of land;
  - (b) Provides additional amenity for the key north-south and east-west movement networks;
  - (c) Promotes ecological linkages through the Precinct; and
  - (d) Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.
- (14) Require development adjacent to rural zones to manage potential reverse sensitivity effects on those zones through a building setback.
- (15) Encourage higher buildings which will act as marker buildings at the Coatesville-Riverhead Highway and Riverhead intersection, support the legibility of a new centre and reinforce the role of Memorial Park as the heart of the settlement.
- (16) Encourage building heights throughout the Mixed Housing Suburban zone that:
- (a) Provide for three storey development within Sub-precinct B to enable a transition in height between the five and two storey development in the adjacent areas.
  - (b) Enable three storey development within the Mixed Housing Suburban zone where sites overlook public open space to take advantage of amenity and outlook of public open spaces and promote passive surveillance.

*Stormwater management*

- (17) Require subdivision and development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including:
- (a) Providing a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;
  - (b) Applying water sensitive design to achieve water quality and hydrology mitigation;
  - (c) Requiring the use of inert building materials to eliminate or minimise the generation and discharge of contaminants;

- (d) Requiring treatment of runoff from public road carriageways and publicly accessible carparks by a water quality device designed in accordance with GD01;
- (e) Requiring runoff from other trafficked impervious surfaces to apply a water sensitive approach to treat contaminant generating surfaces, including cumulative effects of lower contaminant generating surfaces;
- (f) Providing indigenous planting on the riparian margins of permanent or intermittent streams; and
- (g) Ensuring development is coordinated with sufficient stormwater infrastructure.

*Ecology*

- (18) Contribute to improvements to water quality, habitat and biodiversity, including by providing indigenous planting on the riparian margins of permanent and intermittent streams.

*Mana Whenua values*

- (19) Recognise, protect and enhance the cultural values and relationships associated with the cultural landscapes at Riverhead by:
  - (a) Including Te Kawerau ā Maki and Ngāti Whātua ō Kaipara (and any other relevant tangata whenua) in resource consenting, including through provision of cultural impact assessments or other engagement;
  - (b) Acknowledging the key views and spiritual connection identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa;
    - (i) Providing opportunities to express the relationship of Mana Whenua with the precinct through the establishment of a cultural narrative and/or art, including but not limited to:
    - (ii) The cross roads between several takiwa including Kaipara, Waitākere, Te Whenua Roa ō Kahu, and on to Waitematā;
    - (iii) Ancient footprints of the tūpuna of Te Kawerau ā Maki and Ngāti Whātua ō Kaipara;
    - (iv) Connections to the hills to the north and the awa;
    - (v) References to the natural features or resources of cultural significance;
  - (c) Identifying opportunities early to incorporate traditional names or other names put forward by Te Kawerau ā Maki and Ngāti Whātua ō Kaipara into open space areas, roads, or other community spaces;
  - (d) Taking an integrated approach to the management stormwater which protects and enhances the mauri of freshwater, in particular with regard to Papakoura Awa; and
  - (e) Ensuring the design of streets and publicly accessible open spaces incorporates Te Aranga design principles.

#### IX.4. Activity table

All relevant overlay, Auckland-wide and zone activity tables apply in this precinct except for the following:

##### All Sub-Precincts

- H4 Residential – Mixed Housing Suburban Zone:
  - H4.4.1(A3) Up to three dwellings per site
  - H4.4.1(A4) Four or more dwellings per site

##### Sub-precinct A

- H6 Residential – Terrace Housing and Apartment Buildings Zone:
  - H6.4.1(A15) Restaurants and cafes up to 100m<sup>2</sup> gross floor area per site
  - H6.4.1(A25) Healthcare facilities up to 200m<sup>2</sup> gross floor area per site

Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.

**Table IX.4.1 Activity table – Precinct-wide activities**

Activity		Activity status
<b>Development</b>		
(A1)	New buildings prior to subdivision	RD
(A2)	Infringements to IX6.2 Road Widening Setback along Riverhead Road	D
(A2A)	Buildings for up to 3 residential dwellings per site in the Mixed Housing Suburban Zone	P
(A2B)	Buildings for more than 3 residential dwellings per site in the Mixed Housing Suburban Zone that comply with Standards IX6.7. Building height within the Mixed Housing Suburban Zone, IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone, IX6.9. Yards within the Mixed Housing Suburban Zone	RD
<b>Subdivision</b>		
(A3)	Subdivision, including subdivision establishing private roads	RD
(A4)	Subdivision and development that does not comply with Standard IX.6.1(1) Staging of Development with Transport Upgrades	D
(A5)	Subdivision and development that does not comply with Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades	RD

(A6)	Subdivision and development that does not comply with Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct	RD
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**Table IX.4.2 Activity table – Sub-precinct A activities**

Activity		Activity status
<b>Commerce</b>		
(A7)	Restaurants and cafes up to 250m <sup>2</sup> gross floor area per site	P
(A8)	Retail up to 100m <sup>2</sup> gross floor area per site	P
<b>Community</b>		
(A9)	Healthcare facility up to 250m <sup>2</sup>	RD

#### **IX.5. Notification**

- (1) Any application for a restricted discretionary activity listed in Table IX.4.1 Activity table above, will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.
- (2) Any application for resource consent for an activity listed in Table IX.4.1 Activity table above and which is not listed in IX.5(1) will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (3) When deciding on who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

#### **IX.6. Standards**

All relevant overlay, Auckland-wide and zone standards apply in this precinct except for the following:

##### ***Precinct-wide***

- H4 Residential – Mixed Housing Suburban Zone Standards:
  - H4.6.4 Building height
  - H4.6.5 Height in relation to boundary
  - H4.6.6 Alternative height in relation to boundary
  - H4.6.7 Yards
  - H4.6.8 Maximum impervious area
  - H4.6.9 Building coverage

- H4.6.10 Landscaped area
- H4.6.11 Outlook space
- H4.6.13 Outdoor living space
- E27.6.1 – Trip Generation

All activities, except activities listed in Activity Table IX.4.1 (A2B), listed as permitted and restricted discretionary in Activity Table IX.4.1, Activity Table IX.4.2, Activity Table H11.4.1, Activity Table H12.4.1, Activity Table H6.4.1 and Activity Table H4.4.1 must comply with the following permitted activity standards.

Activities listed in Activity Table IX.4.1(A2B) are not required to comply with standards IX6.10. Building coverage within the Mixed Housing Suburban Zone, IX6.11. Landscaped area within the Mixed Housing Suburban Zone, IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone, IX6.13. Outlook space within the Mixed Housing Suburban Zone, IX6.14. Outdoor living space within the Mixed Housing Suburban Zone, IX6.15. Windows to the street within the Mixed Housing Suburban Zone, H5.6.13 Daylight, H5.6.15 Front, side and rear fences and walls, and H5.6.16 Minimum dwelling size, but must comply with all the other following permitted activity standards.

### **IX.6.1. Standards**

#### **IX.6.1. Staging of development with transport upgrades**

Purpose: To manage the adverse effects of traffic on the safety and efficiency of the surrounding road network for all modes of transport by ensuring subdivision and development is coordinated with transport infrastructure.

- (1) Prior to occupation of a dwelling within the Riverhead Precinct, the following transport infrastructure must be constructed and operational:
  - (a) Upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection to a roundabout, as part of the SH16 Brigham Creek to Waimauku project, led by Waka Kotahi NZ Transport Agency.
  - (b) Upgrade of the Coatesville-Riverhead Highway / Old Railway Road intersection to provide a right turn bay.
  - (c) Upgrade of the Coatesville-Riverhead Highway / Riverland Road intersection to provide a right turn bay.
- (2) Prior to occupation of a building on a site with vehicle access to and/or from Coatesville-Riverhead Highway, the following road infrastructure upgrades must be constructed and operational:
  - (a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including walking/cycling infrastructure, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and
  - (b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.

- (3) Prior to occupation of a building on a site with vehicle access to and/or from Riverhead Road, the following road infrastructure upgrades must be constructed and operational:
- (a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including walking/cycling infrastructure, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and
  - (b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and
  - (c) Upgrade and urbanise Riverhead Road, from the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3.
- (4) Prior to occupation of a building on a site with vehicle access to and/or from Lathrope Road, the following road infrastructure upgrades must be constructed and operational:
- (a) Upgrade Lathrope Road between Riverhead Road and the new access point, in accordance with IX.10.3 Riverhead: Precinct plan 3 and Appendix 2; and
  - (b) Upgrade the Riverhead Road/Lathrope Road intersection to a Give-Way controlled intersection, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.
- (5) Prior to occupation of a building on a site with vehicle access to and/or from Cambridge Road, the following road infrastructure upgrades must be constructed and operational:
- (a) A new footpath on the western side of Cambridge Road between Queen Street and Riverhead Road in accordance with IX.10.3 Riverhead: Precinct plan 3;
  - (b) Upgrade and urbanise the existing carriageway of the formed portion of Cambridge Road south of Queen Street to an urban standard, in accordance IX.10.3 Precinct Plan 3;
  - (c) A new footpath on the northern side of Queen Street between Coatesville-Riverhead Highway and Cambridge Road in accordance with IX.10.3 Riverhead: Precinct plan 3; and
  - (d) An additional pedestrian crossing facility on Coatesville-Riverhead Highway between Edward Street and Princes Street.

#### **IX6.2. Road widening setback along Riverhead Road**

Purpose: To provide for the future required widening of Riverhead Road.

- (1) A 2m wide road widening setback must be provided along that part of the frontage of the land adjoining Riverhead Road shown as subject to the 'Required Road Widening' notation on the IX.10.3 Riverhead: Precinct plan 3.

- (2) The setback must be measured from the legal road boundary that existed at the year of 2022. No buildings, structures or parts of a building shall be constructed within this 2m wide setback.
- (3) Any minimum front yard setback required in the underlying zoning for the land adjoining Riverhead Road shall be measured from this 2m wide road widening setback.

#### **IX.6.3. Riparian margin**

Purpose: To contribute to improvements to water quality, habitat and biodiversity.

- (1) Riparian margins of permanent or intermittent streams must be planted either side to a minimum width of 10m measured from the top of bank of the stream, provided that:
  - (a) This rule shall not apply to road crossings over streams;
  - (b) Walkways and cycleways must not locate within the riparian planting area; and
  - (c) The riparian planting area is vested in Council or protected and maintained in perpetuity by an appropriate legal mechanism.

#### **IX.6.4. Stormwater quality**

Purpose: To ensure that stormwater is managed and treated prior to discharge to maintain and enhance the health and ecological values of the receiving environment.

- (1) Stormwater runoff from new, or redeveloped, high contaminant generating carparks, all publicly accessible carparks exposed to rainfall, and all roads must be treated with a stormwater management device(s) meeting the following standards:
  - (a) The device or system must be sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or
  - (b) Where alternative devices are proposed, the device must demonstrate it is designed to achieve an equivalent level of contaminant or sediment removal performance to that of 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'.
- (2) For all other trafficked impervious surfaces, water quality treatment in accordance with the approved stormwater management plan must be installed.
- (3) New buildings, and additions to buildings must be constructed using inert cladding, roofing, spouting and building materials that avoid the use of high contaminant yielding building products which have:
  - (a) Exposed surface(s) or surface coating of metallic zinc of any alloy containing greater than 10% zinc; or
  - (b) Exposed surface(s) or surface coating of metallic copper or any alloy containing greater than 10% copper; or
  - (c) Exposed treated timber surface(s) or any roof material with a copper-containing or zinc-containing algaecide.

### IX.6.5. Rural interface setback

Purpose: To provide a buffer between residential activities within the Precinct and the neighbouring Mixed Rural zone to mitigate reverse sensitivity effects.

- (1) A building or parts of a building must be set back from the relevant boundary by the minimum depth listed in Table IX.6.5.1.

**Table IX.6.5.1 Rural Interface Setback**

Yard	Minimum depth
Rear	5m where the rear boundary adjoins the Rural – Mixed Rural Zone
Side	5m where the side boundary adjoins the Rural – Mixed Rural Zone

Note 1: A side or rear yard is only required along that part of the side or rear boundary adjoining the Rural – Mixed Rural Zone.

### IX.6.6. Fences adjoining publicly accessible open space

Purpose: To ensure development positively contributes to the visual quality and interest of publicly accessible open spaces.

- (1) Fences, or walls, or a combination of these structures, within a side or rear yard adjoining a publicly accessible open space (excluding roads) must not exceed the heights specified below, measured from the ground level at the boundary:
  - (a) 1.2m in height, or;
  - (b) 1.8m in height if the fence is at least 50 per cent visually open.

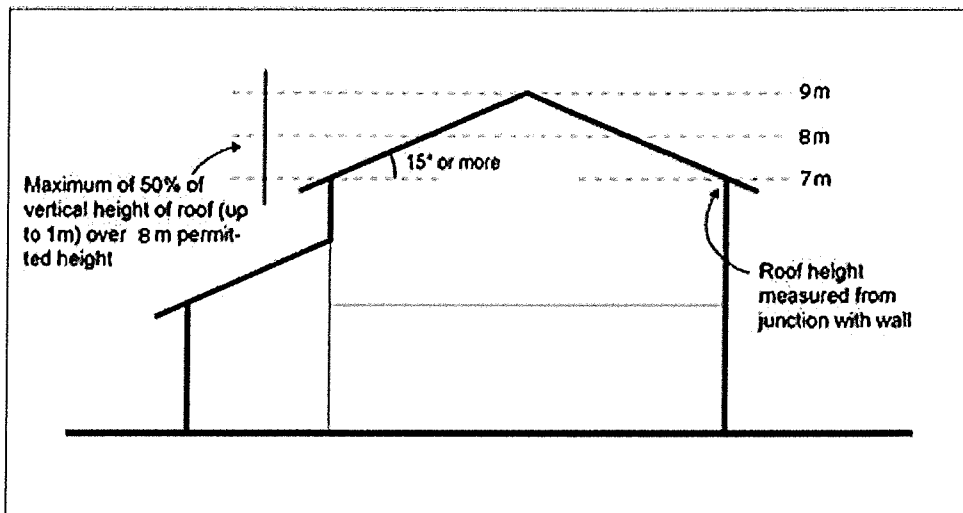
### IX.6.7. Building height within the Mixed Housing Suburban Zone

Purpose: To manage the height of buildings to achieve an urban built character of generally two storeys, with three storey development adjoining the Terrace Housing and Apartment Building zone and the Local Centre zone to enable a transition in height between the five and two storey development in the adjacent areas.

- (1) In Sub-precinct B, Standard H5.6.4. Building height applies.
- (2) In the remainder of the Residential – Mixed Housing suburban zone, buildings must not exceed 8m in height, except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1m, where the entire roof slopes 15° or more, as shown on the following diagram:

**Figure IX 6.7.1 Building height in the Mixed Housing Suburban Zone not located within Sub-precinct B.**





### IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone

Purpose: to manage the height and bulk of buildings at boundaries to maintain a reasonable level of sunlight access, privacy and minimise adverse visual dominance effects to immediate neighbours.

- (1) Standard H5.6.5 Height in relation to boundary applies within the Mixed Housing Suburban zone.

### IX6.9. Yards within the Mixed Housing Suburban Zone

Purpose:

- to create a suburban streetscape character and provide sufficient space for landscaping within the front yard;
  - to maintain a reasonable standard of residential amenity for adjoining sites;
  - to ensure buildings are adequately set back from lakes, streams and the coastal edge to maintain water quality and provide protection from natural hazards; and
  - to enable buildings and services on the site or adjoining sites to be adequately maintained.
- (1) A building or parts of a building must be set back from the relevant boundary by the minimum depth listed in Table IX.6.9.1 Yards below.

Table IX.6.9.1 Yards

Yard	Minimum depth
Front	2.5m
Side	1m
Rear	1m
Riparian	10m from the edge of all permanent and intermittent streams

Lakeside	30m
Coastal protection yard	10m

#### **IX6.10. Building coverage within the Mixed Housing Suburban Zone**

Purpose: to manage the extent of buildings on a site to achieve the planned urban character of buildings surrounded by open space

- (1) Standard H5.6.10(1) Building coverage applies within the Mixed Housing Suburban zone.

#### **IX6.11. Landscaped area within the Mixed Housing Suburban Zone**

Purpose:

- to provide for quality living environments consistent with the planned urban built character of buildings within a generally spacious setting; and
  - to maintain the landscaped character of the streetscape within the zone.
- (1) A dwelling at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.
- (2) The landscaped area may be located on any part of the development site, and does not need to be associated with each dwelling.

#### **IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone**

Purpose:

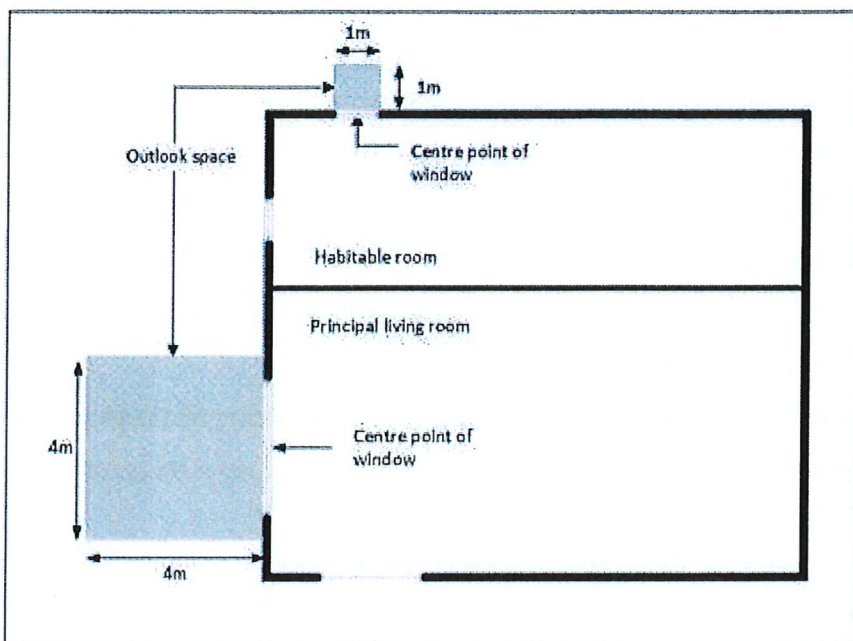
- to manage the amount of stormwater runoff generated by a development, particularly in relation to the capacity of the stormwater network and potential flood risks;
  - to support the functioning of riparian yards, lakeside yards and coastal yards and water quality and ecology;
  - to reinforce the building coverage and landscaped area standards;
  - to limit paved areas on a site to improve the site's appearance and cumulatively maintain amenity values in a neighbourhood.
- (1) Standard H5.6.9 Maximum impervious area applies within the Mixed Housing Suburban zone.

#### **IX6.13. Outlook space within the Mixed Housing Suburban Zone**

Purpose:

- to ensure a reasonable standard of visual privacy between habitable rooms of different buildings, on the same or adjacent sites; and
- in combination with the daylight standard, manage visual dominance effects within a site by ensuring that habitable rooms have an outlook and sense of space.

- (1) An outlook space must be provided for each dwelling as specified in this clause.
- (2) An outlook space must be provided from habitable room windows as shown in the diagram below:



- (3) The minimum dimensions for a required outlook space are as follows:
  - (a) a principal living room must have an outlook space with a minimum dimension of 4 metres in depth and 4 metres in width; and
  - (b) all other habitable rooms must have an outlook space with a minimum dimension of 1 metre in depth and 1 metre in width.
- (4) The width of the outlook space is measured from the centre point of the largest window on the building face to which it applies.
- (5) Outlook spaces may be over driveways and footpaths within the site or over a public street or other public open space.
- (6) Outlook spaces may overlap where they are on the same wall plane in the case of a multi-storey building.
- (7) Outlook spaces may be under or over a balcony.
- (8) Outlook spaces required from different rooms within the same building may overlap.
- (9) Outlook spaces must—
  - (a) be clear and unobstructed by buildings; and
  - (b) not extend over an outlook space or outdoor living space required by another dwelling.

#### **IX6.14. Outdoor living space within the Mixed Housing Suburban Zone**

Purpose: to provide dwellings, supported residential care and boarding houses with outdoor living space that is of a functional size and dimension, has access to sunlight,

and is accessible from the dwelling.

- (1) A dwelling at ground floor level must have an outdoor living space that is at least 20 square metres and that comprises ground floor, balcony, patio, or roof terrace space that,—
  - (a) where located at ground level, has no dimension less than 3 metres; and
  - (b) where provided in the form of a balcony, patio, or roof terrace, is at least 8 square metres and has a minimum dimension of 1.8 metres; and
  - (c) is accessible from the dwelling; and
  - (d) may be—
    - (i) grouped cumulatively by area in 1 communally accessible location; or
    - (ii) located directly adjacent to the unit; and
  - (e) is free of buildings, parking spaces, and servicing and manoeuvring areas.
- (2) A dwelling located above ground floor level must have an outdoor living space in the form of a balcony, patio, or roof terrace that—
  - (a) is at least 8 square metres and has a minimum dimension of 1.8 metres; and
  - (b) is accessible from the dwelling; and
  - (c) may be—
    - (i) grouped cumulatively by area in 1 communally accessible location, in which case it may be located at ground level; or
    - (ii) located directly adjacent to the unit.

#### **IX6.15. Windows to the street within the Mixed Housing Suburban Zone**

Purpose: To provide for passive surveillance while maintaining privacy for residents and users.

- (1) Any dwelling facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.

#### **IX.7. Assessment – controlled activities**

There are no controlled activities in this precinct.

#### **IX.8. Assessment – restricted discretionary activities**

##### **IX.8.1. Matters of discretion**

The Council will restrict 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) Healthcare facility up to 250m<sup>2</sup>:
  - (a) Matters of discretion H6.8.1(1) apply.
- (2) For new buildings prior to subdivision; and subdivision, including subdivision establishing private roads:

- (a) Location and design of the collector road, key local roads and connections with neighbouring sites to achieve an integrated street network, and appropriately provide for all modes;
  - (b) Provision of cycling and pedestrian networks;
  - (c) Open space network;
  - (d) Stormwater and flooding effects;
  - (e) Servicing;
  - (f) Trees;
  - (g) The effects on cultural values and Māori Cultural Landscape values; and
  - (h) Matters of discretion IX.8.1(1)(a)-(g) apply in addition to the matters of discretion in E38.12.1.
- (3) For four or more dwellings on a site:
- (a) The effects on the neighbourhood character, residential amenity, safety, and the surrounding residential areas from all of the following
    - (i) Building intensity, scale, location, form and appearance;
    - (ii) Traffic; and
    - (iii) Location and design of parking and access.
  - (b) All of the following standards:
    - (i) Standard IX6.10. Building coverage within the Mixed Housing Suburban Zone;
    - (ii) Standard IX6.11. Landscaped area within the Mixed Housing Suburban Zone;
    - (iii) Standard IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone;
    - (iv) IX6.13. Outlook space within the Mixed Housing Suburban Zone;
    - (v) Standard IX6.14. Outdoor living space within the Mixed Housing Suburban Zone;
    - (vi) Standard IX6.15. Windows to the street within the Mixed Housing Suburban Zone; and
    - (vii) Standard H5.6.13 Daylight;
    - (viii) Standard H5.6.15 Front, side and rear fences and walls; and
    - (ix) Standard H5.6.16 Minimum dwelling size.
  - (c) Infrastructure and servicing.
- (4) For occupation of dwellings that does not comply with Standard IX.6.1.(2)-(6) Staging of development with transport upgrades, Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct:

- (a) Effects of traffic generation on the safety and operation of the surrounding road network;
  - (b) Effects on pedestrian and cyclist connectivity and safety; and
  - (c) Effects on public transport.
- (5) For development that does not comply with Standard IX6.3. Riparian margins:
- (a) Effects on water quality and stream habitat.
- (6) For development that does not comply with Standard IX6.4. Stormwater quality:
- (a) Matters of discretion E9.8.1(1) apply.
- (7) For development that does not comply with Standard IX6.5. Rural interface setback:
- (a) Reverse sensitivity effects.
- (8) Infringement of Standard IX.6.6. Fences adjoining publicly accessible open space:
- (a) Effects on the amenity and safety of the open space.
- (9) Infringement of Standard IX6.7. Building height within the Mixed Housing Suburban Zone:
- (a) Within Sub-precinct B:
    - (i) Matters of discretion H5.8.1(2)(a) apply.
  - (b) Within the remainder of the Mixed Housing Suburban zone:
    - (i) The design and layout of buildings and development insofar as it affects the existing and future amenity values of open spaces; any policy which is relevant to the standard;
    - (ii) the purpose of the standard;
    - (iii) the effects of the infringement of the standard;
    - (iv) the effects on the planned built character of the zone;
    - (v) the effects on the amenity of the neighbouring sites;
    - (vi) the effects of any special or unusual characteristic of the site which is relevant to the standard;
    - (vii) the characteristics of the development; and
    - (viii) any other matters specifically listed for the standard.
- (10) Infringement of Standard H6.5.5. Building height:
- (a) Matters of discretion H6.8.1(4) apply.
- (11) Infringement of Standard H11.6.1. Building height:
- (a) Matters of discretion H11.8.1(8) apply.
- (12) Infringement of Standard IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone:
- (a) any policy which is relevant to the standard;

- (b) the purpose of the standard;
- (c) the effects of the infringement of the standard;
- (d) the effects on the planned built character of the zone;
- (e) the effects on the amenity of the neighbouring sites;
- (f) the effects of any special or unusual characteristic of the site which is relevant to the standard;
- (g) the characteristics of the development; and
- (h) any other matters specifically listed for the standard.

(13) Infringement of Standard IX6.9. Yards within the Mixed Housing Suburban Zone; IX6.10. Building coverage within the Mixed Housing Suburban Zone; IX6.11. Landscaped area within the Mixed Housing Suburban Zone; IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone; IX6.13. Outlook space within the Mixed Housing Suburban Zone; IX6.14. Outdoor living space within the Mixed Housing Suburban Zone; IX6.15. Windows to the street within the Mixed Housing Suburban Zone:

- (a) Matters of discretion H5.8.1(4) apply.

#### **IX.8.2. 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) Healthcare facility up to 250m<sup>2</sup>:
  - (a) Assessment criteria H6.8.2(1) apply.
- (2) For new buildings prior to subdivision, and subdivision, including subdivision establishing private roads:

#### *Māori cultural landscape values*

- (a) The extent to which Māori cultural landscape values and associations of Te Kawerau ā Maki and Ngāti Whātua ō Kaipara (as well as any other relevant tangata whenua) with land and water are recognised and provided for including but not limited to:
  - (i) The key views and spiritual connection identified on IX.10.1 Riverhead: Precinct plan 1;
  - (ii) The cross roads between several takiwa including Kaipara, Waitakere, Te Whenua Roa o Kahu, and on to Waitemata;
  - (iii) Ancient footprints of the tūpuna of Te Kawerau ā Maki and Ngāti Whātua ō Kaipara;
  - (iv) Connections to the hills to the north and the awa;
  - (v) Freshwater quality; and
  - (vi) Mauri, particularly in relation to freshwater.

- (b) The ability to incorporate mātauranga Māori and tikanga Māori, recognising and providing for the outcomes articulated by Mana Whenua;
- (c) Whether consideration of practicable alternative methods, locations or designs that would avoid or mitigate the impact on the identified Māori cultural landscape values;
- (d) The extent to which streets and public open spaces recognise the relationship of Mana Whenua with the Māori cultural landscape including through:
  - (i) The incorporation of design elements, art works, naming and historical information to reflect the values and relationship mana whenua have with the Riverhead area;
  - (ii) Locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values identified in IX.10.1 Riverhead: Precinct plan 1 where practicable;
  - (iii) Indigenous landscaping, vegetation and design including removal and replanting; and
  - (iv) Maintenance of views and connections to and between important sites, places and areas, wāhi tapu and other taonga.

*Location of roads*

- (e) Whether the collector road, key local road and key pedestrian connections are provided generally in the location shown on IX.10.2 Riverhead: Precinct Plan 2 to achieve a highly connected street layout that integrates with the surrounding transport network. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:
  - (i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;
  - (ii) The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and
  - (iii) The constructability of roads and the ability for it to be delivered by a single landowner.
- (f) Whether a high quality and integrated network of local roads is provided within the precinct that has a good degree of accessibility and supports a walkable street network. Whether roads are aligned to provide visual and physical connections to open spaces, including along the stream network, where the site conditions allow.

*Design of roads*

- (g) Whether the design of new collector and local roads accord with the road design details provided in IX.11.1 Appendix 1.
- (h) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network. As a general principle,



the length of a block should be no greater than 200m, and the perimeter of the block should be no greater than 600m.

*Open space network*

- (i) Whether open spaces are provided in the locations generally consistent with the indicative locations shown on IX.10.2 Riverhead: Precinct plan 2.
- (j) Neighbourhood and suburb parks should have adequate street frontage to ensure they are visually prominent and safe.
- (k) Whether multi-purpose green corridors are provided in a manner consistent with Policy IX.3(13).

*Trees*

- (l) Whether the Beech Tree identified on IX.10.2 Riverhead: Precinct plan 2, is retained where possible.

*Stormwater and flooding*

- (m) Whether development is in accordance with the approved Stormwater Management Plan and Policies E1.3(1)-(14).
- (n) The design and efficacy of infrastructure and devices with consideration given to the likely effectiveness, ease of access, operation and integration with the surrounding environment.
- (o) Whether the proposal ensures that development manages flooding effects upstream or and downstream of the site and in the Riverhead precinct so that the risks to people and property (including infrastructure) are not increased for all flood events, up to a 100-year ARI flood event.
- (p) The location, size, design and management of any interim flood attenuation areas that may be necessary to ensure that development does not increase flooding risks prior to upgrades of culverts.

*Servicing*

- (q) Whether adequate water supply and wastewater infrastructure is provided at the time of subdivision or development.
- (3) For four or more dwellings on a site:
- (a) The extent to which or whether the development achieves the purpose outlined in the following standards or what alternatives are provided that result in the same or a better outcome:
    - (i) Standard IX6.10. Building coverage within the Mixed Housing Suburban Zone;
    - (ii) Standard IX6.11. Landscaped area within the Mixed Housing Suburban Zone;
    - (iii) Standard IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone;
    - (iv) Standard IX6.13. Outlook space within the Mixed Housing Suburban Zone;

- (v) Standard IX6.14. Outdoor living space within the Mixed Housing Suburban Zone;
  - (vi) Standard IX6.15. Windows to the street within the Mixed Housing Suburban Zone;
  - (vii) Standard H5.6.13 Daylight;
  - (viii) Standard H5.6.15 Front, side and rear fences and walls; and
  - (ix) Standard H5.6.16 Minimum dwelling size.
- (b) The extent to which the development contributes to a variety of housing types at higher densities in the zone and is in keeping with the neighbourhood's planned built character of predominantly two storey buildings (attached or detached) by limiting the height, bulk and form of the development and managing the design and appearance as well as providing sufficient setbacks and landscaped areas.
- (c) The extent to which development achieves attractive and safe streets and public open space by:
- (i) providing doors, windows and/or balconies facing the street and public open spaces.
  - (ii) minimising tall, visually impermeable fences.
  - (iii) designing large scale development (generally more than 15 dwellings) to provide for variations in building form and/or façade design as viewed from streets and public open spaces.
  - (iv) optimising front yard landscaping.
  - (v) providing safe pedestrian access to buildings from the street.
  - (vi) minimising the visual dominance of garage doors, walkways or staircases to upper level dwellings, and carparking within buildings as viewed from streets or public open spaces.
- (d) The extent to which the height, bulk and location of the development maintains a reasonable standard of sunlight access and privacy and minimises visual dominance to adjoining sites;
- (e) The extent to which dwellings:
- (i) Orientate and locate windows to optimise privacy and encourage natural cross ventilation within the dwelling.
  - (ii) Optimise sunlight and daylight access based on orientation, function, window design and location, and depth of the dwelling floor space.
  - (iii) Provide secure and conveniently accessible storage for the number and type of occupants the dwelling is designed to accommodate.
  - (iv) Provide the necessary waste collection and recycling facilities in locations conveniently accessible and screens from streets and public open spaces.

- (f) The extent to which outdoor living space:
    - (i) Provides for access to sunlight.
    - (ii) Provides privacy between the outdoor living space of adjacent dwellings on the same site and between outdoor living space and the street.
    - (iii) When provided at ground level, is located on generally flat land or otherwise functional.
  - (g) refer to Policy H5.3(7); and
  - (h) infrastructure and servicing:
    - (i) Whether there is adequate capacity in the existing stormwater and public reticulated water supply and wastewater network to service the proposed development.
    - (ii) Where adequate network capacity is not available, whether adequate mitigation is proposed.
- (4) For development and subdivision that does not comply with Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades, Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct:
- (a) A proposal that does not comply with IX.6.1 Staging of development with transport upgrades will be assessed in terms of the matters below, as informed by an Integrated Transport Assessment.
  - (b) Whether the proposal is in accordance with Policy IX.3(4) in addition to any relevant AUP policy that is within the scope of the matters of discretion in IX.8.1(3).
  - (c) Whether safe connections can be achieved to public transport services, schools and community facilities within Riverhead.
  - (d) The extent to which public transport facilities on Coatesville Riverhead Highway fronting the Precinct are of a high standard including shelter, hardstand and seating.
  - (e) The extent to which localised intersection widening will allow for safe, protected active-mode facilities and bus stop infrastructure on Coatesville-Riverhead Highway. The extent to which localised intersection widening will allow for safe, protected active-mode facilities on Riverhead Road.
  - (f) Whether the transport network at key intersections within Riverhead can operate safely and efficiently during the inter-peak period, with an overall intersection Level of Service (LOS) no worse than LOS D. The key intersections to consider include Coatesville Riverhead Highway/Riverhead Road, Coatesville Riverhead Highway/Riverhead Point Drive and Riverhead Road/Lathrope Road.
  - (g) The extent to which safety improvements have been implemented at the Coatesville Riverhead Highway/SH16 intersection.

- (h) The extent to which interim transport upgrades which achieve (a) – (g) will contribute towards the final transport upgrade.
- (5) For development that does not comply with Standard IX.6.3. Riparian planting:
  - (a) Whether the development is consistent with Policy IX.3(18).
- (6) For development that does not comply with Standard IX.6.4. Stormwater quality:
  - (a) Assessment criteria E9.8.2(1); and
  - (b) Whether the proposal is in accordance with the approved Stormwater Management Plan and Policies E1.3(1)-(10) and (12)-(14).
- (7) For development that does not comply with Standard IX.6.5. Rural interface setback:
  - (a) Refer to Policy IX.3(13).
- (8) Infringement of Standard IX.6.6 Fences adjoining publicly accessible open space:
  - (a) Whether the proposal positively contributes to the visual quality and interest of the adjoining open space, while providing an adequate degree of privacy and security for the development.
- (9) Infringement of Standard IX.6.7. Building height within the Mixed Housing Suburban Zone:
  - (a) Refer to Policy IX.3(16);
  - (b) For sites within Sub-precinct B, assessment criteria H5.8.2(4) apply;
  - (c) For sites within the remainder of the Residential – Mixed Housing Suburban zone, assessment criteria H4.8.2(5) apply.
- (10) Infringement of Standard H6.6.5: Building height:
  - (a) Refer Policy IX.3(15); and
  - (b) Assessment criteria H6.8.2(5) apply.
- (11) Infringement of Standard H11.6.1: Building height:
  - (a) Refer Policy IX.3(15); and
  - (b) Assessment criteria H11.8.2(8)(a) apply.
- (12) Infringement of Standard IX.6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone:
  - (a) Assessment criteria H4.8.2(6) apply.
- (13) Infringement of Standard IX.6.9. Yards within the Mixed Housing Suburban Zone:
  - (a) Assessment criteria H5.8.2(9) apply.
- (14) Infringement to Standard IX.6.10. Building coverage within the Mixed Housing Suburban Zone:
  - (a) Assessment criteria H5.8.2(11) apply.
- (15) Infringement to Standard IX.6.11. Landscaped area within the Mixed Housing Suburban Zone:

- (a) Assessment criteria H5.8.2(12) apply.
- (16) Infringement of Standard IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone:
  - (a) Assessment criteria H5.8.2(10) apply.
- (17) Infringement of Standard IX6.13. Outlook space within the Mixed Housing Suburban Zone:
  - (a) Assessment criteria H5.8.2(13) apply.
- (18) Infringement of Standard IX6.14. Outdoor living space within the Mixed Housing Suburban Zone:
  - (a) Assessment criteria H5.8.2(15) apply.
- (19) Infringement of Standard IX6.15. Windows to the street within the Mixed Housing Suburban Zone:
  - (a) The extent to which the glazing:
    - (i) Allows views to the street and/or accessways to ensure passive surveillance; and
    - (ii) Provides a good standard for privacy of occupants.

#### **IX.9 Special information requirements**

(1) Riparian planting plan

An application for land modification, development and subdivision which adjoins a permanent or intermittent stream must be accompanied by a riparian planting plan identifying the location, species, planter bag size and density of the plants. Plant species should be native.

(2) Consultation with Waka Kotahi NZ Transport Agency

An application for development, excluding construction activities, which occurs prior to the upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection must be accompanied by a description of consultation undertaken with Waka Kotahi NZ Transport Agency and the outcomes of this consultation.

(3) Large or highly visible commercial or community focused buildings

Design of large or highly visible commercial or community focused buildings or structures or infrastructure shall provide opportunity to Te Kawerau ā Maki and Ngāti Whātua ō Kaipara to integrate cultural design elements.

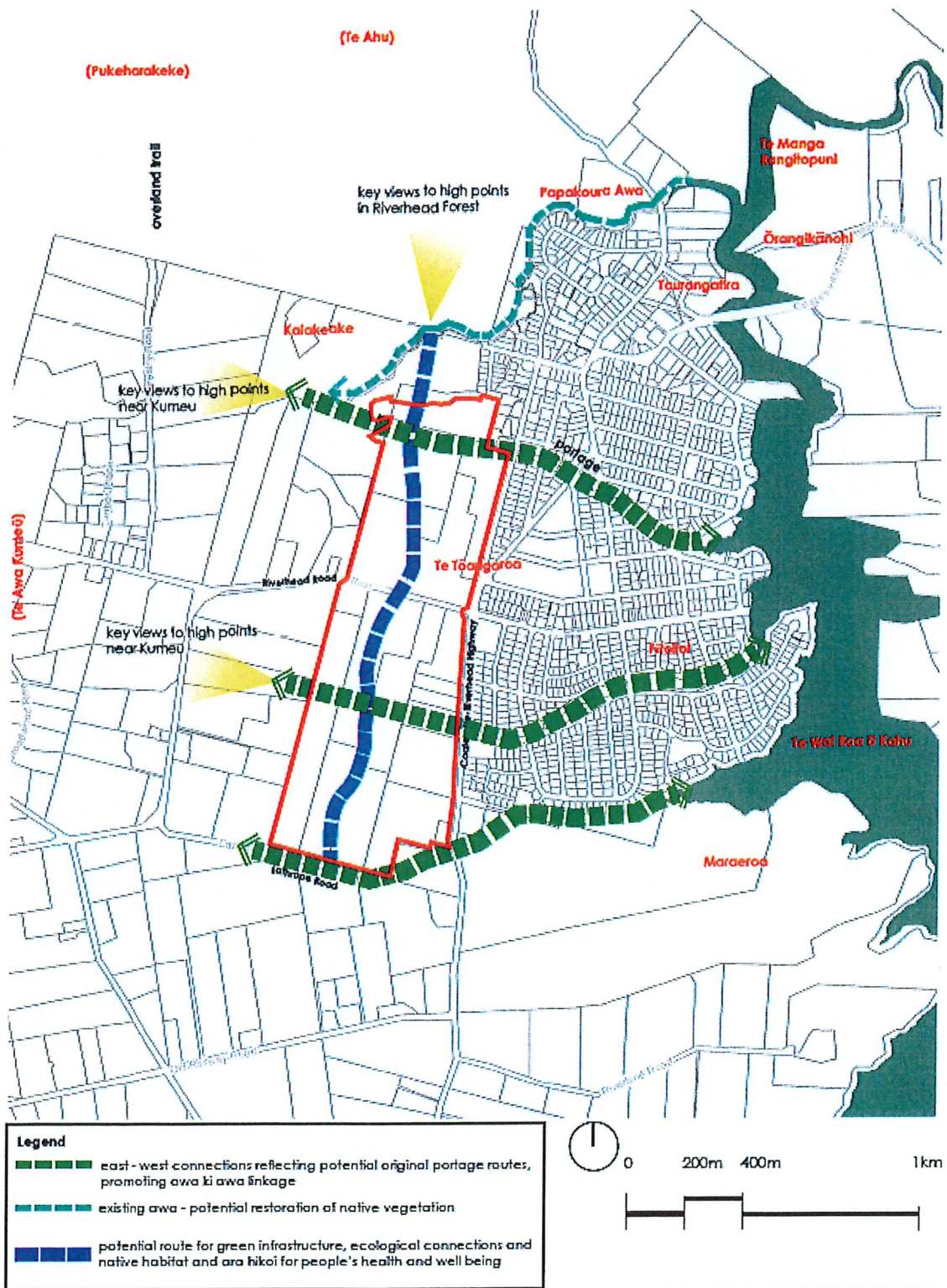
(4) Archaeological assessment

An application for land modification on 22 Duke Street must be accompanied by an archaeological assessment, including a survey. The purpose of this assessment is to evaluate the effects on archaeological values associated with the Waitemata Flour Mill/Riverhead Paper Mill site R10\_721 prior to any land disturbance, and to confirm whether the development will require an Authority to Modify under the Heritage New Zealand Pouhere Taonga Act 2014.



## IX.10. Precinct plans

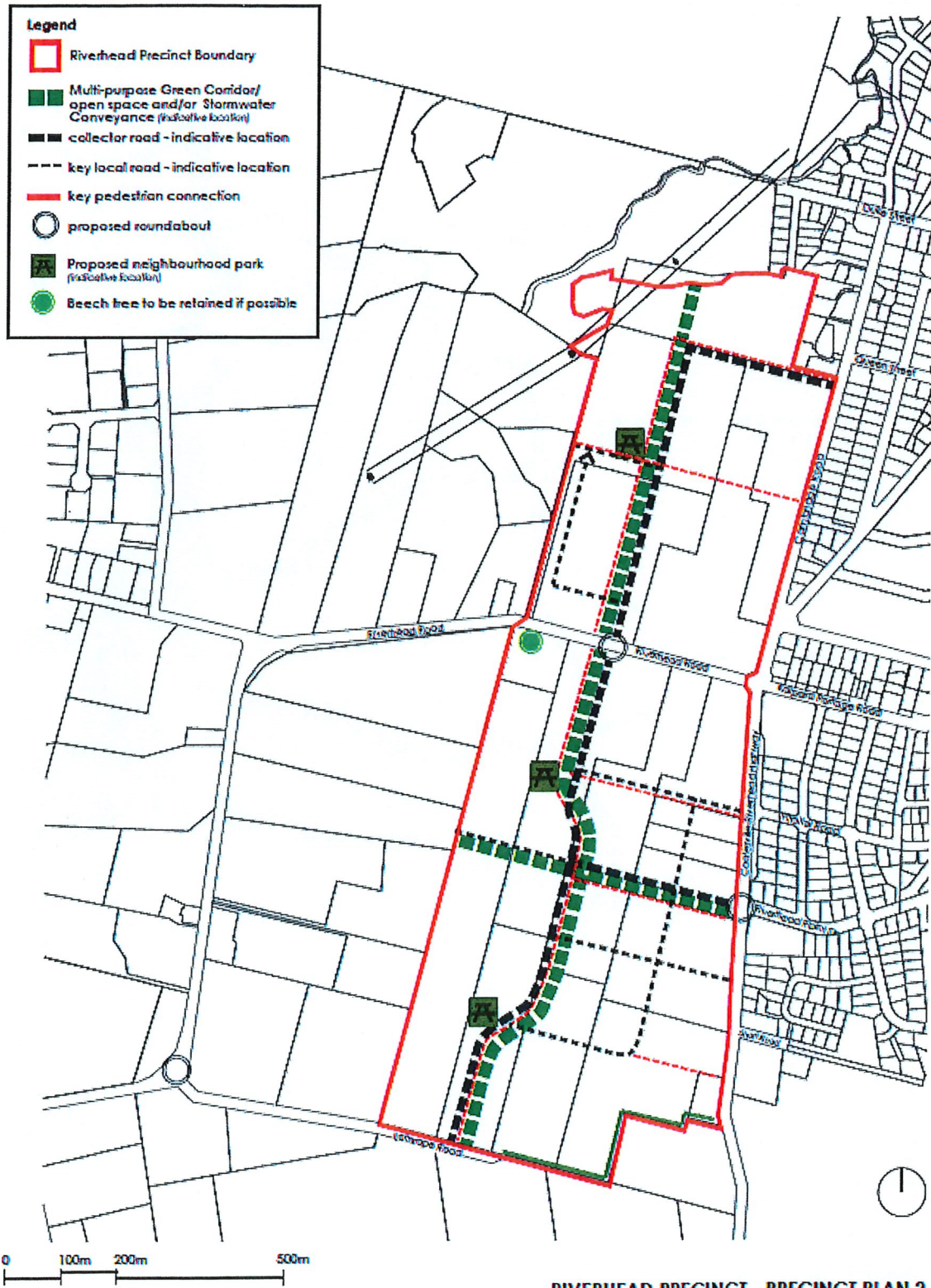
### IX.10.1 Riverhead: Precinct plan 1



RIVERHEAD PRECINCT - PRECINCT PLAN 1  
Mana Whenua Cultural Landscape

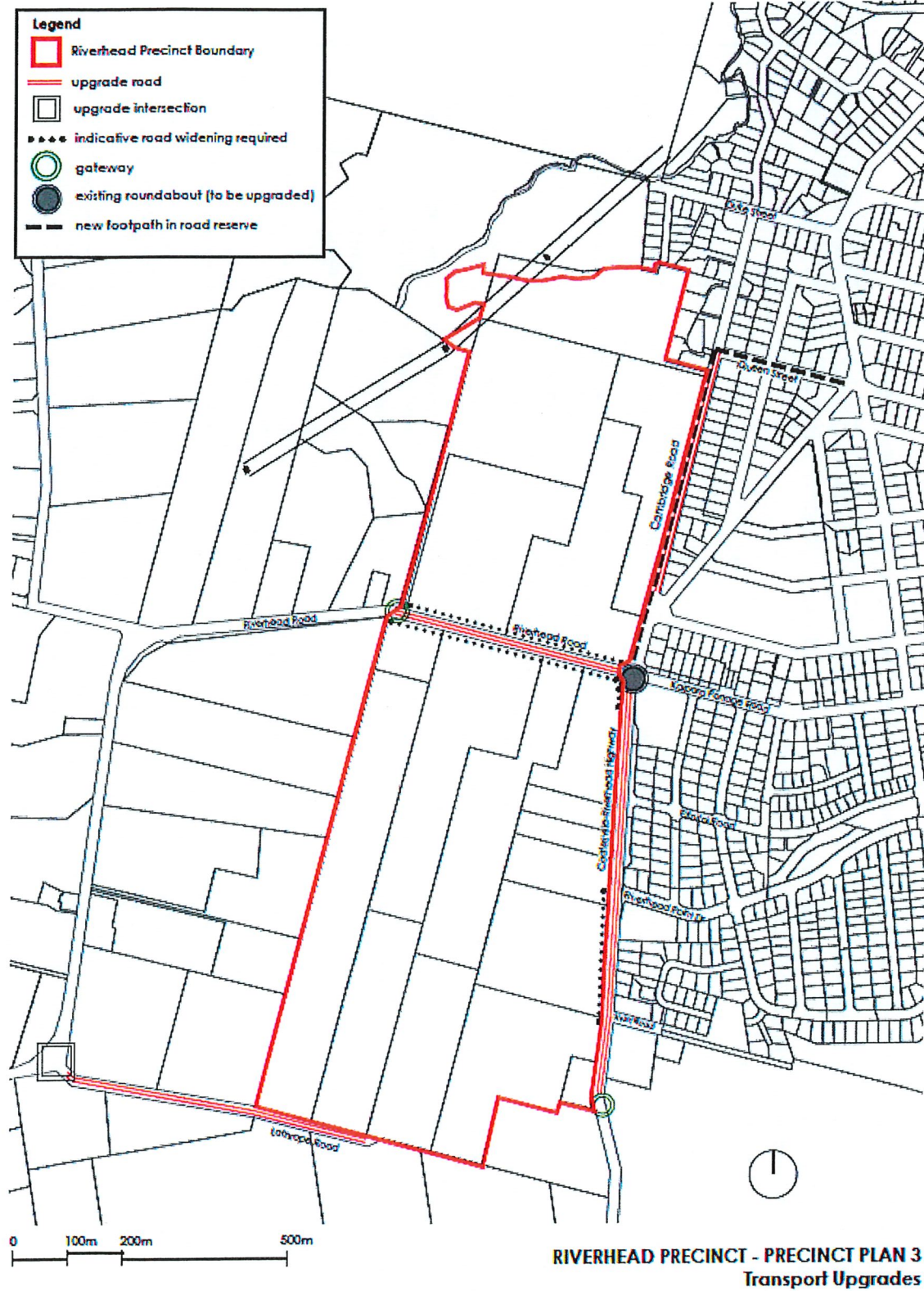


## IX.10.2 Riverhead: Precinct plan 2





### IX.10.3 Riverhead: Precinct plan 3



**IX.11. Appendices**

**IX.11.1 Appendix 1 : Road function and design elements table – Internal roads within Precinct**

Road Description	Proposed Role and Function of Road in Precinct Area	Minimum Road Reserve	Total Number of Lanes	Speed Limit (Design)	On-Street Parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision
<b>Collector Road</b> (without adjacent reserve)	Collector Road (Type 1)	25m	2	40 km/h	Optional	No	Yes Separated on both sides	Yes Both sides	Trees each side	Yes
<b>Collector Road</b> (with adjacent reserve which includes a shared path alongside (but outside) road reserve)	Collector Road (Type 1)	21m	2	40 km/h	Optional	No	Yes Separated on both sides	Yes One side (not required on reserve side)	Trees each side	Yes
<b>Local Roads</b>	Local Road (Type 2)	18m	2 (on-street parking with staggered yellow lines)	30 km/h	Optional	No	No	Yes Both sides	Trees each side	No

IX.11.2 Appendix 2: Road function and design elements table – External roads to the Precinct

Road Description	Proposed Role and Function of Road	Minimum Road Reserve	Total Number of Lanes	Speed Limit (Design)	On-Street Parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision
Coatesville-Riverhead Highway Between Kaipara Portage Road and Riverhead Point Drive	Arterial Road	Existing width (varies) plus localised intersection widening	2	50	No	Yes	Yes Separated on both sides	Yes	Yes	Yes
Coatesville-Riverhead Highway From Riverhead Point Drive to 80m south of Short Road	Arterial Road	Existing with localised widening on the western boundary to allow for intersections and tie-in works for the future shared path on Coatesville-Riverhead Highway, south of Short Road.	2	50	No	Yes	Yes Separated on both sides	Yes	Yes Western side only	Yes

Road Description	Proposed Role and Function of Road	Minimum Road Reserve	Total Number of Lanes	Speed Limit (Design)	On-Street Parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision
<b>Riverhead Road</b> From the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway	Arterial Road	24m, with 2m side plus localised intersection widening	2	50	No	No	Yes Separated on both sides	Yes	Yes	No
<b>Lathrope Road</b>	Local Road	Existing width (20m)	2	50	No	No	No	Yes Northern side only	No	Yes

## **APPENDIX 5**

### **POTENTIAL CHANGES**

Amendments are shown with text to be deleted as struck through and text to be added as underlined



## Appendix 5

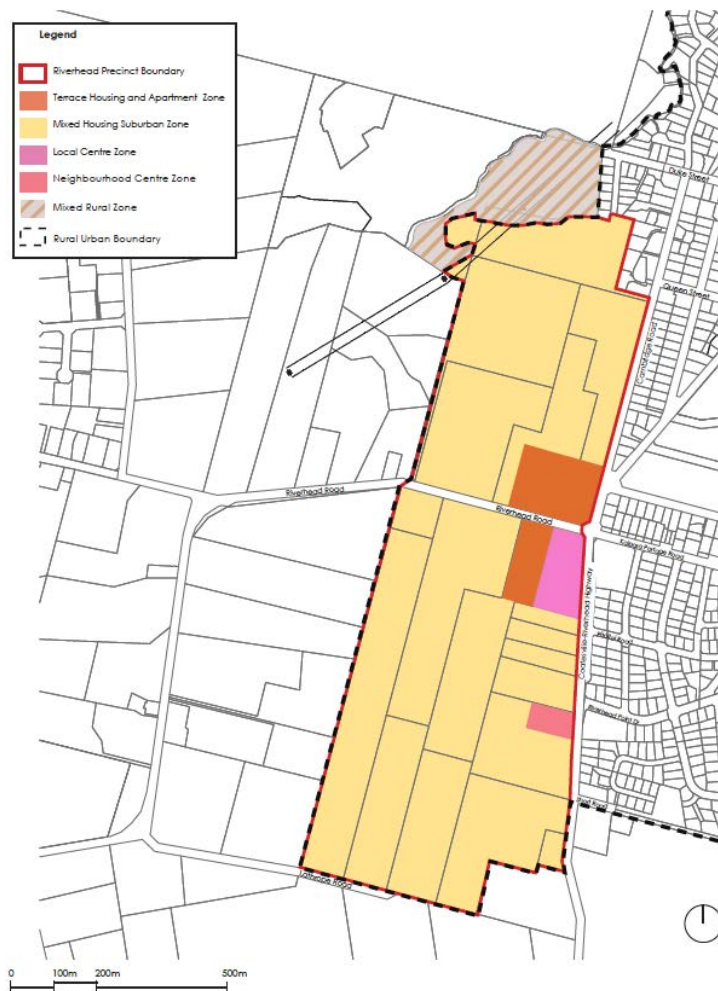
### S42A recommended changes to PC100.

Note: The changes set out in this document are suggested changes should PC100 be approved. Further changes may also be recommended depending on the outcomes of additional information sought and potentially provided in the applicant's evidence. A fulsome set of recommended changes may be produced following the lodgement of the applicant's evidence.

### Riverhead zoning plan

Amend RUB and MRZ boundary to reflect 8.5ha area subject to flooding.

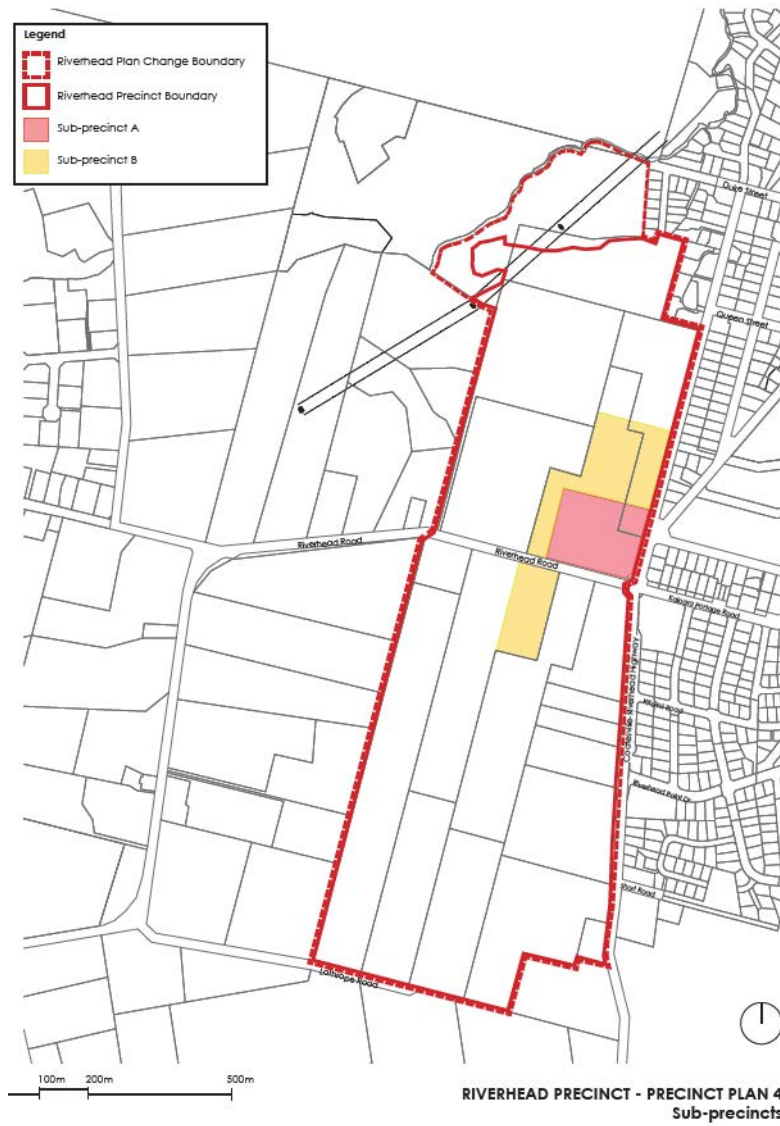
Commented [DW1]: HW and ACS 186.2



## Riverhead precinct plan

Amend RUB and MRZ boundary to reflect 8.5ha area subject to flooding.

Commented [DW2]: HW and ACS 186.2





### Riverhead Stormwater Management Area Control (Flow 1)



Commented [DW3]: Extend SMAF1 to Blue shaded area (HW)

### IX.1. Precinct description

The Riverhead Precinct applies to approximately 75.5ha of land with a contiguous boundary to the existing urban settlement of Riverhead.

The purpose of the Riverhead Precinct is to provide for the development of a new, comprehensively planned residential community as an extension to Riverhead Village that supports a well-functioning urban environment and a quality compact built form.

A Local Centre is provided at the intersection of Coatesville-Riverhead Highway and Riverhead Road. This centre will provide for the establishment of retail to meet the day to day needs of residents and some increased employment opportunities in a central location to enhance walkability.

The precinct provides for a range of residential densities, including higher residential densities close to the Local Centre and the intersection of Coatesville-Riverhead Highway and Riverhead Road. Medium residential densities are enabled in the remainder of the precinct, with height generally limited to two storey development to respond to the built character of the existing Riverhead settlement.

There are two Sub-precincts within the Riverhead Precinct:

- Sub-precinct A is zoned Residential - Terrace Housing and Apartment Building and provides for the greatest height and residential densities at a key intersection location adjacent to the Local Centre Zone and public transport facilities. A wider range of non-residential activities is provided for at ground floor.
- Sub-precinct B is zoned Residential Mixed Housing Suburban and provides for a transition in building height between Sub-precinct A and the surrounding Mixed Housing Suburban area where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.

The precinct emphasises the need for development to contribute to a unique sense of place for Riverhead acknowledging the presence of Riverhead Forest, the unnamed tributary of the Rangitōpuni Stream and the surrounding rural environment, while integrating with the existing settlement at Riverhead and realising the opportunity to establish green corridors through the precinct. In particular, there is a need to manage stormwater, meet open space needs, and establish connections for all modes of transport through the precinct, and between the precinct and the existing settlement of Riverhead.

The precinct seeks to enable the transition from rural to urban development, while recognising the cultural values and relationships that Te Kawerau ā Maki, Ngāti Whātua o Kaipara and other interested iwi have with the land in Riverhead as part of the Māori cultural landscape. The wider Riverhead area is an important cross-roads to different cultural districts being situated between Te Awa Kumeū (Kumeū River) and Manga Rangitōpuni (Rangitōpuni Stream) on the productive alluvial plains between Pukeharakeke and Te Ahu (the Riverhead Forest hillcountry) and Nga Rau Pou ā Maki (the Waitākere Ranges). This wider area contains important historical kāinga, pā, ara and tōanga (travel routes), wāhi tapu, and food and resource gathering areas. This includes peacemaking areas such as Rangitōpuni between Te Kawerau ā Maki and Te Taou, important Te Kawerau pūrakau such as related to Ruarangi hāerere, and Treaty Settlement assets including the adjacent Riverhead Forest.

Cultural values and associations encompass the geological, ecological, and wāhi tupuna within and adjoining the precinct. In particular Te Tōangaroa (Kaipara Portage) which crosses east-west near the southern part of the precinct and the Papakoura Awa in the north.

There are transport upgrades and bulk water supply and wastewater infrastructure required prior to subdivision and development

Commented [DW4]: ACS 186.4

Subdivision and / or development is restricted until land within the Riverhead Precinct is able to be serviced by bulk water supply and wastewater infrastructure. Water supply and wastewater infrastructure requires a series of upgrades to avoid, remedy or mitigate adverse impacts on the existing and planned water supply and wastewater infrastructure. Many of the necessary water supply and wastewater infrastructure upgrades are located outside of the precinct boundaries.

Commented [DW5]: WSL

The transport and other infrastructure networks within Riverhead will be progressively upgraded over time to support development in the precinct. The precinct includes provisions to ensure that the subdivision and development of land for development is coordinated with the transport and infrastructure upgrades necessary to manage and mitigate potential adverse effects on the local and wider transport network. Provision is also made for the future widening of Riverhead Road.

Commented [DW6]: AT 161.5

The zoning of land within this precinct is Residential – Terrace Housing and Apartment Building, Residential – Mixed Housing Suburban, Business – Local Centre and Business – Neighbourhood Centre.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

## IX.2. Objectives

- (1) Riverhead Precinct is a well-functioning urban environment that integrates with the existing Riverhead settlement, the natural environment and respects Mana Whenua values.
- (2) A variety of housing types and sizes are provided that respond to:
  - (a) Housing needs and demand; and
  - (b) The neighbourhood's planned built character.
- (3) Activities in the Business – Local Centre zone provide local employment opportunities and complement the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone.
- (4) Access to, and from and within the precinct for all modes of transport, occurs in a safe, effective and efficient manner for all modes of transport and mitigates the adverse effects on the surrounding road network.
- (5) Subdivision and development are coordinated with the supply and capacity of sufficient adequate transport, water supply, wastewater, energy and communications infrastructure where subdivision and development in advance of the provision of such infrastructure are avoided.
- (5A) Subdivision and development are co-ordinated with the provision of bulk water supply and wastewater infrastructure with sufficient capacity to service the precinct.

Commented [DW7]: AT 161.6 modified

Commented [DW8]: ACS 185.5

Commented [DW9]: WSL

- (6) Stormwater quality and quantity is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment and to maintain the health and well-being of the receiving environment and is enhanced over time in degraded areas.
- (7) ~~Identified~~ Existing ecological values within wetland and stream habitats are maintained, protected, restored and enhanced.
- (8) Development is supported by social facilities, including education and healthcare facilities.
- (9) Te Kawerau ā Maki and Ngāti Whātua ō Kaipara (as well as any other relevant tangata whenua) cultural values and their relationship associated with the Māori cultural landscapes, including ancestral lands, water, sites, wāhi tapu, and other taonga, in the Riverhead Precinct are identified, recognised, protected, and enhanced.
- (10) Development provides for future road widening on Riverhead Road.

Commented [DW10]: From HW adapted

Commented [DW11]: Ecology memo

Commented [DW12]: AT 161.9

### IX.3. Policies

#### Land Use

- (1) Provide for high density residential development and supporting non-residential activities compatible with residential amenity values in Sub-precinct A.
- (2) Enable a variety of housing types with a mix of densities within the precinct including attached and detached dwellings, and apartments.
- (3) Encourage appropriately-scaled office activities, including co-working spaces, to establish in the Local Centre zone to provide local employment opportunities and support the surrounding land uses in Riverhead Precinct.

#### Transport, infrastructure and staging

- ~~(x) Require that subdivision and development in the Precinct does not occur in advance of the availability of operational infrastructure.~~
- ~~x) Require development with frontage to Riverhead Road to provide for future road widening.~~
- (4) Require ~~the subdivision and development~~ occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.
- (5) Require subdivision and development in the precinct to be coordinated with the provision and capacity of ~~sufficient~~ adequate stormwater, wastewater, water supply, energy and telecommunications infrastructure.
- (5A) Avoid subdivision and development progressing ahead of the provision of bulk water supply and wastewater infrastructure with sufficient capacity to service subdivision and development within the precinct.
- (6) Provide for new social facilities, including education facilities, that meet the needs of the community.

Commented [DW13]: AT 161.10 modified

Commented [DW14]: AT 161.11

Commented [DW15]: AT 161.12 modified

Commented [DW16]: WSL

*Street network, built form and open space*

- (7) Require the main collector roads to be provided generally in the location shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly-connected ~~street~~ layout of streets and pedestrian connections that integrates with the collector road network within the precinct and the surrounding existing and proposed transport network.
- (8) Require the key local roads and pedestrian connections to be generally in the location shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected street layout that integrates with the surrounding transport network.
- (9) Ensure that subdivision and development provides a local road network that achieves a highly-connected street layout and integrates with the collector road network within the precinct and the surrounding existing and proposed transport network, and supports the safety and amenity of the open space network.
- (10) Require streets to be attractively designed and to appropriately provide for all transport modes by:
- (a) providing ~~for~~ safe separated access for cyclists on arterial and collector roads;
  - (b) providing a level of landscaping that is appropriate for the function of the street; and
  - (c) providing for the safe and efficient movement of vehicles including public transport.
  - (d) providing upgrades to existing road frontages of the precinct to an urban standard and pedestrian connections to the existing Riverhead urban area;
  - (e) providing safe route and crossings for pedestrians and cyclists ;
  - (f) providing upgraded public transport facilities on the Coatesville- Riverhead Highway.
- (11) Provide safe connections to public transport facilities and social infrastructure such as open space and schools.
- (12) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place and a quality network of open spaces for Riverhead, including by incorporating natural features such as:
- (a) Wetlands and streams;
  - (b) The Beech tree identified on IX.10.2 Riverhead: Precinct plan 2, where possible; and
  - (c) Any other mature trees that are worthy of retention, where possible.
- (13) Encourage the provision of a continuous and connected multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2, which achieves the following outcomes:
- (a) Integrates stormwater management, passive recreation opportunities and active transport mode connections, to promote the efficient use of land;

Commented [DW17]: AT 161.14

Commented [DW18]: At 161 .15

Commented [DW19]: AT 161.16

- (b) Provides additional amenity for the key north-south and east-west movement networks;
  - (c) Promotes ecological linkages through the Precinct; and
  - (d) Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.
- (14) Require development adjacent to rural zones to manage potential reverse sensitivity effects on those zones through a building setback.
- (15) Encourage higher buildings which will act as marker buildings at the Coatesville-Riverhead Highway and Riverhead intersection, support the legibility of a new centre and reinforce the role of Memorial Park as the heart of the settlement.
- (16) Encourage building heights throughout the Mixed Housing Suburban zone that:
- (a) Provide for three storey development within Sub-precinct B to enable a transition in height between the five and two storey development in the adjacent areas.
  - (b) Enable three storey development within the Mixed Housing Suburban zone where sites overlook public open space to take advantage of amenity and outlook of public open spaces and promote passive surveillance.

*Stormwater management*

- (17) Require subdivision and development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including:
- (aa) Be consistent with an approved stormwater management plan;
  - (a) Provide ~~ing~~ a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;
  - (b) Applying water sensitive design to achieve water quality and hydrology mitigation;
  - (c) ~~Requiring the~~ use of inert building materials to eliminate or minimise the generation and discharge of contaminants;
  - (d) ~~Requiring treatment of~~ Treat runoff from all impervious surfaces (except roofs) public road carriageways and publicly accessible carparks by a water quality device designed in accordance with GD01;
  - (e) ~~Requiring runoff from other trafficked impervious surfaces to apply a water sensitive approach to treat contaminant generating surfaces, including cumulative effects of lower contaminant generating surfaces;~~
  - (f) ~~Providing~~ Provide indigenous planting on the riparian margins of permanent or intermittent streams; and
  - (g) ~~Ensuring~~ Ensure development is coordinated with sufficient stormwater infrastructure.

Commented [DW20]: Healthy waters

*\*Note: Clause (a) above is not consistent with the stormwater management proposed in the current Stormwater Management Plan prepared by CKL. In addition, it is shown on IX.10.2 Riverhead: Precinct plan 2 that the green corridor is for stormwater conveyance but not treatment. Amendment to this clause might be required after clarification and further information is provided by the Applicant in their evidence.*

#### *Ecology*

- (18) Contribute to improvements to water quality, indigenous fauna habitat and biodiversity, including by providing indigenous planting on the riparian margins and wetland buffers of permanent and intermittent streams and natural inland wetlands.

Commented [DW21]: Ecology memo

#### *Mana Whenua values*

- (19) Recognise, protect and enhance the cultural values and relationships associated with the cultural landscapes at Riverhead by:
- (a) Including Te Kawerau ā Maki and Ngāti Whātua ō Kaipara (and any other relevant tangata whenua) in resource consenting, including through provision of cultural impact assessments or other engagement;
  - (b) Acknowledging the key views and spiritual connection identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa;
    - (i) Providing opportunities to express the relationship of Mana Whenua with the precinct through the establishment of a cultural narrative and/or art, including but not limited to:
    - (ii) The cross roads between several takiwa including Kaipara, Waitākere, Te Whenua Roa ō Kahu, and on to Waitemata;
    - (iii) Ancient footprints of the tūpuna of Te Kawerau ā Maki and Ngāti Whātua ō Kaipara;
    - (iv) Connections to the hills to the north and the awa;
    - (v) References to the natural features or resources of cultural significance;
  - (c) Identifying opportunities early to incorporate traditional names or other names put forward by Te Kawerau ā Maki and Ngāti Whātua ō Kaipara into open space areas, roads, or other community spaces;
  - (d) Taking an integrated approach to the management stormwater which protects and enhances the mauri of freshwater, in particular with regard to Papakoura Awa; and
  - (e) Ensuring the design of streets and publicly accessible open spaces incorporates Te Aranga design principles.

#### **IX.4. Activity table**

All relevant overlay, Auckland-wide and zone activity tables apply in this precinct except for the following:

**All Sub-Precincts**

- H4 Residential – Mixed Housing Suburban Zone:
  - H4.4.1(A3) Up to three dwellings per site
  - H4.4.1(A4) Four or more dwellings per site

**Sub-precinct A**

- H6 Residential – Terrace Housing and Apartment Buildings Zone:
  - H6.4.1(A15) Restaurants and cafes up to 100m<sup>2</sup> gross floor area per site
  - H6.4.1(A25) Healthcare facilities up to 200m<sup>2</sup> gross floor area per site

Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.

**Table IX.4.1 Activity table – Precinct-wide activities**

Commented [DW22]: AT 161.17

Activity		Activity status
<b>Development</b>		
(A1)	New buildings prior to subdivision	RD
(A2)	Infringements to IX6.2 Road Widening Setback along Riverhead Road	D
(A2A)	Buildings for up to 3 residential dwellings per site in the Mixed Housing Suburban Zone	P
(A2B)	Buildings for more than 3 residential dwellings per site in the Mixed Housing Suburban Zone that comply with Standards IX6.7. Building height within the Mixed Housing Suburban Zone, IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone, IX6.9. Yards within the Mixed Housing Suburban Zone	RD
<b>Subdivision</b>		
(A3)	Subdivision, including subdivision establishing private roads	RD
(A4)	Subdivision <u>and development</u> that does not comply with Standard IX.6.1(1) Staging of Development with Transport Upgrades	<del>D</del> NC
(A5)	Subdivision <u>and development</u> that does not comply with Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades	<del>RD</del> NC
(A6)	Subdivision <u>and development</u> that does not comply with Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct	RD

Commented [DW23]: AT 161.18



(A7)	<u>Subdivision and development that does not comply with Standard IX6.16 Water Supply and Wastewater Infrastructure.</u>	NC
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**Table IX.4.2 Activity table – Sub-precinct A activities**

Activity	Activity status
<b>Commerce</b>	
(A7)	Restaurants and cafes up to 250m <sup>2</sup> gross floor area per site P
(A8)	Retail up to 100m <sup>2</sup> gross floor area per site P
<b>Community</b>	
(A9)	Healthcare facility up to 250m <sup>2</sup> gross floor area RD
(A10)	<u>Any commerce or community activity that does not comply with Standard IX6.16 Water Supply and Wastewater Infrastructure.</u> NC

Commented [DW24]: AT 161.20

Commented [DW25]: AT 161.21

Commented [DW26]: AT 161.22

#### IX.5. Notification

- (1) ~~Any application for a restricted discretionary activity listed in Table IX.4.1 Activity table above, will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.~~
- (2) Any application for resource consent for an activity listed in Table IX.4.1 Activity table above and which is not listed in IX.5(1) will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (3) When deciding on who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

Commented [DW27]: AT 161.23

#### IX.6. Standards

All relevant overlay, Auckland-wide and zone standards apply in this precinct except for the following:

##### **Precinct-wide**

- H4 Residential – Mixed Housing Suburban Zone Standards:
  - H4.6.4 Building height
  - H4.6.5 Height in relation to boundary
  - H4.6.6 Alternative height in relation to boundary
  - H4.6.7 Yards
  - H4.6.8 Maximum impervious area

- o H4.6.9 Building coverage
- o H4.6.10 Landscaped area
- o H4.6.11 Outlook space
- o H4.6.13 Outdoor living space

• ~~E27.6.1 Trip Generation~~

Commented [DW28]: At 161.24

All activities, except activities listed in Activity Table IX.4.1 (A2B), listed as permitted and restricted discretionary in Activity Table IX.4.1, Activity Table IX.4.2, Activity Table H11.4.1, Activity Table H12.4.1, Activity Table H6.4.1 and Activity Table H4.4.1 must comply with the following permitted activity standards.

Activities listed in Activity Table IX.4.1(A2B) are not required to comply with standards IX6.10. Building coverage within the Mixed Housing Suburban Zone, IX6.11. Landscaped area within the Mixed Housing Suburban Zone, IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone, IX6.13. Outlook space within the Mixed Housing Suburban Zone, IX6.14. Outdoor living space within the Mixed Housing Suburban Zone, IX6.15. Windows to the street within the Mixed Housing Suburban Zone, H5.6.13 Daylight, H5.6.15 Front, side and rear fences and walls, and H5.6.16 Minimum dwelling size, but must comply with all the other following permitted activity standards.

**IX.6.1. Standards**

Commented [DW29]: Add a specific set of multi-purpose green corridor standards

**IX.6.1. Staging of development and subdivision with transport upgrades**

Commented [DW30]: AT 161 -25 -to 161. 30 Further amendments required in accordance with submission

Purpose: To ~~manage~~ mitigate the adverse effects of traffic on the safety and efficiency of the surrounding local and wider road network for all modes of transport by ensuring subdivision and development is coordinated with transport infrastructure.

To achieve the integration of land use and transport:

To ensure subdivision and development complies with Appendices 1 and 2 Road function and design elements tables.

- (1) ~~Prior to occupation of a dwelling~~ development or subdivision within the Riverhead Precinct, the following transport infrastructure must be constructed and operational:
  - (a) Upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection to a roundabout, and the provision of two eastbound lanes on Main Road (SH16) from Coatesville-Riverhead Highway to Brigham Creek Road, as part of the SH16 Brigham Creek to Waimauku project, led by Waka Kotahi NZ Transport Agency.
  - (b) Upgrade of the Coatesville-Riverhead Highway / Old Railway Road intersection to provide a right turn bay.
  - (c) Upgrade of the Coatesville-Riverhead Highway / Riverland Road intersection to provide a right turn bay.
- (2) ~~Prior to occupation of a building on a site~~ development or subdivision with vehicle access to and/or from Coatesville-Riverhead Highway, the following road infrastructure upgrades must be constructed and operational:
  - (a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road

- roundabout, including walking/cycling infrastructure, along and across Coatesville-Riverhead Highway, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and
- (b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout, including walking and cycling infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.
- (3) Prior to ~~occupation of a building on a site~~ subdivision or development with vehicle access to and/or from Riverhead Road, the following road infrastructure upgrades must be constructed and operational:
- (a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including walking/cycling infrastructure, along and across Coatesville-Riverhead Highway gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and
- (b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout including walking and cycling infrastructure, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and
- (c) Upgrade and urbanise Riverhead Road, from the eastern boundary of the vehicle crossing of 307 Riverhead Road onto Coatesville-Riverhead Highway to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3.
- (4) Prior to ~~occupation of a building on a site~~ subdivision or development with vehicle access to and/or from Lathrope Road, the following road infrastructure upgrades must be constructed and operational:
- (a) Upgrade Lathrope Road between Riverhead Road and the new access point, in accordance with IX.10.3 Riverhead: Precinct plan 3 and Appendix 2; and
- (b) Upgrade the Riverhead Road/Lathrope Road intersection to a Give-Way controlled intersection, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.
- (5) Prior to ~~occupation of a building on a site~~ subdivision or development with vehicle access to and/or from Cambridge Road, the following road infrastructure upgrades must be constructed and operational:
- (a) A new footpath on the western side of Cambridge Road between Queen Street and Riverhead Road in accordance with IX.10.3 Riverhead: Precinct plan 3;
- (b) Upgrade and urbanise the existing carriageway of the formed portion of Cambridge Road south of Queen Street to an urban standard, in accordance IX.10.3 Precinct Plan 3;

- (c) A new footpath on the northern side of Queen Street between Coatesville-Riverhead Highway and Cambridge Road in accordance with IX.10.3 Riverhead: Precinct plan 3; and
- (d) An additional pedestrian crossing facility on Coatesville-Riverhead Highway between Edward Street and Princes Street.

**IX.6.2. Road widening setback along Riverhead Road and Coatesville-Riverhead Highway**

Purpose: To provide for the future required widening of Riverhead Road and Coatesville-Riverhead Highway.

- (1) A 2m wide road widening setback must be provided along that part of the frontage of the land adjoining Riverhead Road and Coatesville Riverhead Highway shown as subject to the 'Indicative required Road Widening' notation on the IX.10.3 Riverhead: Precinct plan 3.
- (2) The setback must be measured from the legal road boundary that existed at the year of 2022. No buildings, structures or parts of a building shall be constructed within this 2m wide setback.
- (3) Any minimum front yard setback required in the underlying zoning for the land adjoining Riverhead Road or Coatesville Riverhead Highway shall be measured from this 2m wide road widening setback.

Commented [DW31]: AT 161.31

**IX.6.3. Riparian margin and wetland buffers**

Purpose: To contribute to improvements to water quality, habitat and biodiversity.

- (1) Riparian margins of permanent or intermittent streams must be planted either side to a minimum width of 10m measured from the top of bank of the stream, and a minimum planted buffer width of 10m measured from the wetted edge of a natural wetland, provided that:
  - (a) This rule shall not apply to road crossings over streams;
  - (b) Walkways and cycleways must not locate within the 10m riparian planting area; and
  - (c) The riparian margin and wetland buffer planting area ~~is~~ are vested in Council or protected and maintained in perpetuity by an appropriate legal mechanism.

Commented [DW32]: From ecology memo

**IX.6.4. Stormwater quality**

Purpose: To ensure that stormwater is managed and treated prior to discharge to maintain and enhance the health and ecological values of the receiving environment.

- (1) Stormwater runoff from all impervious surfaces (except roofs) ~~new, or redeveloped, high contaminant generating carparks, all publicly accessible carparks exposed to rainfall, and all roads~~ must be treated with a stormwater management device(s) meeting the following standards:
  - (a) The device or system must be sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or

Commented [DW33]: From Healthy Waters

- (b) Where alternative devices are proposed, the device must demonstrate it is designed to achieve an equivalent level of contaminant or sediment removal performance to that of 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'.
  - ~~(2) For all other trafficked impervious surfaces, water quality treatment in accordance with the approved stormwater management plan must be installed.~~
- (3) New buildings, and additions to buildings must be constructed using inert cladding, roofing, spouting and building materials that avoid the use of high contaminant yielding building products which have:
  - (a) Exposed surface(s) or surface coating of metallic zinc of any alloy containing greater than 10% zinc; or
  - (b) Exposed surface(s) or surface coating of metallic copper or any alloy containing greater than 10% copper; or
  - (c) Exposed treated timber surface(s) or any roof material with a copper-containing or zinc-containing algaecide.
- (4) Roof runoff must be directed to a tank sized for the minimum of 5mm retention volume for non-potable reuse within the property.

**IX.6.5. Rural interface setback**

Purpose: To provide a buffer between residential activities within the Precinct and the neighbouring Mixed Rural zone to mitigate reverse sensitivity effects.

- (1) A building or parts of a building must be set back from the relevant boundary by the minimum depth listed in Table IX.6.5.1.

**Table IX.6.5.1 Rural Interface Setback**

Yard	Minimum depth
Rear	5m where the rear boundary adjoins the Rural – Mixed Rural Zone
Side	5m where the side boundary adjoins the Rural – Mixed Rural Zone

Note 1: A side or rear yard is only required along that part of the side or rear boundary adjoining the Rural – Mixed Rural Zone.

**IX.6.6. Fences adjoining publicly accessible open space**

Purpose: To ensure development positively contributes to the visual quality and interest of publicly accessible open spaces.

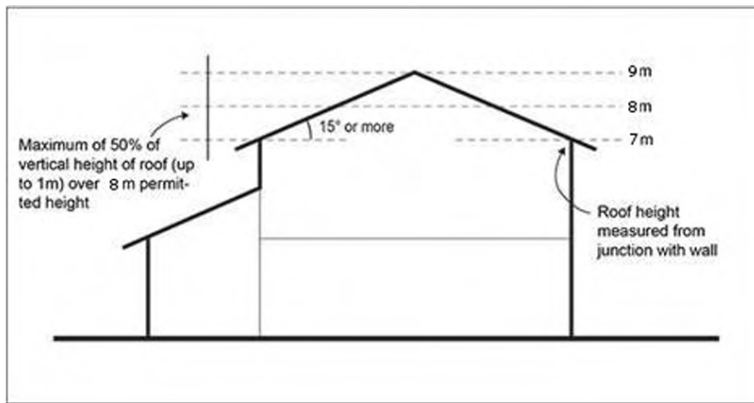
- (1) Fences, or walls, or a combination of these structures, within a side or rear yard adjoining a publicly accessible open space (excluding roads) must not exceed the heights specified below, measured from the ground level at the boundary:
  - (a) 1.2m in height, or;
  - (b) 1.8m in height if the fence is at least 50 per cent visually open.

**IX.6.7. Building height within the Mixed Housing Suburban Zone**

Purpose: To manage the height of buildings to achieve an urban built character of generally two storeys, with three storey development adjoining the Terrace Housing and Apartment Building zone and the Local Centre zone to enable a transition in height between the five and two storey development in the adjacent areas.

- (1) In Sub-precinct B, Standard H5.6.4. Building height applies.
- (2) In the remainder of the Residential – Mixed Housing suburban zone, buildings must not exceed 8m in height, except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1m, where the entire roof slopes 15° or more, as shown on the following diagram:

**Figure IX 6.7.1 Building height in the Mixed Housing Suburban Zone not located within Sub-precinct B.**



#### **IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone**

Purpose: to manage the height and bulk of buildings at boundaries to maintain a reasonable level of sunlight access, privacy and minimise adverse visual dominance effects to immediate neighbours.

- (1) Standard H5.6.5 Height in relation to boundary applies within the Mixed Housing Suburban zone.

#### **IX6.9. Yards within the Mixed Housing Suburban Zone**

Purpose:

- to create a suburban streetscape character and provide sufficient space for landscaping within the front yard;
- to maintain a reasonable standard of residential amenity for adjoining sites;
- to ensure buildings are adequately set back from lakes, streams and the coastal edge to maintain water quality and provide protection from natural hazards; and
- to enable buildings and services on the site or adjoining sites to be adequately maintained.

- (1) A building or parts of a building must be set back from the relevant boundary by the minimum depth listed in Table IX.6.9.1 Yards below.

**Table IX.6.9.1 Yards**

Yard	Minimum depth
Front	2.5m
Side	1m
Rear	1m
Riparian	10m from the edge of all permanent and intermittent streams
Lakeside	30m
Coastal protection yard	10m

**IX6.10. Building coverage within the Mixed Housing Suburban Zone**

Purpose: to manage the extent of buildings on a site to achieve the planned urban character of buildings surrounded by open space

- (1) Standard H5.6.10(1) Building coverage applies within the Mixed Housing Suburban zone.

**IX6.11. Landscaped area within the Mixed Housing Suburban Zone**

Purpose:

- to provide for quality living environments consistent with the planned urban built character of buildings within a generally spacious setting; and
- to maintain the landscaped character of the streetscape within the zone.

- (1) A dwelling at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.
- (2) The landscaped area may be located on any part of the development site, and does not need to be associated with each dwelling.

**IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone**

Purpose:

- to manage the amount of stormwater runoff generated by a development, particularly in relation to the capacity of the stormwater network and potential flood risks;
- to support the functioning of riparian yards, lakeside yards and coastal yards and water quality and ecology;
- to reinforce the building coverage and landscaped area standards;
- to limit paved areas on a site to improve the site's appearance and cumulatively maintain amenity values in a neighbourhood.

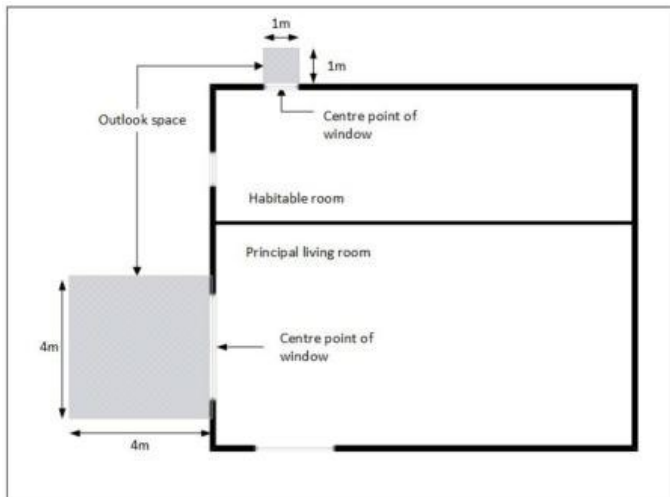
- (1) Standard H5.6.9 Maximum impervious area applies within the Mixed Housing Suburban zone.

### IX6.13. Outlook space within the Mixed Housing Suburban Zone

Purpose:

- to ensure a reasonable standard of visual privacy between habitable rooms of different buildings, on the same or adjacent sites; and
- in combination with the daylight standard, manage visual dominance effects within a site by ensuring that habitable rooms have an outlook and sense of space.

- (1) An outlook space must be provided for each dwelling as specified in this clause.
- (2) An outlook space must be provided from habitable room windows as shown in the diagram below:



- (3) The minimum dimensions for a required outlook space are as follows:
- (a) a principal living room must have an outlook space with a minimum dimension of 4 metres in depth and 4 metres in width; and
  - (b) all other habitable rooms must have an outlook space with a minimum dimension of 1 metre in depth and 1 metre in width.
- (4) The width of the outlook space is measured from the centre point of the largest window on the building face to which it applies.
- (5) Outlook spaces may be over driveways and footpaths within the site or over a public street or other public open space.
- (6) Outlook spaces may overlap where they are on the same wall plane in the case of a multi-storey building.
- (7) Outlook spaces may be under or over a balcony.



(8) Outlook spaces required from different rooms within the same building may overlap.

(9) Outlook spaces must—

- (a) be clear and unobstructed by buildings; and
- (b) not extend over an outlook space or outdoor living space required by another dwelling.

#### **IX6.14. Outdoor living space within the Mixed Housing Suburban Zone**

Purpose: to provide dwellings, supported residential care and boarding houses with outdoor living space that is of a functional size and dimension, has access to sunlight, and is accessible from the dwelling.

(1) A dwelling at ground floor level must have an outdoor living space that is at least 20 square metres and that comprises ground floor, balcony, patio, or roof terrace space that,—

- (a) where located at ground level, has no dimension less than 3 metres; and
- (b) where provided in the form of a balcony, patio, or roof terrace, is at least 8 square metres and has a minimum dimension of 1.8 metres; and
- (c) is accessible from the dwelling; and
- (d) may be—
  - (i) grouped cumulatively by area in 1 communally accessible location; or
  - (ii) located directly adjacent to the unit; and
- (e) is free of buildings, parking spaces, and servicing and manoeuvring areas.

(2) A dwelling located above ground floor level must have an outdoor living space in the form of a balcony, patio, or roof terrace that—

- (a) is at least 8 square metres and has a minimum dimension of 1.8 metres; and
- (b) is accessible from the dwelling; and
- (c) may be—
  - (i) grouped cumulatively by area in 1 communally accessible location, in which case it may be located at ground level; or
  - (ii) located directly adjacent to the unit.

#### **IX6.15. Windows to the street within the Mixed Housing Suburban Zone**

Purpose: To provide for passive surveillance while maintaining privacy for residents and users.

(1) Any dwelling facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.

#### **IX.6.16 Water Supply and Wastewater Infrastructure**

Commented [DW34]: WSL

Purpose:

To ensure bulk water supply and wastewater infrastructure with sufficient capacity is available to support the subdivision and development of the Riverhead Precinct.

(1) All subdivision and / or development within the Precinct must be serviced by a publicly available functioning bulk wastewater network and water supply network with sufficient capacity to service the precinct.

**IX.7. Assessment – controlled activities**

There are no controlled activities in this precinct.

**IX.8. Assessment – restricted discretionary activities**

**IX.8.1. Matters of discretion**

The Council will restrict 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) Healthcare facility up to 250m<sup>2</sup> gross floor area:

(a) Matters of discretion H6.8.1(1) apply.

(2) For new buildings prior to subdivision; and subdivision, including subdivision establishing private roads:

(a) Location and design of the collector road, key local roads and connections with neighbouring sites to achieve an integrated street network, and appropriately provide for all modes;

(b) Provision of cycling and pedestrian networks and connections;

(x) Upgrades to public transport infrastructure;

(x) Design and sequencing of upgrades to the existing road network;

(c) Open space network;

(d) Stormwater and flooding effects;

(e) Servicing;

(f) Trees;

(g) The effects on cultural values and Māori Cultural Landscape values; and

(h) Matters of discretion IX.8.1(1)(a)-(g) apply in addition to the matters of discretion in E38.12.1.

(3) For four or more dwellings on a site:

(a) The effects on the neighbourhood character, residential amenity, safety, and the surrounding residential areas from all of the following

(i) Building intensity, scale, location, form and appearance;

(ii) Traffic; and

(iii) Location and design of parking and access.

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Commented [DW36]: AT 161.34

- (b) All of the following standards:
- (i) Standard IX6.10. Building coverage within the Mixed Housing Suburban Zone;
  - (ii) Standard IX6.11. Landscaped area within the Mixed Housing Suburban Zone;
  - (iii) Standard IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone;
  - (iv) IX6.13. Outlook space within the Mixed Housing Suburban Zone;
  - (v) Standard IX6.14. Outdoor living space within the Mixed Housing Suburban Zone;
  - (vi) Standard IX6.15. Windows to the street within the Mixed Housing Suburban Zone; and
  - (vii) Standard H5.6.13 Daylight;
  - (viii) Standard H5.6.15 Front, side and rear fences and walls; and
  - (ix) Standard H5.6.16 Minimum dwelling size.
- (c) Infrastructure and servicing.
- (4) For occupation of dwellings that does not comply with ~~Standard IX.6.1.(2)-(6) Staging of development with transport upgrades~~, Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct:
- (a) Effects of traffic generation on the safety and operation of the surrounding road network;
  - (b) Effects on pedestrian and cyclist connectivity and safety; and
  - (c) Effects on public transport.
- (5) For development that does not comply with Standard IX6.3. Riparian margins and wetland buffers:
- (a) Effects on water quality, indigenous fauna habitat and biodiversity, and stream habitat.
- (6) For development that does not comply with Standard IX6.4. Stormwater quality:
- (a) Matters of discretion E9.8.1(1) apply.
- (7) For development that does not comply with Standard IX6.5. Rural interface setback:
- (a) Reverse sensitivity effects.
- (8) Infringement of Standard IX.6.6. Fences adjoining publicly accessible open space:
- (a) Effects on the amenity and safety of the open space.
- (9) Infringement of Standard IX6.7. Building height within the Mixed Housing Suburban Zone:
- (a) Within Sub-precinct B:

Commented [DW37]: AT 161.36

- (i) Matters of discretion H5.8.1(2)(a) apply.
- (b) Within the remainder of the Mixed Housing Suburban zone:
  - (i) The design and layout of buildings and development insofar as it affects the existing and future amenity values of open spaces; any policy which is relevant to the standard;
  - (ii) the purpose of the standard;
  - (iii) the effects of the infringement of the standard;
  - (iv) the effects on the planned built character of the zone;
  - (v) the effects on the amenity of the neighbouring sites;
  - (vi) the effects of any special or unusual characteristic of the site which is relevant to the standard;
  - (vii) the characteristics of the development; and
  - (viii) any other matters specifically listed for the standard.
- (10) Infringement of Standard H6.5.5. Building height:
  - (a) Matters of discretion H6.8.1(4) apply.
- (11) Infringement of Standard H11.6.1. Building height:
  - (a) Matters of discretion H11.8.1(8) apply.
- (12) Infringement of Standard IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone:
  - (a) any policy which is relevant to the standard;
  - (b) the purpose of the standard;
  - (c) the effects of the infringement of the standard;
  - (d) the effects on the planned built character of the zone;
  - (e) the effects on the amenity of the neighbouring sites;
  - (f) the effects of any special or unusual characteristic of the site which is relevant to the standard;
  - (g) the characteristics of the development; and
  - (h) any other matters specifically listed for the standard.
- (13) Infringement of Standard IX6.9. Yards within the Mixed Housing Suburban Zone; IX6.10. Building coverage within the Mixed Housing Suburban Zone; IX6.11. Landscaped area within the Mixed Housing Suburban Zone; IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone; IX6.13. Outlook space within the Mixed Housing Suburban Zone; IX6.14. Outdoor living space within the Mixed Housing Suburban Zone; IX6.15. Windows to the street within the Mixed Housing Suburban Zone:
  - (a) Matters of discretion H5.8.1(4) apply.

**IX.8.2. 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) Healthcare facility up to 250m<sup>2</sup>:

(a) Assessment criteria H6.8.2(1) apply.

(2) For new buildings prior to subdivision, and subdivision, including subdivision establishing private roads:

*Māori cultural landscape values*

(a) The extent to which Māori cultural landscape values and associations of Te Kawerau ā Maki and Ngāti Whātua ō Kaipara (as well as any other relevant tangata whenua) with land and water are recognised and provided for including but not limited to:

(i) The key views and spiritual connection identified on IX.10.1 Riverhead: Precinct plan 1;

(ii) The cross roads between several takiwa including Kaipara, Waitakere, Te Whenua Roa o Kahu, and on to Waitemata;

(iii) Ancient footprints of the tūpuna of Te Kawerau ā Maki and Ngāti Whātua ō Kaipara;

(iv) Connections to the hills to the north and the awa;

(v) Freshwater quality; and

(vi) Mauri, particularly in relation to freshwater.

(b) The ability to incorporate mātauranga Māori and tikanga Māori, recognising and providing for the outcomes articulated by Mana Whenua;

(c) Whether consideration of practicable alternative methods, locations or designs that would avoid or mitigate the impact on the identified Māori cultural landscape values;

(d) The extent to which streets and public open spaces recognise the relationship of Mana Whenua with the Māori cultural landscape including through:

(i) The incorporation of design elements, art works, naming and historical information to reflect the values and relationship mana whenua have with the Riverhead area;

(ii) Locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values identified in IX.10.1 Riverhead: Precinct plan 1 where practicable;

(iii) Indigenous landscaping, vegetation and design including removal and replanting; and

(iv) Maintenance of views and connections to and between important sites, places and areas, wāhi tapu and other taonga.

*Location of roads and other transport connections*

(e) Whether the collector road, key local roads and key pedestrian active mode connections are provided generally in the location shown on IX.10.2 Riverhead: Precinct Plan 2 to achieve a highly connected street layout and active mode network that integrates with the surrounding transport network. Whether an alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:

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- (i) Land ownership patterns, the presence of natural features, natural hazards, or contours or other constraints and how this impacts the placement of roads and active mode connections;
- (ii) The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and
- (iii) The constructability of roads and the ability for them to be delivered by a single landowner and connected beyond any property boundary within the precinct.

(f) Whether a high quality and integrated network of local roads (including collector and local roads) is provided within the precinct that has a good degree of accessibility including to public transport, and supports a walkable street network and provides for public transport (where appropriate). Whether roads and active mode connections are aligned to provide visual and physical connections to open spaces, including along the stream network, where the site conditions allow.

Commented [DW39]: At 161.38

#### Design of roads

(g) Whether the design of new collector and local roads or upgrade of existing roads accord with the road design details provided in IX.11.1 Appendix 1 and 2.

Commented [DW40]: At 161.39

(h) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network. As a general principle, the length of a block should be no greater than 200m, and the perimeter of the block should be no greater than 600m.

x) Whether the public transport infrastructure improvements provided on Coatesville-Riverhead Highway in accordance with IX.6.1 Staging of subdivision and development with transport upgrades, are of a high standard and include bus stops, bus shelters, and pedestrian crossing facilities.

(x) Whether upgrades to the Coatesville-Riverhead Highway intersections with Old Railway Road and Riverland Road provide for safe right hand turns.

(x) Whether the design of the new collector roads provides or future proofs for public transport facilities.

#### Open space network

(i) Whether open spaces are provided in the locations generally consistent with the indicative locations shown on IX.10.2 Riverhead: Precinct plan 2.

- (j) Neighbourhood and suburb parks should have adequate street frontage to ensure they are visually prominent and safe.
- (k) Whether multi-purpose green corridors are provided in a manner consistent with Policy IX.3(13).

*Trees*

- (l) Whether the Beech Tree identified on IX.10.2 Riverhead: Precinct plan 2, is retained where possible.

*Stormwater and flooding*

- (m) Whether development is in accordance with an ~~the~~ approved Stormwater Management Plan and Policies E1.3(1)-(14).
- (n) The design and efficacy of infrastructure and devices with consideration given to the likely effectiveness, ease of access, operation, ongoing viability and maintenance, and integration with the surrounding environment including the road corridor where relevant.
- (o) Whether the proposal ensures that subdivision and development manages flooding effects (including cumulative effects) upstream or and downstream of the site and in the Riverhead precinct so that the risks to people and property (including infrastructure) are not increased for all flood events, up to a 100-year ARI flood event.
- (p) The location, size, design and management of any interim flood attenuation areas that may be necessary to ensure that development does not increase flooding risks prior to upgrades of culverts.

Commented [DW41]: From Healthy Waters and At 161.40

*Note: No on-site flood attenuation is proposed by the Applicant based on the CKL report. Amendment to Assessment Criterion (p) above might be required after clarification and further information addressing the matters raised in this memo is provided by the Applicant in their evidence.*

*Servicing*

- (q) Whether adequate water supply and wastewater infrastructure is provided at the time of subdivision or development.
- (3) For four or more dwellings on a site:
- (a) The extent to which or whether the development achieves the purpose outlined in the following standards or what alternatives are provided that result in the same or a better outcome:
    - (i) Standard IX6.10. Building coverage within the Mixed Housing Suburban Zone;
    - (ii) Standard IX6.11. Landscaped area within the Mixed Housing Suburban Zone;
    - (iii) Standard IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone;

- (iv) Standard IX6.13. Outlook space within the Mixed Housing Suburban Zone;
  - (v) Standard IX6.14. Outdoor living space within the Mixed Housing Suburban Zone;
  - (vi) Standard IX6.15. Windows to the street within the Mixed Housing Suburban Zone;
  - (vii) Standard H5.6.13 Daylight;
  - (viii) Standard H5.6.15 Front, side and rear fences and walls; and
  - (ix) Standard H5.6.16 Minimum dwelling size.
- (b) The extent to which the development contributes to a variety of housing types at higher densities in the zone and is in keeping with the neighbourhood's planned built character of predominantly two storey buildings (attached or detached) by limiting the height, bulk and form of the development and managing the design and appearance as well as providing sufficient setbacks and landscaped areas.
- (c) The extent to which development achieves attractive and safe streets and public open space by:
- (i) providing doors, windows and/or balconies facing the street and public open spaces.
  - (ii) minimising tall, visually impermeable fences.
  - (iii) designing large scale development (generally more than 15 dwellings) to provide for variations in building form and/or façade design as viewed from streets and public open spaces.
  - (iv) optimising front yard landscaping.
  - (v) providing safe pedestrian access to buildings from the street.
  - (vi) minimising the visual dominance of garage doors, walkways or staircases to upper level dwellings, and carparking within buildings as viewed from streets or public open spaces.
- (d) The extent to which the height, bulk and location of the development maintains a reasonable standard of sunlight access and privacy and minimises visual dominance to adjoining sites;
- (e) The extent to which dwellings:
- (i) Orientate and locate windows to optimise privacy and encourage natural cross ventilation within the dwelling.
  - (ii) Optimise sunlight and daylight access based on orientation, function, window design and location, and depth of the dwelling floor space.
  - (iii) Provide secure and conveniently accessible storage for the number and type of occupants the dwelling is designed to accommodate.



(iv) Provide the necessary waste collection and recycling facilities in locations conveniently accessible and screens from streets and public open spaces.

(f) The extent to which outdoor living space:

- (i) Provides for access to sunlight.
- (ii) Provides privacy between the outdoor living space of adjacent dwellings on the same site and between outdoor living space and the street.
- (iii) When provided at ground level, is located on generally flat land or otherwise functional.

(g) refer to Policy H5.3(7); and

(h) infrastructure and servicing:

- (i) Whether there is adequate capacity in the existing stormwater and public reticulated water supply and wastewater network to service the proposed development.
- (ii) Where adequate network capacity is not available, whether adequate mitigation is proposed.

(x) The extent to which traffic generated from the site affects the safe and efficient operation of the transport network.

(4) For development and subdivision that does not comply with ~~Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades~~, Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct:

Commented [DW42]: AT 161.41

- ~~(a) A proposal that does not comply with IX.6.1 Staging of development with transport upgrades will be assessed in terms of the matters below, as informed by an Integrated Transport Assessment.~~
- ~~(b) Whether the proposal is in accordance with Policy IX.3(4) in addition to any relevant AUP policy that is within the scope of the matters of discretion in IX.8.1(3).~~
- ~~(c) Whether safe connections can be achieved to public transport services, schools and community facilities within Riverhead.~~
- ~~(d) The extent to which public transport facilities on Coatesville Riverhead Highway fronting the Precinct are of a high standard including shelter, hardstand and seating.~~
- ~~(e) The extent to which localised intersection widening will allow for safe, protected active mode facilities and bus stop infrastructure on Coatesville Riverhead Highway. The extent to which localised intersection widening will allow for safe, protected active mode facilities on Riverhead Road.~~
- ~~(f) Whether the transport network at key intersections within Riverhead can operate safely and efficiently during the inter-peak period, with an overall intersection Level of Service (LOS) no worse than LOS D. The key~~

~~intersections to consider include Coatesville Riverhead Highway/Riverhead Road, Coatesville Riverhead Highway/Riverhead Point Drive and Riverhead Road/Lathrope Road.~~

~~(g) The extent to which safety improvements have been implemented at the Coatesville Riverhead Highway/SH16 intersection.~~

~~(h) The extent to which interim transport upgrades which achieve (a) – (g) will contribute towards the final transport upgrade.~~

x) For subdivision and / or development that does not comply with the Road Function and Design Elements tables in Appendices 1 and 2

(a) Whether there are constraints or other factors present which make it impractical to comply with the required standards.

(b) Whether the design of the road and associated road reserve achieves the relevant transport-related policies of the Precinct.

(c) Whether the proposed design and road reserve:

(i) incorporates measures to achieve the required design speeds;

(ii) can safely accommodate required vehicle movements;

(iii) can appropriately accommodate all proposed infrastructure and roading elements including utilities and/or any stormwater treatment;

(iv) assesses the feasibility of upgrading any interim design or road reserve to the ultimate required standard.

(d) Whether there is an appropriate interface design treatment at property boundaries, particularly for pedestrians and cyclists.'

(5) For development that does not comply with Standard IX.6.3. Riparian margin planting and wetland buffers:

(a) Whether the development is consistent with Policy IX.3(18).

(6) For development that does not comply with Standard IX.6.4. Stormwater quality:

(a) Assessment criteria E9.8.2(1); and

(b) Whether the proposal is in accordance with the approved Stormwater Management Plan and Policies E1.3(1)-(10) and (12)-(14).

(7) For development that does not comply with Standard IX6.5. Rural interface setback:

(a) Refer to Policy IX.3(13).

(8) Infringement of Standard IX.6.6 Fences adjoining publicly accessible open space:

(a) Whether the proposal positively contributes to the visual quality and interest of the adjoining open space, while providing an adequate degree of privacy and security for the development.

(9) Infringement of Standard IX6.7. Building height within the Mixed Housing Suburban Zone:

(a) Refer to Policy IX.3(16);

Commented [DW43]: Ecology memo

- (b) For sites within Sub-precinct B, assessment criteria H5.8.2(4) apply;
  - (c) For sites within the remainder of the Residential – Mixed Housing Suburban zone, assessment criteria H4.8.2(5) apply.
- (10) Infringement of Standard H6.6.5: Building height:
- (a) Refer Policy IX.3(15); and
  - (b) Assessment criteria H6.8.2(5) apply.
- (11) Infringement of Standard H11.6.1: Building height:
- (a) Refer Policy IX.3(15); and
  - (b) Assessment criteria H11.8.2(8)(a) apply.
- (12) Infringement of Standard IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone:
- (a) Assessment criteria H4.8.2(6) apply.
- (13) Infringement of Standard IX6.9. Yards within the Mixed Housing Suburban Zone:
- (a) Assessment criteria H5.8.2(9) apply.
- (14) Infringement to Standard IX6.10. Building coverage within the Mixed Housing Suburban Zone:
- (a) Assessment criteria H5.8.2(11) apply.
- (15) Infringement to Standard IX6.11. Landscaped area within the Mixed Housing Suburban Zone:
- (a) Assessment criteria H5.8.2(12) apply.
- (16) Infringement of Standard IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone:
- (a) Assessment criteria H5.8.2(10) apply.
- (17) Infringement of Standard IX6.13. Outlook space within the Mixed Housing Suburban Zone:
- (a) Assessment criteria H5.8.2(13) apply.
- (18) Infringement of Standard IX6.14. Outdoor living space within the Mixed Housing Suburban Zone:
- (a) Assessment criteria H5.8.2(15) apply.
- (19) Infringement of Standard IX6.15. Windows to the street within the Mixed Housing Suburban Zone:
- (a) The extent to which the glazing:
    - (i) Allows views to the street and/or accessways to ensure passive surveillance; and
    - (ii) Provides a good standard for privacy of occupants.

## IX.9 Special information requirements

(1) Riparian margin and wetland buffer planting plan

Commented [DW44]: Ecology memo

An application for land modification, development and subdivision which adjoins a permanent or intermittent stream and/or natural wetland must be accompanied by a riparian planting plan identifying the location, species, planter bag size, ~~and~~ density of the plants, and site preparation (including weed and pest animal control). Plant species should be native and ecologically appropriate to the site, and must follow the planting standards of Te Haumanu Taiao.

(2) Consultation with Waka Kotahi NZ Transport Agency

An application for development, excluding construction activities, which occurs prior to the upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection must be accompanied by a description of consultation undertaken with Waka Kotahi NZ Transport Agency and the outcomes of this consultation.

(3) Large or highly visible commercial or community focused buildings

Design of large or highly visible commercial or community focused buildings or structures or infrastructure shall provide opportunity to Te Kawerau ā Maki and Ngāti Whātua ō Kaipara to integrate cultural design elements.

(4) Archaeological assessment

An application for land modification on 22 Duke Street must be accompanied by an archaeological assessment, including a survey. The purpose of this assessment is to evaluate the effects on archaeological values associated with the Waitemata Flour Mill/Riverhead Paper Mill site R10\_721 prior to any land disturbance, and to confirm whether the development will require an Authority to Modify under the Heritage New Zealand Pouhere Taonga Act 2014.

(5) Watercourse Assessment

Commented [DW45]: Healthy Waters

An application for any land modification, subdivision and/or development which:

- Adjoins a permanent or intermittent stream; or
- Discharges stormwater to the Southern Stream and the unnamed stream to the west of the Riverhead Precinct and identified in Figure (NEW) below.

Must be accompanied by a Site Specific Watercourse Assessment prepared by a suitably qualified person. The assessment must include a stream reach assessment identifying any erosion hotspots, stream bank erosion and appropriate erosion mitigation measures.



(6) Transport Design Report

Any proposed new key road intersection or upgrading of existing key road intersections illustrated on Precinct Plans 2 and 3 must be supported by a Transport Design Report and Concept Plans (including forecast transport modelling and land use assumptions), prepared by a suitably qualified transport engineer confirming that the location and design of any road and its intersection(s) supports the safe and efficient function of the existing and future (ultimate) transport network and can be accommodated within the proposed or available road reserves. This may be included within a transport assessment supporting land use or subdivision consents.

In addition, where an interim upgrade is proposed, information must be provided, detailing how the design allows for the ultimate upgrade to be efficiently delivered.'

Commented [DW46]: AT161. 41

Make consequential amendments to Precinct Plans 2 and 3 to clearly identify the key road intersections.

(7) Wastewater Infrastructure Capacity Assessment

All applications for two or more dwellings and subdivision must provide a Wastewater Infrastructure Capacity Assessment.

Commented [DW47]: ACS 186.8

Or

(8) Local Network Water and Wastewater Servicing Plan

(1) At the first stage of subdivision and / or development of any site existing at (date of plan change approval) within the Precinct applicants are required to provide a Local Network Water and Wastewater Servicing Plan for the Precinct Area. The Local Network Water and Wastewater Servicing Plan must:

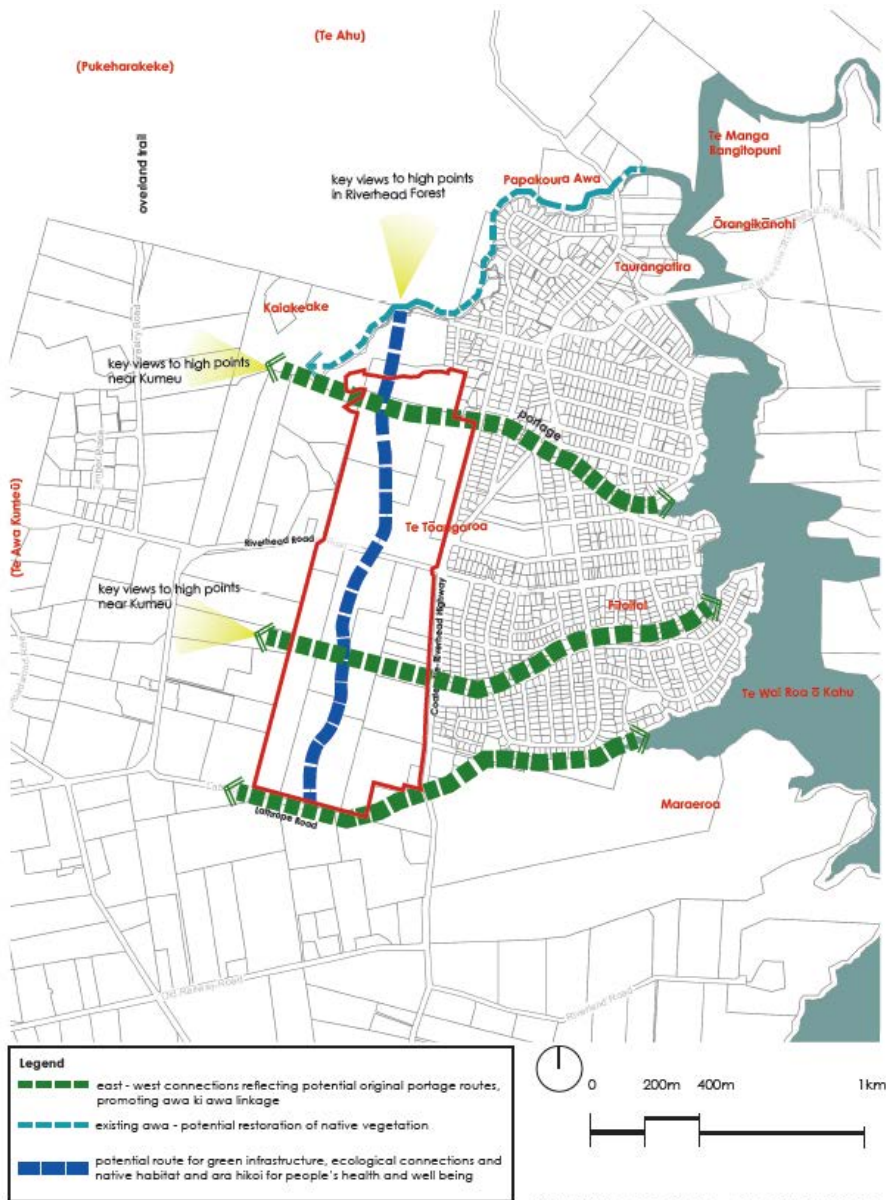
(a) Identify the overall local water supply and wastewater network for the Precinct Area.

(b) Identify the location, size and capacity of the key water and wastewater infrastructure dependencies located outside of the Precinct Area but are necessary to service the Precinct.

(c) Identify the location, size and capacity of the local connections within the Precinct.

IX.10. Precinct plans

IX.10.1 Riverhead: Precinct plan 1



**IX.10.2 Riverhead: Precinct plan 2**

Make consequential amendments to Precinct Plans 2 and 3 to clearly identify the key road intersections.

Commented [DW48]: At 161-42

Amend the notation applying at the intersection of Lathrope Road / Riverhead Road to 'upgrade key intersection' instead of 'proposed roundabout'.

Commented [DW49]: At 161.43

Add two additional direct east to west pedestrian connections towards the Riverhead Memorial Park on that part of the PC100 map area north of Riverhead Road

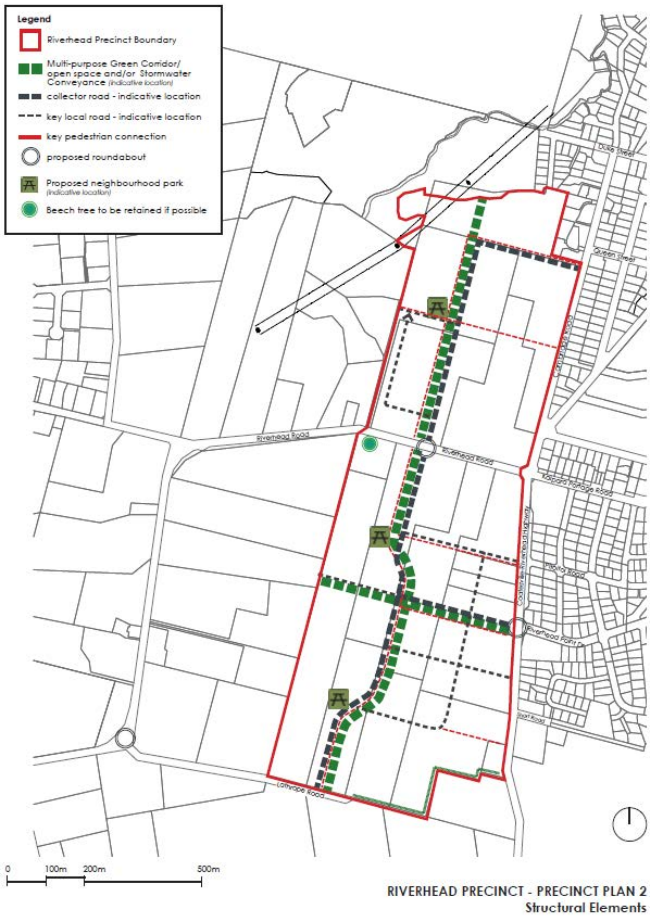
Commented [DW50]: Parks memo

Additional direct east to west key local road (indicative location) through 1092 Coatesville Riverhead Highway towards the Riverhead Memorial Park on that part of the PC100 map area north of Riverhead Road

Commented [DW51]: Parks memo

Delete the three proposed neighbourhood parks (indicative locations) and amend by illustrating the proposed locations of two neighbourhood parks as shown in **Figure 14 of parks memo**

Commented [DW52]: Parks memo



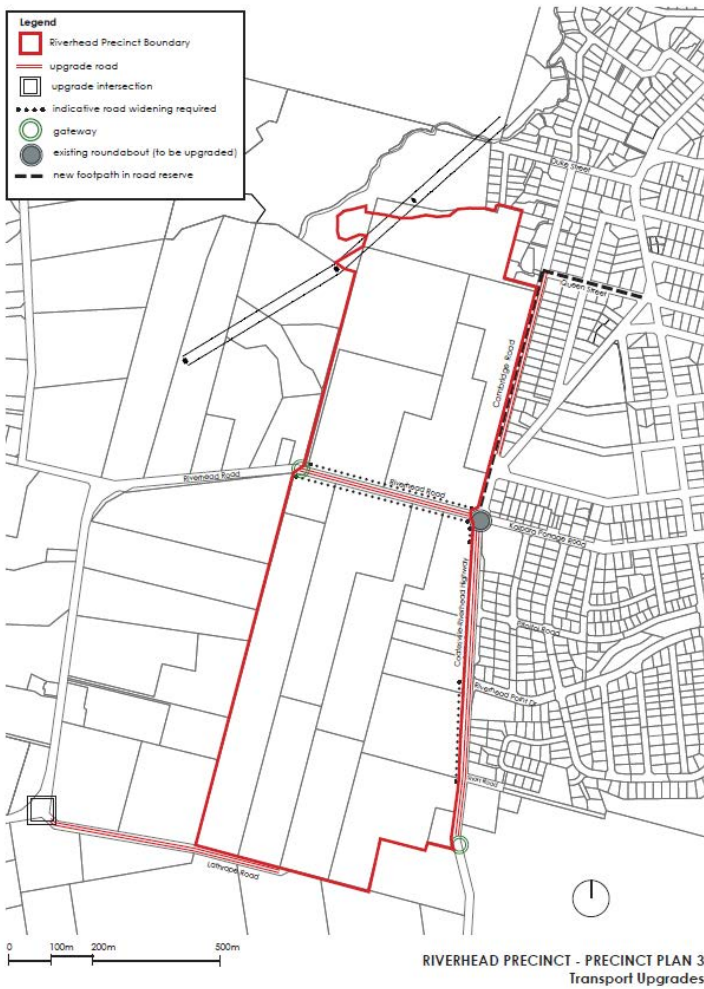


### IX.10.3 Riverhead: Precinct plan 3

identify all of the key road intersection upgrades including:  
 Coatesville-Riverhead Highway / Old Railway Road  
 Coatesville-Riverhead Highway / Riverland Road  
 Riverhead Road / Coatesville-Riverhead Highway/ Kaipara Portage Road  
 Riverhead Road / Collector Road  
 Riverhead Point Drive / Coatesville-Riverhead Highway / Collector Road.

Commented [DW53]: AT 161.44

Also amend Precinct plan 3, as required, to reflect Precinct plan 2.



## IX.11. Appendices

### IX.11.1 Appendix 1: Road function and design elements table – Internal roads within Precinct

Road Description	Proposed Role and Function of Road in Precinct Area	Minimum Road Reserve* <sup>1</sup>	Total Number of Lanes	Speed Limit (Design)	On-Street Parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision <sup>*2</sup>
<b>Collector Road</b> (without adjacent reserve)	Collector Road (Type 1)	<del>25m</del> 21m	2	40 km/h	Optional	No	Yes  Separated on both sides	Yes  Both sides	Trees each side	Yes
<b>Collector Road</b> (with adjacent reserve which includes a shared path alongside (but outside) road reserve)	Collector Road (Type 1)	21m	2	40 km/h	Optional	No	Yes  Separated on both sides	Yes  One side (not required on reserve side)	Trees each side	Yes
<b>Local Roads</b>	<del>Local Road</del> (Type 2)	<del>48m</del> 16m	2 (on-street parking with staggered yellow lines)	30 km/h	Optional	No	No	Yes  Both sides	Trees each side	No

Commented [DW54]: AT161.47

Commented [DW55]: At 161.46

\*1 Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'

\*2 Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage

IX.11.2 Appendix 2: Road function and design elements table – External roads to the Precinct

Road Description	Proposed Role and Function of Road	Minimum Road Reserve <sup>*1</sup>	Total Number of Lanes	Speed Limit (Design)	On-Street Parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision <sup>*2</sup>
<b>Coatesville-Riverhead Highway</b>  Between Kaipara Portage Road and Riverhead Point Drive	Arterial Road	Existing width (varies) plus localised intersection widening	2	50	No	<del>No</del> Yes	Yes  Separated on both sides	Yes	Yes	Yes
<b>Coatesville-Riverhead Highway</b>  From Riverhead Point Drive to 80m south of Short Road	Arterial Road	Existing with localised widening on the western boundary to allow for intersections and tie-in works for the future shared path on Coatesville-Riverhead Highway, south of Short Road.	2	50	No	<del>No</del> Yes	Yes  Separated on both sides	Yes	Yes  Western side only	Yes

Commented [DW56]: At 161.48

Commented [DW57]: AT161.49

Commented [DW58]: AT 191 50

Road Description	Proposed Role and Function of Road	Minimum Road Reserve <sup>*1</sup>	Total Number of Lanes	Speed Limit (Design)	On-Street Parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision <sup>*2</sup>
<b>Riverhead Road</b> From the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway	Arterial Road	24m, with 2m widening each side plus localised intersection widening	2	50	No	<del>No</del> Yes	Yes Separated on both sides	Yes	Yes	<del>No</del> Yes
<b>Lathrope Road</b>	Local Road	Existing width (20m)	2	50	No	<del>No</del> Yes	No	Yes Northern side only	No	Yes
<b>Cambridge Road</b>	Local Road	Varies (formed 6m carriageway)	2	50	Yes	<del>No</del>	No	Yes West side only	No	No

Commented [DW56]: At 161.48

Commented [DW57]: AT161.49

<sup>\*1</sup> Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements

<sup>\*2</sup> Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage.



**APPENDIX 6**  
**SPECIALIST TECHNICAL MEMOS**





## Arboricultural Memorandum for the Plan Change for 100 Riverhead Road Dairy Flat

To: David Wren– Auckland Council Resource Consents Planning Consultant and Resource Management Commissioner

From: Regine Hoi Gok Leung – Auckland Council Senior Specialist Adviser (Arborist)

Date: 5<sup>th</sup> September 2024

### 1. Application details

**Applicant’s name:** Riverhead Landowner Group

**WBS number:** D.002325.02

**Site address:**

- 1092 Coatesville-Riverhead Highway
- 1140 Coatesville-Riverhead Highway
- 1156 Coatesville-Riverhead Highway
- 1170 Coatesville-Riverhead Highway
- 1186 Coatesville-Riverhead Highway
- 1194 Coatesville-Riverhead Highway
- 298 Riverhead Road
- 306 Riverhead Road
- 307 Riverhead Road
- 325 Riverhead Road
- 328 Riverhead Road
- 340 Riverhead Road
- 30 Cambridge Road
- 22 Duke Street
- 51 Lathrope Road
- Lot 2 DP 164978, Lathrope Road
- Lot 2 DP 64605, Lathrope Road

### 2. INTRODUCTION

#### QUALIFICATIONS AND RELEVANT EXPERIENCE

2.1. My name is Regine Hoi Gok Leung, and I am Senior Specialist Arborist in the Earth, Streams and Trees Team of Specialist Unit at Auckland Council.

My qualifications include Bachelor of Science in Biology (1998) and Master of Philosophy in Geography (2001). I am also the Certified Arborist (since 2009) of International Society of Arboriculture (ISA) and hold the Tree Risk Assessment Qualification (TRAQ) of ISA (2022 – 2027).

2.2. My current role at Auckland Council is to provide reports and recommendations to Council Planners for resource consent applications that involve protected trees, prepare and determine tree-only consent applications, provide specialist advice on major infrastructure projects, outline plans of works, and notices of requirement, and to prepare reports and

technical memoranda as an arboricultural expert at notified Council hearings, Council committees, and in the Environment Court.

- 2.3. I am a member of the International Society of Arboriculture (ISA), the New Zealand Arboricultural Association (NZArb), Professional Lawn Care Association of America, The Hong Kong Institute of Environmental Impact Assessment (HKIEIA) and The Hong Kong Institute of Landscape Architects (HKILA).
- 2.4. I have been practicing arboriculture since 2000 and have been working in the industry of arboriculture, ecology and environmental impact assessment for more than 24 years in Hong Kong, Asia Pacific and Auckland.

### **EXPERT WITNESS CODE OF CONDUCT**

- 2.5. I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this technical memo. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express. I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

### **3. SUMMARY OF PROPOSAL**

- 3.1 The Applicant has applied for resource consent of Plan Change from Future Urban Zone to Residential – Mixed Housing Suburban, Business – Local Centre, Business – Neighbourhood Centre, and Rural – Mixed Rural which may require vegetation removal and alteration in riparian margin of streams and two wetlands for the development on site. An iconic mature specimen of Copper Beech tree located at 298 Riverhead Road, Riverhead is nominated as potential notable tree.

- 3.2 The following activities are proposed for the Project:

- 75 ha of Future Urban Zone will be developed for urban use, including residential activities such as residential (medium and higher density), local centre, neighbourhood centre, stormwater management area, multi-purposes green corridor and internal roundabout and roads;
- A mature specimen of Copper Beech tree (identified as T33), located at 298 Riverhead Road, Riverhead is good in tree form and health that it is nominated as notable tree. The tree is proposed to be retained and protected on site;
- There are total 5,602 trees including trees and tree groups found within the site, which located on riparian margin, as shelterbelts, firewood plantation and crop trees on site;
- There are 61 individual trees including four Kauri trees subject to biosecurity protocol; and,
- There are two groups of shelterbelts tree which are located on road reserve outside the site and are protected under E17 of AUP.

Works affecting trees and vegetation will include:

- There are two groups of trees as shelterbelts located on the road reserve outside the site. Alternation or removal of these protected street trees in the future will trigger resource consent under E17 of AUP;
- The potential candidate of notable tree (Copper Beech tree - T33) to be nominated and protected on site under D13 of AUP. A detailed nomination and evaluation form for this candidate tree has been included in the Arboricultural Assessment Report by GreensceneNZ Limited. The proposal will be further reviewed technically by the Heritage Team of Council.
- It is the intention of the applicant to retain any other mature trees within the site that are worthy of retention, where possible;
- It is the intention of the applicant to ensure that the location and design of publicly accessible open spaces contribute to a sense of place and a quality network of open spaces for Riverhead, including by incorporating natural features such as wetlands and streams on site; and
- It is proposed to provide indigenous planting on the riparian margins of permanent and intermittent streams to enhance the natural features on site.

3.3 This technical memorandum addresses the Arboricultural effects of the Plan Change application and in preparation for this I have reviewed the following documents relevant to the Plan Change Application for 100 Riverhead:

- Riverhead Private Plan Change Request Section 32 Assessment Report (version 3) by Barker and Associates Limited dated on 4<sup>th</sup> October 2023;
- Riverhead Private Plan Change Request – Riverhead Precinct by Barker and Associates Limited dated on 4<sup>th</sup> October 2023 (Appendix 1);
- Riverhead Private Plan Change Request – PC Zoning Map by Barker and Associates Limited dated on 4<sup>th</sup> October 2023 (Appendix 2);
- Riverhead Private Plan Change Request – Structure Plan by Barker and Associates Limited dated on 4<sup>th</sup> October 2023 (Appendix 4);
- Riverhead Plan Change Arboriculture Assessment (version 1.5) by GreensceneNZ Limited dated in Sept 2023 (Appendix 17);
- Riverhead Plan Change Ecological Values Assessment (version 5) by RMA Ecology Limited dated in Sept 2023 (Appendix 9); and
- Riverhead Private Plan Change Request – Landscape and Natural Character Effects Assessment by Boffa Miskell Limited dated on 3<sup>rd</sup> October 2023 (Appendix 16).

## 4 ASSESSMENTS

- 4.1 Further to the desktop review of the application documents, review via street views and GIS database and my site visit, it is noted that these 5,600 trees recorded on site are mature in size, located within the riparian margin of streams and wetlands or along the site boundary as shelterbelts, firewood plantation and crop trees to provide diversified amenity, soil stability, screening effects and ecosystem services to the area. According to the AEE Report, applicant intends to retain any mature trees, where possible and connect to the proposed green corridor and the Open Spaces for public access within the site and sustain the functions that the trees are contributing on site.
- 4.2 Applicant also intends to retain and protect the natural features including streams and wetlands on site from the residential developments in the vicinity. The riparian margin of streams and wetland will be enhanced by revegetation and weeding. It is noted that tree groups 54 (mature Maple trees – *Acer* sp.) & 60 (early mature Kauri trees) are located within the riparian margin of the streams and wetlands, and they are protected under E15.4.1 (A17) and (A18) that it will trigger resource consent for alternation and removal by the development in the future. Therefore, these trees located on the riparian margin should be protected and incorporated into the Structure Plan of development, wherever possible. If in case tree removal cannot be avoided and triggers resource consent under E15 of AUP, revegetation with native trees should be implemented within the riparian margin to sustain the ecosystem services and amenity provided by these trees.
- 4.3 There are 61 individual trees including four Kauri trees are recorded on site. Biosecurity protocols should be incorporated into the Construction Management Plan during construction period to minimise the spread of plant disease including Kauri dieback, Dutch Elm disease and myrtle rust within the site.
- 4.4 A mature specimen of Copper Beech tree (*Fagus sylvatica* 'Purpurea') has been recorded within the site at 298 Riverhead Road. It is mature, healthy, an iconic specimen of the tree species in good tree form. No structural defects have been recorded on the trunk or main stems of the tree. It has been nominated as a potential notable tree on behalf of its outstanding features. The proposal has been reviewed by Council's heritage arborist (West Fynn) and he can support the nomination for further review and confirmation by Council's Heritage Team. No matter whether the tree to be categorised as notable tree or not, it should be retained and incorporated into the Structure Plan and continue to contribute to the local area of its iconic outstanding amenity, aesthetic values and ecosystem services.
- 4.5 There are two groups of trees (Tree Group 55 & 56 – Monterey Pine trees) as shelterbelts located on the road reserve outside the site. Alternation and removal of these protected trees will trigger resource consent under E17 of AUP. Therefore, they should be incorporated into the Structure Plan for the development to sustain the screening effect and amenity provided by the trees. If in case tree removal cannot be avoided, mitigation replanting with new street trees should be proposed and implemented to sustain the streetscape in local area.

## 5 RECOMMENDATIONS

- 5.1 I can support the proposal and agree that mature trees within the site, especially these located on the riparian margin of the streams and wetlands, and the potential notable

Copper Beech tree to be retained and incorporated into the Structure Plan for development in the future. In case tree alternation or removal cannot be avoided which trigger resource consents under E15 and E17 of AUP, comprehensive replanting plan should be proposed and the plan to be reviewed and approved by Council's ecologist and arborist.

- 5.2 It is my recommendation that biosecurity protocol should be incorporated into the Construction Management Plan for development in the future to minimise the spread of Kauri dieback disease, Dutch Elm disease and myrtle rust during period of construction.
- 5.3 It is my recommendation that a qualified arborist should be engaged within the project team to review the detail designs of the development on site to avoid, minimise and reduce the actual tree impacts from the proposed development, and propose mitigation measures (including arboricultural supervision of proposed tree works, tree protection measures for retained trees, mitigation replanting etc) to ensure the proposed tree works to be implemented according to arboricultural practice and achieve the desirable arboricultural outcome throughout the project.



Regine Hoi Gok Leung – Senior Specialist Arborist

Earth, Streams and Trees Team

Specialist Unit – Auckland Council

**Memo (technical specialist report to contribute towards Council’s section 42A hearing report)**

23 August 2024

To: David Wren – Planning consultant for Auckland Council  
From: Mica Plowman – Principal Heritage Advisor, Cultural Heritage Implementation, Heritage Unit, Planning and Governance Division

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**Subject: Proposed Private Plan Change – Riverhead – Historic Heritage (archaeology) assessment**

## 1.0 Introduction

1.1 I have undertaken a review of the proposed private plan change (PC 100), on behalf of Auckland Council in relation to historic heritage effects. This advice does not address effects on built heritage, which is the subject of a separate review by Megan Walker, nor does it address effects on mana whenua cultural values. The cultural and other values that mana whenua place on the area may differ from its historic heritage values and are to be determined by mana whenua. It is the applicants’ responsibility to consult with mana whenua to determine mana whenua values.

1.2 I have a Master of Arts degree with first class honours in anthropology (archaeology) specialising in New Zealand and Pacific archaeology. I have worked in the field of historic heritage management for 30 years, including 11 years for Auckland Council. My experience spans archaeology, materials analysis, and historic heritage planning and implementation.

1.3 In writing this memo, I have reviewed the following documents:

- Section 32 Report – Riverhead Private Plan Change
  - Appendix 1: Riverhead Plan Change
  - Appendix 2: Plan Change Zoning Map
  - Appendix 3: List of Properties within the Plan Change Area
  - Appendix 4: Riverhead Structure Plan
  - Appendix 5: Auckland Unitary Plan Objectives and Policies Assessment
  - Appendix 13: Archaeology Assessment (September 2023)
  - Appendix 17: Arborist Report
  - Appendix 18: Consultation Report
- Clause 23 Response
  - Summary of Decisions Requested
  - Plan Change 100- Submissions 01-254

## 2 Key Historic Heritage Issues

2.1 The key issue in relation to historic heritage is whether the application has sufficiently assessed and addressed actual or potential effects on historic heritage.



### 3 Applicant's assessment of historic heritage values, adverse effects and mitigation methods

- 3.1 In relation to historic heritage the applicant has provided a historic heritage assessment by Richard Sharkles and Rod Clough, of Clough and Associates Limited, (Appendix 13 - 2023).
- 3.2 The historic heritage assessment provides a description of those places of heritage value within the plan change area, and the wider heritage context through desktop research and field survey. It then assesses the significance of the sites in the plan change area against both the Auckland Unitary Plan (**AUP**) Historic Heritage Regional Policy Statement (**RPS**) and Heritage New Zealand Pouhere Taonga Act (**HNZPTA**) criteria. Finally, it provides a preliminary summary of actual and potential adverse effects and recommended mitigation measures.
- 3.3 In my opinion, the historic heritage assessment provides a sufficient level of detail in relation to historic heritage for the purposes of the proposed plan change.
- 3.4 The report states that there are two archaeological sites situated within the Riverhead Plan Change Area. The first site consists of the Riverhead Mill water race (part of the Riverhead Mill site R10/721), the course of which has been determined to run along the southeastern boundary of Lot 20 DP 499876 (22 Duke Street) and the northeastern boundary of Lot 1 DP 499822 (30 Cambridge Road) in the far north of the project area.<sup>1</sup>
- 3.5 The plan change proposes that the entirety of Lot 20 DP 499876 and a portion of Lot 1 DP 499822 along the northwestern boundary will be zoned as Mixed Rural and outside of the proposed Riverhead Precinct.<sup>2</sup> Therefore, only a section of the mill race which traverses the boundary of Lot 20 DP 499876 and Lot 1 DP 499822 (eastern side), remains within the proposed plan change area (Mixed Suburban), reducing the overall potential impact of future development on the heritage feature.<sup>3</sup>
- 3.6 The second, is the site of a former late 19<sup>th</sup> century Ellis house with possible outbuildings (R10/1537) located on Lot 1 DP 164978 at 298 Riverhead Road.<sup>4</sup>
- 3.7 Both the Riverhead Mill water race (R10/721) and Ellis house (R10/1537) are assessed by Clough and Associates Limited as having low overall historic heritage values according to the Auckland Unitary Plan (**AUP**) Historic Heritage Regional Policy Statement (**RPS**) and Heritage New Zealand Pouhere Taonga Act (**HNZPTA**) criteria.<sup>5</sup>
- 3.8 No historic heritage values relating to pre-1900 Māori settlement have been identified within the Riverhead Plan Change area and Clough and Associates Ltd. state it is unlikely to contain any unidentified subsurface remains connected with pre-European Māori settlement.<sup>6</sup>

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<sup>1</sup> Clough and Associates 2023, pg.,44.

<sup>2</sup> Appendix 2: Plan Change Zoning Map.

<sup>3</sup> Clough and Associates 2023, pg.,49

<sup>4</sup> Clough and Associates 2023, pg.,44.

<sup>5</sup> Clough and Associates 2023, pg.,44

<sup>6</sup> Clough and Associates 2023, pg.,45.

- 3.9 The assessment recommends that management of historic heritage values associated with the Riverhead Mill water race (R10/721) (Lot 1 DP 499822 (30 Cambridge Road) and the location of the 19th century Ellis house (R10/1537) (Lot 1 DP 164978 at 298 Riverhead Road), can be appropriately managed at any future development stage by requiring additional archaeological assessment.
- 3.10 Clough and Associates Ltd., conclude that any potential adverse effects resulting from future development enabled by the proposed Riverhead Structure Plan and Plan Change area can be appropriately managed and mitigated under the existing provisions of the AUP (i.e. Accidental Discovery Rule (E.12.6.1)) and the archaeological provisions of the HNZPTA.
- 3.11 Provision for the recommended additional archaeological assessment is provided in the proposed precinct provisions (Appendix 1, IX.9 Special information requirements), but only in relation to the Riverhead Mill water race (R10/721) and only for the property at 22 Duke Street (Lot 20 DP 499876 proposed Mixed Rural).<sup>7</sup>
- 3.12 To give effect to the recommendations made by Clough and Associates Ltd., amendment to the proposed Plan Change provisions are required to include further archaeological assessment for the Riverhead Mill water race (R10/721) within Lot 20 DP 499876 (22 Duke Street) and Lot 1 DP 499822 (30 Cambridge Road), and for the location of Ellis house (R10/1537) located on Lot 1 DP 164978 at 298 Riverhead Road. Amendment to this effect is provided in section 5.

#### 4 Submissions

- 4.1 No submissions were received in relation to historic heritage matters.

#### 5 Conclusions and recommendations

- 5.1 The Historic Heritage Assessment provides a full description of the heritage sites and values<sup>8</sup> within the plan change area.
- 5.2 Overall, I agree with the assessment's identification of potential impacts on historic heritage, and I can support the private plan change, subject to amendments.
- 5.3 Proposed amendments to IX.9 Special information requirements are provided below in underlined text to give effect to the recommendations outlined section 3.11.

##### IX.9 Special information requirements

##### (4) Archaeological assessment

An application for land modification on 22 Duke Street Lot 20 DP 499876, 30 Cambridge Road (Lot 1 DP 499822) and 298 Riverhead Road (Lot 1 DP 164978) must be accompanied by an archaeological assessment, including a survey. The purpose of this assessment is to evaluate the effects on archaeological values associated with the Waitemata Flour Mill/Riverhead Paper Mill site R10\_721 and location of the former Ellis house (R10/1537) prior to any land disturbance, and to confirm whether the development will require an Authority to Modify under the Heritage New Zealand Pouhere Taonga Act 2014.

<sup>7</sup> Plan Change- Riverhead Appendix 1, pg., 27.

<sup>8</sup> AUP - B5. Ngā rawa tuku iho me te āhua – Historic heritage and special character



5.4 Any further heritage effects associated to the proposed Plan Change can be appropriately managed through the existing provisions in the AUP and under the Heritage New Zealand Pouhere Taonga Act (2014).

**Memo (technical specialist report to contribute towards Council’s section 42A hearing report)**

23 August 2024

To: David Wren – Planning consultant for Auckland Council  
From: Megan Walker – Specialist Built Heritage – Heritage Policy, Heritage Unit, Planning and Governance Division

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**Subject: Proposed Private Plan Change – Riverhead – Historic Heritage (built) assessment**

## **1.0 Introduction**

1.1 I have undertaken a review of the private plan change on behalf of Auckland Council relating to effects on historic heritage. My review is focused on built heritage and includes addressing potential historic heritage interest. This advice does not address effects on archaeology, which is the subject of a separate review by Mica Plowman, nor does it address effects on mana whenua cultural values.

1.2 My current role is Specialist – Built Historic Heritage in the Heritage Policy Team. I have held this role since April 2015. Prior to this role, I was employed as an architectural graduate by conservation architects, DPA Architects, from February 2009 until March 2015.

1.3 I have a Bachelor of Architecture (Honours) from the University of Auckland. I have six years of experience in conservation architecture and have researched and prepared over 70 conservation plans and heritage assessments. I have more than nine years of experience in heritage policy planning, which includes skills and experience in plan development and modifications, inputting into structure and area plans and resource consents, undertaking heritage surveys, and evaluating heritage places.

1.4 In writing this memo, I have reviewed the following documents:

- Section 32 Report – Riverhead Private Plan Change
  - Appendix 1: Riverhead Plan Change
  - Appendix 2: Plan Change Zoning Map
  - Appendix 3: List of Properties within the Plan Change Area
  - Appendix 4: Riverhead Structure Plan
  - Appendix 5: Auckland Unitary Plan Objectives and Policies Assessment
  - Appendix 13: Archaeology Assessment
  - Appendix 18: Consultation Report
- Clause 23 Response
- Summary of Decisions Requested

## **2.0 Key built historic heritage issues**

2.1 The key issue in relation to built heritage is whether the application has assessed and considered if there is potential built heritage and how it would be affected by the proposal of the private plan change.

### **3.0 Applicant's Archaeological Assessment**

- 3.1 the applicant has provided a historic heritage assessment by Richard Sharkles and Rod Clough, of Clough and Associates Limited, (Appendix 13 - 2023).
- 3.2 Two places of interest have been adequately addressed in the Clough and Associates archaeological assessment. These are a bungalow at 306 Riverhead Road and the remains of a possible early cottage or farm building at 328 Riverhead Road.
- 3.3 However, I would dispute the age of the bungalow at 306 Riverhead Road,<sup>1</sup> it has clearly been modified compromising any physical value it may have possessed. Preliminary research has not revealed any significant historic heritage value.
- 3.4 A further bungalow at 340 Riverhead Road which appears on a 1940 aerial was not addressed. However, this building has also been modified with additions that compromise its physical value and again preliminary research has not revealed significant historic heritage values.

### **4.0 Submissions**

- 4.1 No submissions were received in relation to built heritage matters.

### **5.0 Conclusions and recommendations**

- 3.5 The Archaeological Assessment has generally provided adequate information of the early 20th century buildings. While the bungalow at 340 Riverhead Road has not been addressed, it has undergone compromising alterations detracting from its original form.
- 3.6 No further consideration is required.

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<sup>1</sup> This building is a 1920s/30s bungalow, not mid-century, and is present in a 1940 aerial.

**Specialist Memo (technical report to contribute towards Council’s section 42A hearing report)**

19 August 2024

To: David Wren, Consultant Lead Planner, David Wren Ltd, for Auckland Council  
From: Sarah Pinkerton, Contaminated Land Consultant for Contaminated Land, Contamination, Air & Noise, Specialist Input, Planning and Resource Consents

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**Subject: Private Plan Change – PPC100 Riverhead Plan Change, Riverhead Landowner Group: Contamination Assessment**

## 1.0 Introduction

I have undertaken a review of the request for the above Private Plan Change, on behalf of Auckland Council in relation to potential adverse effects on human health and the receiving environment, associated with the potential contamination within the subject site.

The area of the proposed Private Plan Change covers approximately 75.5 hectares of land in total, bounded by Coatesville-Riverhead Highway and Cambridge Road to the east, the Rangitopuni Stream to the north, and rural-zoned land to the west and south. It consists of 16 individual parcels of land, with legal addresses of 30 Cambridge Road, 1092 Coatesville–Riverhead Highway, 1140 Coatesville–Riverhead Highway, 1156 Coatesville–Riverhead Highway, 1158 Coatesville–Riverhead Highway, 1170 Coatesville–Riverhead Highway, 1186 Coatesville–Riverhead Highway, 1194 Coatesville–Riverhead Highway, 1200 Coatesville–Riverhead Highway, 22 Duke Street (only small southwest part of the property), 51 Lathrope Road, 306 Riverhead Road, 307 Riverhead Road, 325 Riverhead Road, 328 Riverhead Road, and 340 Riverhead Road.

The subject site is currently zoned in the Auckland Unitary Plan (Operative in Part) as ‘Future Urban Area’ and made up of predominantly horticultural with some agricultural (grazing) land use. Various residential and commercial (horticulture-related) buildings are present across the Private Plan Change area.

The Private Plan Change request seeks to re-zone the subject site to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions.

I hold a BSc degree in Geology from the University of Otago and a MSc degree in Environmental Science from the University of Auckland. I have worked as a

Contaminated Land consultant for SM Pinkerton Ltd since 2008, prior to 2008 I was the Contaminated Land Team Leader at Auckland Regional Council. I have extensive experience within contaminated land management, resource consenting, and consent compliance monitoring, relevant to contaminated land.

In writing this memo, I have reviewed the following documents lodged in support of the proposed Private Plan Change:

- *Riverhead Plan Change Request S32 Assessment Report: Prepared for Riverhead Landowner Group*, prepared by B&A Ltd, and dated 4 October 2023
- *Environmental Site Assessment: Preliminary and Detailed Site Investigation to Support Structure Plan and Plan Change at Coatesville – Riverhead Highway, Riverhead*, Rev D, prepared by Soil & Rock Consultants Ltd, and dated 26 September 2023
- *Preliminary Soil Contamination Assessment for 1092 Coatesville-Riverhead Road*, prepared by Geosciences Ltd, and dated 15 March 2021
- *Detailed Site Investigation, Pooks Blocks, Riverhead, Auckland*, prepared by Focus Environmental Services Ltd, and dated October 2018
- *Due Diligence investigation of 307 & 325 Riverhead Road, Riverhead*, prepared by Geosciences Ltd, and dated 7 December 2015

## **2.0 Key contamination issues (relevant to protection of human health and the environment)**

This Private Plan Change request is reported to be in line with the Riverhead Structure Plan, adopted by Auckland Council in December 2022.

I consider the following regulations, plan, and policy statements to be relevant to the assessment of the proposed Private Plan Change request, in the context of contamination of the land and the associated effects on human health and the environment:

- *Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations*, Ministry for the Environment, 2011 (NES:CS)
- Chapter E30 of the *Auckland Unitary Plan (Operative in Part) (AUP(OP))*, Objective E30.2(1) and Policies E30.3(1 and 2)
- *The Auckland Council Regional Policy Statement*, particularly Section 17, Objectives 17.3.1-3, and Policies 17.4.1.1-4
- *The National Policy Statement for Freshwater Management*, updated in 2020, particularly Part 2, Objectives 2.1(1)(a-c), and Policies 2.2(1-5 and 13)

The current assessment of the Private Plan Change request and supporting documentation is focused on identifying any major constraints, associated with the

contamination status of the subject site, which would present an impediment to the proposed re-zoning of the land. Any other than major constraints, associated with potential contamination of the subject site can be dealt with at a later stage, under the requirements of the relevant regulatory consenting process, associated with the future development.

Preliminary site investigations were undertaken at all parcels of land of subject to this Private Plan Change. Detailed site investigations were undertaken at most of the sites, except for 1092 Coatesville-Riverhead Highway and 1170 Coatesville- Riverhead Highway, where physical access to the property could not be obtained. The remaining detailed site investigations and any additional soil investigations recommended in the Environmental Site Assessment are proposed to be undertaken prior to obtaining relevant resource consents, required for carrying out land-disturbance works, the actual change of land use, and subdivisions.

The NES:CS regulations, AUP(OP), and policy statements listed above will be applicable once again during the consenting process, and at that stage the remaining investigation and remediation of the land, where required, will be carried out. The regulations of the NES:CS and Contaminated Land Rules of the AUP(OP) will be relevant to those pieces of land within the subject site, which have formerly been affected by any contaminating activities, and they will be considered in the consenting process.

Based on the reviewed Environmental Site Assessment (ESA) and individual Investigation Reports, the following potential contamination, associated with former and current potentially contaminating activities, described on the Ministry for the Environment's Hazardous Activities and Industries List (HAIL) have initially been identified as the potential constraints to the proposed Private Plan Change and relevant future development:

- Potential contamination of the shallow subsurface soil with selected metals and organochlorine pesticides (OCP), associated with historical application of selected persistent pesticides during the horticultural land use (HAIL A.10)
- Potential contamination of the shallow subsurface soil with hydrocarbons, associated with transport depots or yards including areas used for refuelling or the bulk storage of hazardous substances (HAIL F.8)
- Potential contamination of the shallow subsurface soil with fibrous asbestos, asbestos fines, and asbestos containing materials (ACM), associated with the demolition of historical demolition of building structures containing asbestos (HAIL E.1)
- Potential contamination of the shallow subsurface soil with lead, associated with the historical application and maintenance of lead-based paint on the cladding of building structures (HAIL I)
- Potential contamination of the shallow and deep ground with selected metals, petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAH), and OCP,

associated with a Landfill (HAIL G.3), Waste Disposal to land (HAIL G.5) and potential uncertified filling (HAIL I).

The following summaries the soil sampling results for each site:

- **30 Cambridge Road** – heavy metals at natural background levels, no detections of OCPs and TPHs.
- **340 Riverhead Road** – heavy metals exceed natural background levels, but not exceeding the relevant Soil Contaminant Standards (SCS) for protection of human health, set out in the NES:CS, Zinc exceeds the Permitted Activity (PA) soil acceptance criteria, set out in the AUP(OP), and trace levels of OCPs.
- **1140 Coatesville-Riverhead Highway** - exceedance of the NES:CS SCS for arsenic and lead, trace levels of OCPs and TPH. Asbestos exceeding the Fibrous Asbestos/Asbestos Fines (FA/AF) for Residential sites, New Zealand Guidelines for Assessing and Managing Asbestos in Soils (BRANZ Asbestos in Soil Guidelines).
- **1156 & 1158 Coatesville-Riverhead Highway** – exceedance of natural background levels, but not exceeding the relevant NES:CS SCS for protection of human health, trace levels of OCPs.
- **1186 Coatesville-Riverhead Highway** - exceedance of natural background levels, but not exceeding the relevant NES:CS SCS for protection of human health, trace levels of OCPs.
- **1194 Coatesville-Riverhead Highway** - exceedance of natural background levels, but not exceeding the relevant NES:CS SCS for protection of human health, zinc exceeds the AUP (OP) PA soil acceptance criteria, low concentrations of PAHs but below the appropriate MfE Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand trace levels of OCPs.
- **1200 Coatesville-Riverhead Highway** – exceedance of NES:CS SCS for arsenic and lead, low concentrations of TPH and PAHs but below the appropriate MfE Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand, trace levels of OCPs.
- **51 Lathrope Road** - zinc exceeds the AUP (OP) PA soil acceptance criteria, arsenic and copper exceed background levels but not exceeding the relevant NES:CS SCS for protection of human health.
- **22 Duke Street** – This site is a known Landfill site, however the two soil sample locations chosen (one at surface and one at depth) did not record any contamination above natural background levels or at the level of analytical detection for OCPs, samples were not analysed for TPHs, PAHs or asbestos.
- **306 & 328 Riverhead Road** – exceedance of NES:CS SCS for arsenic and lead, copper and lead exceeded the AUP (OP) PA soil acceptance criteria, asbestos detected, and trace concentrations of OCPs and PAHs.

- **307 & 325 Riverhead Road** - detectable concentrations of OCPs, heavy metals at natural background concentrations.

The soils at 1092 Coatesville-Riverhead Highway and 1170 Coatesville-Riverhead Highway have not been tested for the contaminants of concern identified in the preliminary site investigation.

Additional soil investigations will be required to be undertaken at 22 Duke Road (two areas within the proposed plan change) to delineate the extent of the landfill and characterise the contaminant within the landfill.

Based on the findings of the Environmental Site Assessment and Individual reports the following is recommended:

- Prior to any earthworks or redevelopment in the vicinity of the historical landfill area at 22 Duke Street property, further assessment is required to determine the area, volume and associated contaminants of the historical landfill during development planning of the property prior to Resource Consent and that contaminated fill material must be remediated prior to any future redevelopment of the site.
- Detailed site investigations to be undertaken on 1092 and 1170 Coatesville-Riverhead Highway, and further delineation soil sampling is recommended on some properties prior to future redevelopment.
- Prior to earthworks or site redevelopment, a site-specific Remediation Action Plan (RAP) /Site Management Plan (SMP) must be completed outlining remediation and control measures to be in place in order to ensure that site conditions are protective of human health and the environment.
- Soil / fill material with heavy metals concentrations above applicable human health and / or environmental discharge criteria (AUP(OP) PA soil acceptance criteria) should be remediated (excavated and disposed of off-site or otherwise isolated).
- Any fill material / soil with heavy metals concentrations above background levels and / or organic contaminants of concern (CoC) in the concentrations above analytical limits of detection is not considered 'Cleanfill' for disposal purposes and must be disposed of at a facility licensed to accept such materials.

The above recommendations have been incorporated into the overall recommendations relevant to the proposed Private Plan Change, in Section 6.0 of this Specialist Memo.

### **3.0 Applicant's assessment**

The Assessment Report acknowledges that the NES:CS and Contaminated Land Rules of the AUP(OP) set out an appropriate framework to manage the potential adverse



effects associated with the contamination hotspots identified during the Environmental Site Assessment undertaken on the site.

Resource consent requirements under the NES:CS and AUP(OP) will ensure that additional site investigations and Remediation Action Plans/Site Management Plans are prepared at the time of resource consent for subdivision or development to demonstrate how the works will be managed to ensure that any land disturbance and urban use of the land avoid and mitigate adverse effects on the environment and human health.

The Environmental Site Assessment concludes overall that the Private Plan Change area is suitable for future residential and commercial development, and there is no evidence to suggest that the presence of contamination would prevent the proposed rezoning of land as sought in the plan change. Overall, it is considered that there is a high level of confidence that the Private Plan Change area can be remediated and that the potential adverse effects of land contamination associated with land disturbance and the change of use of the site can be appropriately managed through the existing statutory framework with respect to the NES:CS Regulations and AUP(OP) for any discharges.

The Environmental Site Assessment report relies on the recommendation made for undertaking additional site investigations and implementing appropriate management or remediation of the soils on site, affected by elevated levels of contaminants prior to undertaking the intended development or subdivision.

I consider the recommendations for further site investigations of the properties within the subject site, soil management, and or relevant remediation (where necessary) during development of the sites as being satisfactory and relevant to the proposed Private Plan Change.

The above recommendation has been incorporated into the overall recommendations relevant to the proposed Private Plan Change, in Section 6.0 of this Memo.

#### **4.0 Assessment of the effects on human health and the environment, and management methods**

The purpose of my review was to obtain an understanding of the constraints affecting the proposed Private Plan Change and the relevant future development, associated with the potential contamination of soil and groundwater within the subject site.

My review included the assessment of the reports submitted in support of the Private Plan Change request and the compliance of the proposed Private Plan Change with the purpose of the NES:CS regulations, and the objectives and policies of the AUP(OP), Auckland Council Regional Policy Statement, and National Policy Statement for Freshwater Management, relevant to the contaminated land management.

I consider the information provided in support of the Private Plan Change request as being adequate for obtaining general understanding of the scale and significance of the adverse effects and positive effects on human health and the environment, anticipated from the implementation of the proposed Private Plan Change.

While no delineation of the landfill extent and contamination characteristics at 22 Duke Street was provided within the Environmental Site Assessment report, previous investigation findings were included in the same report, which confirmed the approximate location of a landfill containing construction and demolition debris and minor household waste located in the south-western part of 22 Duke Street. As the Private Plan Change only includes two small areas in the south-western part of 22 Duke Street, I consider the information provided suitable for the proposed Private Plan Change. However, further assessment is required prior to any future proposal for subdivision and development.

No Detailed Site Investigation has been undertaken within the properties at 1092 and 1170 Coatesville-Riverhead Road to date, however, a general overview of the current and former land use and associated contaminating activities was included within the relevant preliminary site investigations reports. Therefore, the extent of the areas affected by contamination, if any, will be able to be assessed at a later stage, prior to the development and subdivision process.

I consider the proposed Private Plan Change as being generally consistent with the purpose of the NES:CS regulations, and the objectives and relevant policies of the AUP(OP), Auckland Council Auckland Regional Policy Statement, and National Policy Statement for Freshwater Management, and anticipate the land subject to the Private Plan Change as being generally suitable for the intended future residential and commercial development.

## **5.0 Submissions**

I have reviewed all 254 submissions, and 9 further submissions, received with regards to the proposed Private Plan Change. The submitters were concerned about potential adverse effects on the environment and human health. One of the two submitters recommended that thorough testing and remediation of contaminated soil be conducted prior to redevelopment. This recommendation has been proposed within the Environmental Site Assessment report, with further soil investigations to be undertaken and soil remediated/managed during development works, in order to ensure the effects to human health and the environment are no more than minor.

## **6.0 Conclusions and recommendations**

I consider the documentation provided in support of the Private Plan Change request to be sufficiently adequate to identify the relevant potential effects of the implementation of the proposed Private Plan Change on human health and the environment.

While an information gap (i.e. detailed site investigation reports for the property at 1092 and 1170 Coatesville-Riverhead Road, as well as the delineation and characterisation of the landfill at 22 Duke Road) has been identified within the documentation submitted in support of the Private Plan Change request, it is considered not to hinder obtaining a sufficient understanding of the potential environmental effects anticipated from the implementation of the proposed Private Plan Change. Other relevant documents, such as the Assessment Report, Environmental Site Assessment report, and individual investigation reports provided adequate description of the potential contamination issues, and the relevant risks.

There appear to be no significant issues of concern with regards to contamination within the subject site, that would affect the Private Plan Change in principle. However, a number of potentially contaminating land-use activities and relevant soil contaminants of concern have been identified within the site. Recommendations have been made that site-specific detailed site investigations be carried out at 1092 and 1170 Coatesville-Riverhead Road, and delineation and characterisation of the landfill at 22 Duke Street is undertaken prior to the consenting process, in order to assess the actual contamination status of the properties within the subject sites and inform the relevant management or remediation requirements.

From the perspective of contamination and the associated potential effects on human health and the environment, the proposed Private Plan Change is considered to be consistent with the purpose of the NES:CS, and relevant objectives and policies of the Contaminated Land Rules of the AUP(OP), Auckland Council Regional Policy Statement, and National Policy Statement for Freshwater Management.

Two submitters submitted on the proposed Private Plan Change, they were concerned about potential adverse effects on the environment and human health. The recommendation proposed by one of the submitters to undertake thorough testing and remediation of contaminated soil prior to redevelopment, has also been recommended within the Environmental Site Assessment report, therefore, any potential adverse effects from contaminated soil/groundwater shall be appropriately managed/mitigated during development of the site and into the future to ensure the effects to human health and the environment are no more than minor.

**Overall, from the perspective of the current contamination status of the subject site and the potential effects on human health and the environment, I recommend that the proposed Private Plan Change be supported, subject to the following recommended actions to be taken prior to and during the proposed residential and commercial development:**

- Prior to any earthworks or redevelopment in the vicinity of the historical landfill area at 22 Duke Street property, further assessment is required to determine the area, volume and associated contaminants of the historical landfill during development planning of the property prior to Resource Consent, and that

contaminated fill material must be remediated prior to any future redevelopment of the site.

- Detailed site investigations to be undertaken on 1092 and 1170 Coatesville-Riverhead Highway and further delineation soil sampling is recommended on some properties prior to future redevelopment.
- Prior to earthworks or site redevelopment, a site-specific Remediation Action Plan (RAP) /Site Management Plan (SMP) must be completed outlining remediation and control measures to be in place in order to ensure that site conditions are protective of human health and the environment.
- Soil / fill material with heavy metals concentrations above applicable human health and / or environmental discharge criteria (AUP(OP) PA soil acceptance criteria) should be remediated (excavated and disposed of off-site or otherwise isolated).
- Any fill material / soil with heavy metals concentrations above background levels and / or organic contaminants of concern (CoC) concentrations above analytical detection is not considered 'Cleanfill' for disposal purposes and must be disposed of at a facility licensed to accept such materials.

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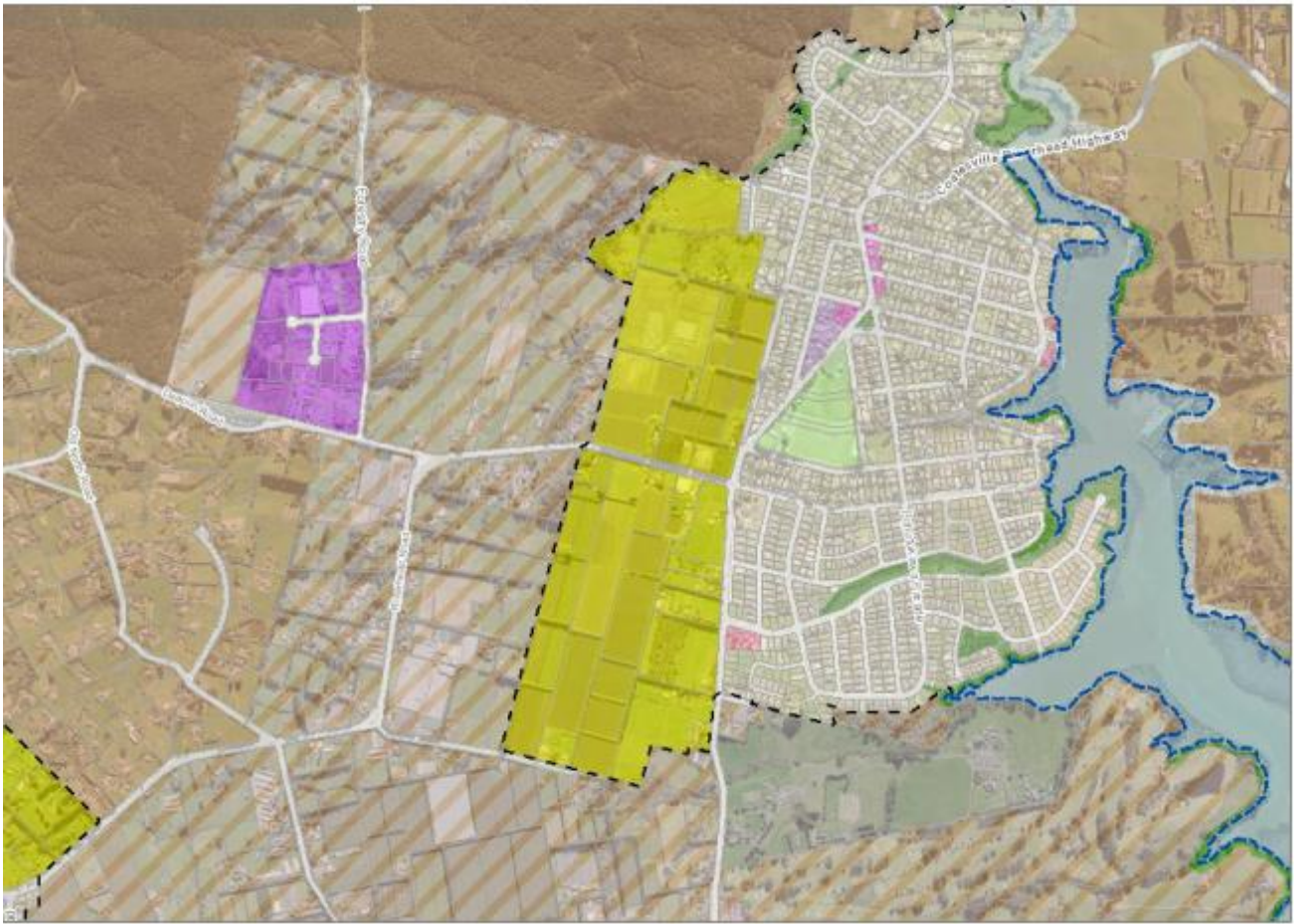
Reviewed by Andrew Kalbarczyk, Senior Specialist – Contaminated Land, Specialist Input, Policy & Resource Consents, 23 August 2024

## Memo - Development Engineering Assessment

Application:

Site address: Riverhead Road, Coatesville-Riverhead highway, Cambridge road and Duke Street, Riverhead

To	Planner <i>David wren</i>
From	Engineer <i>Lavannya Iliger</i>
Date	Thursday, 28 November 2024
Proposal	Private plan change request to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions. The request also seeks to shift the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.
Applicant's name	Riverhead Land Owner group
Reports & Information	<p>Reports and information considered as part of assessment.</p> <ul style="list-style-type: none"> <li>• <i>Stormwater Management and Flood risk assessment report by CKL</i></li> <li>• <i>Geotechnical assessment by Soil&amp;Rock consultants.</i></li> <li>• <i>Water and Wastewater servicing strategy by GHD</i></li> <li>• <i>Transport assessment report by Flow Transportation specialists</i></li> </ul> <p>Note: The above reports reviewed in brief only as they are covered by other Council appointed Specialists</p>
Asset Groups	<p>For the purpose of this memo, these include:</p> <ul style="list-style-type: none"> <li>• <i>Auckland Transport (AT)/ NZTA;</i></li> <li>• <i>Watercare Services Limited(WSL);</i></li> <li>• <i>Auckland Council Healthy Waters.</i></li> </ul>
Site Visit	nil



From Assessment report: **Figure 3: Locality plan – Plan Change Area**

**Engineering suitability for proposed use:**

<b>Transport</b>	
Access & Rooding infrastructure	<p>From all the information provided, upgrades to the surrounding local roads and highways are proposed to cater to the increased traffic as the part of plan change. The developer proposes to widen the roads, build footpaths and cycle lanes, new bus service upgrade the existing intersections and lowering the speed limits at the time of development. All the roading and accessway way works shall be carried out in accordance with the respective code of practices and then Auckland Transport will review the designs and provide their comments once resource consent is lodged (If the plan change goes ahead)</p> <p>It is noted that with the development there will be a significant increase in the traffic volumes and insufficient upgrading of the existing roads both local and highway would cause unpleasant traffic congestion and lead to roading grid lock. The overall proposed plan change will create significant adverse effects on the existing transport networks. the details to be reviewed.</p>
Traffic Effects	<p>The ITA report covers access and traffic issues. I have no issues with the report however approval in principle and Auckland Councils appointed Traffic Engineer and AT is required.</p>
<b>Earthworks</b>	
Erosion control & Management	<p>Earthworks assessment will be provided by other Specialists.</p>

Geotech, Soils & Ground Stability	<p>Geotechnical investigation, report by Soil &amp; Rock consultants</p> <p>The Soil &amp; Rock report concludes the development is suitable for development. I note it identifies a few issues. From the bore hole logs, the groundwater was encountered at 0.8m depth. Because of this reason any kind of soakage on site is not recommended. The site is mostly a horticulture site with alluvial soils and parts of the site have sensitive soils which means any kind of earthwork activities even as small as using the vibrating machine can cause settlements. A further Geotech investigation is required if at all this plan change proposal proceeds to resource consent stage. The Geotech report concludes that geotechnical modifications to the land are required.</p> <p>Further assessment will be required by Geotech specialist once more information becomes available.</p>
<b>Services</b>	<b>Summary of effects – what, where, how</b>
Stormwater and Flooding	<p>There is a complex network of overland flowpaths. The analysis and methods for protection of these will be covered by other specialists. It is anticipated there will be various forms of mitigation provided for the proposed roading (by way of (Regulatory) Engineering Approval); and the individual lots (likely by way of Consent notice) to be enacted at time of building consent. Any large infrastructure e.g. ponds or Wetlands created for Stormwater attenuation would be vested in Auckland Council or Auckland Transport. I note there is Flooding downstream as identified on GeoMaps. The applicant is proposing to keep this portion of the site as rural zone. There is no public reticulation available for the North , West and south of site, to the east of the site public reticulation is available. Verified through GIS maps.</p> <p>The hydrology issues to be covered by Healthy Waters.</p>
Wastewater	<p><i>The applicant proposes to provide the necessary pipe infrastructure to the pumpstations (Riverhead WWPS) they refer to pump stations Riverhead and Kumeu -Huapai.the Riverhead pump station currently has issues with household pumps tripping on high pressure. The developer proposes SMART pressure sewers to remedy this problem. The idea I sto seprte the Kumeu-Huapai catchment from riverhead so that the Riverhead pumpstation can cater to the development's service lines. Their assessment is based on Torino PS being diverted to Slaughter house. The current projection is 2025 according to developer whilst WSL states its 2050. WSL opposes the Plan Change 100 entirely.</i></p>
Water Supply	<p>The transmission main and the reservoir from Riverhead will need to be upgraded to cater to the development. WSL has assessed the capacity and concluded that the exiting bulk supply water meter at the Riverhead and Kumeu – Huapai areas can service 4500DUEs. Imn excess of this the developer will have to propose additional bulk meter. However, WSL opposes the plan change 100. If the plan change goes ahead then the general network as required for subdivision would be constructed under Engineering Approval and as accepted by WSL. Although nothing about the g=hydrants for fire fighting has been mentioned.</p>
<b>Power &amp; Telco</b>	<p><b>From their letter from Vector:</b></p> <p>Vector have stated that they currently don not have capacity in the surrounding High voltage network estimated to be 4-5MVA. To provide this development with points of supply new high voltage and low voltage lines to be installed. Other than this not much information is provided</p>

**Memo (technical specialist report to contribute towards Council's section 42A hearing report)**

22 August 2024

To: David Wren – Consultant Planner, on behalf of Auckland Council  
From: Alicia Wong – Senior Ecologist, Auckland Council

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**Subject: Private Plan Change – PC100 – Riverhead – Ecological Assessment**

## **1.0 Introduction**

1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to ecological effects.

1.1.1 I hold the qualifications of Bachelor of Science in Biological Sciences (Specialisation in Conservation Ecology and Biosecurity), Bachelor of Arts in Geography, Post Graduate Diploma in Environmental Science, and Master of Science in Environmental Science from The University of Auckland.

1.1.2 I have 7 years' experience working as an ecologist in private and local government sectors.

1.1.3 I am a professional member of the New Zealand Ecological Society, Environment Institute of Australia, and New Zealand.

1.2 In writing this memo, I have reviewed the application material in full. The following documents specifically address ecological matters:

- *'Riverhead Private Plan Change Request – Section 32 Assessment Report'*, by Barker & Associates Limited, dated 05 July 2022.
- *'Riverhead Plan Change Request – response to Clause 23 request for further information'*, by Barker & Associates Limited, dated 22 September 2022.
- *'Updated Appendix 1: Riverhead Plan Change Precinct'*
- *'Updated Riverhead Precinct - Structure Plan'*
- *'Riverhead Private Plan Change - Ecological Values Assessment'* by RMA Ecology Ltd, version 2, dated 15 September 2022.

1.3 I have not undertaken a site visit of the subject site, therefore, am relying on information provided by the applicant.

## **2.0 Key ecological Issues**

2.1 Stream classifications. Notably, watercourses classified as 'drains' yet there are natural portions from their confluence with a stream to their headwaters.

2.2 No protection, maintenance, and enhancement of wetlands is provided for in the current Precinct Plan. Notably, wetland areas (on either side of the National Grid Corridor) are zoned as Residential – medium density.



- 2.3 Absence of wetland extents on Riverhead Precinct - Structure Plan.
- 2.4 Absence of wetland extents and streams on Riverhead: Precinct Plan 2. Specifically, the already identified areas of wetland and streams.
- 2.5 Proposed Objectives IX.2.(7) specifically identifies wetland and stream habitats to protected, restored, and enhanced. Subsequent policies and standards should reflect the inclusion of wetlands identified across the subject site: Policy IX.3.(18), Standard IX.6.3.(1), Matters of discretion IX.8.1.(4), Special information requirements IX.9.(1).

### **3.0 Applicant's assessment**

- 3.1 The applicants s32 planning report and ecological impact assessment report discuss the potential effects on the site's ecological values.
- 3.2 Section 7.9 of the planning report summarises the ecological effects which are discussed in further detail in the ecological impact assessment report.
- 3.3 Section 3 of the ecological impact assessment report describes the ecological context of the site by each ecological component on site, aquatic ecology – streams, wetlands, and receiving environment and terrestrial ecology – vegetation and native fauna (herpetofauna, avifauna, and bats) and freshwater ecology – streams, freshwater fauna, wetlands, and receiving environment. Of note, site-based surveys were not undertaken for freshwater fauna, or lizards, birds or bats. Fauna results are based on records surrounding the PPC area on ecology related databases, opportunistic observations, and randomised small opportunistic searches.
- 3.4 Section 3.2 notes and identifies a network of watercourses located in the northern portion of the site. One intermittent stream, with moderate ecological values, has been identified and classified under the intermittent stream definition in the AUP:OP across the entire site. All other watercourses have been identified as 'constructed drains'. Of note, no watercourses were identified for the southern portion of the site.
- 3.5 Section 3.3 notes and identifies four natural inland wetlands located in the northern portion of the site. Wetlands 1 and 2 are largely comprised of exotic wetland species, described as '*fields of rafted Mercer grass*', '*thick, soft rush*', and '*comprises buttercup and water celery*'. Wetlands 3 and 4 are made up of native *Carex virgata* with a range of common weed and pest plant encroachment.
- 3.6 Section 3.5 notes enhancements to the ecology for the site to focus on improving connectivity between ecological systems through using the existing stream and wetland areas to manage, treat, and control stormwater on the site, which offers opportunities to restore streams and wetland areas.
- 3.7 Section 4 recommends ecological considerations through several key design drivers, expressed in the Structure Plan, by formalising "*the use of the stream and wetland areas to the north of the site as integral parts to the overall drainage structure for the site and in doing so will protect and restore these features*".

- 3.8 The applicant proposes “riparian margins of permanent or intermittent streams must be planted either side to a minimum width of 10m measured from the top of the bank of the stream” under IX.6.3(1) to contribute to improvements to water quality, habitat and biodiversity.
- 3.9 The applicant concludes that the proposal will have a “*positive and net-benefit for indigenous biodiversity values and ecological services, and spans waterways, wetlands, wildlife habitat and native revegetation*”.

#### 4.0 Assessment of ecological effects and management methods

##### Wetland

- 4.1 In response to further information, the applicant updated the ecology report to include the identified extent of Wetland 2. However, it is noted that it is “currently tentatively mapped as wetland may be assessed to be ‘not wetland’ if the proposed changes to the NPS-FM 2020 regarding pasture species are confirmed”. The NPS-FM pasture exclusion clause does not apply in situations such as changes in land use, e.g. for urban development or other land uses. “*The purpose of the NPS-FM pasture exclusion clause is to support the continuing use of pasture for grazing purposes. The exclusion is not targeted at pasture being converted for urban development or for other land uses*”<sup>1</sup>.
- 4.2 No survey wetland field results, in accordance with the wetland delineation protocol<sup>2</sup>, have been provided nor any indication of where survey plots were undertaken across a gradient/transect to determine wetland extents. Avifauna associated with wetland have been recorded by the ecologist on the site.
- 4.3 Whilst the wetland extents have been updated in the Ecology Report, no wetlands have been illustrated on Riverhead Precinct Structure Plan (Fig 1).



Fig 1: Riverhead Precinct Structure Plan

<sup>1</sup> Ministry for the Environment. 2022. *Pasture exclusion assessment methodology*. Wellington: Ministry for the Environment.

<sup>2</sup> Ministry for the Environment. 2022. *Wetland delineation protocols*. Wellington: Ministry for the Environment.

## **Stream**

- 4.4 One intermittent stream (Stream I1) has been identified across the entire site, with a pond upstream and connects to a 'constructed drain' at the downstream end. I raised this matter in my Clause 23 report, querying the justification that the 'constructed drains' are not intermittent or permanent streams. The 'constructed drains' appear to be highly modified natural streams that have historically been straightened and possibly deepened. Furthermore, the intermittent stream (Stream I1) is located upstream of the 'drain' system and an unnamed permanent stream is located downstream of the 'drain' system.
- 4.5 Under Chapter J of the AUP:OP, artificial watercourse is defined as "*constructed watercourses that contain no natural portions from their confluence with a river or stream to their headwaters*". In this instance, some of the drains downstream of Stream I1 have natural portions from their confluence with a stream to their headwaters.
- 4.6 No photos of the identified 'drains' have been provided to accompany the Ecology Report. I am unable to confirm that all streams have been accurately represented in the Ecology Report. There is the possibility that not all 'drains' identified are artificial watercourses.

## **Indigenous fauna (terrestrial and freshwater)**

- 4.7 The Ecology Report acknowledges the reliance of desktop databases and opportunistic observations during a site visit. Due to the location and known existing bat activity in Riverhead, a request for a bat survey (following best practice survey methods) was sought via Clause 23 to inform long-tailed bats. No further ecological surveys were undertaken and provided in the Clause 23 response to specifically inform potential adverse effects on bats. Therefore, the applicant has not adequately provided an understanding of the ecological fauna values across the site, specifically in providing a thorough assessment of potential adverse effects from the proposed change in land use. This is further amplified by the incomplete and/or inaccurate classification and identification of ecological features (wetland and streams) across site.
- 4.8 Objectives, Policies, and Standards cannot reflect ecological features and values if they are not identified, which is a key matter of consideration in Appendix 1, Section 1.4.2. Natural resources of the AUP:OP.

## **Precinct Plan**

- 4.9 Objective IX.2.(7) states "*Identified ecological values within wetland and stream habitats are protected, restored and enhanced*". Yet, Policy IX.3.(18) only includes the provisions for providing indigenous planting on the riparian margins of permanent and intermittent. No mention for any wetland values or habitat to be protected, restored and enhanced.
- 4.10 In response to further information, it is stated that "*there is no need for a policy referring specifically to wetland buffer planting (as none is to be imposed via a standard) as the underlying policies of Chapter E3 of the AUP OP*". However, I disagree with this as a minimum 10m width buffer should be applied around each natural wetland across the site

that is consistent with the direction and framework of Appendix 1, Section 1.4.2. of the Auckland Unitary Plan: Operative in Part (AUP:OP) and the National Policy Statement for Freshwater (NPS-FM).

- 4.11 The NPS-FM 2020, AUP:OP Chapter B7 and Appendix 1, and the National Environmental Standards for Freshwater (NES-F) contain strong directives requiring any more than minor adverse effects of changes in land use on freshwater, and on any ecosystem associated with freshwater to be avoided and that freshwater systems are maintained or enhanced. The NES-F urban development states that Council must *(b) satisfied itself that (i) there is no practicable alternative location for the activity within the area of the development; or (ii) every other practicable alternative location in the area of the development would have equal or greater adverse effects on natural inland wetland; and (c) applied the effects management hierarchy.*
- 4.12 The proposed Precinct Plan identifies the area compressing the large areas of wetland as Residential – Medium density. The proposal does not provide for the avoiding and safeguarding of these large areas of wetland (on either side of the National Grid Corridor), which is inconsistent with the NES-F.
- 4.13 There are no activity statuses, Standards, nor Matters of Discretion that relate and refer to Objective IX.2.(7) in relation to wetland protection, restoration and enhancement.
- 4.14 Assessment criteria IX.8.1.(4) states “for development that does not comply with Standard IX.6.3 Riparian Margins: (a) effects on water quality and stream habitat.” This unclear and ambiguous as it should also relate to wetlands.
- 4.15 A setback for riparian margin have not been provided in IX.6.5.(1). A 10 m minimum setback should be given to riparian margins.
- 4.16 Lastly, without the necessary assessment and robust surveys to fully understand the fauna that use and occupy the site, there is a potential that the Precinct Plan misses out on providing key outcomes for indigenous fauna, including development controls that may be necessary to protecting, maintaining, and/or enhancing indigenous biodiversity (e.g. lighting, restricting development at the northern most extent of the Plan Change area).

## **5.0 Submissions**

- 5.1 Submissions on the proposed plan change were reviewed and noted that most submissions relate to other matters of the proposed PC100. Submissions that are relevant to ecology include provisions to retain large trees, planting of large trees in front yards and new roads, redesign plans to a low to medium-density, protect ecology, provide for green infrastructure and green corridor for native birds. These are summarised in the table below.

<b>Submission Number</b>	<b>Sub point</b>	<b>Submitter's Name</b>	<b>Issues Raised</b>	<b>Relief Sought (From Submitter)</b>	<b>Technical Assessment</b>
112	112.2	Josette Barbara Haggren	J B Haggren approves the plan change with amendments to include provisions to retain large trees, specifically "for any new development to acknowledge and preserve the natural environment".	Provisions to retain large trees.	I support J B Haggren in that the Precinct Plan should include policies and standards that reflect the preservation of the natural environment which includes the areas of wetlands identified on the site as well as large trees that have potential to support long-tailed bats.
114	114.10 & 114.13	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Riverhead Community Association seeks clear requirements, objectives, policies, and standards for the green corridor and for it to be extended to the Rangitopuni tributary, provided as an esplanade reserve vested in Council to be maintained in perpetuity (as per IX.6.3. Riparian margin).	Clear and directive requirements in the Precinct Plan.	I support Riverhead Community Association for the inclusion of clear and directive requirements in the Precinct Plan to formalise the green corridor and riparian margins by including wetlands and buffers and reassessment of stream networks across the site.
169	169.6	Adrian Low	A Low approves the plan change with amendments made to provisions. A Low highlights the lack of features included in the Master Plan Design. In particular, A Low identifies the ecological assessment is insufficient and does not fully address potential impacts.	Recommends conducting comprehensive ecological surveys, updating stormwater management plans, and integrating green spaces into urban design. Lastly, to redesign plans to emphasize low to medium density development and protect ecological assets.	I agree with the concerns raised by A Low and support their recommendations. I agree that the ecological assessment undertaken is high-value and lacks robust ecological surveys undertaken across site (to understand streams, wetlands, and indigenous fauna). I have raised concerns that some definitions of 'drains' is a misinterpretation of 'streams' that are highly

					modified, the lack of policies and standards to protect, restore and enhance wetlands, as well as reliance of third-party non-site specific fauna records.
<b>174</b>	<b>174.11, 174.12, 174.15, &amp; 174.29</b>	<b>Claire Walker</b>	<p>C Walker raises concerns for the Mixed Housing Suburban Zone resulting in potentially the lack of large trees without requirements to undertaken planting for both yards and street trees.</p> <p>C Walker seeks clear requirements, objectives, polices, and standards for the green corridor and for it to be extended to the Rangitopuni tributary, provided as an esplanade reserve vested in Council to be maintained in perpetuity (as per IX.6.3. Riparian margin).</p>	Provisions be included requiring minimum tree quantity for new roads and yard sizes to accommodate large trees and a requirement for a large tree at each property.	<p>While the size of yards and minimum quantity are outside of my consideration, I see this as an opportunity to increase indigenous biodiversity across the proposed Plan Change area, therefore, I support the planting of ecologically suitable native tree species that provides food sources for indigenous fauna such as birds.</p> <p>I support C Walker for the inclusion of clear and directive requirements in the Precinct Plan to formalise the green corridor and riparian margins by including wetlands and buffers and reassessment of stream networks across the site.</p>
<b>248</b>	<b>248.5</b>	<b>Linda Barton-Redgrave</b>	L Barton-Redgrave raises concerns for the limited amount of planned green space and highlights Riverhead is part of the North-West Wildlink.	Decline the plan change. Of provide clear green corridor to be established for the many native birds in the area if the Plan Change proceeds.	I agree with the concerns raised by L Barton-Redgrave and support clear policies and standards for protecting, restoring, and enhancing indigenous biodiversity through the protection of the wetland and stream networks to the north of the Plan Change area.

## 6.0 Conclusions and recommendations

- 6.1 The private plan change is generally consistent with the direction and framework of the AUP:OP, requiring 10m riparian margins along streams in urban areas.
- 6.2 The private plan change is not, however, consistent with the direction and framework of the AUP:OP and NPS-FM for the protection of wetlands and providing buffers around wetlands. The four identified wetlands are not shown on the Riverhead Precinct Structure Plan, nor is the protection of wetlands provided for in the Policies and Standards of the Precinct Plan. Additionally, no buffers are proposed for the four identified wetlands. A 10m buffer for each of the for wetlands is recommended.
- 6.3 I am concerned with the stream assessment undertaken across the site. I disagree that all the watercourses identified as 'drains' do not meet intermittent or permanent stream definition under the AUP:OP. Further assessment should be undertaken to provide evidence required to conclusively understand the network of streams in the northern portion of the Plan Change area.
- 6.4 The one intermittent stream identified across the Plan Change area is not shown on the Precinct Plan. The private plan change appears inconsistent with National Policy Statement for Freshwater Management 2020 and National Environmental Standards for Freshwater Regulations 2023. I believe this is relevant as the two statutory considerations afford protection, maintenance, and preferable enhancement unless reclamation has no practicable alternative. The applicant has provided no evidence to support reclamation of some streams (referred to as 'drains') and wetlands in a green field development demonstrating *"there is a functional need for the reclamation of the river bed in that location"*, and/or, *"there is no practicable alternative location for the activity within the area of the development"* in the case of wetlands.
- 6.5 Whilst the protection of one intermittent streams is provided, the plan change does not fully give effect to the AUP:OP in relation to indigenous biodiversity (B7.2), due to the absence of standards that give effect to indigenous vegetation (wetland), retention, and enhancement.
- 6.6 I suggest more assessment be undertaken to provide conclusive evidence of the presence and absence of streams and wetlands. I suggest that all existing wetlands and streams be retained, clearly identified in the Precinct Plan, and specifically referred to in the Policies and Standards.
- 6.7 I suggest that following further assessment and classification of the wetland and stream networks, that the area it encompasses be redesigned and rezoned from Residential – medium density to a Green Corridor.
- 6.8 Following further assessments be undertaken to fully ascertain the existing ecological values on site, specifically in relation to stream classification, I am able to support the plan change with the proposed amendments to the PC100 are attached shown below and specifically identifying wetland areas on Riverhead Precinct - Structure Plan. Relief sought: ~~Strike through~~ is to be read as deletion; Underlining is to be read as an addition.
- 6.8.1 IX.2. Objectives  
(7) Existing identified ecological values within wetland and stream habitats are maintained, protected, restored, and enhanced.
- 6.8.2 IX.3. Policies  
(18) Contribute to improvements to water quality, indigenous fauna habitat and biodiversity, including by providing indigenous planting on the riparian margins and wetland buffers of permanent and intermittent streams, and natural inland wetlands.
- 6.8.3 IX.6.3. Riparian Margin and Wetland Buffers  
  
Purpose: To contribute to improvements to water quality, indigenous flora and fauna habitat and biodiversity.

- (1) Riparian margins of permanent or intermittent streams must be planted either side to a minimum width of 10m measured from the top of bank of the stream, and a minimum planted buffer width of 10m measured from the wetted edge of a natural wetland, provided that:
  - (a) This rule shall not apply to road crossings over streams;
  - (b) All pedestrian walkways and cycleways and recreational spaces must not locate within the 10m riparian and preferably within 10m of a wetland planting area buffer width; and
  - (c) The riparian margin and wetland buffer planting areas ~~is~~ are vested ~~to~~ in Council and/or protected and maintained in perpetuity by an appropriate legal mechanism.
- (2) A building, or parts of a building, must be setback at least 20m from the bank of a river or stream measuring 3m or more in width, consistent with the requirements of E38.7.3.2.

6.8.4 IX.8.1. Matters of discretion

- (4) For development that does not comply with Standard IX.6.3 Riparian Margin and Wetland Buffers:
  - (a) Effects on water quality, indigenous fauna habitat and biodiversity, and stream habitat.

6.8.5 IX.8.2. Assessment criteria

- (3) For development that does not comply with Standard IX.6.3. Riparian Planting Margin and Wetland Buffers:
  - (a) Whether the development is consistent with Policy IX.3.(18).

6.8.6 IX.9. Special information requirements

- (1) Riparian margin and wetland buffer planting plan

An application for land modification, development and subdivision which adjoins a permanent or intermittent stream and/or natural wetland must be accompanied by a planting plan identifying the location, species, planter bag, size, ~~and~~ density of the plants, and site preparation (including weed and pest animal control). Plant species ~~should~~ must be native and ecologically appropriate to the site, and must follow the planting standards of Te Haumanu Taiao.

Technical memo reviewed and approved for release by:



Rue Statham  
 Senior Ecologist  
 Ecological Advice Team | Infrastructure and Environmental Services  
 pp. Jane Andrews | Team Manager  
 22/08/2024



# Memo

9/09/2024

**To:** David Wren, Policy Planner, Auckland Council  
**From:** Nicole Li, Engineering, Assets and Technical Advisory (EATA), Auckland Council  
**Subject:** Private Plan Change - Coatesville Riverhead Highway, Riverhead  
**Status:** Issued for Information  
**Document ID:** AKLCGEO-1790012875-15616

Version: 0

## 1 Introduction

We have been requested by David Wren, Policy Planner, Auckland Council to review geotechnical aspects of a Proposed Private Plan Change requesting to rezone approximately 75.5ha of land in Riverhead from Future Urban to a mix of urban and rural zones. Six hectares (i.e. 22 Duke Street) in the northern portion of the proposed plan change area will be rezoned to Rural- Mixed Rural Zone due to the significant flooding constraints. The properties included in this proposed private plan change are presented in Table 1 below.

Address	Legal Description	Area (Ha) (Rounded to 1 DP)
22 Duke St	Lot 20 DP 499876	6.3
30 Cambridge Rd	Lot 1 DP 499822	4.9
307 Riverhead Rd	Lot 2 DP 109763	6.8
1092 CRH	Lot 2 DP 164590	4.2
Lot 1 DP 164590, CRH	Lot 1 DP 164590	5.8
325 Riverhead Rd	Lot 1 DP 109763	6.2
306 Riverhead Rd	Lot 1 DP 109763	1.0
Lot 2 DP 164978, Lathrope Rd	Lot 2 DP 164978	8.4
328 Riverhead Rd	Pt Lot 2 DP 37432	7.0
51 Lathrope Rd	Lot 1 DP 64605	4.0
340 Riverhead Rd	Pt Lot 2 DP 4818	6.0
Lot 2 DP 64605, Lathrope Rd	Lot 2 DP 64605	4.0
1140 CRH	Lot 1 DP 61985	2.4
1156 CRH	Lot 1 DP 77992	0.8
1158 CRH	Lot 2 DP 77992	0.8
1170 CRH	Lot 3 DP 63577	1.6
1186 CRH	Lot 2 DP 63577	4.3
1194 CRH	Lot 1 DP 113506	5.4
1200 CRH	Lot 1 DP 66488	0.4

**Figure 1: Properties that are included in this private plan change**

The following reports attached to the application were reviewed by us:

- Soil&Rock Consultants Ltd (S&RC) “PRELIMINARY GEOTECHNICAL INVESTIGATION TO SUPPORT PLAN CHANGE, Coatesville Riverhead Highway, Riverhead”, reference 21640, Version C and dated 19 September 2023.

## 2 Proposed Plan Change

### Existing Site

The Preliminary Geotechnical Investigation Report describes the subject area as follow:

*“The site is generally near-level, with moderate slopes in some locations (generally on the edge of erosional gully features such as the southern side of 1194 CRH [Coatesville Riverhead Highway] and the western side of 22 Duke St. Current land use generally comprises horticulture with some agriculture (grazing). Various residential and commercial (horticulture-related) buildings are present across the site. Large shelterbelts are present within the site.”*

### Proposed Development

The general layout of the proposed re-zoning is shown in Figure 2 below

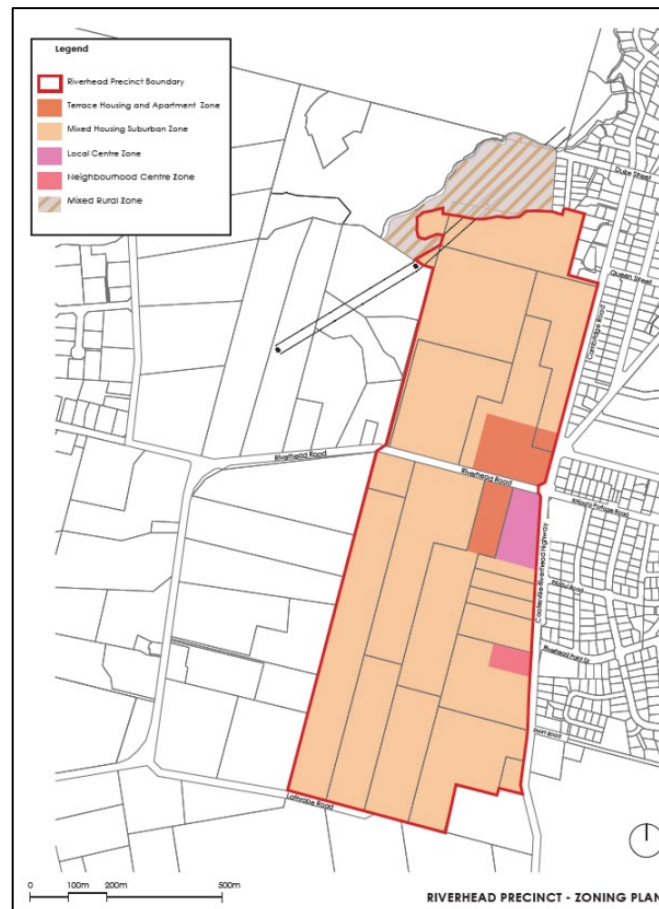


Figure 2: Proposed zoning

### 3 Assessment of Geotechnical Effects

#### Geology and Geotechnical Field Investigation

The site is underlain by alluvial deposits of the Puketoka Formation of the Tauranga Group, overlying East Coast Bays Formation of the Waitemata Group. It is understood that S&RC undertook 22 hand auger boreholes on site to a maximum depth of 3m as part of the preliminary geotechnical investigation, in conjunction with past investigations carried out by CMW Geosciences Ltd (CMW). CMW undertook 27 hand auger boreholes on site between 2015 and 2018, and the boreholes were drilled to a maximum depth of 5m below the ground surface.

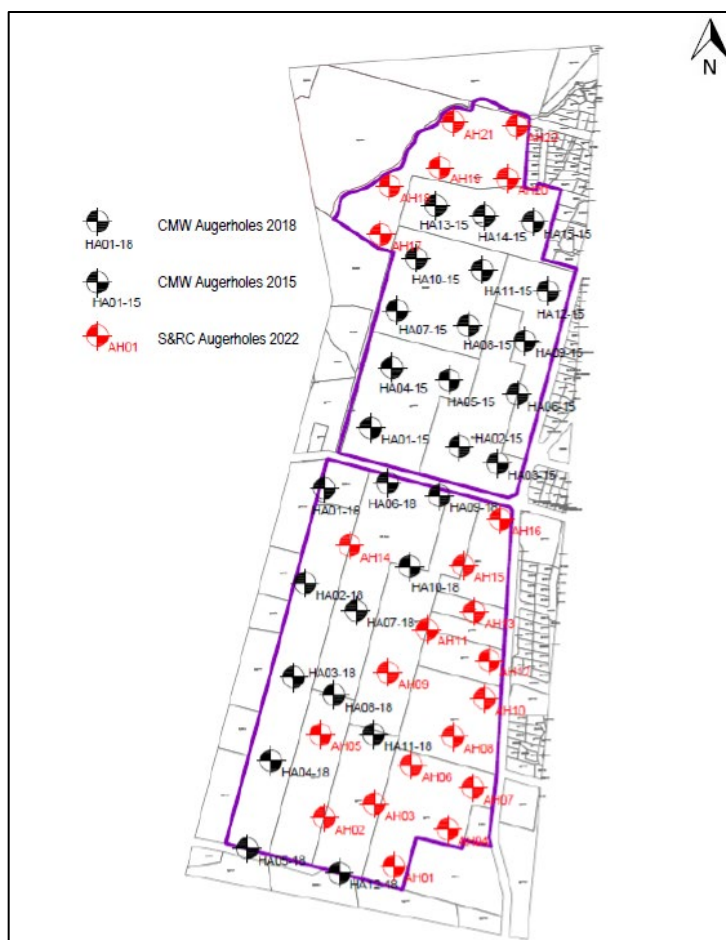


Figure 3: Site extent and locations of hand auger boreholes undertaken

#### Anticipated Geotechnical Constraints

The provided S&RC report indicates geohazards presented below should be considered for the development of the sites:

Groundwater – The geotechnical report indicates “*It is likely that civil works (drainage etc) and possibly bulk earthworks will encounter groundwater which will require special consideration at the time of construction. Detailed investigation of groundwater levels is recommended prior to development.*”

Sensitive Soils – The geotechnical report identified the soils generally range between ‘moderately sensitive’ and ‘extra sensitive’. It indicates that *“These soils are potentially susceptible to mechanical disturbance and/or exposure to the elements and soils that test well in-situ can perform poorly when construction is underway.”*

Expansivity – The geotechnical report considers the site consists of H (highly expansive) to E (extremely expansive) expansive soil. The report recommends *“Site specific testing should be undertaken following bulk earthworks.”*

Stability – The geotechnical report considers the risk of global slope instability is low due to the gently sloping and near-flat ground profiles on site. It states that *“The areas of moderately sloping land will require specific assessment for global land stability during detailed geotechnical investigations. We consider that prudent engineering and construction to good practice will mitigate the effects of global instability in these areas, and they do not propose an impediment to the proposed land rezoning.”*

The following geohazards are presented on site, but have not been discussed in the provided S&RC report:

Liquefaction - The site is located within a “liquefaction damage is undetermined” vulnerability category area as indicated by the current Auckland Council Geomap. Thus, the liquefaction vulnerability category for this site requires clarification in accordance with the MBIE categories detailed in the MBIE publication “Planning and engineering guidance for potentially liquefaction-prone land”. **Site specific deep investigation and quantitative liquefaction assessment will be required at future resource and building consent stages. Ground improvement or liquefaction resistant foundation designs may be required for the development.**

Lateral Spread - The lateral spreading is caused by liquefaction where a free face is present within the vicinity of the site. Given the undetermined liquefaction vulnerability category on site and the presence of water in the vicinity (approximately 800m to the east of the site), the risk and effect of lateral spread should be assessed and reviewed at the resource consent stage. Specifically designed ground improvement may be required.

Load Induced Settlement - This settlement hazard is typically associated with soft and/or organic soils which are likely presented within the low-lying areas of the gullies. Undercutting and removal of the unsuitable materials or preloading should be considered and assessed at the resource consent stage.

## 4 Recommendations and Conclusions

At the plan change stage, it is appropriate to comment on the suitability of the land for rezoning. We consider that the site is likely to be suitable from the geotechnical perspective to support the proposed private land change, provided that detailed geotechnical assessments, specific engineering designs of earthworks, associated remedial measures, structures, infrastructure and appropriate construction methodologies are submitted for proposed works once the scope is decided. We recommend that the resource consent stage is the most appropriate time to address the specific geotechnical issues on the site.

Inputs from the Council geotechnical specialists will be required at the future resource and building consent stages.

## 5 Quality assurance

*Reviewed and approved for release by*

Reviewer	Frank Zhou, Senior Geotechnical Specialist, EATA
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*This memo is satisfactorily completed to fulfil the objectives of the scope. I have reviewed, and quality checked all information included in this memo*

Author	Nicole Li, Principal Geotechnical Specialist, EATA
File location	<a href="https://aklcouncil.sharepoint.com/sites/EXT/ETS/Shared Documents/Memo template ETS.docx">https://aklcouncil.sharepoint.com/sites/EXT/ETS/Shared Documents/Memo template ETS.docx</a>
Date printed	9/09/2024 3:28 pm

# Memo

17 February 2025

To: David Wren  
cc: Peter Vari  
From: Ian Kloppers

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Subject: **PC100 – Riverhead Private Plan Change**

## Context

This private plan change aims to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions. The request also seeks to shift the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.

Auckland Council's Future Development Strategy (FDS) signals the Kumeu-Huapai and Riverhead areas to be development ready not before 2050+. Specific transport infrastructure requirements listed in the FDS are,

- Brigham to Waimauku SH16 Upgrade,
- SH16 Main Road Upgrade,
- Alternative State Highway Access Road upgrade
- Coatesville-Riverhead Highway upgrades
- Northwest Rapid Transit extension to Huapai

### 1. **Auckland Council's position regarding the certainty of transport infrastructure financing and funding**

Supporting Growth Alliance (SGA) Notices of Requirements (NOR's)

SGA, a partnership between Auckland Transport (AT) and Waka Kotahi NZ Transport Agency (NZTA) has lodged applications for a number of NOR's, referred to as the Northwest Local Network Projects.

The one NOR impacting PC100 is;

- NOR R1 – Upgrading the southern section of the Coatesville – Riverhead Highway corridor to a rural arterial with active mode facilities and upgrading the northern section of the corridor to an urban arterial with active mode facilities.

## Funding and financing

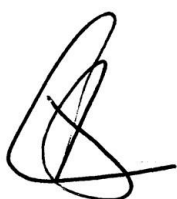
There is currently no allocated funding for the SGA NOR R1 related to the private plan change area. In addition, Auckland Council are not collecting any development contributions against this project as it is not listed in the current LTP and sits outside of the Inner Northwest 30 -Year DC Policy which went out for public consultation at the end of September 2024.

The Infrastructure Funding & Development Strategy (IF&DS) team have had oversight of the negotiations between Auckland Transport (AT) and the applicants since early 2024 to ensure there is no potential impact on Councils funding and financing situation.

While AT and the applicants have reached agreement on the extent of the transport upgrades to be included in an Agreement, some minor contractual stipulations have not yet been agreed on.

As indicated earlier the Infrastructure Agreement has not been fully settled and signed by all parties, however the fact the transport infrastructure requirements have been verbally agreed creates tangible level of certainty from a funding and financing point of view.

The above is the view of the Infrastructure Funding & Development Strategy team, applying a funding and finance lens only. This memo should not be read as a transport technical expert opinion.



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**Ian Kloppers**  
**Head of Infrastructure Funding & Development Strategy**

To: David Wren | Council's Consultant Processing Planner  
From: Douglas Sadlier  
Senior Planner – Parks Planning – Parks and Community Facilities

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Subject: **PARKS PLANNING – PARKS AND COMMUNITY FACILITIES ASSESSMENT FOR PLAN CHANGE 100 (PRIVATE) RIVERHEAD**

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**1.0 Introduction**

- 1.1 My name is Douglas Regenalld Keith Sadlier. I hold the qualifications of Master of Urban Design (hons); Bachelor of Planning; Bachelor of Arts; and a Post-Graduate Diploma in Business (Quality Management) obtained from the University of Auckland and a Business Diploma in Management from the New Zealand Institute of Management. I am a full member of the New Zealand Planning Institute.
- 1.2 I have over twenty-five years' professional planning experience, including fifteen years in public specialist regulatory planning and district / spatial planning roles and ten years private planning consultancy. My most recent role was as director and principal planner at No.8 Plan Limited, a resource management practice.
- 1.3 My involvement in this application has been to assess and report on the plan change application from an open space perspective, on behalf of Parks Planning: Parks and Community Facilities Department, Auckland Council.
- 1.4 I commenced my role on this application in May 2024 and therefore did not have an opportunity to raise queries through the Schedule 1, Part 2 (23) – requests for further information changes to policy statements and plans of local authorities or Section 32 – requirements for preparing and publishing evaluation reports of the Resource Management Act 1991 (RMA) information request process.
- 1.5 The information reviewed includes the private plan change application, and supporting documents, in particular:
- Public Notice as notified 18 April 2024
  - Section 32 Assessment Report – Riverhead Private Plan Change Request 4 October 2023
  - Appendix 1 - Riverhead Plan Change (PC100) as notified 18 April 2024
  - Appendix 2 - Plan Change Zoning Map as notified 18 April 2024
  - Appendix 3 – List of properties within the Plan Change area as notified 18 April 2024
  - Appendix 4 - Riverhead Structure Plan October 2023
  - Appendix 5 - Auckland Unitary Plan (Operative in Part) Objectives and Policies Assessment December 2022
  - Appendix 6 - Urban Design Statement 25 September 2023 (denoted as Neighbourhood Design Statement)
  - Appendix 7 - Retail Assessment September 2023
  - Appendix 8 - Integrated Transport Assessment October 2023
  - Appendix 9 - Ecology Values Assessment 23 September 2023
  - Appendix 10 - Stormwater Management and Flood Risk Assessment 29 September 2023



- Appendix 11 – RPC / Riverhead Landowner Group - Water and Wastewater Servicing Memorandum 03 28 September 2023
- Appendix 11A – Riverhead Future Urban Zone - Water and Wastewater Servicing Strategy Development 28 June 2022
- Appendix 11B – Riverhead – Response to Clause 23 – Wastewater Memorandum 01 13 September 2022
- Appendix 11C - RPC / Riverhead Landowner Group - Water and Wastewater Servicing Memorandum 02 1 December 2022
- Appendix 12 – Correspondence with Chorus and Vector 5 April 2022
- Appendix 13 – Archaeological Assessment September 2023
- Appendix 14 – Contaminated Land Assessment 26 September 2023
- Appendix 15 – Geotechnical Report 19 September 2023
- Appendix 16 - Landscape and Natural Character Effects Assessment 3 October 2023
- Appendix 17 - Arboricultural Assessment September 2023
- Appendix 18 – Riverhead Structure Plan and Plan Change Consultation Summary Report 5 December 2022
- Summary of Submissions as notified July 2024

1.6 Relevant submitted plan change application documents and Council Parks Policies, were also reviewed by other Council specialists, whose feedback was incorporated into this s42 memorandum, including:

- Ezra Barwell – Senior Policy Advisor – Policy Planning and Governance
- Rahman Bashir – Principal Property Provision Specialist – Parks and Community Facilities
- Matt Woodside – Parks and Places Specialist - Parks and Community Facilities
- Benedict Free – Senior Specialist Advisor (Arboriculture) - Parks and Community Facilities

1.7 Auckland Council documents referred to include:

- Auckland Unitary Plan (Operative in Part) (AUP(OP))
- Parks and Open Space Acquisition Policy 2013
- Parks and Open Space Acquisition Action Plan 2013
- Open Space Provision Policy 2016
- Auckland Plan 2050
- Tamaki – Whenua Tauri Kura: Auckland Future Development Strategy 2023 - 2053

1.8 I undertook a site visit on 13 May 2024.

## **2.0 AUP(OP) Zoning Matters**

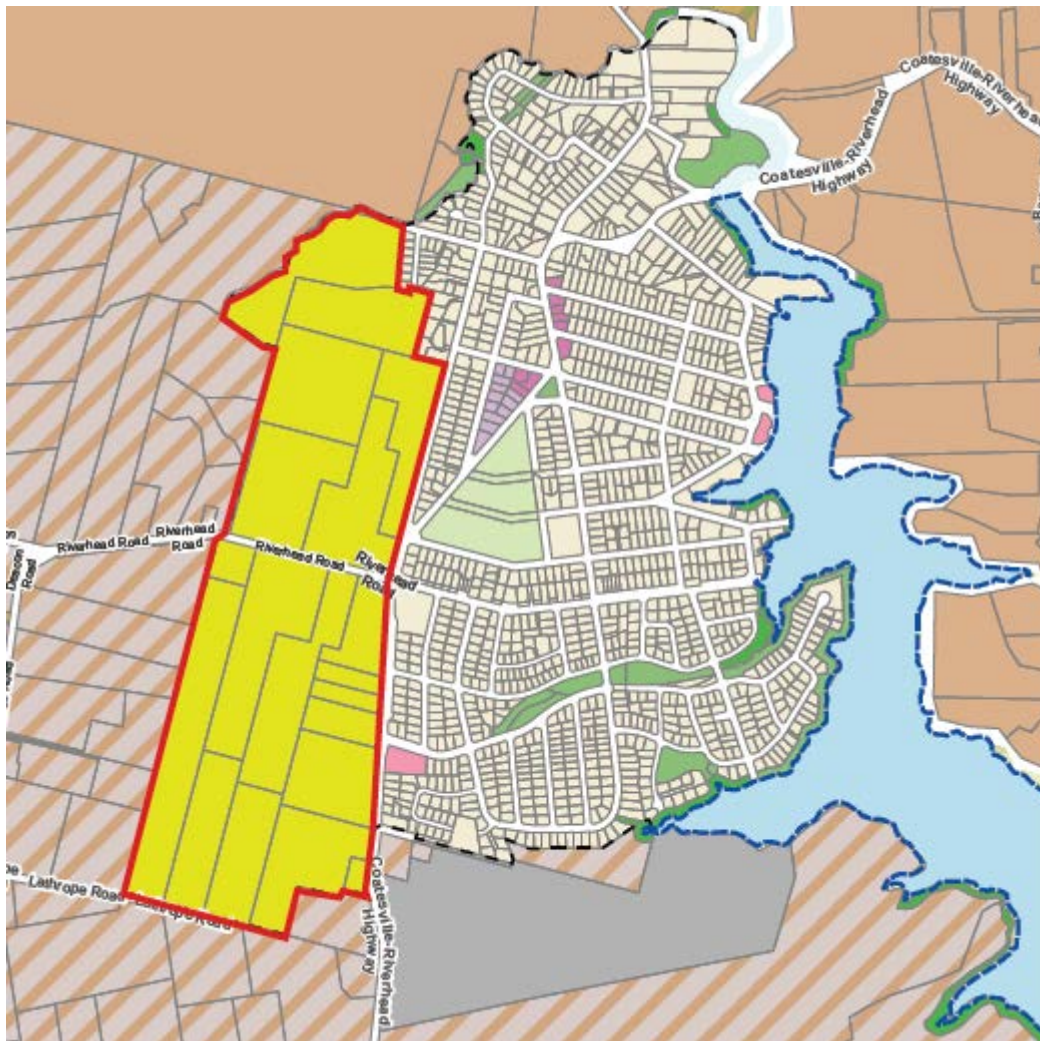
2.1 The PC100 Riverhead plan change proposes changes to approximately 75.5 hectares of existing Future Urban Zoned land (FUZ).

2.2 Existing land to the immediate north is zoned Rural (brown shade). Land to the west and south is zoned Mixed Rural (brown with diagonal brown lines). Land to the east is predominantly Residential – Single House Zone (cream AUP(OP) shading) with pockets of land identified as Open Space Zone (green AUP(OP)) shading. The large grey Special Purpose Zoned Area is a site of religious significance to the Hare Krishna faith housing a school, temple, residential dwellings, gardens and other purpose buildings.

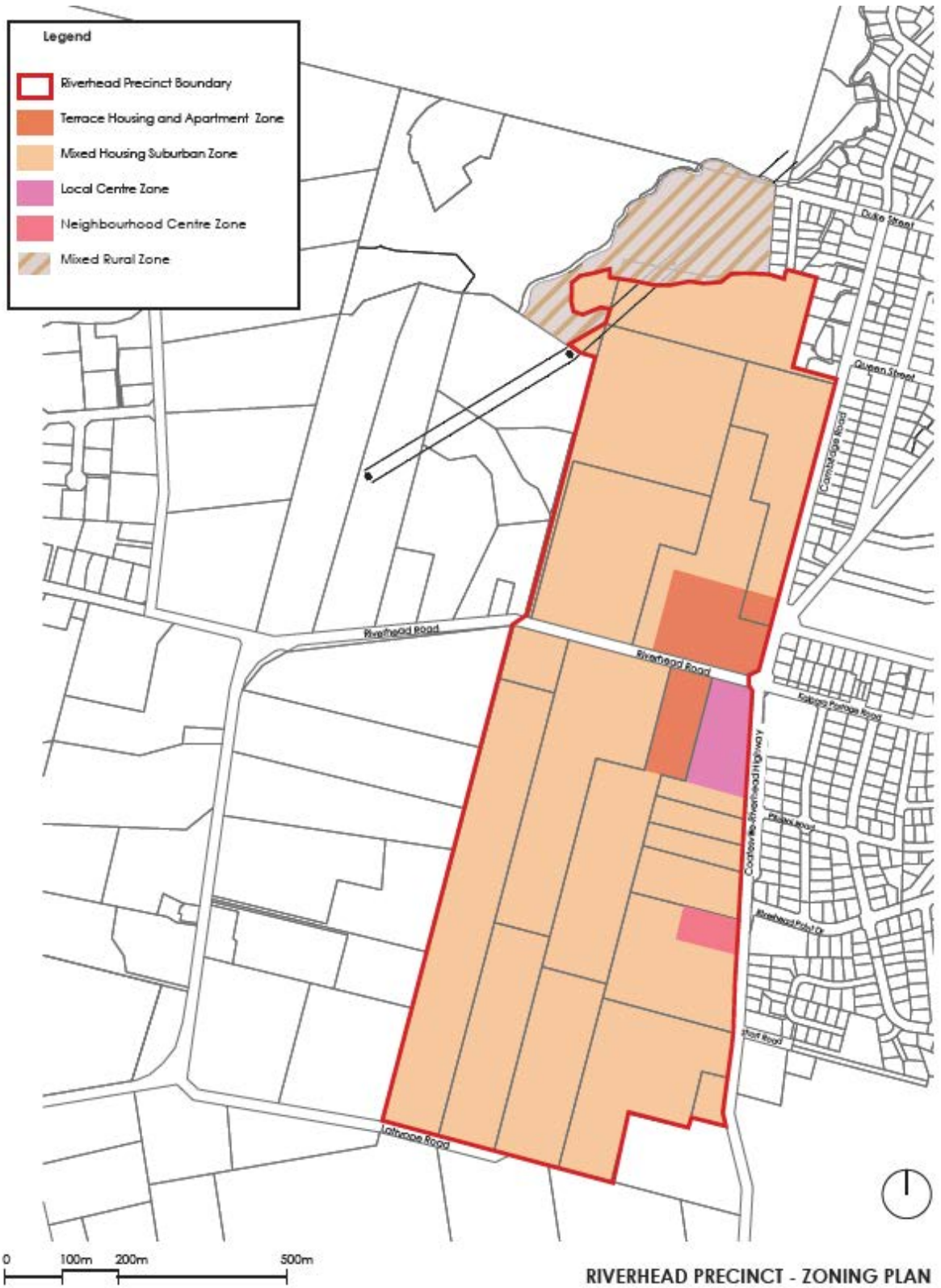
2.3 The key open space ‘heart’ of Riverhead is the triangle portion of green land, the Riverhead Memorial Park to the immediate east of the northern PC100 area. It contains sports fields, a tennis court, a skateboard facility, a playground, a rugby club, walking tracks, mature trees, picnic and seating assets, and multi-nodal connections to other parts of Riverhead.

- 2.4 A fragmented series of esplanade reserves and esplanade strips are located along the shoreline of the Riverhead and Coatesville foreshore. In summary, a series of publicly accessible open spaces are established within the surrounding coastal environment, however the network is not contiguous.
- 2.5 **Figure 1** below identifies the existing FUZ area in yellow shading as denoted in the AUP(OP) zoning map and the other existing zoning areas as noted in 2.2, 2.3, and 2.4 above.

**Figure 2** below illustrates the proposed zoning changes from FUZ that include: a Mixed Rural zone to the north (brown with diagonal brown lines); a predominance of land to Residential - Mixed Housing Suburban zone; two small pockets of Residential - Terraced Housing and Apartment Building zone; and two separate small pockets of Business - Neighbourhood Centre zone and Business - Neighbourhood Local Centre zone.



**Figure 1** – 83.5 hectares (approximately) of Plan Change Area (red outline of yellow Future Urban zoned area) and surrounding existing zones (Source: AUP(OP) Planning Maps & PC100 Urban Design Statement, Page 11)



**Figure 2** – 75.5 hectares (approximately) – Riverhead Precinct Zoning Plan (Source: PC100 - Appendix 2)

### Note

*Land to the north of the existing Future Urban Zone (FUZ) (approximately 8.5ha, being the exclusion of part of 22 Duke Street and part of 30 Cambridge Road totalling (8.5858ha)) has been removed by way of Environment Court Decision NZENV049 dated 20 March 2024 and is no longer part of the Future Urban zone (FUZ) area and is proposed to revert to a Mixed Rural zone as illustrated in **Figure 2** above – Riverhead Precinct Zoning Plan.*

### **3.0 Site Description**

- 3.1 As noted in 1.8 above I undertook a site visit on 13 May 2024.
- 3.2 Overall, I concur with the site and context description outlined in PC100 and visually illustrated in the submitted Ecology Values Assessment, prepared by RMA Ecology and the Urban Design Statement prepared by Urban Acumen.
- 3.3 The plan change area is relatively flat, contains large individual rural blocks with shelter belts, some farm buildings and multiple dwellings.
- 3.4 As noted in the submitted Ecological Values Assessment, Job 2052, prepared by RMA Ecology, dated 23 September 2023 (PC100 Appendix 9), key features of the site also include(s):
- An intermittent stream on the site that receives flow from the northern-central part of the site and directs it to the northern low-lying floodplain/ wetland area.
  - The north-west and northern boundaries of the site are framed by an unnamed tributary of the Rangitopuni Stream, a well-established permanent stream with extensive riparian margin wooded cover, most of which includes native scrub or forest species. This stream is the ultimate receiving environment from land associated with most of the PC100 site.
  - Four wetlands that meet the definition of ‘natural inland wetland’ in the National Policy Statement for Freshwater 2020 were identified on the site.
  - Overall, the ecology values for wetlands, watercourses and wildlife reflect a highly modified landform that has lost most of its original indigenous values. Although most native components are absent, and key ecological features such as streams and wetlands are highly degraded, there is substantial opportunity to improve on this and return biodiversity and ecological function to the site.
- 3.5 It is adjacent to established low density residential development to the immediate east, with a rural interface north, west and south.
- 3.6 Key arterial and collector roads are in close proximity.
- 3.7 **Figure 3** below illustrates an aerial pictorial view of the plan change land in question.





**Figure 3** – Plan Change Area - Google Map (Source: Urban Design Statement, Page 11)

Note

*The portion of land to the immediate north (approximately 8.5 ha) is no longer part of the PC100 area having been removed by way of Environment Court Decision NZENV049 dated 20 March 2024*

#### **4.0 Parks / Sport / Recreation - Open Space Matters**

- 4.1 The purpose of this parks planning memorandum is to assess proposed private plan change 100 Riverhead (PC100) with respect to public open space matters (parks, sports and recreation) including open space provision, pedestrian and greenway connections, proposed zoning, objectives, policies and standards.
- 4.2 Public submissions to PC100 have also been received with relevant open space themes identified, reviewed, and noted in this park planning memorandum as appropriate to the brief.
- 4.3 From an open space perspective, proposed PC100 anticipates an open space network incorporating a multi-purpose green corridor, three indicative park locations, and potential connections to stream and wetland regeneration areas.
- 4.4 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 section 229 and section 230 requires the provision of esplanade reserves (if triggered by location of mean highwater springs or 3m wide streams at their banks) for the purposes of protecting conservation values and enabling public access and recreational use to or along any sea, river, or lake. The

intermittent stream on the site may trigger the requirement of esplanade reserves as part of a future subdivision process. Further investigation including specialist surveyor input would be required to confirm the requirement for esplanade reserves.

- The National Policy Statement for Freshwater Management (NPSFM) which, at Policies 6 and 7 require that there be 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. Any of the four natural wetlands in the area could be in close proximity to an intermittent stream that may also trigger the requirement of esplanade reserves as part of a future subdivision process. If part of an esplanade reserve (or for that matter a drainage reserve), the potential upgrade of the four natural inland wetlands to improve and return biodiversity and ecological function would become a vested Council asset likely to be managed by Healthy Waters with input from Parks in its set up.
- The National Policy Statement Urban Development (NPSUD) 2020 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. This policy statement requires at 3.5 that Local Authorities must be satisfied that the additional infrastructure (including public open space) to service the proposed development capacity will be available.
- The Auckland Regional Policy Statement, which at B2.7.1 and B2.7.2 requires that recreational needs of people and communities be met through the provision of a range of quality, connected, accessible open spaces and recreation facilities.
- The AUP(OP) 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 Objective H7.2(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 E38.2.1 Land is subdivided to achieve the objectives of the residential zones, business zones, **open space** zones, special purpose zones, coastal zones, relevant overlays and Auckland-wide provisions; Objective E38.2.2 Land is subdivided in a manner that provides for the long-term needs of the community and minimises adverse effects of future development on the environment; and Objective E38.2.3 Land is vested to provide for **esplanades reserves**, roads, stormwater, infrastructure and other purposes.
  - Subdivision Urban - Policy E38.3(18) which requires that subdivision provides for the recreation and amenity needs of residents by: providing for open spaces that are prominent and accessible by pedestrians; that provide for the number and size of open spaces in proportion to the future density of the neighbourhood; and provides for pedestrian and/or cycle linkages.

4.5 The policy framework for Parks, Sport and Recreation assessment is set out within the below policy mechanisms:

- The Parks and Open Space Acquisition Policy 2013.
- The Parks and Open Space Strategic Action Plan 2013.
- The Open Space Strategic Asset Management Plan 2015-2025.
- The Open Space Provision Policy 2016.
- Auckland Plan 2050

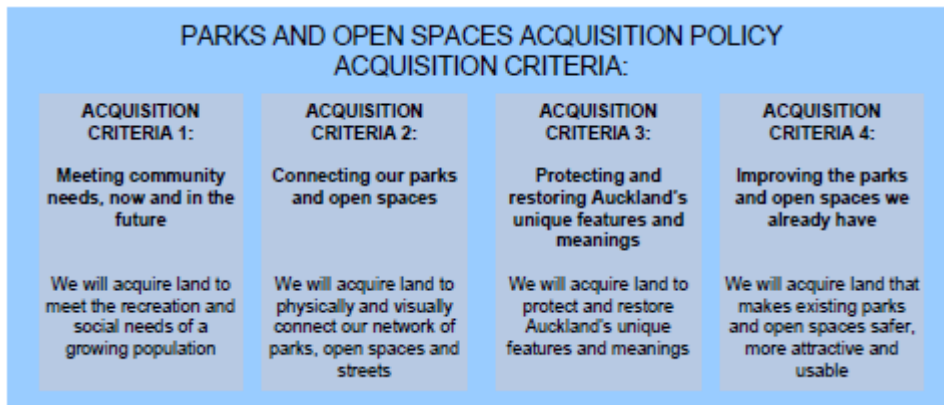
- Auckland Plan 2050 Tamaki – Whenua Taurikura Auckland Future Development Strategy 2023-2053

The Parks and Open Space Acquisition Policy 2013 (POSAP)

- Due to the wide spectrum of parks and open space that Auckland Council acquires, this policy aims to set the overarching framework for acquiring new land for parks and open space while recognising the need for detailed planning to identify opportunities to acquire land that meet local community and regional needs.
- Parks and open space, including streets and greenways, provide opportunities to move around the neighbourhood and must be designed to be routes that are attractive and safe for walking, cycling, wheelchairs, scooters, well-connected and accessible to key destinations to assist with reducing dependency on travel by private vehicle. The proposed multi-purpose green corridor as part of the proposed internal pedestrian, stormwater, landscaped spinal network of PC100 is an example of working to align with this policy.
- A connected network of parks and open space delivers ecological benefits. Acquiring land that connects existing patches of habitat or ecosystems that allow for the movement and natural life cycles of species, helping to protect Auckland’s natural heritage.
- Having the ability to connect to recognised cultural and historical heritage areas is also important for a culturally rich and creative Riverhead. For example, Maori identity through historic portage routes and viewing points has been recognised in the PC100 documentation, and is a point of difference that needs to be inclusive and celebrated. In the Auckland Plan 2050, the Maori identity and Wellbeing outcome, compliments this point of view.
- The suitability of PC100 specific sites for the three proposed neighbourhood parks for open space purposes will be assessed in detail with four main areas of focus – connect, enjoy, treasure, and utilise.
- A core value of parks and open space is to provide opportunities for rest and relaxation. Parks provide pleasant areas to escape the hustle and bustle of city life. They also provide “green” visual relief in urban areas. The environment surrounding a site will influence the amenity of a park and what type uses it is suitable for. A pleasant outlook can contribute to the quality of a park. Pedestrian connections encompassing ecological attributes for the three indicative park spaces have been proposed with this in mind.

The Parks and Open Space Strategic Action Plan 2013 (POSAP)

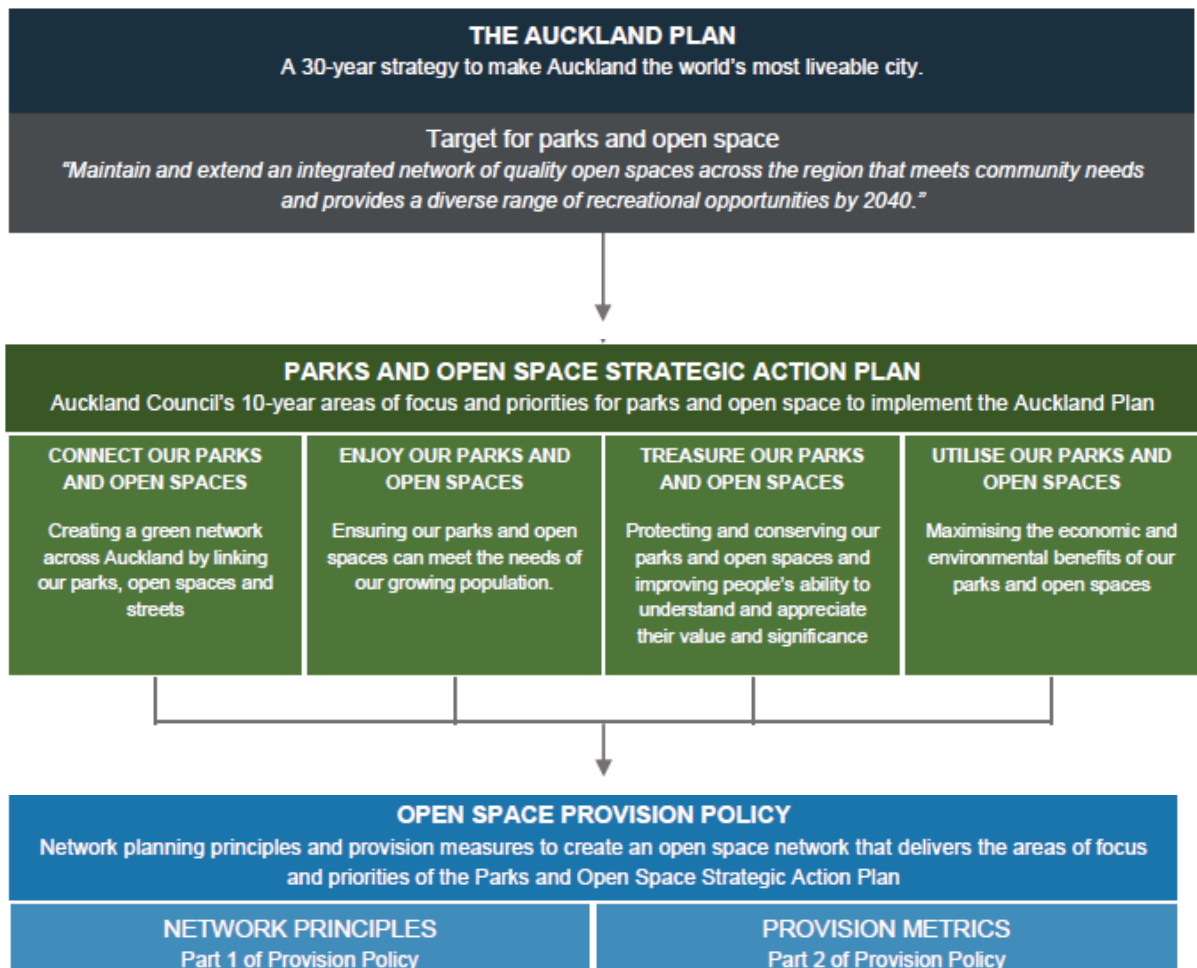




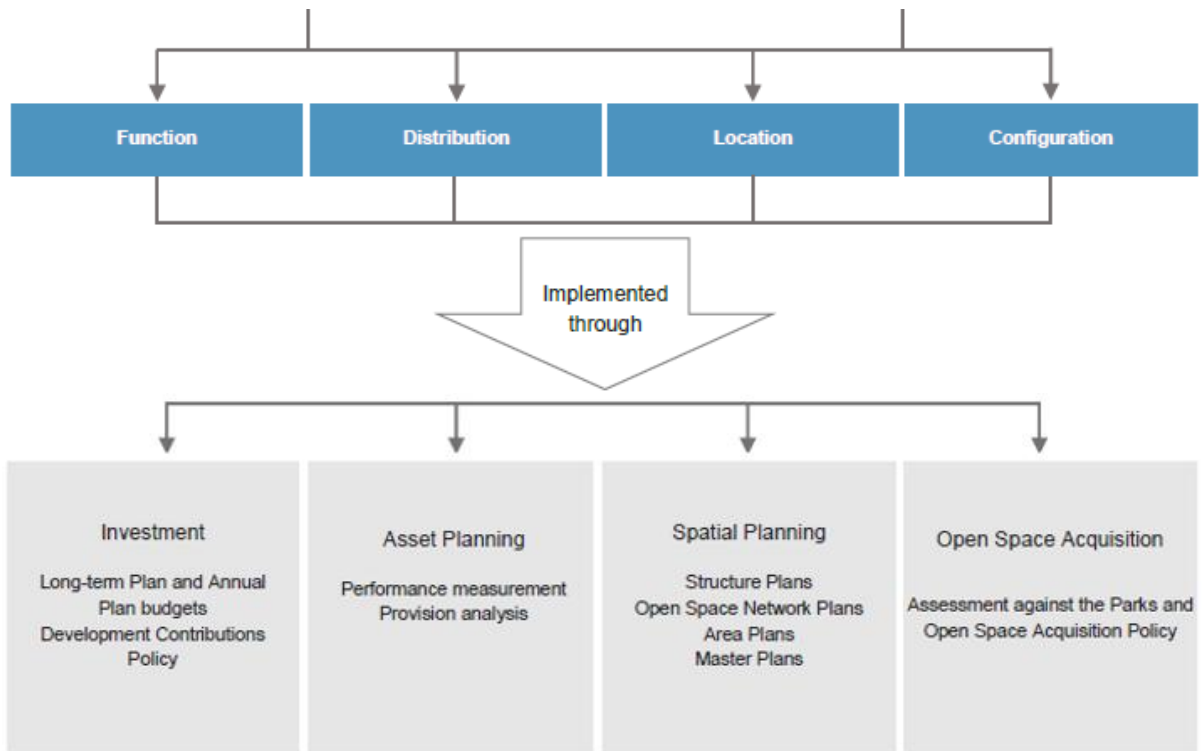
**Figure 4:** Parks & Open Spaces Core Functions / Acquisition (Source: POSAP, page 15)

The Open Space Provision Policy 2016 (OSPP)

- Four network principles – Treasure / Enjoy / Connect / Utilise our parks and open spaces.
- Apply provision metrics and targets, informing the council's investment, asset and acquisition activities in open space and guiding spatial planning such as plan changes.
- Fund open space.
- Open space makes a major contribution towards Aucklanders' quality of life and is integral to achieving the vision and strategy of The Auckland Plan in accord with the Open Space Strategic Action Plan 2013 (OSSAP), in particular:

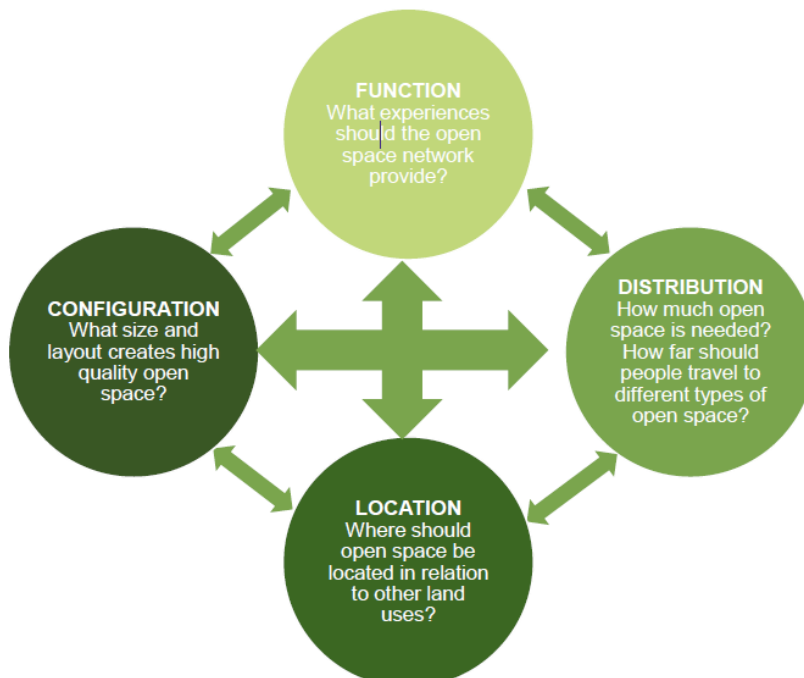






**Figure 5:** Key principles of the OSSAP (Source: Open Space Provision Policy 2016, page 7)

- Quality open space is a critical component of attractive and liveable urban areas.
- Provision of open space at a network scale (across multiple open spaces rather than an individual site) is considered on the basis of four inter-related factors:



**Figure 6:** Factors that influence open space design (Source: OSPP, page 5)

### Auckland Plan 2050

A long-term streamlined spatial plan for Auckland looks ahead to 2050.

It considers how we will address our key challenges of high population growth, shared prosperity, and environmental degradation.

The Auckland Plan 2050 is a digital plan. This allows you to choose your own journey through the plan based on your area of interest.

Auckland Plan 2050 six outcomes:

1. Belonging and Participation
2. Maori identity and Wellbeing
3. Homes and Places
4. Transport and Access
5. Environment and Cultural Heritage
6. Opportunity and Prosperity

Of these six outcomes, Parks and Open Spaces primarily drop into:

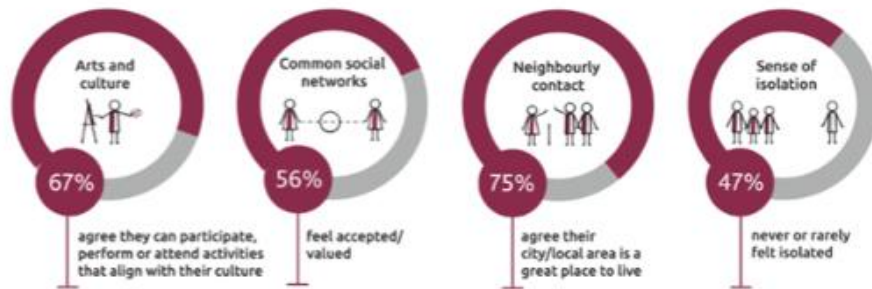


Two directions of where we are heading are noted under this outcome:



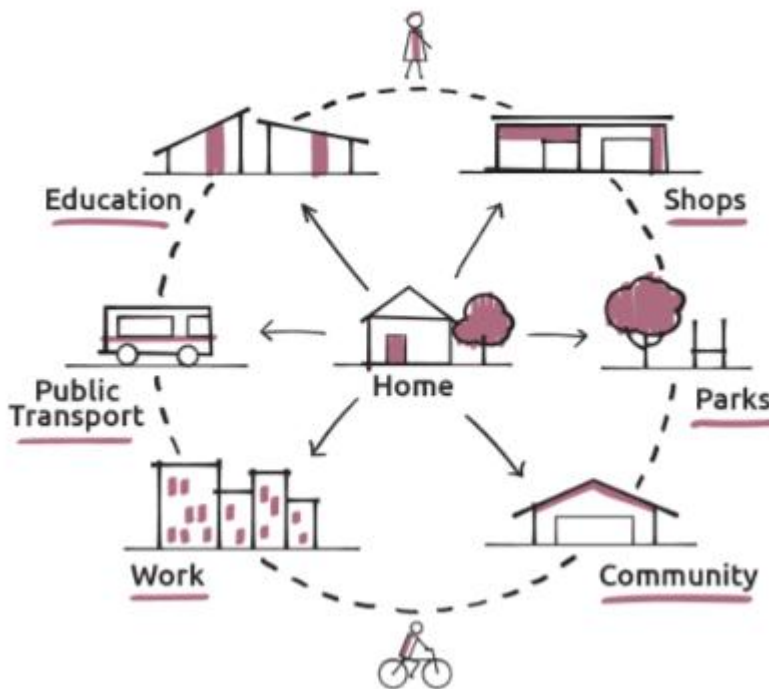
**71%**  
believe a sense of community in their neighbourhood is important

**47%**  
experience a sense of community in their neighbourhood



Quality of Life survey 2022

Improving Aucklanders' physical and mental health and wellbeing means people will be happier, healthier, and more able to participate in activities that they value.



Focus area – recognise the values of sports and recreation to quality of life.

Participating in sport and recreation is a major contributor to our quality of life, health and general wellbeing. More active lifestyles help combat obesity and related health issues. Evidence shows that participation can have a positive impact on physical and mental health, social cohesion and educational outcomes.

Recreation and sport draw people from different backgrounds together. They promote social interaction and help build relationships within and across diverse communities. Participation is especially important for children and young people. It helps them to develop life skills and confidence and life-long, healthy living habits. Providing a wide range of recreation and sport

opportunities enables all Aucklanders to be more active, more often contributing to healthy lifestyles.

Continuing to build the sector’s capability to deliver quality recreation and sport experiences.

PC100 should look to exemplify Auckland 2050 in its open space objectives, policies and standards.

### Tamaki – Whenua Taurikura Auckland Future Development Strategy 2023-2053

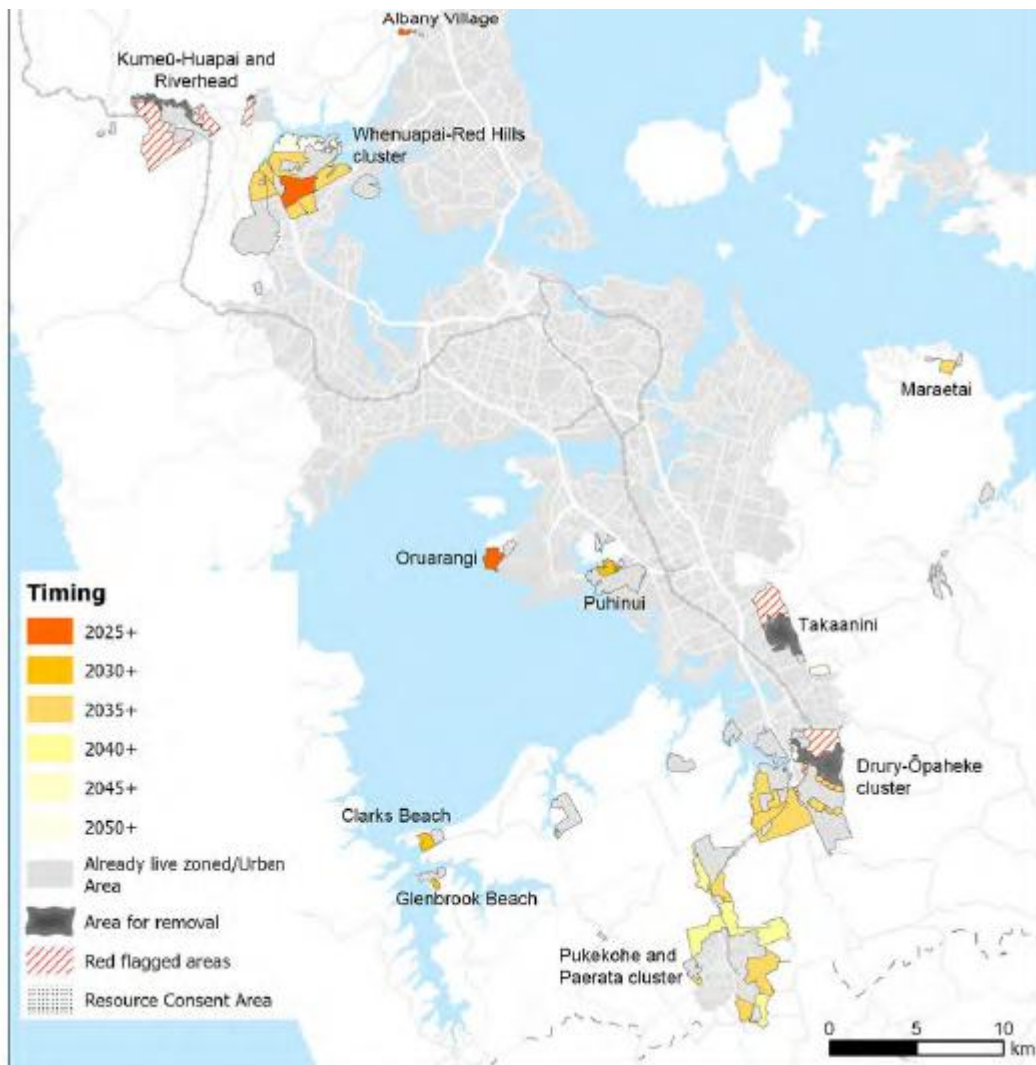
In relation to Riverhead (inclusive of Kumeu-Huapai) the development strategy states that:

#### **Kumeū-Huapai-Riverhead**

*“The northern portion of the Kumeū-Huapai-Riverhead FUA located within the 1% Annual Exceedance Probability (AEP) floodplain of the Kumeū River and Riverhead River is no longer considered appropriate for urban development.*

*Development in these locations is not appropriate due to the risks to life and property. There is no feasible option to appropriately mitigate this without having potentially significant effects downstream”.*

This development strategy statement has a direct impact on proposed indicative areas for parks in the PC100 area, and as such they need to be located outside flood prone areas.



**Figure 7:** Future Urban Areas (Source: Figure 14 Auckland Future Development Strategy)

The Riverhead area is also identified as a red flagged area in Figure 14, page 47 of the development strategy.

Future urban areas, staging breakdown, timing and infrastructure prerequisites for Kumeu-Huapai, Riverhead have been included in Appendix 1: Constraints on development (Page 35) as noted in the table below

Kumeu-Huapai, Riverhead	Kumeu-Huapai	Live zoned	Project
	Kumeu-Huapai & Riverhead	Not before 2050+	Brigham to Waimauku SH16 Upgrade SH16 Main Road Upgrade Alternative State Highway Access Road upgrade Coatesville-Riverhead Highway upgrades Northwest Rapid Transit extension to Huapai Riverhead separation from the KHR WW Main

Although not open space focussed, the Tamaki – Whenua Taurikura Auckland Future Development Strategy 2023-2053 does provide direction to developers that live zoning should not occur before 2050 based on required roading and wastewater infrastructure upgrades.

The overall regulatory and policy framework(s) for Parks, Sport and Recreation as noted directly above at section(s) 4.4 and 4.5 assists in framing the technical review of PC100 noted in section 5 below.

## 5.0 Proposed Riverhead Plan Change 100 (RPC) - Review

### Information Assessment Requirement

5.1 The Parks and Community Facilities Team associated with PC100 have reviewed the plan change request documents and advise that no additional information is required for Parks and Community Facilities to assess the plan change request. There is sufficient information to assess the requested private plan change.

### Technical Review Requirement

5.2 Review of PC100 including the Riverhead Plan Change objectives and policies, the Riverhead zoning plan, Riverhead precinct plan, Riverhead stormwater management area control plan (Flow 1), precinct description (IX.1), precinct objectives (IX.2), precinct policies (IX.3) (and especially IX.3 (11) (12) and (13) that have a policy focus on safe connections to open space (IX.3-11); open space contribute to a sense of place and a quality network (IX.3-12); and encourage provision of continuous and connected multi-purpose green corridor (IX.3-13)), precinct activity table (IX.4), precinct notification (IX.5), precinct standards (IX.6), precinct assessment controlled activities (IX.7), precinct assessment restricted discretionary activities (IX.8), precinct special information requirements (IX.9), precinct plans: Riverhead Precinct plan 1 – Mana Whenua cultural landscape (IX.10.1); Riverhead: Precinct plan 2 – Structural elements (IX.10.2); Riverhead: Precinct plan 3 – transport upgrades (IX.10.3), and appendices (IX.11) - the intended outcomes with respect to public open space is included below:

- The overall PC100 in relation to open space, aspires to (in summary):
  - have objective(s) to meet recreation needs through the provision of a range of quality open spaces and recreation facilities and provide access to coastline, rivers, streams and wetlands ensuring restoration, maintenance, enhancement and protection
  - have policies to provide a variety of open space activities, experiences, and functions; have accessible connections to open space and wildlife; provide open spaces and facilities where there are deficiencies; avoid, remedy or mitigate adverse effects of land use or development on open spaces or on nearby residents and communities. Locate key infrastructure, including roads and pedestrian access connections clear of the stream and all natural wetlands
  - realise the opportunities to establish green corridors through the precinct
  - meet open space needs and establish connections
  - provide safe connections to open space
  - recognise the historical and present cultural values and relationships that Te Kawerau a Maki, Ngati Whatua Kaipara and other interested iwi have with the design of future open space land in Riverhead through future collaboration that could incorporate Te Aranga design elements, art works, naming and historical information, indigenous landscaping and connections to and between important cultural sites
  - reinforce the role of Riverhead Memorial Park as the heart of the settlement
  - ensure that the location and design of publicly accessible open spaces contribute to a sense of place and a quality network of open spaces for Riverhead
  - provide for parks that have adequate street frontage to ensure they are visually prominent and safe
  - provide for three separate neighbourhood parks at indicative locations (north / central / south)
  
- The Riverhead: Precinct plan 2 – Structural elements (IX.10.2); in relation to open space, aspires to (in summary):
  - ensure that development provides a local road network that connects and supports the safety and amenity of the open space network
  - require streets to be attractively designed providing a level of landscaping that is appropriate for the function of the street
  - provide for safe connections to open space
  - ensure that the location and design of publicly assessable open spaces contribute to a sense of place and a quality network of open spaces for Riverhead,
  - encourage a continuous and connected multi-purpose green corridor as specified to provide amenity, promote ecological linkages and co-locate smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space
  - provide for three-neighbourhood park open spaces as proposed in the indicative locations as appropriate
  - neighbourhood and suburb parks should have adequate street frontage to ensure they are visually prominent and safe



5.3 The described aspirational intent of PC100, and precinct provisions noted in 5.2 above, is supported from a public open space perspective. However, it remains unclear if the aspirational outcomes anticipated will be delivered by PC100 due to concerns which relate to:

#### 5.4 Methodologies

a. From 5.2 above, aspirational open space methodologies have been identified in relation to open space provision within the PC100 documentation as follows:

- A north south multi-purpose green corridor has been proposed through the middle of the plan change area that functions as a structural placemaking element, promotes ecological linkages, adopts an integrated exemplar stormwater management approach, provides for open space and open space connectivity, provides amenity for key pedestrian and cycle networks, and supports the road hierarchy and thereby legibility of the movement network.
- The existing Riverhead Memorial Park has been identified as the ‘heart’ of the community.
- Recognition of Te Tiriti o Waitangi partnerships and participation objectives and policies (B6.2) have been recognised.
- Three neighbourhood park locations have been identified.
- Open space and recreational facility objectives and policies (B2.7.1 and B2.7.2) and (PC100 Precinct objectives (IX.2) and policies (IX.3)) have been developed to support the outcomes of the PC100 area.
- Meeting recreation needs through providing pedestrian access to regenerated and enhanced streams and wetlands.

b. The identified aspirational open space methodologies noted under a. above **are unable to be achieved fully** for the following reasons:

##### 5.4.1 Multi-purpose green corridor

- The multi-purpose green corridors feasibility requires further consideration by the applicant.
- The PC100 precinct IX.2 objective and precinct IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake but the workable feasibility of all these functions occurring in the one multi-purpose green corridor is challenging.
- PCF requests that a separate and specific set of multi-purpose green corridor standards be provided at the hearing by the applicant to align with the proposed environmental and open space values, constraints and opportunities noted in the PC100 document.
- These separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.
- For example, some questions that come to mind are:
  - How wide does the corridor need to be and what functional design elements are required to deliver on its open space outcomes?
  - How will open space outcomes be achieved when taking into consideration the views of multiple individual lots and owners, and also those connected sites not within the plan change area?
  - Will the multi-purpose green corridor be a type of ‘open space’ or ‘road’ to be vested or a type of ‘drainage reserve’?

- Is a residential zone appropriate for its core function?
- How will this space and its assets (green and hard assets) be maintained?
- It is themed as a key connector to drainage reserves, neighbourhood parks, regenerated streams and wetlands and other open space elements but no explanation is given on how this will be achieved.
- Environmental values and opportunities have been identified, however there is insufficient detail to determine whether these are actually deliverable.
- Should the multi-purpose green corridor functions as a **drainage reserve**, that **vests** to **Council**, whose primary outcome is stormwater and ecological management. If this is the case then Council's Healthy Waters specialists and Council's Environmental Services ecologists need to be involved to express their views over ecological linkages and stormwater management.

#### 5.4.2 Riverhead Memorial Park

- PCF agrees with the applicant that The Riverhead Memorial Park is the 'heart' of the community. It has multiple passive, play and recreation sport attributes; is a habitat of high value trees and therefore bird life; provides key multi-nodal connections to other parts of the Riverhead Community; and therefore, it is imperative that direct connection from and through the plan change area is provided to this key Riverhead neighbourhood asset.
- The 'unconsented' Retirement Village land, owned by Matvin Group Limited, observers (and I understand submitters through third parties) to the PC100 process, provides a direct obstruction for the majority of the plan change area residents gaining direct walkable access to the Riverhead Memorial Park.

#### Note:

*In the High Court of New Zealand Decision – CIV-2023-404-835 [2023] NZHC 2481, judgement of WOOLFORD J, dated 6 September 2023, that Matvin Group Limited application for land use and subdivision consents to establish a retirement village and associated facilities at 1092 Coatesville, Riverhead Highway, Riverhead, Auckland, as per the Fast Tracks Panel decision of 29 March 2023, was quashed; and*

*In the Court of Appeal of NZ Decision – CA587/2023 a Notice of Abandonment of Appeal by Appellant Matvin Group Limited was accepted on 9 November 2023.*

- Although outside PCF scope, safe connections to existing open space land from adjacent sites (such as the Matvin Group land) should provide an opportunity to create pedestrian streets to Council standards, including specimen tree planting and wide shared footpaths to allow permeable, safe and direct pedestrian access to Riverhead Memorial park. These streets can be vested as 'public roads' or 'privately owned', and managed and maintained by either the Council or the landowner, both subject to Council standards.
- Matt Woodside Parks and Places Specialist - Parks and Community Facilities notes priority route pedestrian access has been identified in the Rodney Greenways (Kumeu, Huapai, Waimauku and Riverhead) December 2016 Report. **Figures 8 and 9** provides a snippet of these priority routes through the PC100 area including the Matvin Group land with **Figure 10** proving priority connections through the southern part of PC100:





**Figure 8:** Greenway connections through RPC area (Source: Rodney Greenways Page 22)

- **Figure 9** provides a closeup snippet of these priority routes through the northern part of the PC100 area:



**Figure 9:** Greenway connections through northern PC100 area (Source: Rodney Greenways Page 26)

- **Figure 10** provides a closeup snippet of these priority routes through the southern part of the PC100 area



**Figure 10:** Greenway connections through southern RPC area (Source: Rodney Greenways Page 29)

- The Riverhead: Precinct plan 2 – Structural elements (IX.10.2) should be amended for the northern part of the RPC area (as per **Figure 9**) to include these and other more direct pedestrian routes through to the Riverhead War Memorial Park as noted.
- As a key open space destination, the formation of direct pedestrian links from this higher density residential area will create positive resident benefits.

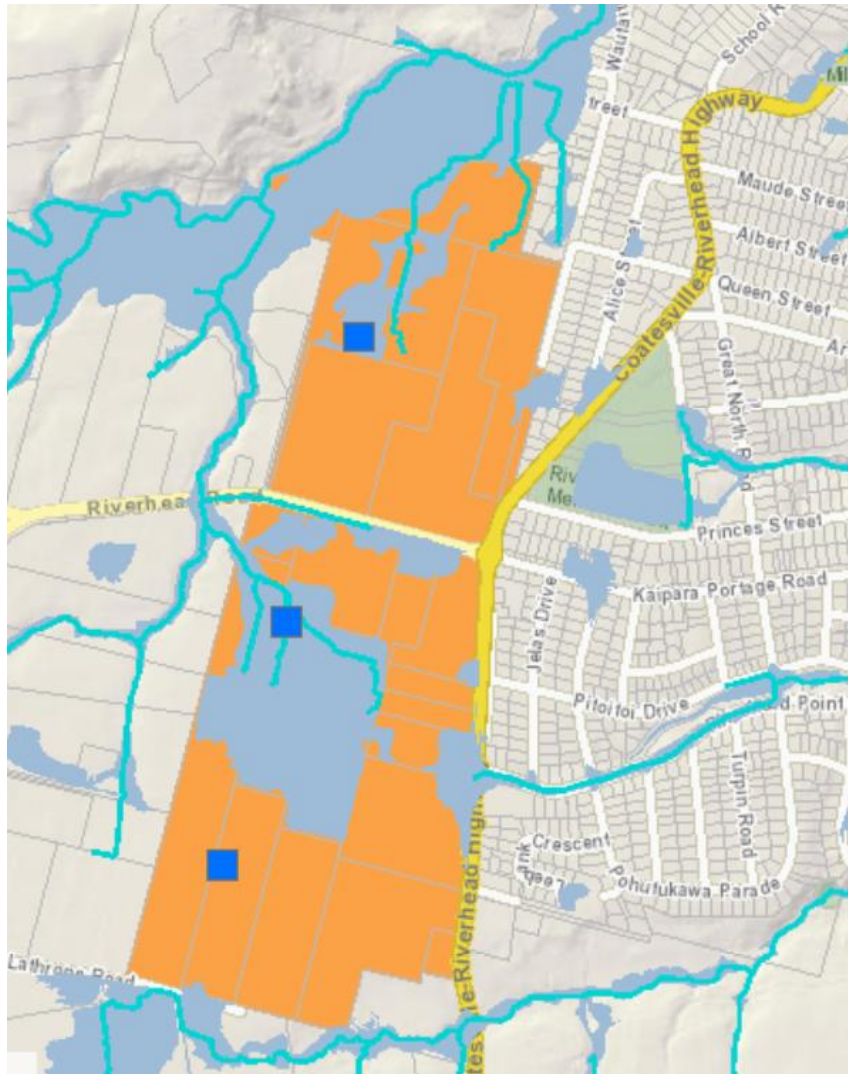
#### 5.4.3 Other pedestrian connections

- Other direct pedestrian connections to key green space viewing areas (high points to Riverhead Forest and Kumeu); Riverhead Tavern and Ferry; and other important open space areas are endorsed in the PC100 document but clarity is required on how these routes can be practically connected to and implemented outside the PC100 area.
- Pedestrian connections to future regenerated stream and wetland environments are also endorsed in the PC100 document but clarity is required on how these routes can be practically connected to.
- There is no PC100 precinct IX.2 objective to support this pedestrian movement function.
- The PC100 precinct IX.3(8)(9)(11) street network, built form and open space policy description outlines the multiple functions that pedestrian connections should look like and be undertaken but there are no standards on their delivery on how to connect to the open space environments within the PC100 area and outside of it.
- In its present form, it is in accord with the aspirational part of the National Policy Statement Urban Development (NPSUD) 2020 which at Policy 2.2, requires urban environments to have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces. This policy statement requires at 3.5 that

Local Authorities must be satisfied that the additional infrastructure (including public open space) to service the proposed development capacity will be available. Further detail should be provided from the applicant at the hearing on how good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces will actually be implemented by PC100.

#### 5.4.4 Three neighbourhood park locations

- IX.10.2 Riverhead: Precinct plan 2, indicates three proposed neighbourhood park locations.
- There is a lack of clarity around the three ‘indicative park’ areas.
- There is a lack of an assessment of open space needs within the precinct and wider area and the assumption that PC100 is adequate to meet these.
- There is a lack of acknowledgment of the requirement to offer parks land to council for vesting.
- Medium density thresholds for the predominant Residential – Mixed Housing Suburban zone (MHS) and smaller pocket of Residential – Terraced Housing and Apartment Building zone (THAB) have been alluded to as per the Open Space Provision Policy 2016, being the key driver for open space needs in the PC100 area.
- Utilise flat land where appropriate.
- Ensure parks are set back away from arterial routes (ideally collectors as well).
- On this basis, other Parks Specialists were approached to provide further clarity.
- Ezra Barwell - Senior Policy Advisor – Community Investment notes that an earlier assessment of the area against the council’s Open Space Provision Policy 2016 indicated that three neighbourhood parks would be supportable in the PC100 area subject to further analysis and due diligence – refer screenshot below (**Figure 11**):



**Figure 11:** IX.10.2 Riverhead: Precinct plan 2 area (orange) and the three park locations

- Since the recent Auckland flood event(s) two of the indicative park locations that were outside flood plain(s) when the area was originally assessed are now within flood plain(s) as noted in **Figure 11** above, so would not be suitable for parks unless the flood plains were managed to prevent flooding of the parks.
- Rahman Bashir Principal Property Provision Specialist – PCF agrees with Ezra Barwell that any new parks be located outside the flood plain areas.
- Mr Bashir provided other considerations for open space parks within the PC100 area that include:
  - o Maximise and utilise the existing Riverhead Memorial Park to take on some of the residential density growth anticipated.
  - o Maximise utilities by centralising the park site locations.
  - o As riparian walkways or cycleways or esplanade reserves have not been indicated in the PC100 area, neighbourhood parks at a minimum of 5000m<sup>2</sup> are warranted.
  - o Ensuring that the proposed neighbourhood parks can accommodate a 900m<sup>2</sup> kick back space (30x30).

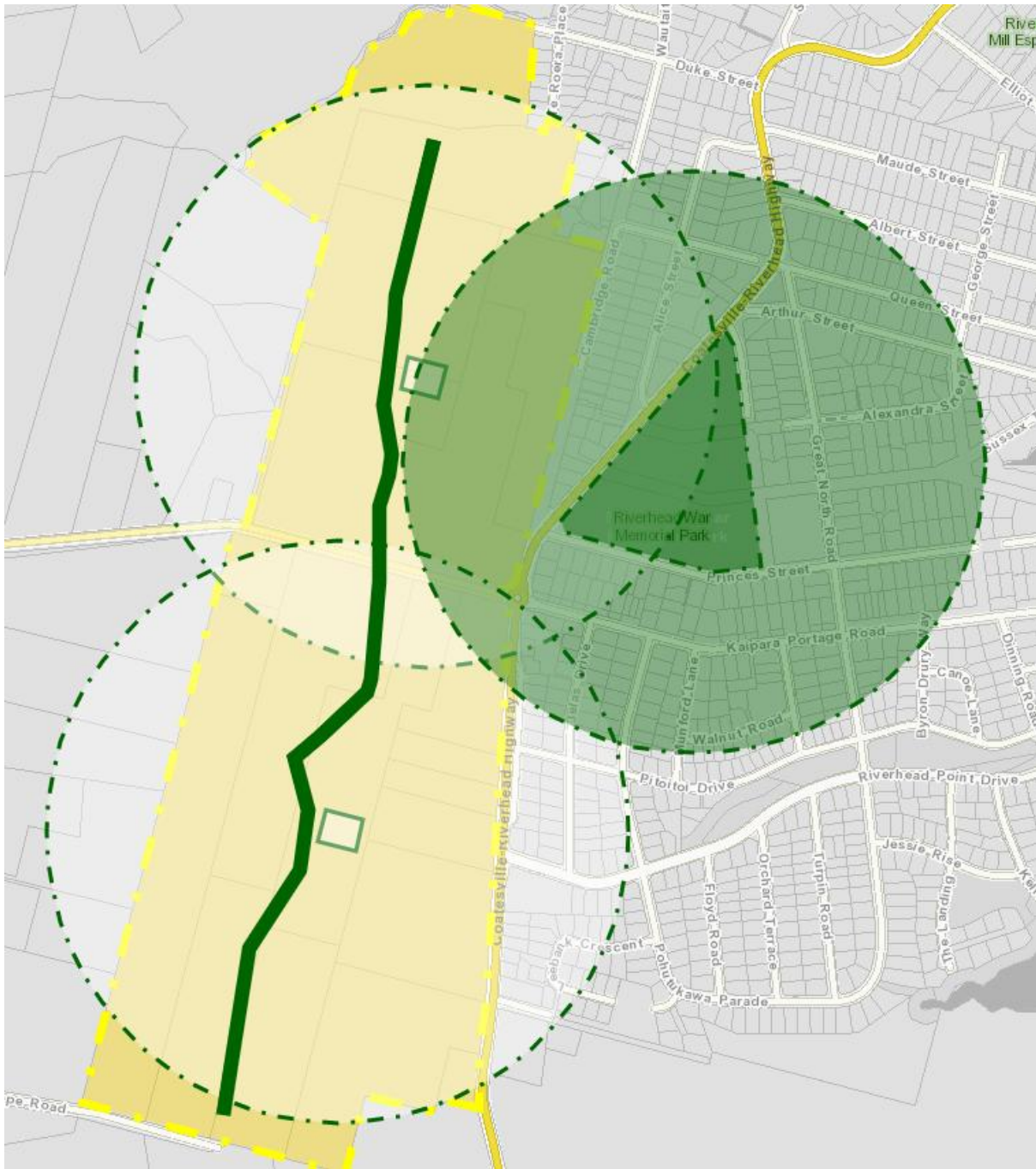


- Park edge road provision to accommodate Crime Prevention Through Environment Design (CPTED) principals.
- Shape to be as square or rectangular as possible.
- Apply a 400m ‘pedestrian shed’ catchment to maximise usage.
- Centralise parks to maximise the ‘pedestrian shed’ catchment area.
- Because of the existing Riverhead Memorial Park, we lose a central indicative park with only **two** additional neighbourhood parks at a minimum of 5000m<sup>2</sup> now required.
- The existing Riverhead Memorial Park ‘pedestrian shed’ covers the central gaps.
- Through negotiation, we would require that these general locations be zoned open space in future amendments or iterations to the PC100 zoning plan.
- See **Figure 12** below for a graphic illustration of existing and proposed neighbourhood park locations based on some of the attributes noted above.



**Figure 12:** ‘Pedestrian shed’ analysis best locations for two additional parks (Source: Rahman Bashir – Principal Property Provision Specialist)

- o See **Figure 13** below for a second graphic illustration of the two indicative park locations, the Riverhead Memorial Park, and the improbable multi-purpose green corridor, as they could be illustrated in an amended PC100 precinct plan.



**Figure 13:** ‘Pedestrian shed’ analysis best locations for two additional parks for PC100 precinct plan purposes with multi-purpose green corridor (Source: Rahman Bashir – Principal Property Provision Specialist)



- o See **Figure 14** below for a third graphic illustration of the two indicative park locations, the Riverhead Memorial Park, without the multi-purpose green corridor as they could be illustrated in an amended PC100 precinct plan.



**Figure 14:** ‘Pedestrian shed’ analysis best locations for two additional parks for PC100 precinct plan purposes with no multi-purpose green corridor (Source: Rahman Bashir – Principal Property Provision Specialist)

- Overall, the two neighbourhood parks, and their recommended location by PCF, are in accord with the National Policy Statement Urban Development (NPSUD) 2020 which at Policy 2.2, requires urban environments to have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport. This policy statement requires at 3.5 that Local Authorities

must be satisfied that the additional infrastructure (including public open space) to service the proposed development capacity will be available.

6.0 Objectives and Policies

6.1 Open space and recreational facility objectives and policies (B2.7.1 and B2.7.2)

These objectives and policies were provided in PC100 Appendix 5. An assessment of these and our conclusions, are included below at 6.2 and Table A.

6.2 Comment from the applicant and Parks and Community Facilities (PCF):

The Auckland-wide provisions will ensure the adequate provision of accessible and quality open space for future residents.

**PCF agrees.**

Indicative locations for neighbourhood parks are shown in the Structure and Precinct Plans, as advised by Parks.

**PCF agrees.**

The surrounding existing and planned amenities and social facilities are accessible by active modes of transport, and are of a sufficient size to cater for the social and cultural needs and well-being of future residents of the Plan Change area.

**PCF agrees.**

The Plan Change is in keeping with the relevant objectives and policies.

**PCF agrees.**

Table A

B2.7 Open space and recreational facilities	
B2.7.1 Objectives	Parks and Community Facilities Commentary
(1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.	Through the use of the existing Riverhead Memorial Park and the location of two additional neighbourhood parks, to the north and south of the PC100 area, this objective can be met.  Aligns with the Regional Policy Statement (RPS).  <b>Supported</b>
(2) Public access to and along Auckland’s coastline, coastal marine area, lakes, rivers, streams and wetlands is maintained and enhanced.	The aspirational intention to provide pedestrian connectivity to coastline, rivers, streams and wetlands is provided for in PC100 through existing connections (inside and outside the PC100 area) and future connections.  Further detail should be provided from the applicant at the hearing on how good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces will actually be implemented by PC100.  Aspirational intention aligns with the RPS.



	<b>Supported</b>
(3) Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.	Esplanade Reserves and Esplanade Strips that provide public access to these areas are dependent on future detail triggers (such as Mean High Water Springs and width of existing streams / rivers), location of proposed lots to rivers or streams and size of potential new lots that will occur as part of a future subdivision consent processes.  Aligns with the RPS.  <b>Supported</b>
B2.7.2 Policies	Aligns with the RPS.
(1) Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions.	Through the use of the existing Riverhead Memorial Park and the location of two additional neighbourhood parks, to the north and south of the PC100 area, this policy can be met.  Other potential smaller ‘open space pockets’ or a sperate ‘multi-purpose green corridor’ can be supported through future negotiation but cannot be to the detriment and requirement of providing two additional new open space neighbourhood park areas.  <b>Supported</b>
(2) Promote the physical connection of open spaces to enable people and wildlife to move around efficiently and safely.	Although outside PCF scope, safe connections to existing open space land from adjacent sites (such as the Matvin Group land) should provide an opportunity to create pedestrian streets to Council standards, including specimen tree planting and wide shared footpaths to allow permeable, safe and direct pedestrian access to Riverhead Memorial park. These streets can be vested as ‘public roads’ or ‘privately owned’, and managed and maintained by either the Council or the landowner, both subject to Council standards.  <b>Supported</b>
(3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.	<b>Supported</b>
(4) Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.	<b>Supported</b>
(7) Avoid, remedy or mitigate significant adverse effects of land use or development on open spaces and recreation facilities.	<b>Supported</b>
(8) Avoid, remedy or mitigate significant adverse effects from the use of open spaces and recreational facilities on nearby residents and communities.	The multi-purpose green corridors feasibility requires further consideration by the applicant. The PC100 precinct IX.2 objective and precinct IX.3(13)(a)-(d) policy description outlines the

	<p>multiple functions that this corridor should undertake but the workable feasibility of all these functions occurring in the one multi-purpose green corridor is challenging.</p> <p>PCF requests that a separate and specific set of multi-purpose green corridor standards be provided at the hearing by the applicant to align with the proposed environmental and open space values, constraints and opportunities noted in the PC100 document.</p> <p>These separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p> <p><b>Supported</b></p>
(9)Enable public access to lakes, rivers, streams, wetlands and the coastal marine area by enabling public facilities and by seeking agreements with private landowners where appropriate.	<b>Supported</b>

### 6.3 PC100 Precinct objectives (IX.2) and policies (IX.3)

These objectives and policies were provided in PC100 Appendix 1. An assessment of these is included below at Table B.

Table B

IX.2 PC100 Objectives	Parks and Community Facilities Commentary
No Open Space or Parks objective is noted in the IX.2 PC 100 Objectives list.	<p>Although no Open Space or Parks objective is noted in the IX.2 PC 100 Objectives list, reliance can be placed on the specific B2.7.1 Open space and recreational facility objectives noted above and as submitted for PC 100.</p> <p><b>Supported</b></p>
IX.3 PC100 Policies	Parks and Community Facilities Commentary
IX.3 Policy 11 Provide safe connections to public transport facilities and social infrastructure such as open space and schools.	<p>PC 100 will provide safe connections to open space subject to safe connections to existing open space land from adjacent sites (such as the Matvin Group land) should provide an opportunity to create pedestrian streets to Council standards, including specimen tree planting and wide shared footpaths to allow permeable, safe and direct pedestrian access to Riverhead Memorial park. These streets can be vested as ‘public roads’ or ‘privately owned’, and managed and maintained by either the Council or the landowner, both subject to Council standards.</p>

	<b>Supported</b>
<p>IX.3 Policy 12 Ensure that the location and design of publicly accessible open spaces contribute to a sense of place and a quality network of open spaces for Riverhead, including by: incorporating natural features such as:</p> <ul style="list-style-type: none"> <li>(a) wetlands and streams;</li> <li>(b) the Beech tree identified on IX.10.2, where possible; and Riverhead: Precinct plan 2; and</li> <li>(c) any other mature trees that are worthy of retention, where possible.</li> </ul>	<p>Although out of scope, PCF supports private landowners, within the PC100 area, such as those at 298 Riverhead Road (also known as 306 Riverhead Road) that have a minimum of 18 high value specimen trees, including the ‘Beech Tree’ noted and located on this property, that choose to protect these trees.</p> <p>Although out of scope, this site of the ‘Beech tree’ is a ‘gateway site’ to the PC100 area and also part of the key Huapai – Riverhead cycleway network (number 10 on the Greenway Plan) and these trees provide green landscape amenity to this adjoining Riverhead Road environment and to the PC100 area as a whole.</p> <p>PCF scope is primarily around private roads to be vested, through the planting of specimen trees in berms, and trees being planted as part of new park space development, esplanade reserves or esplanade strips and not private site areas (such as those at 298 Riverhead Road (also known as 306 Riverhead Road)).</p> <p>Wetland and streams are outside the scope of PCF unless they are part of land vested for esplanade reserve / esplanade strip purposes or as drainage reserves.</p> <p style="text-align: center;"><b>Supported</b></p>
<p>IX.3 Policy 13 Encourage the provision of a continuous and connected multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2, which achieves the following outcomes: Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.</p>	<p>The multi-purpose green corridors feasibility requires further consideration by the applicant. The PC100 precinct IX.2 objective and precinct IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake but the workable feasibility of all these functions occurring in the one multi-purpose green corridor is challenging.</p> <p>PCF requests that a separate and specific set of multi-purpose green corridor standards be provided at the hearing by the applicant to align with the proposed environmental and open space values, constraints and opportunities noted in the PC100 document.</p> <p>These separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>

	<b>Supported</b>
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#### 6.4 Multi-purpose green corridor

As noted above, PCF supports IX.3 Policy 13 that encourages the provision of a continuous and connected multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2,

However, the proposed multi-purpose green corridor requires further feasibility analysis so that it can be implemented in line with the submitted objectives and policies noted above, assist in aligning with environmental values, constraints and opportunities and to ensure that the recreational needs of people and communities are met.

#### 7.0 Assessment against key statutory planning documents

The assessment of PC100 against the regulatory framework for parks and open space assessment is set out below with key points noted:

##### 7.1 Resource Management Act 1991 (RMA)

The RMA, which at section(s) 229 and section 230 requires the provision of esplanade reserves (if triggered by location of mean highwater springs or 3m wide streams and their banks) and esplanade strips, for the purposes of protecting conservation values and enabling public access and recreational use to or along any sea, river, or lake.

Future subdivision around the intermittent stream(s) running through parts of the 75ha site may trigger the requirement of esplanade reserves or esplanade strips if triggered under the RMA. Further investigation including specialist surveyor as part of the subdivision consent process input would be required.

The PC100 objectives and policies promote public access to and along Riverhead’s coastline, coastal marine area, lakes, rivers, streams and wetlands and if within vested esplanade reserve areas, or esplanade strips, they are required to be maintained and enhanced by Council.

##### 7.2 National Policy Statement on Urban Development 2020

Policy 2.2 of the National Policy Statement Urban Development (NPSUD) 2020 requires urban environments to have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport.

Policy 3.5 requires local authorities to be satisfied that additional infrastructure (including public open space) to service the proposed development capacity will be available.

PC100 has demonstrated that an appropriate open space network can be provided for the Riverhead community within the plan change area.

However, improved pedestrian connectivity to the existing suburban Riverhead Memorial Park and two proposed neighbourhood parks will require further consideration in terms of its ability to provide additional safe and direct pedestrian routes.

Also, the key spinal connector to the PC100 area, the ‘multi-purpose green corridor’ will require further consideration to frame and support its open space function with other stormwater, ecology and transport attributes.

### 7.3 Auckland Regional Policy Statement (ARPS)

ARPS, which at B2.7.1 and B2.7.2 requires that recreational needs of people and communities be met through the provision of a range of quality, connected, accessible open spaces and recreation facilities.

PC100 has demonstrated that an appropriate open space network can be provided for the Riverhead community within the plan change area.

However, improved pedestrian connectivity to the existing suburban Riverhead Memorial Park and two proposed neighbourhood parks, including a better framing and understanding of the central ‘multi-purpose green corridor’ is required and is a key recommended action for implementation at the conclusion of this memorandum.

### 7.4 The AUP(OP) Framework

#### **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.

Objective H7.2(2) The adverse effects of use and development of open space areas on residents, communities and the environment are avoided, remedied or mitigated.

PC100 has included these objectives, with the additional words ‘and recreational facilities’.

PC100 has demonstrated that an appropriate open space area through additional neighbourhood parks and through potential future esplanade reserves can be provided for the Riverhead community within the plan change area.

#### **Subdivision Urban**

Objective E38.2.1 Land is subdivided to achieve the objectives of the residential zones, business zones, **open space** zones, special purpose zones, coastal zones, relevant overlays and Auckland-wide provisions.

Objective E38.2.3 Land is subdivided in a manner that provides for the **long-term needs** of the **community** and **minimises adverse effects** of future development on the environment.

Objective E38.2.3 Land is vested to provide for **esplanades reserves**, roads, stormwater, infrastructure and other purposes.

PC100 has demonstrated that these three objectives can be met as open zoned land has been indicated as neighbourhood parks, that these open spaces will meet the long-term needs of the community and minimise adverse effects if designed, and constructed in accordance with Council standards and appropriate land can be provided for future esplanade reserves and esplanade strips if triggered by sections 229 and 230 of the RMA.

Policy E38.3(18) requires that subdivision provides for the recreation and amenity needs of residents by: providing for open spaces that are prominent and accessible by pedestrians; that

provide for the number and size of open spaces in proportion to the future density of the neighbourhood; and providing for pedestrian and/or cycle linkages.

Part of this specific subdivision policy has been met in that the existing suburban Riverhead Memorial Park and two proposed neighbourhood parks have been provided in proportion to the future density of the neighbourhood.

However, improved pedestrian connectivity to the existing suburban Riverhead Memorial Park and two proposed neighbourhood parks, including a better framing and understanding of the central 'multi-purpose green corridor' is required and is a key recommended action for implementation at the conclusion of this memorandum.

#### 7.5 The Parks and Open Space Acquisition Policy 2013 and The Parks and Open Space Strategic Action Plan 2013.

PC100 does align with these overarching framework(s) for acquiring new land for parks and open space.

The proposed multi-purpose green corridor is meant to create the proposed key internal pedestrian, stormwater, landscaped, and open space spinal network to align with this policy and action plan. More detail is required, including a specific set of objectives, policies and standards, to ensure this corridor is workable as the PC100 aspirational context alludes to.

A connected network of parks and open spaces that delivers ecological benefits has been alluded to in PC100. Horticultural and past farming activities have removed all existence of indigenous vegetation from the site. Native wildlife across the site reflects the long history of modification and comprises a mix of cosmopolitan birds, mostly exotic species with few common natives. In summary most native components are absent, and key ecological features such as streams and wetlands are highly degraded. Extensive regeneration and maintenance of these natural features have been alluded to in the PC100 documentation. If implemented improvement to this existing natural environment will be achieved. With the possibility of acquiring esplanade reserves, this land acquisition could connect existing regenerated patches of habitat or ecosystems that would allow for the future movement and natural life cycles of species, helping to protect Auckland's natural heritage.

#### 7.6 The Open Space Provision Policy 2016

Open space makes a major contribution towards Aucklanders' quality of life and is integral to achieving the vision and strategy of The Auckland Plan in accord with the Open Space Strategic Action Plan 2013 (OSSAP).

Quality open space is a critical component of attractive and liveable urban areas.

PC100 does provide the necessary tools, subject to the recommendations and conclusions below, that allow for quality open space to develop within the new plan changed area.

Four network principles – Treasure / Enjoy / Connect / Utilise our parks and open spaces. PC100 with the recommendations noted in the conclusions below, does allow for four main areas of focus – connect (as per recommendations), enjoy (the park spaces), treasure (regenerated ecological spaces), and utilise (safe direct connections to destinations).

Apply provision metrics and targets, informing the council's investment, asset and acquisition activities in open space and guiding spatial planning such as plan changes. The PC100 three indicative parks as recommended by the applicant was based on metrics and targets provided to the applicant by Council as part of the earlier and separate Schedule 1, Part 2 (23) – requests for further information changes to policy statements and plans of local authorities process. This

was further refined by the PCF team that allowed for only two additional neighbour parks at 5000m<sup>2</sup> each with use of the existing suburban Riverhead Memorial Park critical in these metrics and targets.

Fund open space. This is a matter for the future Land Advisory Parks Acquisition team in partnership with the relevant Local Board authority and is not a matter to be concluded as part of PC100.

Provision of open space at a network scale (across multiple open spaces rather than an individual site) is considered on the basis of four inter-related factors: function, distribution, location and configuration.

These factors have been considered by the PCF team with: our recommendations for better safe and direct pedestrian connections to the existing suburban Riverhead Memorial Park and two proposed neighbourhood parks; supporting regenerated stream, wetland and ecological linkages through reserve esplanades or esplanade strips if warranted in future subdivision process; supporting high value trees in the area ensuring specimen planting in new roads to be vested, within parks open spaces and supporting private land owners protecting sizeable trees on their own properties; and requesting from the applicant a more feasible and implementable multi-purpose green corridor.

## 7.7 The Auckland Plan 2050

Belonging and participation to foster an inclusive Riverhead where everyone belongs and also to improve wellbeing. In Auckland 71% of people believe a sense of community in their neighbourhood is important with 47% experiencing this sense of community. Neighbourly contact through safe and direct connections to open space environments helps nature belonging and participation. This is one of PCF's key recommendations moving forward and as noted in the body of the memorandum above.

Participating in sport and recreation is a major contributor to our quality of life, health and general wellbeing. More active lifestyles help combat obesity and related health issues.

Recreation and sport draw people from different backgrounds together. They promote social interaction and help build relationships within and across diverse communities. Participation is especially important for children and young people. It helps them to develop life skills and confidence and life-long, healthy living habits. Providing a wide range of recreation and sport opportunities enables all Aucklanders to be more active, more often contributing to healthy lifestyles. Evidence shows that participation can have a positive impact on physical and mental health, social cohesion and educational outcomes.

PC100 provides opportunities for open space participation for both passive and recreational pursuits.

## 8.0 Submissions

- 8.1 254 public submissions were received before submissions closed at midnight on 17 May 2024.
- 8.2 A summary of the submissions received was notified to the general public on 12 July 2024. I reviewed the summary of submissions and also reviewed other individual / group public submissions on what I perceived to be open space matters not included in the summary of submissions documentation. These have been included below with the notation in the Sub Point column as (Not noted).

8.3 An amended summary of submissions table and Parks and Community Facilities (PCF) responses are noted in the Submissions Table A below:

Table C

Sub #	Sub Point	Submitter Name & Address for Service	Summary of Decisions Requested	PCF Responses
66	66 (Not noted)	Hawk Ellery Freight Services Ltd scott@hawkekellery.co.nz	Neighbourhood Parks: The absence of clear objectives, policies, and standards regarding the provision of neighbourhood parks in PC100 poses a significant flaw. These parks are essential for community well-being, yet PC100 lacks the necessary requirements to ensure their creation. Furthermore, the proposed location of a park near 306 Riverhead Road disregards the significance of preserving high-value trees and fails to address the community's needs adequately.	<b>Support</b> , but note that Parks and Community Facilities (PCF) has assessed that the Parks and Open Space Provision Policy 2016 and Auckland Plan 2050 is met (in-part) with regard to the existing open space provision of the Riverhead Memorial Park and has recommended to the applicant that two new neighbourhood parks (at a minimum) be established in the plan change area primarily based on the proposed residential Mixed Housing Suburban (MHS) / Terraced Housing & Apartment Building (THAB) zoning for the plan change area. <b>AND Support</b> the owner to retain the high value trees at 306 Riverhead Road (also known as 298 Riverhead Road) that provides open space amenity to a 'gateway location' and a key cycle lane passing point for the Huapai - Riverhead cycle lane. <b>But</b> the retention of high value trees on private property is outside of the PCF scope.
66	66.4	Hawk Ellery Freight Services Ltd scott@hawkekellery.co.nz	Address critical issues such as parks, stormwater management, transportation and village character.	<b>Support</b> 'parks' but stormwater management, transport and village character are outside the scope of Parks and Community Facilities (PCF), and note that PCF has assessed that the Parks and Open Space Provision Policy 2016 and Auckland Plan 2050 is met (in-part) with regard to the existing open space provision of the Riverhead Memorial Park and has



				recommended to the applicant that two new neighbourhood parks (at a minimum) be established in the plan change area primarily based on the proposed residential MHS and THAB zoning for the plan change area.
71	71 (Not noted)	Michael Brooke mikerbrooke@outlook.com	<p>1. We need to ensure the new development is aligned to the current Riverhead look and feel, especially around greenspaces, trees, and connecting walkways. 2. The Plan Change has no requirement for parks to be provided, it is possible that without clear 'rules' parks (as would be needed to ensure it is like the rest of Riverhead) never happen, or are not developed as expected. 3. A high-value beech tree, and its surrounding trees should be protected, ideally as a park. 4. The proposed green corridor sounds positive, however there are no clear outcomes or rules that stipulate exactly how this will work. Language of 'encourage' and 'promote' is not strong enough, this needs specific requirements. Indeed, it is possible that this is cynically solely about managing stormwater and in areas where that is not required, the corridor might not occur. 5. Likewise, there is no detail around this corridor in respect to if it is to be vested in Council and managed as parkland. There is the potential for this corridor to become a very piecemeal approach if there is not an</p>	<p><b>Support</b> 'greenspaces'; 'trees'; 'connecting walkways' and 'parks.'</p> <p><b>But</b> 'high value beech tree' and 'managing stormwater' is outside the scope of Parks and Community Facilities (PCF).</p> <p><b>AND</b></p> <p><b>Support</b> that the proposed green corridor requires clearer outcome and rules.</p>

			overarching Plan and how it will be managed.	
71	71 (Not noted)	Michael Brooke mikerbrooke@outlook.com	I understand there is already consent for a large retirement village, but this Proposed Plan Change does not address this activity, in some areas it is recognised, in others it is not. This uncertainty is not in the best interests of planning for Riverhead, and should be explicitly managed.	In the High Court of NZ Decision – CIV-2023-404-835 [2023] NZHC 2481, judgement of WOOLFORD J dated 6 September 2023, that Matvin Group Limited application for land use and subdivision consents to establish a retirement village and associated facilities at 1092 Coatesville, Riverhead Highway, Riverhead, Auckland, as per the Fast Tracks Panel decision of 29 March 2023, was quashed. <b>AND:</b> In the Court of Appeal of NZ Decision – CA587/2023 a Notice of Abandonment of Appeal by Appellant Matvin Group Limited was accepted on 9 November 2023. <b>AND</b> PCF has recommended more safe and direct pedestrian connections through 1092 Coatesville, Riverhead Highway for the plan change area to better access Riverhead Memorial Park.
81	81.2	Ed Stubenitsky Stubee_1@hotmail.com	Adequate provisions for quality parks and open spaces.	<b>Support</b>
95	95 (not noted)	Ella McIntosh 0225656222	One of the reasons I value living in Riverhead is the parks, playgrounds and green spaces. Right now, these feel like they are at capacity (especially during school holidays and after school hours). I understand that there are no objectives, policies or standards that require the parks to be provided. This is an issue and should be considered holistically as part of the proposal as green spaces is what make this community beautiful. The proposal needs to consider the environmental effects of	<b>Support</b> , and note that PCF has assessed that the Parks and Open Space Provision Policy 2016 and Auckland Plan 2050 is met (in-part) with regard to the existing open space provision of the Riverhead Memorial Park and has recommended to the applicant that two new neighbourhood parks (at a minimum) be established in the plan change area primarily based on the proposed residential MHS and THAB zoning for the plan change area.

			<p>additional housing – how are we protecting green spaces and ensuring a positive impact on the environment.</p> <p>The proposed plan does not look to have effectively and thoroughly considered the retirement village site. This needs to be reviewed in detail as it has the impact to drastically impact the type of building and additional needs of the community.</p>	
98	98.5	Bridget Michelle Hill bridget.mw@gmail.com	Provide a clear requirement to provide neighbourhood parks.	<b>Support</b> and note that PCF has assessed that the Parks and Open Space Provision Policy 2016 and Auckland Plan 2050 is met (in-part) with regard to the existing open space provision of the Riverhead Memorial Park and has recommended to the applicant that two new neighbourhood parks (at a minimum) be established in the plan change area primarily based on the proposed residential MHS and THAB zoning for the plan change area.
98	98.6	Bridget Michelle Hill bridget.mw@gmail.com	A park should be provided at 298 Riverhead Road.	<b>Support</b> the owner to retain the high value trees at 306 Riverhead Road (also known as 298 Riverhead Road) that provides open space amenity to a ‘gateway location’ and a key cycle lane passing point for the Huapai – Riverhead cycle lane. <b>But</b> the retention of high value trees on private property is outside of the PCF scope.
98	98.7	Bridget Michelle Hill bridget.mw@gmail.com	Provide a contiguous green corridor that is offered to the Council for vesting. The Mixed Rural Zone land alongside the Rangitopuni tributary (20 m margin of land) should be zoned as ‘open space’ to be vested to the	<b>Oppose</b> and note that land to the north, alongside the Rangitopuni Tributary, has been removed from the plan change area by way of Environment Court Decision NZENV049 dated 20 March 2024.

			council (to provide an esplanade reserve), and that link to the land must be provided as part of the green corridor.	
98	98.8	Bridget Michelle Hill bridget.mw@gmail.com	Provide a secondary pedestrian link to into Duke Street or Te Roera to help pedestrians navigate between both new and existing Riverhead for sustainable community pedestrian network should be required.	<b>Oppose</b> and note that land to the north, part of Duke Street, has been removed from the plan change area by way of Environment Court Decision NZENV049 dated 20 March 2024.
98	98.9	Bridget Michelle Hill bridget.mw@gmail.com	Provide two distinct approaches, one with the retirement village and one without.	In the High Court of NZ Decision – CIV-2023-404-835 [2023] NZHC 2481, judgement of WOOLFORD J dated 6 September 2023, that Matvin Group Limited application for land use and subdivision consents to establish a retirement village and associated facilities at 1092 Coatesville, Riverhead Highway, Riverhead, Auckland, as per the Fast Tracks Panel decision of 29 March 2023, was quashed. <b>AND:</b> In the Court of Appeal of NZ Decision – CA587/2023 a Notice of Abandonment of Appeal by Appellant Matvin Group Limited was accepted on 9 November 2023. <b>AND</b> Parks and Community Facilities has recommended more safe and direct pedestrian connections through 1092 Coatesville, Riverhead Highway for the plan change area to better access Riverhead Memorial Park.
104	104 (Not Noted)	Jan Henderson kjhenderson@xtra.co.nz	We have lived in Riverhead since 1988. Parks & Reserves will need to also be addressed with the increase in community numbers. Our lovely Memorial Park is already unable to cope on	<b>Support</b> and note that PCF has assessed that the Parks and Open Space Provision Policy 2016 and Auckland Plan 2050 is met (in-part) with regard to the existing open space provision of the Riverhead Memorial Park and

			<p>Saturday sports or afternoon athletics. The playgrounds already available are not addressing the needs of the over 8 yr. olds. The new development needs to clearly identify areas they are putting aside for parks and reserves as section sizes reduce there is little space for our future generations to play and develop skills they will need in the future. Some of the beautiful old established trees in the land for development could form part of these areas mentioned above. For example, 306 Riverhead Rd has some lovely specimens.</p>	<p>has recommended to the applicant that two new neighbourhood parks (at a minimum) be established in the plan change area primarily based on the proposed residential MHS and THAB zoning for the plan change area.</p>
112	112.2	<p>Josette Barbara Haggren josette.haggren@Eapexecutive.com</p>	<p>Include provisions to retain large trees.</p>	<p><b>Support</b> but the retention of large trees throughout the PC100 area (other than new roads to be vested or open space zoned areas) is outside of PCF scope.</p>
112	112.3	<p>Josette Barbara Haggren josette.haggren@Eapexecutive.com</p>	<p>Provide for walkways.</p>	<p><b>Support</b></p>
114	114.10	<p>Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com</p>	<p>Front yards should be sized to be adequate for planting large trees, for example, 6 metres and a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.</p>	<p><b>Support</b> as this creates attractive neighbourhoods but the planting of trees in front yards is outside of PCF scope.</p>
114	114.13	<p>Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com</p>	<p>Require minimum tree quantity outcomes for new roads.</p>	<p><b>Support</b> and note that this is considered at a future subdivision stage of the process as part of any new roads to be vested and the Auckland wide AUP(OP) provisions provide support for this outcome.</p>
114	114.14	<p>Riverhead Community Association (formerly Riverhead</p>	<p>Require sufficient private and public planted areas to give effect to the intent</p>	<p><b>Support</b> and note that PCF supports more large trees in the plan change area especially in new roads to be</p>

		Residents and Ratepayers Association) mikerbrooke@outlook.com	of Auckland's Urban Ngahere (Forest) Strategy.	vested to Council and where appropriate in Open Space zoned land. <b>AND Support</b> as this creates attractive neighbourhoods but the planting of trees in private property is outside of PCF scope.
114	114.17	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com	Require the 20m margin of land from the stream in the MRZ to be zoned as public open space and vested to the council.	<b>Support</b> but note that this would come into effect when individual subdivision consents are lodged in the future. We do not zone these areas prematurely as the zonings in question would need to be changed if survey proved otherwise. They are protected by law and current AUP(OP) objectives and policies will be sufficient to identify the need.
114	114.18	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com	The green corridor to be extended to the open space esplanade reserve and be available for public access.	<b>Support.</b>
114	114.21	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com	Require the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals.	<b>Support.</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake. Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.  Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.  Any future separate and specific set of standards

				would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.
114	114.24	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com	Ensure the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development.	<p><b>Support.</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake. Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>
114	114.25	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com	That necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism.	<p><b>Support.</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake. Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open</p>

				<p>space values, constraints and opportunities could be established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>
114	114.26	<p>Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com</p>	<p>Provide a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.</p>	<p><b>Support.</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake. Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>
114	114.27	<p>Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com</p>	<p>Extend the green corridor to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.</p>	<p><b>Oppose</b> and note that land to the north, alongside the Rangitopuni Tributary, has been removed from the plan change area by way of Environment Court Decision NZENV049 dated 20 March 2024.</p>



114	114.28	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com	Clear objectives, polices, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.	<p><b>Support.</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake. Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>
114	114.29	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com	A neighbourhood park to be located to include the Beech tree and the overall grove of high value trees.	<p><b>Support</b> the owner to retain the high value trees at 306 Riverhead Road (also known as 298 Riverhead Road) that provides open space amenity to a ‘gateway location’ and a key cycle lane passing point for the Huapai – Riverhead cycle lane.</p> <p><b>But</b> the retention of high value trees on private property is outside of the PCF scope.</p>
114	114.30	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) mikerbrooke@outlook.com	That the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built.	In the High Court of NZ Decision – CIV-2023-404-835 [2023] NZHC 2481, judgement of WOOLFORD J dated 6 September 2023, that Matvin Group Limited application for land use and subdivision consents to establish a retirement village and associated facilities at 1092 Coatesville, Riverhead

				<p>Highway, Riverhead, Auckland, as per the Fast Tracks Panel decision of 29 March 2023, was quashed.</p> <p><b>AND:</b> In the Court of Appeal of NZ Decision – CA587/2023 a Notice of Abandonment of Appeal by Appellant Matvin Group Limited was accepted on 9 November 2023.</p> <p><b>AND:</b> PCF has recommended more direct pedestrian connections through 1092 Coatesville, Riverhead Highway for the plan change area to better access Riverhead Memorial Park.</p>
123	123 (Not noted)	Andrew Coombes and Tara Hatherley andrewwandtara@xtra.co.nz	<p>Parks &amp; Reserves - There are no objectives, policies, or standards that require the parks to be provided. This is a technical flaw which results in a very weak requirement to provide the parks. Without a clear requirement to deliver them, the parks might not result. Why would developers provide them if they don't have to?</p> <p>The Green Corridor - A north-south and east-west 'green corridor' is proposed. The plan change seeks a lot of flexibility about what the green corridor is, what it does and where it is located. The provisions are so non-committal a connected corridor (as shown on the Precinct Plan) would be unlikely to result in practice. Parts that are not directly required for stormwater would be developed for residential as this is more profitable. And the stormwater issue is still unresolved.</p>	<p><b>Support</b> but note that PCF has assessed that the Parks and Open Space Provision Policy 2016 and Auckland Plan 2050 is met (in-part) with regard to the existing open space provision of the Riverhead Memorial Park and has recommended to the applicant that two new neighbourhood parks (at a minimum) be established in the plan change area primarily based on the proposed residential MHS and THAB zoning for the plan change area.</p> <p><b>Support</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake. Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be</p>

				<p>established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>
132	132.3	Declan Penfold decpenfold@gmail.com	The proposed development must prioritise the preservation and expansion of green spaces to sustain our community's beauty and environmental well-being	<b>Support</b> 'green spaces'.
132	132.4	Declan Penfold decpenfold@gmail.com	Proper parks infrastructure, including paved sidewalks, adequate drainage, and designated parking areas.	<b>Support</b> but 'infrastructure', 'paved sidewalks', 'drainage' and 'designated parking areas' are outside the scope of PCF for Healthy Waters and Auckland Transport to comment on.
135	135.6	Paul Seymour paul.seymour@gmail.com	Supports IX.6.3 Riparian Margins and consider this will encourage biodiversity within the stream network.	<b>Support</b> but outside the scope of PCF for the Council Ecologist at Environmental Services to comment on.
140	140 (Not noted)	Caroline Church malik@carolinechurch.co.nz	<p>The proposed development does not provide adequate green areas with canopy trees. This development will be turning rural agricultural land into high density housing, completely changing the landscape and removing existing established trees to be replaced by grassed areas.</p> <p>The current specimen trees on properties along Riverhead Road need to be maintained and incorporated into any future development, not left in limbo with no guarantee they will be safe from removal. The future depends on trees to reduce carbon</p>	<p><b>Support</b> the owner to retain the high value trees at 306 Riverhead Road (also known as 298 Riverhead Road) that provides open space amenity to a 'gateway location' and a key cycle lane passing point for the Huapai – Riverhead cycle lane.</p> <p><b>But</b> the retention of high value trees on private property is outside of the PCF scope.</p>

			<p>emissions, keep the environment cool, mitigate erosion, provide habitat for wildlife, and for general wellbeing. I would like to see the land at 298 Riverhead Road vested to Council as a reserve for the entire community to use, with all trees intact, and more areas left undeveloped to form genuine green corridors, not grassed 'parks' with picnic tables. I would like to see more areas left accessible for the public, and that does not include wandering through a retirement village! Please refer to the Auckland Council Urban Ngahere Strategy when considering this point: The nine principles of Auckland's Urban Ngahere (Forest) Strategy</p>	
141	141 (Not noted)	Aberdeen Adventures Limited shanehartley@tnp.co.nz	<p>We consider the Mixed Housing Suburban Zone overall, or most of the site is appropriate other than where flooding and ecological constraints are confirmed to be significant and unable to be avoided or mitigated. This should also take into account potential engineering works and changes arising from the NPS FM/wetland review process that enable appropriate urban development.</p> <p>We consider the proposed Mixed Housing Suburban Zone applying to approximately 6,700m<sup>2</sup> of the site's land is appropriate.</p> <p>The proposed plan change has taken a broad and generic approach to the site, and has</p>	<b>Oppose</b> as outside the specific scope of PCF.

			unnecessarily limited additional urban development opportunities by applying the Mixed Rural Zone for flooding and ecological reasons. This is unnecessarily restrictive, preventing opportunity for appropriate further urban development when supported by more detailed engineering and ecological assessment. In regard to the identified wetland area, much of this appears to be potentially off little significant ecological value. And, as suggested in the PC 100 application, may not even qualify as wetland if the NPS Freshwater Management criteria are amended under the current NPS review process.	
157	157.6	Rob Mitchell and Karina Mitchell robmit@gmail.com	New development must provide for public parks.	<b>Support</b>
161	161.14	Auckland Transport spatialplanning@at.govt.nz	Amend Policy 8 as follows: '(8) Require the key local roads and pedestrian connections to be provided generally in the locations shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected street layout of streets and pedestrian connections that integrates with the collector road network within the precinct and the surrounding existing and proposed transport network.'	<b>Support</b> (in-part) once a clearer understanding is provided from the applicant on how the 'multi-purpose green corridor' will actually function and is feasible to be implemented as per the changes recommended by PCF and how this key spinal route connects with the proposed PC100 roading network.
161	161.38	Auckland Transport spatialplanning@at.govt.nz	Amend Assessment Criteria IX.8.2(2)(f) as follows: '(f) Whether a high quality and integrated network of local roads (including	<b>Support</b> (in-part) once a clearer understanding is provided from the applicant on how the 'multi-purpose green corridor' will actually function and is feasible to be

			collector and local roads) is provided within the precinct that has a good degree of accessibility and supports a walkable street network. Whether roads and active mode connections are aligned to provide visual and physical connections to open spaces, including along the stream network, where the site conditions allow.’	implemented as per the changes recommended by PCF and how this key spinal route connects with the proposed PC100 roading network.
169	169 (not noted)	Adrian Low, Jelas Drive, Riverhead	Incorporate protection into Open Spaces. Open Spaces: • Design parks around key ecological features for passive recreation and education. Walkways and Cycleways: • Develop paths that integrate with and protect ecological areas. • Use interpretive signage to educate the public. Biodiversity Retention: • Preserve existing biodiversity, including stands of trees and significant flora. • Implement management plans with regular monitoring and maintenance.	<b>Support</b> these open space design features, however these are too detailed to be included in the PC100 documentation and similar principals are already part of the Council ‘tool kit’ new neighbourhood park development utilises.
174	174.3	Claire Walker clare@wla.net.nz	Include provisions which state that development of the plan change area cannot proceed until comprehensive local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.	<b>Oppose</b> as outside the specific scope of PCF.
174	174.4	Claire Walker clare@wla.net.nz	The enormous retirement village privatised site creates pinch points of	In the High Court of NZ Decision – CIV-2023-404-835 [2023] NZHC 2481, judgement

			<p>available connectivity between the plan change area and existing Riverhead. East/west road connections through this area are key – providing chose to residents, weather on foot, bike or car. These should be recognised and addressed by requirements for upgrades.</p>	<p>of WOOLFORD J dated 6 September 2023, that Matvin Group Limited application for land use and subdivision consents to establish a retirement village and associated facilities at 1092 Coatesville, Riverhead Highway, Riverhead, Auckland, as per the Fast Tracks Panel decision of 29 March 2023, was quashed.</p> <p><b>AND:</b> In the Court of Appeal of NZ Decision – CA587/2023 a Notice of Abandonment of Appeal by Appellant Matvin Group Limited was accepted on 9 November 2023.</p> <p><b>AND</b> PCF has recommended more direct pedestrian connections through 1092 Coatesville, Riverhead Highway for the plan change area to better access Riverhead Memorial Park.</p>
174	174.5	Claire Walker clare@wla.net.nz	<p>Other routes within the community need addressing. For example, the road and pedestrian network of Te Roera Place and Duke Street do not show any proposed connectivity improvements or in fact any connection to the new Plan Change 100 area. This will be the route of choice for anyone going to Riverhead School and for those going north to Albany for work or shopping. Cambridge Road, Queen Stret, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. Cambridge Terrace paper road should be completed as a connecting road giving people choice and</p>	<p><b>Oppose</b> as outside the specific scope of PCF.</p>

			allowing traffic to disperse through our community. The development is putting the pressure on this road connection, so surely the developer should pay for this upgrade.	
174	174.6	Claire Walker clare@wla.net.nz	These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and horribly by the retirement village development. The supporting urban design report accurately describes War Memorial Park as the 'heart of Riverhead' but this recognition has not resulted in any meaningful response in PPC100. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings over CRH. The tension is that the CRH is a significant commuter route, and every move which benefits pedestrians puts more strain on the function of this route for people moving west and east between Albany Highway and SH16.	<b>Oppose</b> as outside the specific scope of PCF.
174	174.11	Claire Walker clare@wla.net.nz	Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger	<b>Support (in-part)</b> , but note that PCF has assessed that the Parks and Open Space Provision Policy 2016 and Auckland Plan 2050 is met (in-part) with regard to the existing open space provision



			requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.	of the Riverhead Memorial Park and has recommended to the applicant that two new neighbourhood parks (at a minimum) be established in the plan change area primarily based on the proposed residential MHS and THAB zoning for the plan change area.
174	174.12	Claire Walker clare@wla.net.nz	I want front yards sized to be adequate for planting large trees. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.	<b>Support</b> but planting of trees in private property are outside the scope of PCF and also note that PCF does support more large trees in the plan change area especially in new roads to be vested to Council and where appropriate in Open Space zoned land.
174	174.15	Claire Walker clare@wla.net.nz	To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, I request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.	<b>Support</b> and note that this is considered at a future subdivision stage of the process and the Auckland wide AUP(OP) provisions provide support for this outcome.
174	174.16	Claire Walker clare@wla.net.nz	Overall, our community wants the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.	<b>Support</b> but planting of trees in private property are outside the scope of PCF and also note that PCF does support more large trees in the plan change area especially in new roads to be vested to Council and where appropriate in Open Space zoned land
174	174.17	Claire Walker clare@wla.net.nz	I want provision to require the 20m margin of land	<b>Support</b> but note that this would come into effect when

			from the stream to be zoned as public open space and vested to the council. Development should be required to deliver environmental restoration and improvements to the stream corridor.	individual subdivision consents are lodged in the future. We do not zone these areas prematurely as the zonings in question would need to be changed if survey proved otherwise. They are protected by law and current AUP(OP) objectives and policies will be sufficient to identify the need
174	174.18	Claire Walker clare@wla.net.nz	I want the green corridor to be extended to establish an open space esplanade reserve and be available for public access. The river is an important taonga for our community.	<p><b>Support</b></p> <p>The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake.</p> <p>Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>
174	174.21	Claire Walker clare@wla.net.nz	I want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to	<p><b>Support</b></p>

			align with development of the stormwater/green network corridor necessary to support that development.	
174	174.22	Claire Walker clare@wla.net.nz	I want clarity of the intended use and function of 22 Duke Street with regard to stormwater, public access and environmental improvements	<b>Oppose</b> and note that land to the north, has been removed from the plan change area by way of Environment Court Decision NZENV049 dated 20 March 2024.
174	174.24	Claire Walker clare@wla.net.nz	I want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.	<b>Support</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake.  Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.  Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.  Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.
174	174.25	Claire Walker clare@wla.net.nz	I seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal	<b>Support</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake.  Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green

			<p>mechanism (as per IX.6.3. Riparian margin).</p>	<p>corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>
174	174.26	Claire Walker clare@wla.net.nz	<p>I want a clear description the intended composition corridor to be set out in the plan, including an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.</p>	<p><b>Support</b></p> <p>The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake.</p> <p>Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>

174	174.27	Claire Walker clare@wla.net.nz	I want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve, and require environmental improvements to the degraded margins.	<b>Oppose</b> and note that land to the north, and next to the Rangitopuni Tributary has been removed from the plan change area by way of Environment Court Decision NZENV049 dated 20 March 2024.
174	174.28	Claire Walker clare@wla.net.nz	Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated, because Policy 13 as drafted, will not achieve this outcome.	<p><b>Support</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake.</p> <p>Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.</p> <p>Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.</p> <p>Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.</p>
174	174.29	Claire Walker clare@wla.net.nz	I want a neighbourhood park to be located to include the Beech tree and the adjacent grove of high value trees at this location. These trees represent remnant heritage features and are important to the Riverhead Community. They can provide a unique opportunity to establish some old Riverhead	<p><b>Support</b> the owner to retain the high value trees at 306 Riverhead Road (also known as 298 Riverhead Road) that provides open space amenity to a ‘gateway location’ and a key cycle lane passing point for the Huapai – Riverhead cycle lane.</p> <p><b>But</b> the retention of high value trees on private property is outside of the PCF scope.</p>

			character in the new Riverhead development, along with established ecology and habitat.	
174	174.30	Claire Walker clare@wla.net.nz	It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place, or not. Requiring cross site connectivity and local roads for the scenario of the retirement village not being built. The interface with the residential community at Cambridge Road should be addressed in terms of appropriate built form and interface outcomes.	In the High Court of NZ Decision – CIV-2023-404-835 [2023] NZHC 2481, judgement of WOOLFORD J dated 6 September 2023, that Matvin Group Limited application for land use and subdivision consents to establish a retirement village and associated facilities at 1092 Coatesville, Riverhead Highway, Riverhead, Auckland, as per the Fast Tracks Panel decision of 29 March 2023, was quashed. AND: In the Court of Appeal of NZ Decision – CA587/2023 a Notice of Abandonment of Appeal by Appellant Matvin Group Limited was accepted on 9 November 2023. <b>AND</b> Parks and Community Facilities has recommended more direct pedestrian connections through 1092 Coatesville, Riverhead Highway for the plan change area to better access Riverhead Memorial Park.
205	205.7	Luxembourg Development Company Ltd; Riverhead bnzakeri@gmail.com	Amend Precinct Plan 2 to: • Delete the Multi-purpose Green Corridor and replace it with an annotation for stormwater conveyance. • Straighten the “bends” in the Collector Roads. • Delete the “key local roads”. • Align the “key pedestrian connections” to the Collector Roads.	<b>Oppose</b> and support a ‘multi-purpose green corridor’ as recommended for change as advocated by PCF.
205	205.18	Luxembourg Development Company Ltd; Riverhead bnzakeri@gmail.com	Delete reference to streets in IX.8.2(2) and Policy IX.3(19) and limit the provisions to the design of public open spaces.	<b>Oppose</b> but note that PCF has assessed that the Parks and Open Space Provision Policy 2016 and Auckland Plan 2050 is met (in-part) with regard to the existing open space provision of the Riverhead Memorial Park and has

				recommended to the applicant that two new neighbourhood parks (at a minimum) be established in the plan change area primarily based on the proposed residential MHS and THAB zoning for the plan change area.
205	205.19	Luxembourg Development Company Ltd; Riverhead bnzakeri@gmail.com	Delete the multi-purpose green corridors in IX.8.2(2)(i)-(k).	<b>Oppose</b> and allow for a 'multi-purpose green corridor' as recommended for change as advocated by PCF.
214	214.2	Te Tāhuhu o te Mātauranga / Ministry of Education eden.rima@Beca.com	Retain; Policy 10: Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing for safe access for cyclists on collector roads. Policy 11: Provide safe connections to public transport facilities and social infrastructures such as open space and schools.	<b>Oppose</b> as outside the PCF scope.
248	248.5	Linda Barton-Redgrave beezakiwi@gmail.com	If approved I would like to see a clear green corridor established for the many native birds in our area, and for walkways alongside this corridor and connecting paths throughout the development.	<b>Support</b> The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake.  Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.  Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.  Any future separate and specific set of standards would need to include appropriate measures,

				metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.
251	251.3	Desmond John Reid woodcraftbydesign @xtra.co.nz	The whole of 22 Duke Street to remain the current Future Urban Zone.	<b>Oppose</b> , but note that land to the north, that PCF understands includes 22 Duke Street, has been removed from the plan change area by way of Environment Court Decision NZENV049 dated 20 March 2024.
251	251.4	Desmond John Reid woodcraftbydesign @xtra.co.nz	Include 22 Duke Street in PC100.	<b>Oppose</b> , but note that land to the north, that PCF understands includes 22 Duke Street, has been removed from the plan change area by way of Environment Court Decision NZENV049 dated 20 March 2024.

7.4 Further submissions closed at midnight on 26 July 2024. Nine further submissions were received and reviewed with those relevant to Parks and Community Facilities responded to in Table B below.

Table D

Sub #	Sub Points	Submitter Name & Address for Service	Summary of Decisions Requested	Response
FS09	Various	Desmond John Reid woodcraftbydesign @xtra.co.nz	Primarily to allow submissions in support of 22 Duke Street being included in PC100 and disallow the green corridor as a functional solution to stormwater management.	<b>Oppose</b> , but note that land to the north, that PCF understands includes 22 Duke Street, has been removed from the plan change area by way of Environment Court Decision NZENV049 dated 20 March 2024. <b>AND</b> <b>Oppose</b> and allow for a 'multi-purpose green corridor' as recommended for change as advocated by PCF.
FS07	Various	Bowman Submitters; bnzakeri@gmail.com	Riverhead Community Association – oppose all submissions (points 114.1-114.31)  Claire Walker – oppose all submissions Points 174.1-174.34)	Parks and Community Facilities responses to the Bowman Submitters opposition submissions points of Riverhead Community Association and Claire Walker are noted in the Submissions Table C above.



## 8.0 Additional PC 100 Challenges

- Although outside the scope of PCF, multiple landowners within the plan change area will provide significant challenges to achieving open space outcomes in a co-ordinated and deliverable time-sensitive manner.
- Although outside the scope of PCF, twenty-eight hectares of land in the PC100 area is owned by 'silent observers' to the plan change process, again providing additional challenges to achieving open space outcomes in a co-ordinated and deliverable time-sensitive manner.
- Although outside the scope of PCF, the Matvin Group Limited, another 'additional silent observer' owns approximately 10 hectares of land in a critical part of the PC100 area and as no retirement village is consented - now what use becomes of this land and how does it integrate with its surrounds and make effective connection to the Riverhead Memorial Park.
- Although outside the scope of PCF, road widening of the Riverhead Coatesville Highway would mean existing mature berm trees would be removed so mature trees within private property become even more important. Although trees in private property are outside the scope of PCF we support their retention in providing green space amenity to road frontages if these frontages become devoid of trees through road widening designation implementation.
- Although outside the scope of PCF, the Riverhead stream still poses a significant flood risk based on recent extreme flooding events. Flood mitigation for the new park areas may still have to be actioned even though the recommended two specific park locations are outside the current modelled flood plains.
- Although outside the scope of PCF, how are the cultural values and relationships that interested iwi have with the land in Riverhead truly recognised from an open space perspective? On this note, in the future, if open space zones are created and the land acquired by Council for two neighbourhood parks, Manawhenua will be collaborated with in relation to Te Aranga design principals and how these can be incorporated in these spaces.

## 9.0 PC100 PCF In-Scope recommendations

- 9.1 Aspirational open space methodologies have been identified in relation to open space provision within the PC100 documentation as follows:

### Multi-purpose green corridor

- A north south multi-purpose green corridor has been proposed through the middle of the plan change area that functions as a structural placemaking element, promotes ecological linkages, adopts an integrated exemplar stormwater management approach, provides for open space and open space connectivity, provides amenity for key pedestrian and cycle

networks, and supports the road hierarchy and thereby legibility of the movement network.

#### Riverhead Memorial Park

- The existing Riverhead Memorial Park has been identified as the 'heart' of the community.

#### Three neighbourhood park locations

- Three neighbourhood park locations have been identified by the applicant.

#### Riverhead Memorial Park PCF recommendation(s) to the applicant

##### **Multi-purpose green corridor**

- The PC100 precinct IX.2 objective and IX.3(13)(a)-(d) policy description outlines the multiple functions that this corridor should undertake.
- Further feasibility of all these functions (from the PC 100 applicant) occurring in the one multi-purpose green corridor from a PCF perspective is required.
- Perhaps a specific set of multi-purpose green corridor standards that align with environmental and open space values, constraints and opportunities could be established in future documentation.
- Any future separate and specific set of standards would need to include appropriate measures, metrics and methods, to establish that the corridor is delivering on the outcomes noted and managing identified effects.

##### **Riverhead Memorial Park**

- Parks would like to maximise and utilise the existing Riverhead Memorial Park to take on some of the residential density growth anticipated.
- The 'unconsented' Retirement Village land, owned by Matvin Group Limited, observers (and I understand submitters through third parties) to the PC100 process, provides a direct obstruction for the majority of the plan change area residents gaining safe and direct walkable access to the Riverhead Memorial Park.
- Although outside PCF scope, pedestrian streets to Council standards, including specimen tree planting and wide shared footpaths should be provided through this area to allow permeable, safe and direct pedestrian access to Riverhead Memorial park. These streets can be publicly vested roads or privately owned, either managed and maintained by the Council or private landowner, with both options subject to Council standards.
- The Riverhead: Precinct plan 2 – Structural elements (IX.10.2) should be amended for the northern part of the RPC area (as per **Figures 8 and 9 - Greenways**) to include these and

other more direct pedestrian routes through to the Riverhead War Memorial Park as noted.

### Three neighbourhood park locations

- Medium density thresholds for the predominant Residential – Mixed Housing Suburban zone (MHS) and smaller pocket of Residential – Terraced Housing and Apartment Building zone (THAB) have been alluded to as per the Open Space Provision Policy 2016, being the key driver for open space needs in the PC100 area.
- Parks needs to utilise flat land where appropriate. Shape to be as square or rectangular as possible.
- Parks apply a 400m ‘pedestrian shed’ catchment to maximise usage and centralise parks to maximise the ‘pedestrian shed’ catchment area.
- Ensure parks are set back away from arterial routes (ideally collectors as well).
- Parks maximise utilities by centralising the park site locations.
- As riparian walkways or cycleways or esplanade reserves have not been indicated in the PC100 area, neighbourhood parks at a minimum of 5000m<sup>2</sup> are warranted.
- Parks policies provide guidance that the proposed neighbourhood parks can accommodate a 900m<sup>2</sup> kick back space (30x30).
- Park edge road provision to accommodate Crime Prevention Through Environment Design (CPTED) principals.
- Parks would like to maximise and utilise the existing Riverhead Memorial Park to take on some of the residential density growth anticipated.
- Because of the existing Riverhead Memorial Park, we lose a central indicative park with only **two** additional neighbourhood parks at a minimum of 5000m<sup>2</sup> now required. The existing Riverhead Memorial Park ‘pedestrian shed’ covers the central gaps.
- Through negotiation, we would require that these general locations be zoned open space in future amendments or iterations to the PC100 zoning plan.

9.2 Parks and Community Facilities requests answers from the applicant to the recommendations made in relation to the: multi-purpose green corridor; safe and direct pedestrian connections to the Riverhead Memorial Park; and the now two neighbourhood park scenario and its metrics.

9.3 Submissions and further submissions for PC100, in relation to relevant open space matters, have been reviewed and responded to by the PCF Team in Tables C and D above. There is no further comment to be made in relations to the submissions.

10. Conclusions

- 10.1 Request that the PC 100 applicant prepare a specific set of multi-purpose green corridor standards directed by the proposed precinct IX.2 objectives, and policies IX.3(13)(a)-(d), to provide open space outcomes that manage identified adverse effects.
- 10.2 IX.10.2 Riverhead: Precinct plan 2 – Structural Elements is to be amended to include two additional direct east to west pedestrian connections towards the Riverhead Memorial Park on that part of the PC100 map area north of Riverhead Road (on land owned by Matvin Group Limited).
- 10.3 IX.10.2 Riverhead: Precinct plan 2 – Structural Elements is to be amended to include one additional direct east to west key local road (indicative location) through 1092 Coatesville Riverhead Highway towards the Riverhead Memorial Park on that part of the PC100 map area north of Riverhead Road.
- 10.4 IX.10.2 Riverhead: Precinct plan 2 – Structural Elements is to be amended to delete the three proposed neighbourhood parks (indicative locations) and amend by illustrating the proposed locations of two neighbourhood parks as shown in **Figure 14** above. The legend, in relation to the neighbourhood parks, is to be amended as follows: Proposed neighbourhood park locations (having a minimum area of 5000m<sup>2</sup> each).
- 10.5 PCF support PC100 in relation to open space and recreation facilities within the Riverhead Plan Change area subject to adherence to conclusions 10.1, 10.2, 10.3, and 10.4 above.

Memo ends

## **Private Plan Change 100 – Riverhead (PPC 100)**

### **Specialist Review (Stormwater and Flooding) on behalf of Auckland Council**

**(Amber Tsang and Kedan Li)**

**10<sup>th</sup> February 2025**

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#### **Introduction**

1. This memorandum has been jointly written by Amber Tsang, Senior Associate Planner at Jacobs and Kedan Li, Senior Healthy Waters Specialist at Auckland Council Healthy Waters.
2. Amber Tsang has worked as a consultant planner for Healthy Waters since 2016. Ms Tsang holds a Bachelor of Planning (Hons) degree from the University of Auckland and has been a full member of the New Zealand Planning Institute since 2012.
3. Kedan Li has worked as a Senior Healthy Waters Specialist (Catchment Manager) since 2020. Ms Li holds a Bachelor of Engineering (Hons) degree from the University of Auckland and has been a Chartered Stormwater Engineer since 2022.
4. We (Ms Tsang and Ms Li) have reviewed the proposed stormwater management approach and flood risk assessment submitted as part of PPC 100, on behalf of Auckland Council Healthy Waters, in relation to stormwater and flooding effects.
5. In writing this memorandum, we have reviewed the following documents:
  - Stormwater Management and Flood Risk Assessment for Riverhead Plan Change Area by CKL, Revision 04, dated 29/09/2023 (henceforth referred to as the CKL report).
  - Proposed Riverhead Precinct provisions.
  - Submissions received on PPC 100 raising stormwater and flooding related issues.
6. The Auckland Council Healthy Waters' Regionwide Network Discharge Consent (NDC) authorisation process, and the review and approval of the Applicant's Stormwater Management Plan (included in the CKL report) is not covered by this memo.
7. In preparing this review we have read the code of conduct for expert witnesses contained in the Environment Court Practice Note (2023) and agree to comply with it. Except where we state that we are relying on the specified evidence of another person, the content of this review is within our respective areas of expertise. We have not omitted to consider material facts known to us that might alter or detract from the opinions we express. Where there is an opinion expressed in this memorandum, it is clearly stated whose opinion it is.

#### **Key stormwater management issues**

8. PPC 100 seeks to rezone 6ha of land in Riverhead from Future Urban zone to Rural-Mixed Rural zone and approximately 75.5 ha of land<sup>1</sup> from Future Urban to a mix of

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<sup>1</sup> The CKL report details a total land area of 80.6ha.

Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones under the Auckland Unitary Plan – Operative in Part 2016 (AUP(OP)). The new Riverhead Precinct is being proposed as part of PPC 100.

9. PPC 100 will enable greenfield development on the site and result in new stormwater discharges and diversions of existing stormwater flows. The key stormwater management issues associated with PPC 100 are:
  - Downstream flood effects – the existing flooding risks within the downstream Riverhead stormwater catchment are already significant. Development increases imperviousness and will result in an increase in flow rate and volume of runoff being discharged from the PPC 100 site onto the existing downstream developed area. Flood effects are required to be avoided or mitigated to match with the pre-development conditions so that flooding risks to people, properties and infrastructure in the downstream area are not increased.
  - Flood management within the PPC 100 site – placing new subdivision and urban development within floodplains will create new flooding risks to people, properties and infrastructure. Floodplains within the plan change area are required to be appropriately incorporated into the proposed urban layout and the proposed development must not be subject to flooding.
  - Water quality – the stormwater runoff from the plan change area is proposed to discharge into the Upper Waitemata Harbour via different streams. The Upper Waitemata Harbour is identified as a marine Significant Ecological Area (SEA) under the AUP(OP) (reference: SEA-M2-57b). Appropriate treatment of stormwater is required onsite prior to its discharge in order to manage water quality effects.
  - Stream hydrology and erosion – development increases imperviousness and will result in an increase in flow rate and volume of runoff into the stream network while reducing ground infiltration unless mitigated. Appropriate mitigation is required to retain base flow and reduce the risk of erosion in the watercourses and on downstream structures, such as vehicle crossing bridges.
  
10. Detailed discussion is provided in the following sections to assist the reporting planner's consideration of the plan change request in terms of stormwater and flooding effects:
  - Flooding in Riverhead (the existing/receiving environment).
  - Downstream flood effects.
  - Flood hazards within the PPC 100 site.
  - Onsite flood management.
  - Water quality and stormwater treatment.
  - Hydrological and erosion mitigation.
  - Submissions.

## Flooding in Riverhead (the existing/receiving environment)

11. The PPC 100 site is located within the Riverhead stormwater catchment. As stated in Section 2.1 of the CKL report, the current land use within the PPC 100 site is predominantly agriculture and horticulture, with some rural residential. PPC 100 seeks to enable greenfield development on the site.
12. Section 2.6 of the CKL report provides an overview of the existing flood hazards within and downstream of the PPC 100 site. However, Figure 8 in the CKL report includes the Auckland Council GeoMaps' overland flow paths (OLFP), flood plain and flood prone areas that were published back in 2012, they are out of date. The flood hazard map on GeoMaps has been updated and published in June 2023 (see Figure B below).
13. There are known and documented flooding issues in Riverhead. The flooding risk to the area was realised during a number of past weather events. Table 1 below provides a timeline of the past recent weather events and corresponding requests for service (RFS) reports received by Auckland Council for the Riverhead stormwater catchment. The RFS reports indicated that the area located immediately downstream of PPC 100 (i.e. circled in Figure A below) is one of the worst affected areas within the catchment.

*Table 1: timeline of past weather events and RFS reports received in the Riverhead stormwater catchment.*

Past weather events <i>Note: dates are based on historical rainfall data</i>	RFS reports (flooding) <i>Note: reports are based on the customer request for services received by Auckland Council</i>
23-25 February 2023	<ul style="list-style-type: none"> <li>• Residents from <b>Mill Grove, Te Roera Place and Duke Street</b> had reported flooding in their property and along the road.</li> </ul>
27-28 January 2023 Auckland Anniversary weather event	<ul style="list-style-type: none"> <li>• Severe flooding (including habitable floor flooding) along <b>Mill Grove, Te Roera Place and Duke Street</b> had been reported.</li> <li>• Figure A below includes photos of the flood situation and locations of where the photos were taken.</li> </ul>
29-30 August 2021	<ul style="list-style-type: none"> <li>• Residents from <b>Cambridge Road</b> had reported severe flooding of approximately 20-30cm deep and flood water in the garage.</li> <li>• Residents from <b>Crabb Fields Lane</b> had report garage flooding and flood water about to reach the kitchen.</li> <li>• Residents from <b>Wautaiti Drive</b> had to leave their property.</li> <li>• Residents from <b>Mill Grove</b> had reported knee-high flooding on the road and habitable floor flooding.</li> <li>• Residents from <b>Riverhead Road, Te Roera Place and Duke Street</b> had also reported flooding.</li> </ul>
2-4 July 2019	<ul style="list-style-type: none"> <li>• Residents from <b>Mill Grove and Duke Street</b> had reported flooding in their property and along the road.</li> </ul>
22-23 March 2018	<ul style="list-style-type: none"> <li>• Residents from <b>Cambridge Road</b> had reported garage flooding of approximately 1m deep.</li> <li>• Residents from <b>Duke Street</b> had reported flooding in their property and along the road.</li> </ul>
10-12 March 2017	<ul style="list-style-type: none"> <li>• Residents from <b>Cambridge Road and Duke Street</b> had reported flooding in their property and along the road.</li> </ul>
22-23 June 2016	<ul style="list-style-type: none"> <li>• Residents from <b>Cambridge Road and Duke Street</b> had reported flooding in their property and along the road</li> </ul>



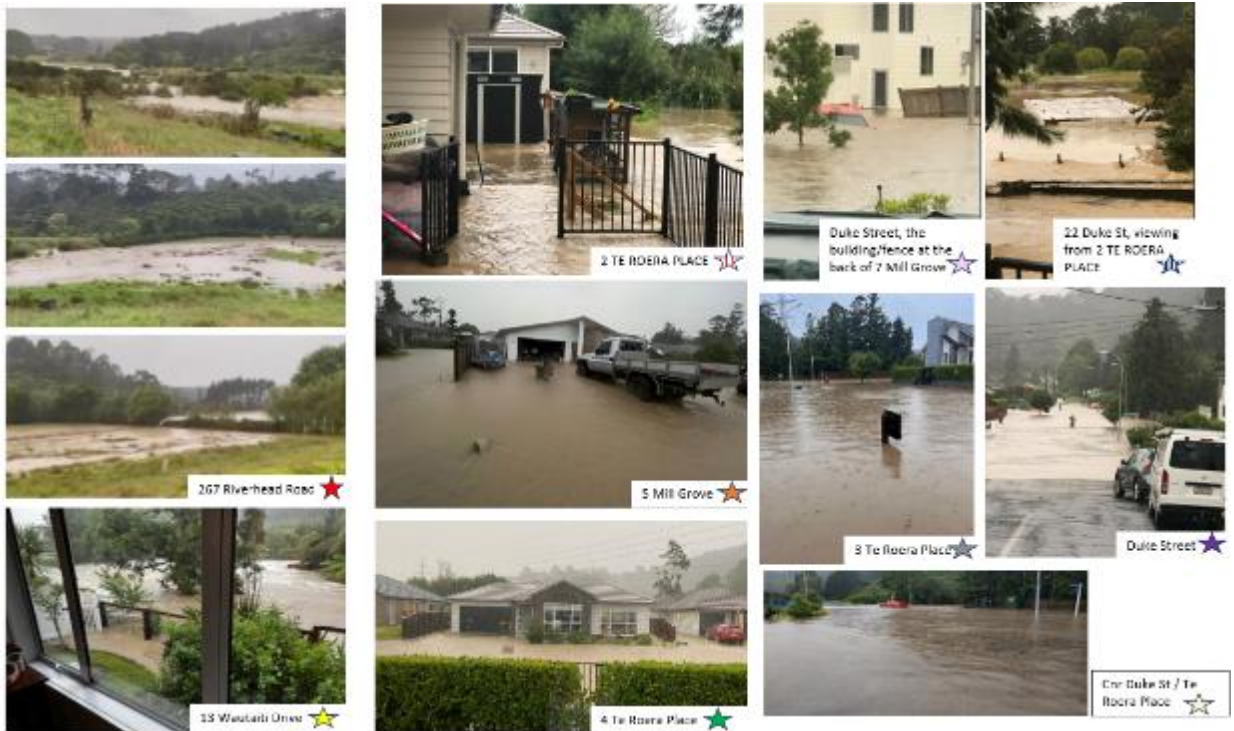


Figure A: photos of the flood situation of the Auckland Anniversary weather event and locations of where the photos were taken. The PPC 100 site is highlighted in yellow. A larger image of Figure A is included in **Attachment D**.

14. Flooding events in January and February 2023 in Riverhead have resulted in Auckland Council needing to purchase three private residential properties in the area. As part of the Tāmaki Makaurau Recovery Plan for Auckland’s recovery from the severe weather events of 2023, a categorisation programme has been set up for storm-affected



homeowners to have their home assessed for future flooding risk. The assessments of the properties identified if there was an intolerable risk to life as a result of the observed rainfall and modelled flood hazard.

15. At the time of writing this memorandum, ten properties within the Riverhead stormwater catchment have opted into the categorisation process. Seven out of the ten properties are located downstream of PPC 100, in which three properties have been assessed to meet the threshold for intolerable risk to life to date. Council's purchase of these properties is required as there is no feasible mitigation available to reduce the risk of future weather events. It should be noted that not all risk assessments for property categorisation have been completed.
16. A number of submitters who have made a submission on PPC 100 have also provided photographs and their observations of the past weather events, including the January 2023 Auckland Anniversary weather event. These submissions support the flood situation in areas downstream of PPC 100 as identified above.
17. The RFS reports also match with the flood modelling prediction and flood hazards mapping undertaken by Auckland Council<sup>2</sup>. As shown in Figure B below (a snapshot from the Auckland Council GeoMaps), many areas of the existing Riverhead urban environment downstream of PPC 100 are predicted to be within the 1% Annual Exceedance Probability (AEP) floodplain. These areas are predicted to be covered by flood water during in a 1% AEP rainfall event in the catchment.

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<sup>2</sup> Updated and published in June 2023 on GeoMaps, based on the 3.8°C climate change factor and Maximum Probable Development (MPD) assuming 70% of impervious area for the Future Urban Zones.



Figure B: 1% AEP floodplain and overland flow path over the PPC 100 site (highlighted in yellow) and in the surrounding area as shown on GeoMaps.

### Downstream flood effects

18. One key potential effect in contention is the downstream flood effects in response to the proposed land use change of PPC 100.

### AUO(OP) Regional Policy Statement

19. Objectives B10.2.1 (2), (3) and (4), and Policy B10.2.2 (7) of the AUP(OP) Regional Policy Statement (RPS) (quoted below) provide the policy direction on how natural hazards risk (including flooding) and effects of climate change should be managed.

#### *B10.2.1 Natural Hazards and Climate Change Objectives*

*(2) The risks to people, property, infrastructure and the environment from natural hazards are not increased in existing developed areas.*

*(3) New subdivision, use and development avoid the creation of new risks to people, property and infrastructure.*

*(4) The effects of climate change on natural hazards, including effects on sea level rise, over at least 100 years and on the frequency and severity of storm events, is recognised and provided for.*

#### **B10.2.2 Policies**

*(7) Avoid or mitigate the effects of activities in areas subject to natural hazards, such as earthworks, changes to natural and built drainage systems, vegetation clearance and new or modified structures, so that the risks of natural hazards are not increased.*

20. These objectives and policies form the basis of our review and assessment, which is to determine:
- Whether stormwater runoff from subdivision and development enabled by PPC 100 has the potential to increase flooding risks to people, properties and infrastructure; and
  - Whether PPC 100 presents an acceptable avoidance or mitigation of any actual and/or potential flood effects of the proposed land use change.

#### **Impact on floodplain extent**

21. A flood model has been built by the Applicant (the PPC model) and a Flood Risk Assessment Report<sup>3</sup> has been prepared. The PPC model provides a high level comparison of the pre and post development scenarios for different rainfall events. Flood maps showing the floodplain extent with the maximum flood depth of the modelled scenarios are included in Appendix 3 of the Flood Risk Assessment Report.
22. Ms Li has concerns that there are areas of potential increase of floodplain extent that have not been assessed by the Applicant in their Flood Risk Assessment Report. The following illustrates the potential increase of floodplain extent as indicated in the PPC model, with snapshots extracted from the model.
23. First comparison: potential increase of floodplain extent near 1 Wautaiti Drive between the pre and post development scenarios for the 1% AEP event without the climate change factor. The area shown in green in Figure C below is the new affected area.

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<sup>3</sup> Rev 02, prepare by CKL, dated 08/12/2022, in Appendix 3 attached to the CKL report.

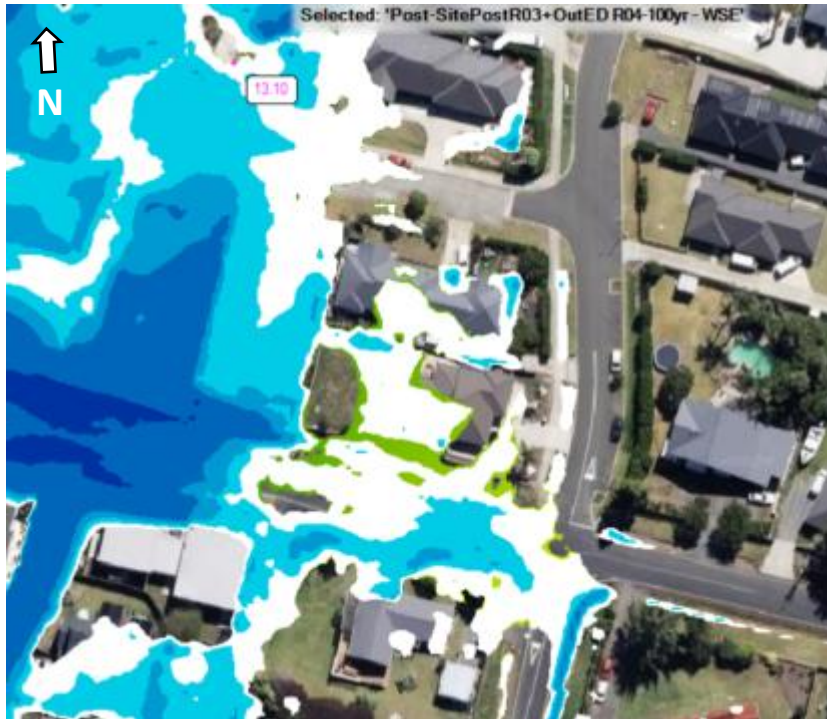


Figure C: Potential increase of floodplain extent (shown in green) between the pre and post development scenarios for the 1% AEP event without the climate change factor.

24. Second comparison: potential increase of floodplain extent along Wautaiti Drive and Crabb Fields Lane between the pre-development scenario for the 1% AEP event without the climate change factor and the post development scenario with development enabled by PPC 100 and MPD (Maximum Probable Development) across the balance of the catchment for the 1% AEP event with 3.8°C climate change factor. The area shown in green in Figure D below is the new affected area.
25. The 3.8°C climate change factor allows for the prediction of future flooding risks in hydraulic models by including climate-driven changes in rainfall, runoff, and flood levels resulting from future temperature rises over the next 100 years. Ms Li considers that the 3.8°C climate change factor is the appropriate factor for assessing effects of climate change in relation to flooding risks as per the Auckland Council Stormwater Code of Practice (SWCoP).



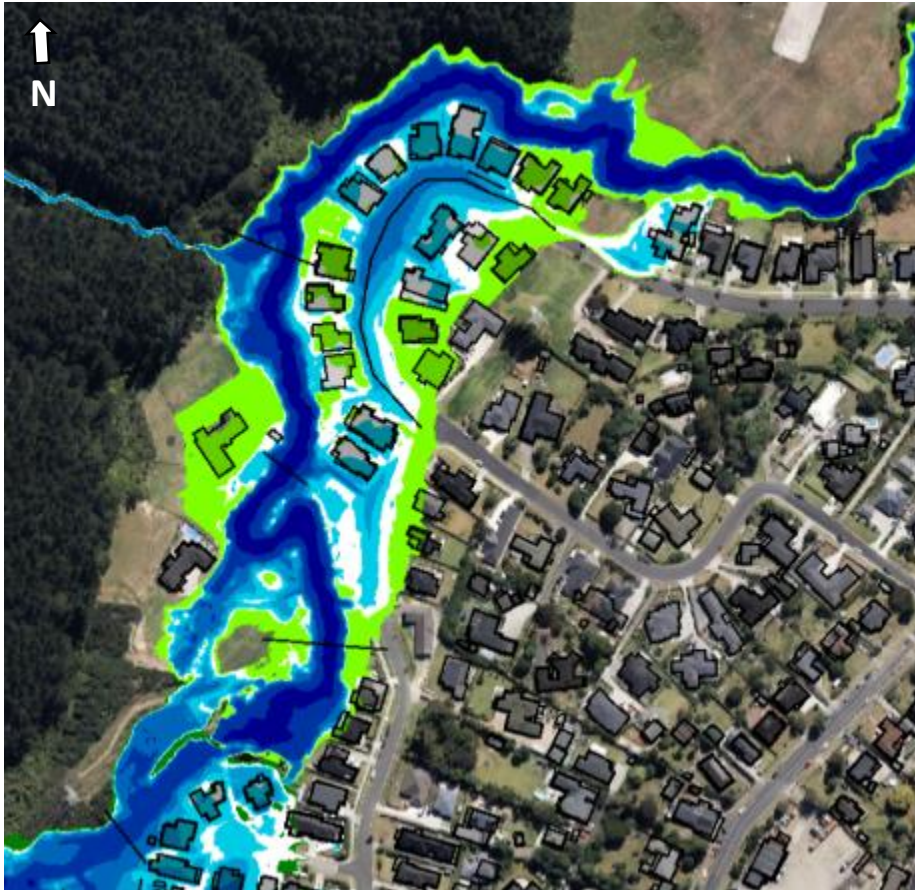


Figure D: Potential increase of floodplain extent (shown in green) between the pre-development scenario for the 1% AEP event without the climate change factor and the post development scenario with PPC 100 within site and MPD (Maximum Probable Development) outside the 1% AEP event with 3.8°C climate change factor.

26. The first comparison considers the effects of the proposed land use change alone (i.e. by excluding the climate change factor in both the pre and post development scenarios). It indicates a small increase of the floodplain extent. The second comparison considers the effects of land use change together with the effects of climate change. It indicates a significant increase of the floodplain extent (i.e. ten additional houses would be affected). Ms Li advises that although this comparison is conservative as the areas outside of PPC 100 are modelled as MPD rather than existing impervious development level (ED), this provides a predication of the worst case scenario (i.e. considering the cumulative effects of the AUP(OP) permitted impervious level in the whole stormwater catchment with no flood mitigation).
27. Section 7 of the Resource Management Act 1991 requires that particular regard shall be given to the effects of climate change in relation to managing the use, development, and protection of natural and physical resources. Objective B10.2.1 (4) of the AUP(OP) RPS (quoted in paragraph 19 above) also directs the need to recognise the effects of climate change. The effects of climate change in relation to downstream flooding risks for the post development scenario have not been addressed in the Applicant's Flood Risk Assessment. In Ms Tsang's opinion, the effects of climate change need to be considered when assessing the flood effects of PPC 100.

## Impact on property/backyard flooding

28. As stated in Section 5.1 of the Flood Risk Assessment Report, the existing flood depth in the area downstream of Duke Street (i.e. in general accordance with the area circled in Figure A above) is greater than 300mm (and over 1m on Duke Street based on the PPC model), and the existing flood risk classification is already Significant (based on the Auckland Council Modelling Specification Hazard Classification<sup>4</sup>). The post development flood depth is modelled to increase by 10-50mm in the area and the flood hazard factor (based on velocity x depth) will increase by  $< 0.1\text{m}^2/\text{s}$ . The indicated increments are small, but they add to the existing problem.
29. In addition, the indicated increments were not modelled nor assessed on the basis that there are existing built developments (except for roads) downstream of PPC 100. The PPC model has assumed that buildings have the same energy loss as everything else (i.e. no obstruction). Ms Li advises that to understand flood behaviour around buildings and assess impacts on property/backyard flooding, building footprints need to be taken into consideration in modelling assessment. Buildings would create flow obstruction and diversion, lead to storage volume reduction, and potentially increase flow velocities. Flood effects can be misrepresented and/or underestimated if building footprints were not considered as an obstruction in the modelling assessment.
30. Ms Li advises that building footprints should be included and represented as an obstruction or roughness polygons with appropriate roughness values in the PPC model for all the model scenarios.
31. In addition, it is shown on Flood Map Figure 21 in Appendix 3 of the Applicant's Flood Risk Assessment Report that there is a flood depth increment of 20-30mm near the property at 35 Crabb Fields Lane and an increment of greater than 0.1m near Mill Grove (see circled areas in Figure E below). Ms Li notes that the indicated increment near Mill Gove is isolated and recommends the Applicant to confirm and clarify if they were caused by subcatchment loading during modelling (i.e. modelling limitations).

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<sup>4</sup> This is the modelling specification that applies to stormwater catchment studies and flood hazard assessment prepared by Auckland Council and in this case by the Applicant of PPC 100.



Figure E: Extract of Flood Map Figure 21.

32. Another modelling input data issue needing clarification is the reason for using Topography Survey TIN for the ground level in the PPC model, as stated in Section 3.5.2 of the Flood Risk Assessment Report. Ms Li advises that the Applicants needs to clarify what the TIN is for, the location where the TIN has been applied, and how this might have affected the PPC model results.

#### **Impact on habitable floor flooding**

33. Ms Li advises that any potential impact on habitable floor flooding is unknown because firstly, as mentioned above, the PPC model does not include buildings as obstruction. In addition, the existing habitable floor level of downstream properties will need to be surveyed to inform the assessment of habitable flood flooding.
34. As discussed above, the existing flooding risks within the downstream Riverhead stormwater catchment are already significant and there are known habitable floor flooding issues downstream of the plan change area. Given this, Ms Li considers that a habitable floor flooding assessment is required to be undertaken by the Applicant for downstream properties that are located within the Council published floodplain as shown on GeoMap. As part of the Flood Recovery Categorisation Programme, Healthy Waters have surveyed a number of downstream properties, and this information can be shared with the Applicant.

#### **Impact on road flooding**

35. As discussed in paragraph 13 above, there are known and documented flooding issues on Duke Street (along with other roads in the locality of PPC 100). As indicated

in the PPC model, flood depth on Duke Street would increase from 500-1200mm to 500-1300mm (i.e. a potential increase of 100mm in flood depth) and flood velocity would remain at 0.3-2.5m/s in the post development scenario for the 1% AEP event without the climate change factor. Based on the flood hazard classification of the Australian Disaster Resilience (ADR) Flood Hazard Guideline<sup>5</sup>, the hazard class (based on flood depth and velocity) will remain as H4 (unsafe for people and vehicles) to H5 (unsafe for vehicles and people, all buildings vulnerable to structural damage, some less robust building types vulnerable to failure) in both the pre and post development scenarios. The indicated increases are small, but they will add to the existing problem which is already significant.

36. In addition, Ms Li has concerns about the three existing culverts along Duke Street (see Figures 6 and 11 below) not having sufficient capacity to accommodate additional flows in response to the proposed land use change. During heavy rainfall events, Duke Street would overtop further if the culverts were under capacity.
37. Based on the high-level information provided in the CKL report, stormwater runoff from the majority of the PPC 100 area is understood to be discharged through these three existing culverts along Duke Street. However, the CKL report provides no information or assessment on whether these culverts have the capacity to accommodate additional flows in response to the proposed land use change. Ms Li advises that the Applicant needs to provide a detailed capacity assessment of the Duke Street culverts (in their hearing evidence) to assess flow restrictions, backwater and overflow effects, and to confirm if any effects mitigation would be required and what that would entail.
38. Riverhead Road is identified as an Arterial Road in the AUP(OP). As stated in Section 9.4.3 of the Flood Risk Assessment Report, the Riverhead Road culvert (750mm diameter) has insufficient capacity with 220mm road overtopping under the existing condition during the 10% AEP event without climate change. As indicated in the PPC model, flood depth on Riverhead Road near the 750mm culvert (refer to Figure 6 below) would increase from 889mm to 980mm and flood velocity would increase from 0.56m/s to 0.59m/s in the post development scenario for the 1% AEP event without the climate change factor. Based on ADR Flood Hazard Guideline, the hazard class will remain as H3 which means that it is unsafe for vehicles, children and the elderly.
39. As stated in Section 9.4.3 of the CKL report, upgrade to the Riverhead Road culvert is recommended to ensure sufficient capacity for the 1% AEP runoff conveyance and to avoid road overtopping. Ms Li advises that the Applicant needs to confirm whether the recommended culvert upgrade forms part of the PPC 100 proposal as a flood mitigation. Consultation with and agreement from Auckland Transport (i.e. the asset owner) will also need to occur at this plan change stage. In the situation where approval from Auckland Transport cannot be obtained, alternative flood mitigation will need to be considered and assessed in the Applicant's hearing evidence.
40. In addition, upgrade of the Riverhead Road culvert would increase flow to the receiving stream and downstream built area. It is stated in Section 9.4.3 of the CKL report that the culvert upgrade will have less than minor impact on the downstream. But there is no evidence to support this statement. Ms Li advises that downstream flood effects

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<sup>5</sup> Australian Disaster Resilience Handbook Collection Flood Hazard Guideline 7-3, dated 2017, prepared by the Australian Institute for Disaster Resilience.



resulting from the increased flow due to the culvert upgrade needs to be confirmed. Also, an assessment of downstream erosion and stream bank stability effects at the resource consent stage is considered necessary to determine if and what site specific stream erosion mitigations would be required. A special information requirement regarding this is recommended to be included in the precinct provisions, should PPC 100 be approved.

41. As stated in Section 9.4.1 of the CKL report, Coatesville-Riverhead Highway (also an Arterial Road) near the 1200mm culvert (refer to Figure 6 below) would overtop by 150mm depth under the existing condition and be further increased by 40mm due to the proposed land use change during the 1% AEP event. Flood velocity will increase by 0.03m/s.
42. However, Ms Li advises that the flood effects presented in Section 9.4.1 of the CKL report are different to those indicated in the PPC model. As indicated in the PPC model, flood depth on Coatesville-Riverhead Highway near the 1200mm culvert would increase from 461mm to 501mm and flood velocity would increase from 0.275m/s to 0.376m/s, in the post development scenario for the 1% AEP event without the climate change factor. Based on the ADR Flood Hazard Guideline, the hazard class will change from H2 (unsafe for small vehicles) to H3 (unsafe for vehicles, children and the elderly). Based on this, Ms Li considers that flooding risks to road users (including emergency services) will increase as a result of the proposed land use change, and that the Applicant needs to consider and propose flood mitigation. Consultation with and approval from Auckland Transport are also required.

#### **Impact on frequency of flooding**

43. The PPC model indicates no increase in the frequency of flooding within the stream channels with the current modelling approach. However, there is not enough information to assess the frequency of property and/or habitable floor flooding. Such assessment will require building footprints to be included and represented specifically in the PPC model for all the model scenarios, as discussed above.

#### **Impact on duration of flooding**

44. While the modelled flood duration at the selected locations (as shown in Appendix 4 of the Applicant's Flood Risk Assessment Report) is not shown to have changed between the pre and post development scenarios, Ms Li notes that the data presented by the Applicant has been rounded to the nearest half-hour. As a result, any increase in flood duration of less than half an hour would not have been captured.
45. Ms Li considers that any duration change should be presented in the time unit of minute instead of hour to provide a better representation of change. This is of particular relevance to the assessment of road flooding, as impacts on public access routes to and from properties need to be considered to ensure that residents are able to safely evacuate in the event of a flood.

#### **Mitigation of flood effects**

46. No on-site attenuation is being proposed by the Applicant, and hence stormwater runoff from the PPC 100 site is to be passed forward (i.e. pass forward flow without

mitigation) as stated in the CKL report. However, based on the PPC model results (as discussed in paragraphs 21-45 above), neither the proposed passing forward flow approach nor on-site attenuation (24-hour) would present an acceptable mitigation of flood effects of the proposed land use change. Ms Li agrees that attenuation of flows over a 24-hour period would increase the risk of coinciding with peak flows in the catchment, as stated in Section 9.5 of the CKL report.

47. Ms Li advises that alternative flood mitigation options such as extended attenuation (i.e. over a 48 to 72-hour period instead of 24-hour) should be considered and assessed by the Applicant. This would shift the attenuation release beyond and after the peak flows in the catchment and with outlet control modification flow can be released gradually to match with the pre-development conditions.

### **Downstream flood effects summary**

48. Overall, the PPC model indicates increases in floodplain extent, property/backyard and road flooding in response to the proposed land use change. The increase of flooding as a consequence of the development PPC 100 seeks to enable will add to the existing downstream flood problem which is already significant. The flood issues exacerbate when the effects of the proposed land use change are considered together with the effects of climate change.
49. As stated in Section 9 of the CKL report, the Applicant's consultants consider that the indicated increase in flooding is small, and hence effects would be less than minor. However, in Ms Li's opinion, and as set out above, the assessment provided by the Applicant lacks sufficient evidence to confirm that this is the case.
50. Further information and assessment regarding property/backyard flooding, habitable floor flooding, road flooding, frequency and duration of flooding, and flood mitigation (as detailed above) are recommended to be provided by the Applicant in their hearing evidence to confirm the downstream flood effects and flood mitigation so that flooding risks to people, properties and infrastructure in the downstream areas will not increase.

### **Flood hazards within the PPC 100 site**

51. The Tāmaki – Whenua Taurikura Auckland Further Development Strategy 2023-2053<sup>6</sup> (FDS) has identified the PPC 100 site as being constrained by flood hazards and provided direction on flood hazards in relation to the Riverhead Future Urban Area (FUA). Section 4.2.6 of the FDS states that:

*The northern portion of the Kumeū-Huapai-Riverhead FUA located within the 1% AEP floodplain of the Kumeū River and Riverhead River is no longer considered appropriate for urban development. Development in these locations is not appropriate due to the risks to life and property. There is no feasible option to appropriately mitigate this without having potentially significant effects downstream. The remaining portion of the FUA to the south is 'red flagged'. Due to the extensive nature of the upstream catchments, development will exacerbate flood risk downstream if it is not appropriately managed.*

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<sup>6</sup> Prepared and adopted by Auckland Council in November 2023.

52. Figure 23 of the FDS has labelled the northernmost part of the PPC 100 site as an 'area for removal' and the rest of the site has been labelled as a 'red flagged' area (extracted and shown below). An explanation of 'areas for removal' and 'red flagged' areas is provided in Section 4.2.2 of the FDS:

*The most hazard constrained parts of certain future urban areas are not considered suitable for urban development due to the risk to life and property. The direction is to remove these as future urban areas and apply an appropriate non-urban zoning through a AUP plan change process. The remaining parts of these future urban areas are 'red flagged' due to the impact urban development in these areas would have on increasing existing flood risk within the future urban area and downstream.*

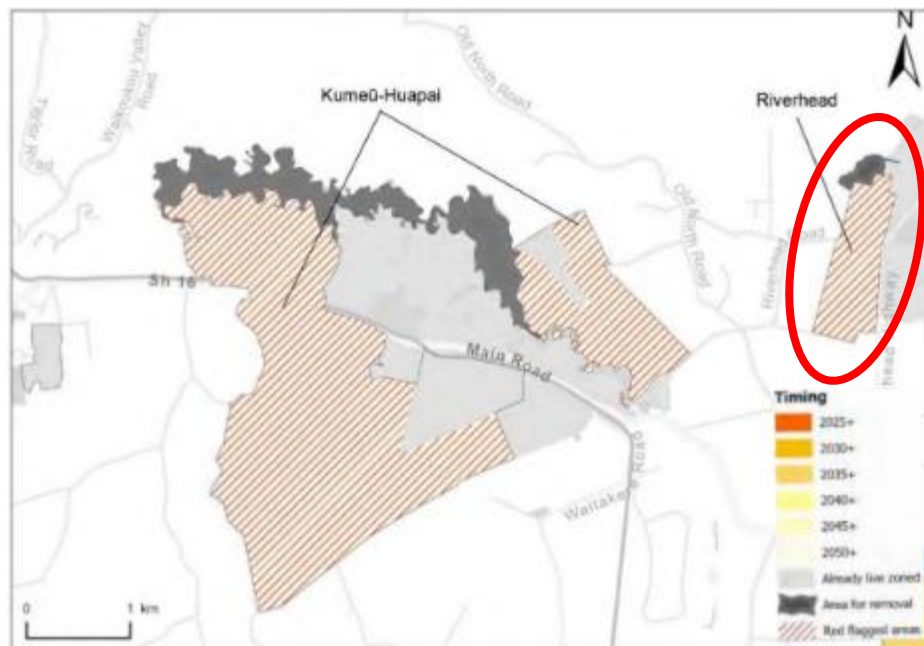


Figure 23 in the FDS showing the area for removal and red flagged area relevant to PPC 100.

53. It is acknowledged that the CKL report and the Applicant's Section 32 Assessment Report<sup>7</sup> were prepared before the adoption of the FDS in November 2023. The Section 32 Assessment Report has relied on the Auckland Council's Future Urban Land Supply Strategy (FULSS) 2017 as one of the relevant documents, but not the FDS. Ms Tsang considers that the more recent document, being the FDS that has replaced the FULSS, should be relied on.
54. The northernmost 6ha of the PPC 100 site is proposed by the Applicant to be rezoned from Future Urban Zone to Rural – Mixed Rural zone (MRZ). The 6ha has been determined from the PPC flood model. Ms Li advises that although the PPC model is considered appropriate for assessing effects in response to the proposed land use change, it cannot be relied on for flood hazard prediction. This is because the Healthy Waters Regionwide Model includes integrated modelling specification that adopts a whole of catchment approach and addresses cumulative effects, whilst the PPC model relates only to the plan change proposal. The area for rezoning to a non-urban zone as directed by the FDS should be **8.5ha** based on the floodplain extent and hazard

<sup>7</sup> Prepared by B&A, Rev 3, dated 4 October 2023.

mapping of the Healthy Waters Regionwide Model. The floodplain extent is published on Auckland Council GeoMap and the hazard mapping (for flood categorisation) is included and published in the FDS Future Urban Areas Evidence Report<sup>8</sup>.

55. Part of the PPC 100 site which has been identified as being subject to moderate and high flood hazard (as per the Healthy Waters Regionwide Model and FDS hazard mapping) is still being proposed to be zoned for urban development (refer to Figures F and G below). Placing urban development in moderate and high flood hazard area will create new flooding risks to people, property and infrastructure if the flooding risks are not appropriately managed. Therefore, we support that the MRZ is being proposed for the northernmost 6ha of the PPC 100 site but recommend the MRZ extent should be increased to 8.5ha, consistent with the floodplain extent and hazard mapping of the Healthy Waters Regionwide Model.

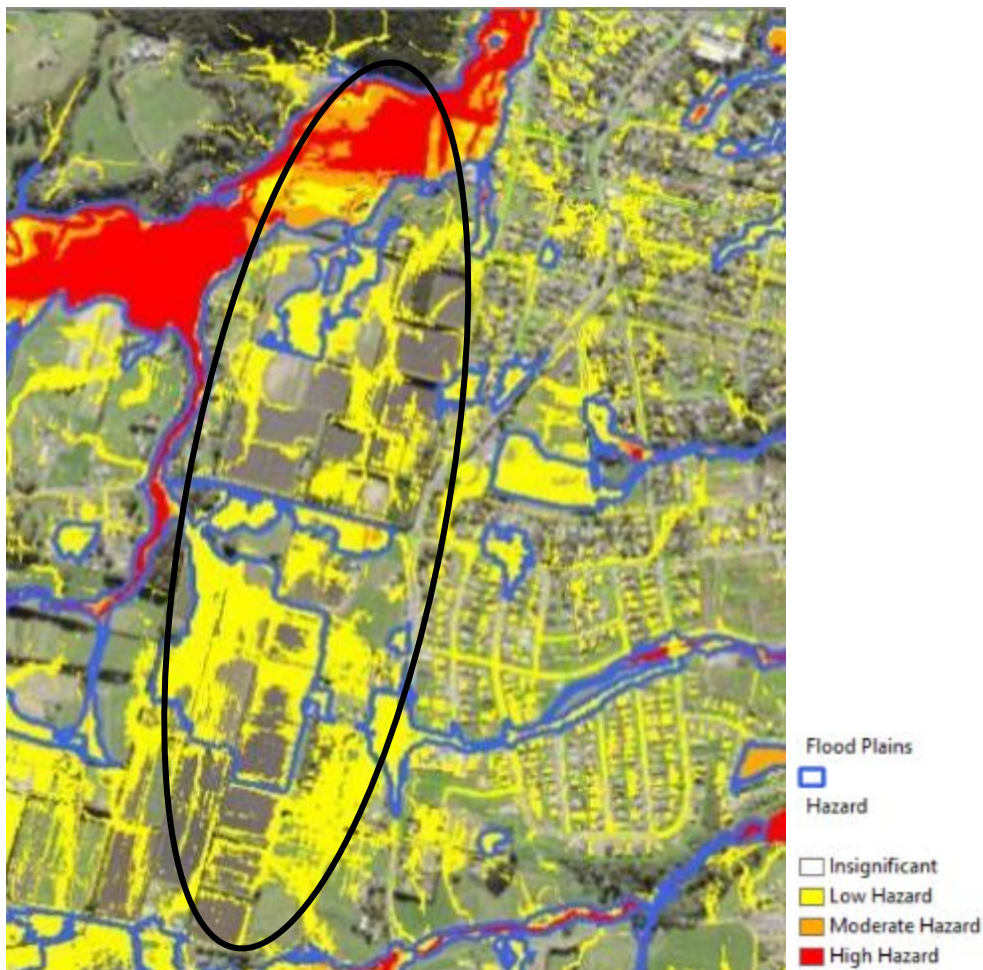


Figure F: Floodplain extent with flood hazard categorisation based on the Healthy Waters Regionwide Model. Location of PPC 100 is circled.

<sup>8</sup> <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/Documents/future-development-strategy-future-urban-areas-evidence-report.pdf>



Figure G: PPC 100 proposed zoning plan.

## Onsite flood management

56. As presented in Appendix 3 of the Applicant's Flood Risk Assessment Report, the PPC model identifies a number of floodplains within the plan change area in response to the 2, 10 and 100-year ARI rainfall events. Based on the PPC 100 Indicative Master Plan, these floodplains are located within the proposed development lots and there is no information provided in the CKL report on how these floodplains would be incorporated into the proposed urban layout. If it is proposed to undertake earthworks to remove these floodplains from the plan change then the volume of runoff will need to be passed downstream, which could further exacerbate the existing significant flood risk. This should be addressed in the Applicant's hearing evidence.
57. Multiple green dotted lines are identified on the proposed IX.10.2 Riverhead: Precinct Plan 2 as being the Multi-purpose Green Corridor/Open Space and/or Stormwater Conveyance. As stated in the proposed Riverhead precinct provisions (i.e. Policy IX.3.17(a)), these green corridors also provide stormwater treatment. However, what is shown on the proposed Precinct Plan 2 does not match with the location and extent of the proposed treatment and detention areas, as identified on the CKL's Stormwater Management Areas Master Plan<sup>9</sup>. In their hearing evidence, the Applicant should provide clarification and address the inconsistencies presented in the plan change documents.
58. In addition, Ms Li has concerns about whether the proposed primary network onsite and outlets (including the existing culverts along Duke Street) would be sufficient to cater for the 10% AEP events (as per the requirement of the SWCoP) and the potential onsite flood effects. As discussed in paragraph 37 above, the culverts being under

<sup>9</sup> Referenced CKL drawing A20405 005, Rev 0, dated 11/03/2022, included in Appendix 1 of the CKL report.



capacity would cause overtopping on Duke Street during heavy rainfall events. It would also cause onsite flooding within the PPC 100 site. Ms Li has recommended that the Applicant provides a detailed capacity assessment of the Duke Street culverts in their evidence.

### Water quality and stormwater treatment

59. As proposed in Section 8 of the CKL report, stormwater runoff from all public and private impervious areas are to receive a level of treatment consistent with GD01 – Stormwater Management Devices in the Auckland Region December 2017 (GD01) through communal bioretention devices (for the sub-catchments discharging to the Southern Stream), communal swales (for the sub-catchments discharging to the Riverhead Point Drive drainage, and communal wetlands or bioretention devices (for the sub-catchments discharging to the Riverhead Forest Stream). The area and discharge location of the proposed sub-catchments are shown in Figure 11 and Table 3 of the CKL report (extracted and shown below). Watercourses of note and existing hydraulic features in the vicinity are shown in Figure 6 of the CKL report (also extracted and shown below).



Figure 11 in the SMP showing the proposed sub-catchments with PPC 100 and indicative discharge locations.

Receiving Environment	Sub-catchments	Total area (ha)	Discharge locations
<b>Riverhead Forest Stream</b>	N01_P_1, N01_P_2, N01_P_3, N01_P_4	66	Northern channel (stream) in site
	N02_P		Channel in wetland
	N03_P		Te Roera PI drain
	N05_P_1, N05_P_2		Riverhead Forest stream
	N04_P		Wetland on site
	S02_P		Stream to the west
<b>Riverhead Point Drive drainage</b>	S03_P_1, S03_P_2	6.0	Riverhead Point Drive
<b>Southern Stream</b>	S01_P	8.6	South Stream
	S04_P		Coatesville Riverhead

Table 3 in the SMP showing the sub-catchments' area, discharge locations and receiving environment.

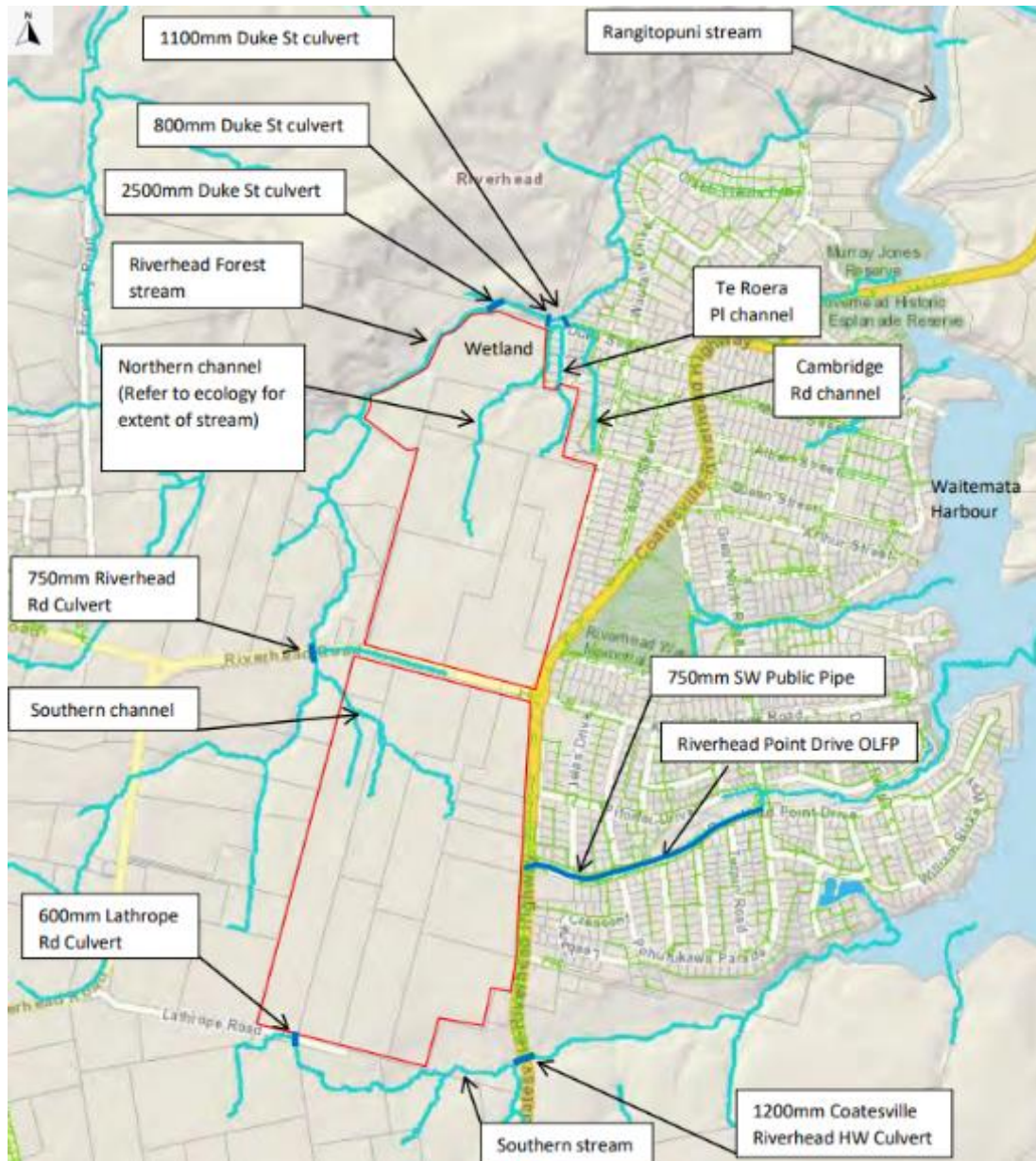


Figure 6 in the SMP showing the hydrological features in the site and surrounding area.

60. The stormwater quality treatment proposed in the CKL report for all impervious areas to receive GD01 level of treatment is considered appropriate. The proposed treatment management should be implemented in order for PPC 100 to avoid or mitigate any actual and potential water quality effects on the sensitive receiving environment. The Rangitopuni Stream estuary in the Upper Waitemata Harbour, where the Riverhead Forest Stream discharges to, is identified as a marine Significant Ecological Area (SEA) under the AUP(OP) (reference: SEA-M2-57b).
61. The Applicant has proposed a stormwater management policy (Policy IX.3.17) and a stormwater quality standard (Standard IX.6.4) as part of the Riverhead Precinct provisions. However, the wording and requirement of these provisions are not consistent with the stormwater management identified in the CKL report. Amendments to these provisions are therefore recommended (outlined in **Attachment C**) for consideration. The recommended provisions address the requirement for the implementation of appropriate stormwater quality treatment at the development stage, should PPC 100 be approved.

### Hydrological and erosion mitigation

62. The Applicant proposes to provide the equivalent of Stormwater Management Area Control Flow 1 (SMAF1) hydrology mitigation (i.e. reflecting the provisions in Chapter E10 of the AUP(OP)) by way of introducing the SMAF1 overlay for the majority of the proposed Riverhead Precinct, except for the proposed Sub-stormwater Catchments S03\_P\_1 and S03\_P\_2 shown on Figure 11.
63. Ms Li considers that the SMAF1 requirements should apply to the entire Riverhead Precinct. This is because Sub-stormwater Catchments S03\_P\_1 and S03\_P\_2 are proposed to discharge to a modified watercourse (approximately 300m downstream of the PPC 100 site boundary) via the local stormwater network along Riverhead Point Drive. Any hydrological and erosion effects on this modified watercourse, which is considered a stream as per the AUP(OP) definition<sup>10</sup>, should be avoided and/or mitigated.
64. Greenfield development enabled by PPC 100 would increase imperviousness and will result in an increase in flow rate and volume of runoff into the receiving streams and increase the risk of stream erosion. For streams that are already subject to moderate or high risk of erosion, SMAF1 hydrology mitigation alone would not be sufficient.
65. There are known existing erosion issues in the Riverhead Forest stream (downstream of Duke Street). The PPC model has indicated a large flow volume increase in the 50% AEP event (i.e. the annual bank full flow) that would increase the risk of erosion in the watercourse and on downstream structures such as vehicle crossing bridges if not mitigated. This has not been addressed by the Applicant. Ms Li advises that the Applicant needs to assess the erosion impacts on the downstream vehicle crossing bridges to 17 Wautaiti Drive, 52 Crabb Fields Lane and 22 Cobblers Lane in their hearing evidence.

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<sup>10</sup> The definition in Chapter J of the AUP(OP) for river or stream is 'a continually or intermittently flowing body of fresh water, excluding ephemeral streams, and includes a stream or modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal except where it is a modified element of a natural drainage system'.



66. In addition, should PPC 100 be approved, Ms Li recommends that a site specific watercourse assessment should be required at the resource consent stage for all streams within the proposed Riverhead Precinct, the Southern Stream (see Figure 6 above) and the unnamed stream (downstream to the west of the Riverhead Precinct) where the proposed Sub-stormwater Catchment S02\_P discharges to. This is to confirm if any site specific erosion mitigation/stream protection measure, in addition to riparian planting (as currently proposed), would be required at sensitive locations. A new special information requirement is therefore recommended to be included in the Riverhead precinct provisions.

## Submissions

67. The 106 submissions received on PPC 100 which raised stormwater and flooding related issues are summarised in **Attachment B**. Maps showing the submitters' location/address are provided in **Attachment A**. The submissions that raised the same and/or similar issues have been grouped under the following headings followed by our comments and recommendations.

### A. Flooding and stormwater runoff

68. A large number of submissions (over 100 submission points) raised issues in relation to flooding and stormwater runoff. They included Submissions 4.1, 11.1, 13.1, 20.1, 20.2, 21.1, 32.1, 33.1, 40.1, 43.1, 43.3, 44.1, 50.1, 50.2, 59.1, 66.1, 66.4, 69.1, 71.1, 74.1, 75.1, 85.1, 85.2, 88.1, 90.1, 90.3, 92.1, 94.1, 94.4, 98.4, 103.1, 104.1, 104.3, 106.1, 109.1, 109.3, 110.1, 111.1, 111.3, 114.1, 114.19, 117.1, 118.1, 120.1, 121.1, 123.1, 124.1, 128.1, 129.1, 130.1, 134.1, 137.1, 138.1, 140.1, 144.1, 145.1, 146.1, 147.1, 148.1, 150.1, 151.1, 153.1, 155.1, 156.1, 156.3, 157.1, 158.1, 162.1, 162.3, 163.1, 164.1, 165.1, 166.1, 168.1, 169.4, 172.1, 173.1, 174.1, 174.19, 175.1, 176.1, 179.1, 181.1, 182.1, 184.1, 184.7, 185.1, 186.2, 186.9, 189.1, 190.1, 192.1, 193.1, 194.1, 196.1, 200.1, 208.1, 210.1, 211.1, 212.1, 213.1, 217.1, 220.1, 221.1, 223.1, 225.1, 228.1, 230.1, 232.1, 234.1, 239.1, 241.1, 244.1, 245.1, 247.1, 248.1, 248.6, 249.1, 251.1, and 251.5.
69. The specific concerns raised by these submissions include the need for a robust flood assessment, the appropriateness of the PPC model, lack of stormwater infrastructure, flood effects on downstream properties and infrastructure (i.e. roads and bridges), and proposed future urban development within the 1% AEP flood plain. Many submissions have requested that PPC 100 is not approved unless the flooding issues can be addressed and resolved.
70. Our review acknowledges that the downstream existing/receiving environment of PPC 100 is already subject to significant flooding risk. We agree with the need for a robust flood assessment as sought by the submitters. Our discussion above addresses the downstream flood effects and recommends that further information and assessment regarding property/backyard flooding, habitable floor flooding, road flooding, frequency and duration of flooding, and flood mitigation are provided by the Applicant in their hearing evidence to confirm the degree of downstream flood effects and flood mitigation so that flooding risks to people, properties and infrastructure in the downstream areas will not increase.

71. Auckland Council's submission sought amendment to the extent of the proposed MRZ zoning. As discussed above, we support that the MRZ is being proposed for the northernmost 6ha of the PPC 100 site but consider the MRZ extent should be increased to 8.5ha, consistent with the floodplain extent and hazard mapping of the Healthy Waters Regionwide Model.

### **B. Stormwater management proposed by the Applicant**

72. Submissions 98.4, 114.21, 114.22, 123.1, 137.1, 171.1, 171.2, 174.21, 174.22, 182.1, and 186.3 raised issues in relation to the stormwater management (i.e. stormwater treatment and conveyance, hydrology mitigation and stream protection) proposed by the Applicant. A number of the submissions raised concerns in relation to the appropriateness of the Multi-purpose Green Corridors as indicated on the proposed Precinct Plan 2 in terms of their design, location and extent, underlying zoning, and timing of delivery.
73. Our discussion above addresses the onsite flood effects, water quality effects, and stream hydrological and erosion mitigation proposed by the Applicant. We have raised a number of outstanding issues and recommended that they are addressed by the Applicant in their hearing evidence, including matters in relation to the proposed Multi-purpose Green Corridors.

### **C. Precinct provisions proposed by the Applicant**

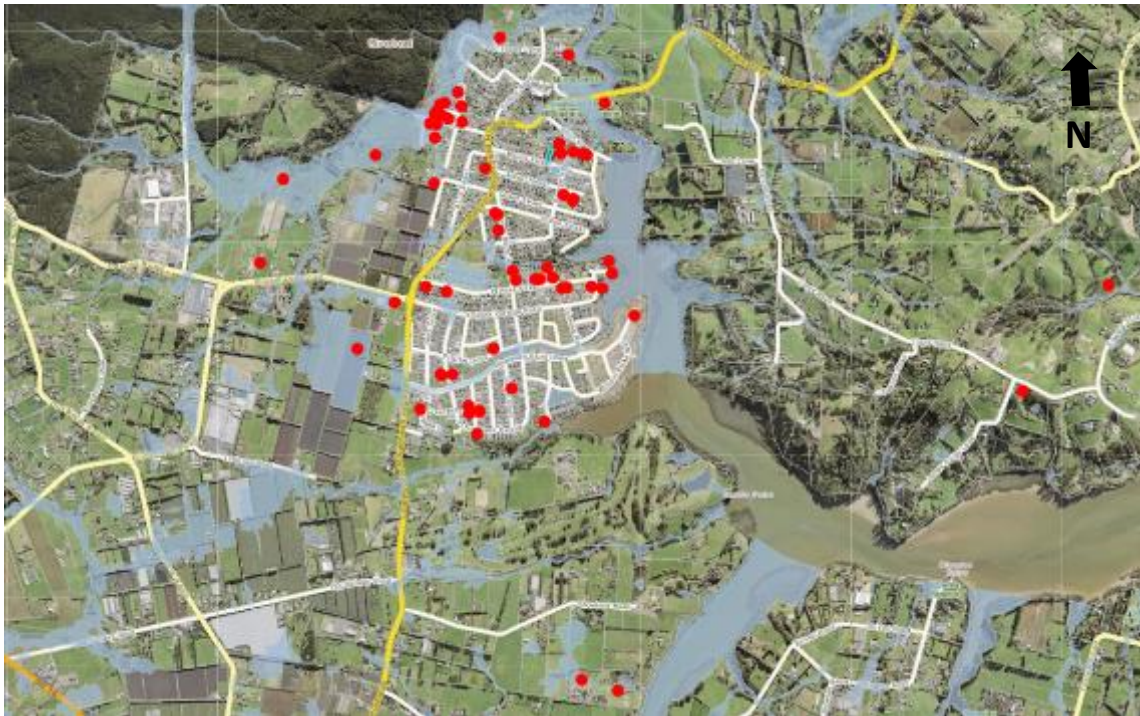
74. Submissions 114.20, 174.20, 182.1, 205.7, 205.16, 205.20 raised concerns in relation to the precinct provision proposed by the Applicant and have requested amendments to the proposed Objective IX.2.6, Policy IX.3.17 and Assessment Criteria IX.8.2.2 (m)-(p). We have considered the submitters' requests. Based on the reasons stated in the above sections of this memo, our recommended amendments to the Applicant's proposed precinct provisions are outlined in **Attachment C**, should PPC 100 be approved.
75. Submission 161.4 by Auckland Transport has requested the consideration of ongoing viability and maintenance associated with publicly vested stormwater assets, and the assets' integration with the surrounding environment 'including the road corridor where relevant' through amendments to the proposed Assessment Criteria IX.8.2.2 (n). Our recommended amendments to the Applicant's proposed precinct provisions have considered and agreed with Auckland Transport's request.

## **Conclusions and Recommendations**

76. In summary, the existing flooding risks within the downstream Riverhead stormwater catchment are already significant and there are known and documented flooding issues downstream of PPC 100. The PPC model prepared by the Applicant indicates increases in floodplain extent, property/backyard and road flooding in response to the proposed land use change. The increase of flooding as a consequence of the development PPC 100 seeks to enable will add to the existing problem and no mitigation is being proposed by the Applicant. The flood issues exacerbate when the effects of the proposed land use change are considered together with the effects of climate change.

77. The Applicant's consultants consider that the indicated increase of flooding is small, and hence effects would be less than minor. We consider that the assessment provided by the Applicant lacks sufficient evidence to confirm that this is the case for the reasons stated in the above sections of this memorandum. Based on the Applicant's assessment as currently provided, we do not support PPC 100 from a stormwater and flooding perspective.
78. We recommend that further information and assessment regarding property/backyard flooding, habitable floor flooding, road flooding, frequency and duration of flooding, and flood mitigation, as detailed in the above sections of this memorandum, are provided by the Applicant in their hearing evidence to confirm the downstream flood effects and flood mitigation so that flooding risks to people, properties and infrastructure in the downstream areas will not increase.
79. We support that the MRZ is being proposed for the northernmost 6ha of the PPC 100 site but consider the MRZ extent should be increased to 8.5ha, consistent with the floodplain extent and hazard mapping of the Healthy Waters Regionwide Model.
80. A number of outstanding issues in relation to onsite flood management and hydrological and erosion mitigation have been raised in the above sections of this memorandum. These should be addressed by the Applicant in their hearing evidence.
81. Should PPC 100 be approved, amendments to the proposed precinct provisions, as outlined in **Attachment C** are recommended. The recommended amendments address the requirement for the implementation of appropriate stormwater management and concerns raised in submissions on PPC 100.

Attachment A – Maps showing the submitters' locations (red dots = address, yellow numbers = submission number)



Map 1: All submissions within Riverhead area



Map 2: Duke St, Mill Grove, Wautaiti Drive (immediately downstream of PPC100)



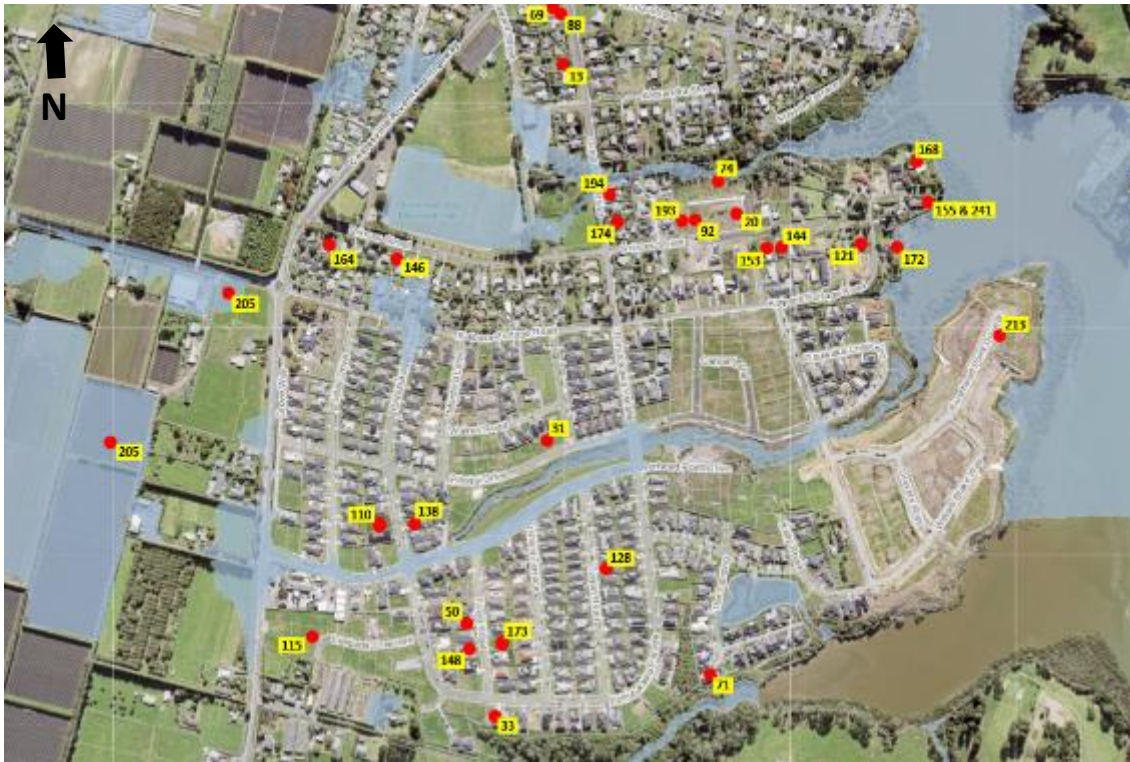


Map 3: Northern area

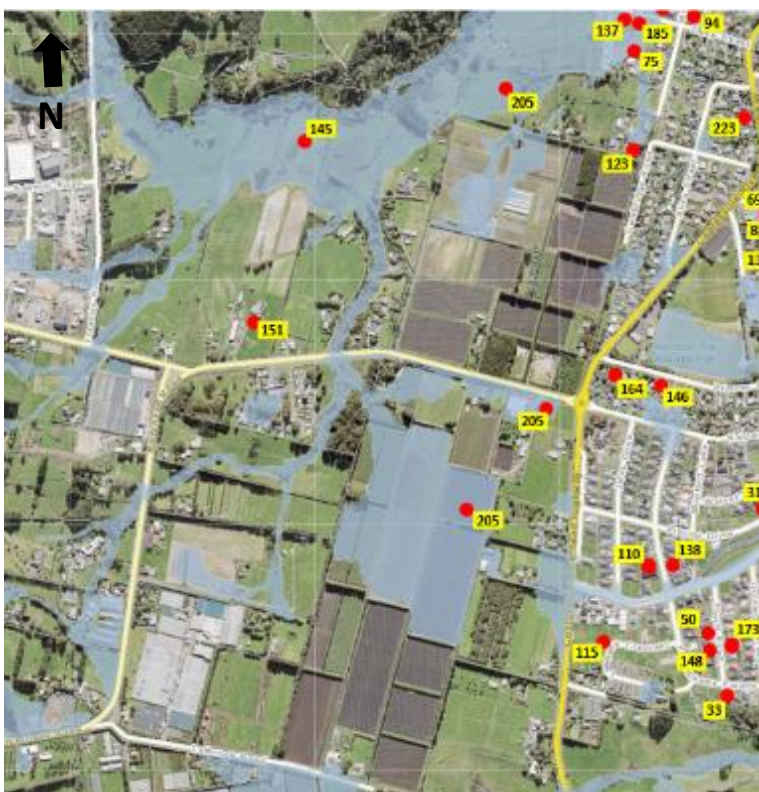


Map 4: Eastern area

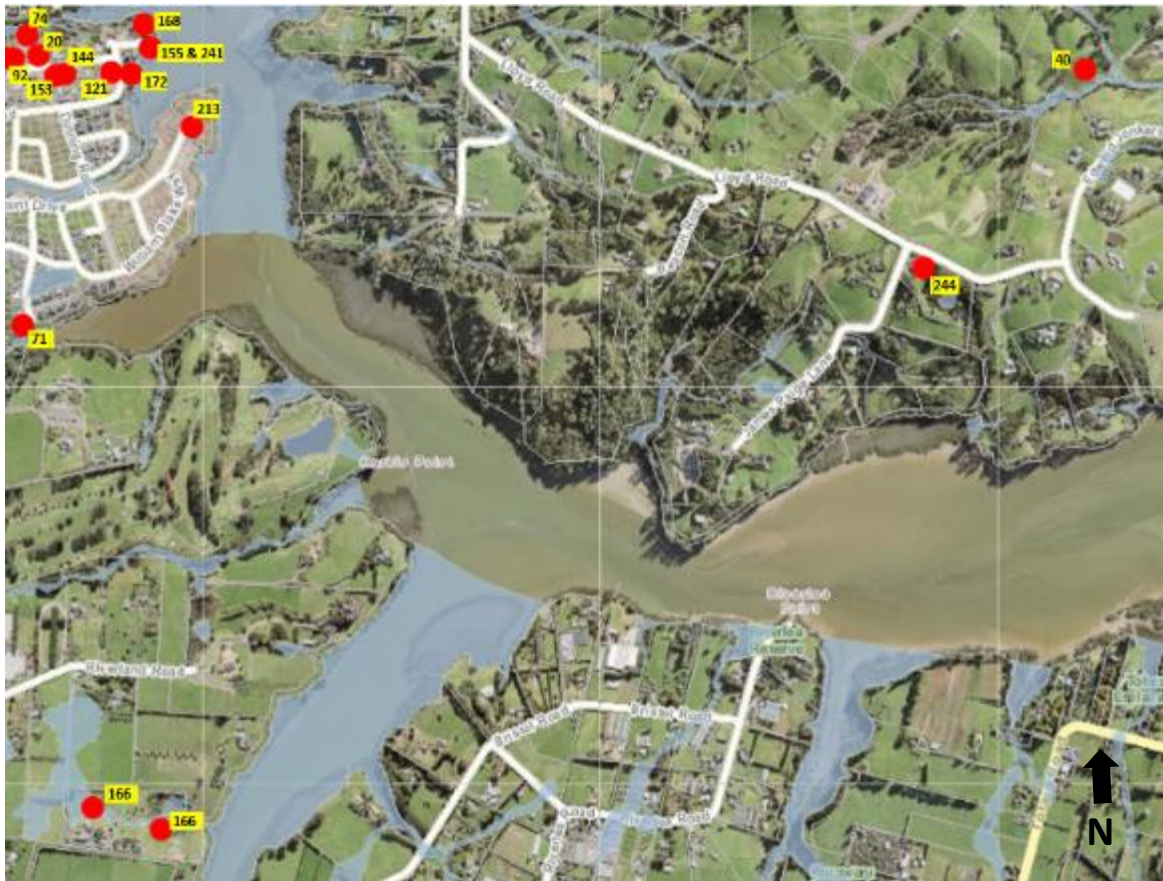




Map 5: Southern area



Map 6: Western area



Map 7: Outer areas


## Attachment B – Summary of submissions table



Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
4.1	Michael Cushnie 53 Queen Street	The development of another Greenfields area on an existing and known flood plain is a recipe for chaos. Look at the developments in Kumeu area on a flood plain and the issues that has caused.
11.1	Daniel Cohen 9 Mill Grove	<p>The plans do not include and prevent excess stormwater increase. The increase in population whilst there currently is poor wetlands coverage has direct impact of flooding to the immediate surroundings.</p> <p>Both transport &amp; flooding prevention are significantly neglected. Infrastructure is almost non-existent – the issue of flooding is the most serious, the drainage and direction of storm water greatly effect Mill Grove. This has happened 4 times and we cannot take on any other water directed towards us.</p> <p>If any development goes ahead at the bottom of duke street that will cause significant increase in stormwater runoff and flood our property as the current situation is already at max stress.</p> <p>There's ongoing concern of drainage issues without any increase to the area. This is extremely concerning.</p>
13.1	Lesa van Bott 18 Great North Road	Effects on existing properties with flooding issues.
20.1, 20.2	Michelle Sandra Young 25 Princes Street	After speaking with the owner of a local drainage company (ODC), he said that the flood plan is not going to be adequate, he said that a lot of local drainage companies think it's a joke and there will be flooding which is very concerning for existing residents. It will be an absolute tragedy for anyone effected.
21.1	Taimane Cohen	We strongly oppose the building on the wetland off duke street as the increase in storm water cause significant flooding to duke street and mill grove and we don't want a repeat of Feb 2023. This is a direct result of the duke street development. It is already causing significant issues every time it rains. We strongly oppose any new developments in the surrounding lands.
32.1	Steve Nicholas 7 Mill Grove	When we first moved to the area and built, there was no issues with flooding. But as the permeable land has been built on, this has gotten worse and worse. Until the major flooding of Auckland anniversary weekend. I have heard so many times that building new subdivisions will have minimal effect on storm water, which is just untrue. Water that used to soak into the ground is now fast tracked to the waterways which cannot cope. So water backs up and floods our properties. We have replaced multiple fences, multiple times. And costing us thousands of dollars to recover our section after flooding. Again how can there even be talk of creating more residential areas without major updates to the storm/wastewater systems?
33.1	David Rice 52 Pohutukawa Parade	The stormwater pond at the Landing in the existing Riverhead development perpetually floods with even the threat of heavy rain and several areas of Riverhead, including many of the roads surrounding the proposed development area (Riverhead Rd, Deacon Rd, Coatesville Riverhead Highway) flood and are impassible on a frequent basis (at least 5 times per annum). If this development is allowed to proceed, the increase in non-permeable land in Riverhead will no doubt worsen these problems substantially and may cause large amounts of property damage.





Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
40.1	Scott Page 731E Ridge Road	Flooding issues that are unresolved and will be exacerbated by further intensification.
43.1, 43.3	Ari King	Deliver stormwater and electricity capacity increases.
44.1	Nicholas McKay 31 Pitoitoi Drive	Roads & schooling need improving. Also placing it on a flood plain what do you think will happen?
50.1, 50.2	Shanley Joyce 10 Floyd Road	The current stormwater infrastructure does not cope with the rainfall we have, this was evident in the floodings around Riverhead in 2023. The current Ecoflow sewerage systems do not cope with any significant rainfall, their alarms regularly go off with significant rainfall. The proposed plan changes do not provide any faith that there will be better, more suitable systems in place to avoid flooding.
59.1	Annika Doggett	Proposed housing is located on floodplains and given the recent and multiple weather events and flooding the area experienced, it would be dangerous for this plan to proceed without, again, significant investment in infrastructure to prevent danger to life and property.
66.1, 66.4	Scott Christopher Ellery Hawk Ellery Freight Services Ltd	PC100's reliance on outdated stormwater management practices and inadequate wastewater servicing strategies raises concerns about the community's resilience to flooding and environmental sustainability. The failure to require coordinated stormwater management systems and specific wastewater upgrades jeopardizes the safety and well-being of Riverhead residents.
69.1	Lynne Fluker 10 Great North Road	We have seen what happens during flooding, my friends in Riverhead have had to evacuate their home 3 times in the past 2 years, roads turn to rivers requiring a boat to get through and this development is considered in the same vicinity?
71.1	Michael Brooke 24 The Landing	The recent 1 in 100 flooding events that significantly affected our western areas demonstrated that current stormwater plans, built under current regulations are unsatisfactory. Areas of Riverhead flooded. Areas that have never flooded until the recent 'up- hill' developments were completed, flooded! This event showed that the level of water joining the Rangitopuni, (upstream of the bridge) placed the bridge under significant risk. Although witnessed by locals this event was significantly under-reported. The Applicants Stormwater and Flooding Assessment is outdated and relies on land that is no longer within the proposed residential zoning. The proposed development will make a very significant impact on stormwater. Riverhead needs an overall system of stormwater management that is completed over the whole plan change area. The 'current standards' have failed abysmally around Kumeu, Huapai and Riverhead. Have the effects of significantly increased levels of stormwater reaching the upstream Rangitopuni and the bridge been considered.
74.1	Sue James 48a George Street	Flooding issues.
75.1	Bharat Sethi 5 Duchess Way	Riverhead is on flood plains and the area gets flooded very easily. With these density homes and commercial development, the flooding will get worse.

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
85.1, 85.2	Alan Macleod	I am not against progress per se, but the current Riverhead stormwater system doesn't cope under adverse conditions. Adding to this on a large scale will only make the system worse.
88.1	Dan Fluker 10 Great North Road	A large area of Riverhead has traditionally been agricultural and farming properties. However, the recent developments in the Riverhead point area have disrupted the natural water table and has redirected water flow to areas where there are now new builds flooding homes.  The area which the proposed development is set is also identified as a flood plain area further construction here will cause more long-term problems and in the current weather and environmental climate is negligent and irresponsible.
90.1, 90.3	Nicholas William Edward Bastow	Limit development to outside of any floodplains.
92.1	Andrew Lorrey 19 Princes Street	The stormwater modelling undertaken for the proposed development was undertaken prior to 2023. It does not comprehensively consider the significant rain and hydrology events in the catchment that occurred during several recent significant storms, including those that caused the 2023 Auckland Anniversary floods when many properties in Riverhead were affected. All of the Annual Exceedance Probabilities (AEP) calculations in the stormwater report must be reconsidered and likely underrepresent the impacts on the areas adjacent to the proposed development. If the development proceeds, Auckland Council could be held liable for exacerbating local floods and additional damages to homes in the adjacent catchments, or worse yet total loss of property and life. There is forthcoming flood mapping evidence being undertaken by Niwa that also needs to be considered. It is my view that additional stormwater discharge away from the development areas into areas further downstream cannot be handled under the current infrastructure and also in a future climate where amplification of rainfall due to atmospheric warming is expected.
94.1, 94.4	Thomas Michael Kelly 11 Duke Street	I oppose these designations and plans as understand there have been no provisions made to upgrade and surrounding infrastructure - schools, stormwater or roads. Having experienced traumatic flooding events in recent years (not just the January floods of 2023) but previously as well and the massive congestion that residents of the local area now must live with, we really need to see some clear plans for infrastructure upgrades to give ourselves and future residents confidence this area will remain a safe, enjoyable and accessible place to live, work and learn.
98.4	Bridget Michelle Hill 13 Wautaiti Drive	The 'Stormwater and Flooding Assessment' (Appendix 10) is outdated. It relies on using the northern parcel of flood plain land, but this land has now been removed from proposed residential zoning. Whilst sensible to exclude this undevelopable area, it also raises the question (which is not answered in any of the documents) as to whether that land can still be relied upon to contain the stormwater ponds and functions shown in the report. The report shows large areas of land to be dedicated to stormwater management, but the scale of the 'green corridor' intended for this purpose (refer Precinct Plan 2) is much narrower than the land required by the stormwater report. It makes no sense to

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		<p>significantly understate the land required for stormwater on the precinct plan.</p> <p>Best practice design must be adhered to as part of the approval of the development by the landowners and any future benefactor.</p> <p>There is no mechanism proposed to require an overall coordinated stormwater management system which works for the whole area. This is clearly needed to ensure that stormwater systems are designed and delivered wholistically.</p> <p>All the land required for stormwater management is proposed to be zoned residential for development. It has not been zoned or set aside for stormwater management open space.</p> <p>I live downstream and certainly have been impacted by recent heavy rainfall events. Please see the view from outside my window from January 27th 2023 as to how close it was to our house being impacted by floodwater. Would another 30mm be significant, probably to us residents yes! And I would clarify as making this significantly worse downstream. There was probably 30 mm to go to wipe out our neighbour's bridge at 17 Wautaiti Drive and similarly the Coatesville Riverhead Highway Bridge. Had this have occurred we would have seen similar impacts as the Mill Flat Road Bridge.</p> 

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		 <p data-bbox="612 981 1114 1010">Out of my upstairs window and on Duke Street</p> 

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		 <p data-bbox="612 763 1321 891">The following days photos, riparian vegetation destroyed and also the neighbour's playhouse. The more normal volume of water which we are used to seeing compared to the giant waterfall and river with strong current.</p> 

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		 <p data-bbox="612 969 1337 1128">For Cyclone Gabrielle we again saw the impact of significant rainfall on 14th February, though it was fortunately not as close to our house. We did see our neighbours in Mill Grove with flooding through their houses a second time. The mental wellbeing of our children and ourselves were affected by these events.</p>  <p data-bbox="612 1848 1337 1973">As an Auckland resident following these events, I strongly advocate there must be a requirement to have an up-to-date floodwater assessment done before any decisions are made. Appropriate rules should be made based on an up-to-date assessment.</p>

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
103.1	Rose Worley	This proposal would result in thousands of new rooftops collecting the water and discharging it into our local waterways. This as we have seen in areas such as Swanson can have a dangerous flooding effect downstream on already established homes.
104.1, 104.3	Jan Henderson 34 Elliot St	Never have we seen flooding in Riverhead to the level of early 2023. Duke Street flooding and Mill Grove and surrounds are new areas which brought the flooding with them. The river was so high we were all very worried the Rangitopuni bridge would be damaged cutting us off from the North Shore. Mill Flat Rd bridge a case in point. We already have a major problem with our current stormwater system which cannot cope with heavy rains. The region around Duke Street which never flooded until the area was developed and now the levels are so high houses have been flooded several times. Before more development occurs let's fix the current problem as the new development intends to use all the current services to disperse their water into an already inadequate system.
106.1	Robyn Moore 26 Pohutukawa Parade	In 2023 when we had Cyclone Gabrielle parts of Riverhead were severely impacted by floodwater, some people being flooded 3 times. Adding more houses to this area with no consideration to how stormwater is treated will result in increased flooding. It cannot just all be pushed to the river as that will break its banks and take out the bridge. Last year we lost one bridge (Mill Rd) during the storm.
109.1, 109.3	Steve Pike 5 Mill Grove	The report states that the extra stormwater will have a minimal impact on stormwater /flooding in the lower Duke St area. At the Fletchers community meeting on 6 May, the Fletchers representative categorically stated that there would be "no" impact from the subdivision. In the first half of 2023 our property was flooded three times - twice through the house. This is largely due to the newer subdivision on the southern side of Duke St (the flooding in Mill Grove did not occur prior to this subdivision) and the failure of the infrastructure in the area (pipes incorrectly aligned, too small and the runoff from Cambridge Road which cascades down Duke St. Adding to this will increase volume, height and extend the damage to other properties.
110.1	Paul Svendsen 26 Pohutukawa Parade	Riverhead is an area that floods. This is not a point up for debate. Covering the ground with cement will do nothing except increase flooding issues. The existing infrastructure to deal with stormwater is insufficient to handle the rain that we've seen, and which is becoming more common. The Stormwater and Flooding Assessment (Appendix 10) is dated early 2022 - long before we had some major rainfall. Additionally, the flood risk assessment [Appendix 10, part 10.2] also highlights that the Riverhead Road culvert will need upgrading because of already existing flooding issues, reiterated in section 7.10 of the Section 32 Assessment Report. Again, there is reference to having this addressed, but by whom? When? Will the developers do it or is this another case of "someone else will do it before it's an issue"?
111.1, 111.3	Lewellan Sclanders 14 Wautaiti Drive	Address the flooding threat.



Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
114.1, 114.19, 114.20, 114.21, 114.22	Riverhead Community Association (RCA) (formerly Riverhead Residents and Ratepayers Association)	<p>We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.</p> <p>We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.</p> <p>Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management:</p> <p>(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.</p> <p>In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.</p> <p>Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor'. To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.</p> <p>Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.</p> <p>Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.</p> <p>A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement, then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct.</p> <p>We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.</p> <p>Policy 17 states: "(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the</p>




Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		<p>supporting stormwater management plan, including: ..." It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: "This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL."</p> <p>In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third-party report prepared in support of a plan change.</p> <p>The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.</p> <p>We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.</p> <p>We want the clause of 'as far as practicable' to be removed from Objective (6), for example: "Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment."</p> <p>We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.</p> <p>We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.</p> <p>We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.</p> <p>We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.</p>
115.1	Oscar Fernando BARRERO LOPEZ 16 Leebank Crescent	During the floodings of last year, the land that is been released for the proposed development was badly affected and I am worried that the plan is still ahead in an area that all of you know is flood prone.
117.1	Johan Vollebregt 6 Mill Grove	The current stormwater design indicates increased flow from the northern side of the development via the duke street culvert. We were heavily affected by the anniversary day floodings and further dates following that. The current stream that collects the water from riverhead forest and areas south of the river cannot handle the current flow of water that comes through it at the best of times. Several debris and blockages that have been removed from the stream following the events but there are several bottle necks throughout the stream especially the waterfall at mill grove walkway.

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		<p>The current infrastructure that has been installed in duke street, and lack of infrastructure on Cambridge Road overwhelms the systems resulting in surcharging of the scruffy domes and then water discharging overground into duke street. The current outlet at the culvert located at the bottom of duke street currently sits half submersed reducing the diameter to 300-350. When the river rises during a downpour, the 750 outlet gets blocked and then water travels backwards again surcharging onto the road. Duke street has an unfortunate dip in the road which begins to capture water which has achieved depths of up 1.0m. The properties located at 5,7 and 9 then become the weak points for overflow and result in private land becoming flooded. Especially number 5 Mill Grove who sits the lowest in the street. Once the water has hit capacity in their properties it will continue to surcharge over the road of Mill Grove. At this point the road drains at the bottom of Mill Grove have become overwhelmed as the outlets have become submerged at the waterfall outlet.</p> <p>The water then continues overland and begins to affect our property of 6 Mill Grove. During the anniversary floodings we saw on more than 1 occasion the river peak an increase in height of over 2.5-3.0m. We then become sitting ducks with literally nowhere to go. I understand the proposed development has intention of reticulation ponds, detention tanks etc. but when considering the current situation I do not believe the influx of underground water will improve or have no less affect to the current stream.</p>
118.1	Hazel Purcell	<p>The area to the north of the proposed development, Duke St, Wautiti Lane, Crabfields already experiences flooding in people's homes due to previous poor development strategies. It is not credible to suggest that developing more of this area will not add to the existing problems. No body believes the developers' claims they can engineer their way around this.</p>
120.1	Michelle Lynda Cushnie 53 Queen Street	<p>Following the February floods, stormwater and wastewater systems are already overwhelmed. The proposed development will put additional pressure on these systems, increasing the risk of flooding and other environmental hazards. There has been a lack of acknowledgment of these issues in the planning documents.</p>
121.1	Mathew Glanfield 6 Kent Street	<p>Flooding in the area is significant and often.</p>
123.1	Andrew Coombes and Tara Hatherley 28 Cambridge Road	<p>The current system is extremely inadequate, as evidenced during the Auckland Floods last year. Our property was affected, and our sheds flooded. Our driveway and part of our backyard turned into a creek with rapids and our front yard was a pond. The current plan is to use the proposed residential area for stormwater control, which is unrealistic as the developers will be using that area for the best financial gain, not for the greater good of the community and the best practice in stormwater flood control. Their Stormwater &amp; Flooding Assessment is outdated and relies on using the northern parcel as flood plain land but doesn't answer whether this will be reliable to contain floodwater. The green corridor is much narrower than the land required by the stormwater report, so how does this make sense? It simply does not.</p>
124.1	Michelle Marshall 1 Newton Road	<p>Flooding issues.</p>

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
128.1	Minki Lee 11 Turpin Rd	The January 2023 floods highlighted severe stormwater issues in the northern part of Riverhead. During this event, the river level at the Riverhead-Coatesville Highway bridge was dangerously high, nearly breaching the bridge. Additional stormwater runoff from the new development could overwhelm the Rangitopuni River, potentially causing the bridge to fail, similar to what happened at Mill Rd. Effective stormwater management solutions must be implemented to prevent such a disaster.
129.1	Allan Irad MACLEAN 969a Coatesville- Riverhead Hwy	The Riverhead Landowner Group has stated that their proposals will make the current situation “no worse”. I guess we can assume that they are capable of designing a suitable water retention scheme, provided the Council has approved it. We must acknowledge that existing flooding is certainly not this Group’s problem, but while “out of scope” of this Plan Change, we do need the authorities to act on the existing flooding!
130.1	Dr Grant Hewison	As referenced in the Section 32 Report, significant portions of the land proposed for rezoning are prone to flooding. Last year’s Cyclone Gabrielle was a harsh lesson in the reality of severe wet weather and the level of damage that can be caused, especially as the global climate continues to warm. Even during Cyclone Gabrielle, areas of Auckland that were not identified to be at risk of flooding were submerged, making it even more imperative that flood risks be seriously considered. Intensifying housing on flood-prone areas will only saddle Aucklanders with greater concerns and costs in the future, as severe storms become more frequent. Urbanisation in this area is antithetical to Aotearoa’s goals of climate resilience.
134.1	Mark and Joanne Robinson	Implement more conservative design controls for managing stormwater given recent flooding events. Evacuation of stormwater from the proposed development to the Rangitopuni stream needs to consider the wider area including the existing Riverhead village to avoid future flood risk.
137.1	Wayne Brown 20B Duke Street	Having lived in Duke Street for over two years we have had the pleasure & pain of more than 5 separate floods of differing levels. Yes, I did due diligence together with my lawyer searching council and other records. I also talked to 20-year veteran for this area for further research pre purchase. Records did show it was one in one hundred years risk of big floods – now records are updated! If I had been aware, then as I am now of the continuous flood risk and potential of contaminants transference in the soils for this potential development area I would not have purchased. The Rangitopuni Stream at the end of Duke Street has [1] a major feed from the forest [2] drainage feeds from the flood plans where the many odd products were buried for many years & still leech into the Rangitopuni Stream / Waitemata Harbour. I will assume that contaminants from the entire potential development area will also leech into the flood plan on a permanent basis – also polluting the Waitemata Harbour? What is planned will not alleviate potential future regular flooding risk – from this land that will be concreted over to maximise profit per square metre.

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
138.1	FAYE SPOONER 25 POHUTUKAWA PARADE	Stormwater runoff is a significant factor. 6.2.2 New Zealand Coastal Policy Statement refers: Concerningly, sediment and contaminant runoff which “could” make its way into the coastal receiving environment. The reality is it will eventually end up in an already choking Waitemata harbour. Loss and degradation of sensitive wetlands and streams is a concern. It's concerning that there's no mention of the impact of Cyclone Gabrielle on the Riverhead area, particularly regarding stormwater management, in the documentation. The developer's input on this matter appears vague and lacking in detail, which is disconcerting given the severity of the event and its implications for future planning and infrastructure. Waterbodies are concentrated within the northern portion of the Plan Change area where there is a large historic wetland across the extensive flat northern terrace, which would have once been a river floodplain. Vegetation within the wetland comprises of exotic species and native purei. Auckland Council Storm Recovery and Resilience Consultation document Vol 7 DOP 06/09/23. This 925-page document – including submissions, has all the reasons why there should not be future urban in flood prone area.
140.1	Caroline Church	Riverhead and the surrounding areas are prone to flooding, which has become more extreme in recent years. Land needs to be set aside for stormwater runoff, not covered in hard surfaces, which will simply divert the water to become someone else's problem. Part of the area in discussion has always been a flood plain and is completely unsuited to development of any kind. I would like to see a more realistic plan for stormwater that allows for worst case scenarios, and that leaves flood prone areas to drain naturally, as they have always done. This includes leaving existing vegetation in place.
144.1	Karen Chambers 66 Princes Street	We want stormwater systems required to be designed to be able to cope with rain events at a higher standard than in the recent past. It is not OK for development to result in the inundation and flooding of existing or new homes just because a theoretical tolerance is exceeded as many parts of Riverhead flooded last year. We want the overall stormwater management system to ensure that there are no upstream or downstream flooding and adverse effects.
145.1	Kim van Zuilen 267 Riverhead Rd	We have lived in our property for over 20 years and during the storm last year our paddocks flooded almost to the top of our fences, the river didn't breach its banks it came from the industrial area as this is now built up and the ground is no longer permeable. What is going to happen with the new subdivision, we will either get flooding further up or down stream so causing problems for other properties.
146.1	Tracy Anne Murray, Keith James Insley 14 Princes Street	Stormwater and Drainage. This needs to be addressed as the system cannot cope with heavy rains as it is. Even if there is a proposed ponding system, the water still needs to drain somewhere. Our community does not wish to be flooded out (3 times in as many weeks) as it did last year.
147.1	Mark Kimber 14 Floyd Rd	Storm water issues, flooding on street.
148.1	Christine Kimber	Storm water issues and recent flooding on Duke Street.

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
	14 Floyd Road	
150.1	Ruth Hirst 30 Elliot Street	<p>The storm water infrastructure under Elliot Street, into the Rangitopuni is already inadequate to support the storm water from 30 Elliot and the adjoining streets (Maude &amp; George St) under the road at 30 Elliot Street into the river. Essentially the pipe under the road is too small!</p> <p>Additionally, the open stormwater drains on Elliot Street, also feeds into this (pinch point) drain. The open drains are too storm and not adequately maintained. The impact being that the under-road piping becomes overwhelmed and backs up causing flooding on the road and into driveways.</p> <p>We would expect existing storm water issues to be addressed at key areas in Riverhead before any additional pressure on an overwhelmed system and a larger pipe under the road at 30 Elliot Street.</p>
151.1	Edwin van Zuilen 267 Riverhead Rd	<p>We have already had extreme flooding in the back of our property, which I have never seen before, this needs to be resolved before any subdivision goes added. I have attached a pdf photo of the flooding, all of this would have carried on down into Riverhead, the subdivision will only worsen this effect.</p>  <p>The first photograph shows a wide, shallow floodplain with muddy water and sparse vegetation. The second photograph shows a similar view from a different angle, with more trees in the background. The third photograph shows a flooded area with a road or path partially submerged, surrounded by trees.</p>
153.1	Megan Lawrence 45 George Street	<p>The stormwater system in Riverhead has caused considerable flooding in recent years, particularly during the February 2023 floods. We're concerned that the proposed stormwater system lacks a comprehensive plan, potentially exacerbating issues for existing residents. It's imperative that a thorough investigation of</p>

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		the proposed stormwater plan is undertaken along with the overall stormwater management for the entire area before moving forward with any further developments.
155.1	Susannah Marshall 20 Kent Terrace	Storm water provisions for the last development were built to standard at the time and yet houses still flooded more than once in the last couple of years (Duke St and neighbouring houses). This development will only add to the impervious surface area and with climate change 1 in 100-year events will only become more frequent.
156.1, 156.3	Gail Sclanders	Address flooding
157.1	Rob Mitchell and Karina Mitchell	Stormwater and wastewater are a concern given the largescale development and the current infrastructure struggles to cope. Nearby Kumeu and Huapai have had significant recent flooding events. If Auckland Council is unable to fund the required upgrades, and if the new development is challenging Auckland Council's position on the development to get it approved, then the new development should fund the required infrastructure upgrades.
158.1	Karen Body	The horrendous flooding that occurred in the PC100 area, i.e. Duke Street shows that this is not a good area for development.
161.40	Auckland Transport	Amend Assessment Criteria IX.8.2(2)(n) under the heading 'Stormwater and flooding' as follows: '(n) The design and efficacy of infrastructure and devices with consideration given to the likely effectiveness, ease of access, operation, <u>ongoing viability and maintenance</u> , and integration with the surrounding environment <u>including the road corridor where relevant</u> .'
162.1, 162.3	Ryan Sclanders 4 Mill Grove	The developers' belief that the new subdivision will not contribute to the existing stormwater issues in Riverhead is a cause for concern. The stormwater drainage in our area is ineffective, and there are no visible plans to address this problem. The subdivision plans to direct most of the water into the northern river, which is already at capacity at times. Additionally, the western end of the subdivision will send water south, where we have witnessed the catchment area and drains overflowing in light to medium rain. This situation leaves our community vulnerable and in need of immediate solutions.  I disagree with the developer's assessment, considering my neighbours' houses and mine were flooded twice just over a year ago. Not just because the stormwater drains were inadequate but also because of the subdivision at the bottom of Duke Street (Which you, the council, approved!).  They also said that their subdivision wouldn't affect our houses. Instead, the subdivision caused all the water to channel through the bottom of Mill Grove.
163.1	Heather Hernandez	With the large amount of land earmarked for development in the area, transport improvements need to be made, along with drainage and flood mitigation plans, prior to further intensification
164.1	Jennifer Caitlin Watson 4 Princes Street	The Plan Change group indicates its flood control for the area within the development. However, the Council has not addressed the flooding that occurs on Princess Street. Having good infrastructure in a small portion of the town and not available within

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		<p>½ block of the proposed development may create unnecessary friction between residents. Kia Ora Tāmaki Makaurau indicates the need for “holistic wellbeing for Tāmaki Makaurau,” which should mean resilient flood control for all residents.</p> <p>The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have good water management infrastructure.</p>
165.1	Sara Wheeler	<p>PC100's residential development occurring in land that is subject to natural hazards, which completely contradicts Auckland Council's own Future Development Strategy.</p> <p>In the past three years, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses. Avoiding further residential development in these areas in the future is vital, in light of more frequent and impactful weather events occurring as a result of climate change and the lack of stormwater infrastructure (that will not be addressed by simply providing for stormwater within the development).</p>
166.1	Mary Midgley 84 and 86 Riverland Road	<p>Homes have been built on flood plain which as weather events prove, has been drastically under considered with dire outcomes for many.</p> <p>Infrastructure first to provide for what is already in place</p>
168.1	Angela Yelavich 51 Kent Terrace	<p>Twice in the last two years, the area adjacent to the proposed development i.e. Duke Street, Cambridge Terrace, Waititi Lane, Crabfields, has experienced significant major flooding. This was due to the already poor development planning. Given global warming and weather situations we are experiencing, it is unrealistic to plan for a “one in a hundred year” flood.</p> <p>More development of this area can only lead to further problems.</p>
169.4	Adrian Low	<p>Policy B10.2.2(5): The northern portion of the Plan Change area faces significant flood risk, requiring comprehensive mitigation before development can proceed.</p> <p>The current stormwater management plan for the Riverhead Future Urban Zone has major shortcomings in light of the overall plan change proposed. Given recent extreme weather events and ongoing infrastructure developments, the plan requires significant updates to address several shortcomings.</p> <p>Key Issues Identified</p> <ol style="list-style-type: none"> <li>1. Inadequate Consideration of Maximum and Peak Flow Events The stormwater report does not adequately account for maximum and peak flow events, which have become more frequent and severe due to intensification and increased impervious surfaces. Recent events in Kumeu and surrounding areas have demonstrated the devastating impact of such flows, highlighting the need for more robust flood management strategies.</li> <li>2. Outdated Report The report, dated March 2022, needs updating to reflect current data and conditions. The rapid pace of urban development and climate change necessitates more frequent reviews to ensure stormwater management strategies remain effective and relevant.</li> <li>3. Proposed Road Widening by NZTA</li> </ol>

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		<p>The report fails to account for the proposed road widening by the New Zealand Transport Agency (NZTA). This significant infrastructure change will alter surface runoff patterns and volumes, necessitating a reassessment of stormwater management strategies to mitigate potential impacts.</p> <p>4. Misalignment with Tree Protection, Archaeological Plans, and Open Spaces The current plan does not align properly with tree protection and archaeological plans, nor does it integrate adequately with open space areas. Effective stormwater management must consider and incorporate these elements to ensure a holistic and sustainable approach.</p> <p>5. Downstream Consequences of Peak Flow Protection The report does not sufficiently outline the downstream consequences of peak flow protection measures. Without a comprehensive understanding of these impacts, downstream areas may face increased flood risks, undermining the overall effectiveness of the stormwater management plan.</p> <p>6. Recent Flooding in Riverhead Significant flooding in Riverhead from recent storm events has not been taken into account. This oversight suggests that the current stormwater management strategies are inadequate for dealing with such extreme weather conditions, necessitating a thorough review and update.</p> <p>Required Actions</p> <ol style="list-style-type: none"> <li>1. Comprehensive Update: The stormwater management plan must be revised to incorporate data from recent peak flow events, reflecting the latest understanding of stormwater dynamics in the region.</li> <li>2. Integration with NZTA Plans: Incorporate the proposed road widening by NZTA into the stormwater management strategy, assessing and mitigating any potential impacts.</li> <li>3. Alignment with Environmental and Heritage Plans: Ensure the plan aligns with tree protection measures, archaeological considerations, and the integration of open spaces.</li> <li>4. Downstream Impact Assessment: Conduct a detailed assessment of the downstream impacts of proposed peak flow protection measures, ensuring they do not exacerbate flood risks.</li> <li>5. Reflect Recent Flood Events: Incorporate lessons learned from recent flooding in Riverhead to enhance the resilience and effectiveness of the stormwater management strategy.</li> </ol> <p>Conclusion The current stormwater management plan for the Riverhead Future Urban Zone requires a significant review and update to address critical shortcomings. Incorporating recent data, aligning with infrastructure developments, and considering environmental and heritage plans are essential steps in developing a robust and sustainable stormwater management strategy.</p>
171.1, 171.2	John Armstrong	<p>Water control around the Wautaiti stream If there is no remedy to clearing the stream there should be no further development.</p>



Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
172.1	Bernard Tye 7 Kent Street	I endorse all the requests asked by the RCA be seriously considered and the Auckland council a dear to the legal requirements to have a thorough assessment of the concerns of the aesthetic effects of the development and the mitigation of flooding from poor designed rainwater management.
173.1	Nathan Brown 13 Floyd Road	The recent flooding events (3 in 2 years!) significantly impacted Riverhead residents of which we are one. Auckland Council representatives have told us in meetings that we need to expect more of these 1 in a 100-year events. The plan from the development group does nothing to address this increasing issue and will only exasperate the problem, turning permeable agriculture land into housing. All stormwater needs to be planned to be self-contained within the development in the event of more than 1 in 100-year event as the current infrastructure and environment does not support these events without further development. Auckland Council has already used this as part of the initial rejection of this development plan, and little has been done to address this in this resubmission.
174.1, 174.19, 174.20, 174.21, 174.22	Claire Walker 41 Great North Road	<p>A mixed rural zone is proposed at the northern part of the plan change area. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.</p> <p>The main issue with this zoning is that the land will not be able to be further developed or subdivided. Due to flooding but also being poor-quality land for agriculture or horticulture it will most likely be left to deteriorate and form no meaningful part of the Riverhead village. This land has pretty much been abandoned, which unfortunately is partly the result of FUZ zoning, which simply facilitates land-banking and neglect or peri-urban land. The riparian area and beyond is rank with huge woody weeds and an environmental embarrassment, despite it being on the fringe of a stream which feeds the might but sensitive Waitemata.</p> <p>Riverhead community have for many years sought to have better connection to the river. The outcome of the rural zoning is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this or recognise the shortcoming of not proving it. The site directly abuts a tributary stream to the Rangitopunui, and along with simply treating this area as a route for stormwater, the plan change must realise the opportunity for environmental restoration and public access connections.</p> <p>Same relief sought as the RCA.</p>
175.1	Tatiana Brown 13 Floyd Road	The recent flooding events (3 in 2 years!) significantly impacted Riverhead residents of which we are one. Auckland Council representatives have told us in meetings that we need to expect more of these 1 in a 100-year events. The plan from the development group does nothing to address this increasing issue and will only exasperate the problem, turning permeable agriculture land into housing. All stormwater needs to be planned to be self-




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		contained within the development in the event of more than 1 in 100-year event as the current infrastructure and environment does not support these events without further development. Auckland Council has already used this as part of the initial rejection of this development plan, and little has been done to address this in this resubmission.
176.1	Jade Lacey	Same relief sought as the RCA.
179.1	Francesca Johnson	Same relief sought as the RCA.
181.1	Priya Khatri 1 Wautaiti Drive	Last year there was flooding in our streets, till date council has not taken any actions or made any changes to prevent this happening in the future. These are the wider issues council needs to fix in first instance before looking into other things.
182.1	Shannon Malcolm 28 Elliot Street	<p>My main concern is the current best practice stormwater system design methodologies (as outlined within Appendix 10). These completely fail to adequately address the negative effects of the development. There is already a very real failure by Council to provide and maintain sufficient services to Riverhead as evidenced in the Auckland Floods February 2023. I hold my breath every time there is rainfall now, as there are continuing stormwater runoff, drainage and water flow issues throughout the Riverhead neighbourhood affecting private residents, and the general public using public areas, that have not be dealt with. The proposed development will completely overwhelm what is already a failing system.</p> <p>The current proposal fails to ensure that adequate stormwater management be required as part of the development. I refer to Objective (6) which must be revised to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated. I submit that the proposed stormwater systems across the plan change area via the 'central stormwater management treatment spine' which is part of a 'multi-purpose green corridor' must be designed and agreed with Council prior to commencement of the development.</p> <p>I submit that the stormwater and wastewater systems must be appropriate and fit for purpose, and agreed upon in full with Council, prior to commencement of the development; and that the plan change area will not negatively impact existing and future users.</p>
184.1, 184.7	Graham and Sunita Ramsey	<p>We acknowledge that there are a significant number of properties within Riverhead that are affected by flooding (for instance, Riverhead Forest Stream downstream of Duke St). Our understanding of the planning documentation is that we are not personally directly affected by flooding; however, we support any concerns that the community has expressed in this regard.</p> <p>We oppose development on any land prone to flooding. We oppose any development that creates or exacerbates any flood hazards within the community. We reject the argument per 9.4.3 of the storm water report that the increase in flood depth should be considered "minor".</p> <p>We also note that the plan change reports do not identify parts of Coatesville-Riverhead Highway that are prone to flooding and can become impassible during heavy rain. We draw attention to the</p>




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		culverts nearer to the interchange between Coatesville-Riverhead Highway and State Highway 16.
185.1	Marcus Cook 5 Te Roera Place	<p>We have only recently had residents able to move back into their homes following the 2023 flooding events – albeit those houses are in some cases still undergoing remediation.</p> <p>Other residents have undertaken “temporary” repairs (to fences, etc.) as they recognize the futility of a permanent fix until flooding issues are resolved. Building adjacent to a floodplain, as opposed to directly on it, will do little to ease the concerns of residents due to the dramatic increase in impermeable area proposed. Indeed, some residents speak of children still anxious during even moderate and commonplace rainfall events. It would not be unreasonable to assume that serious rainfall events will continue and likely increase in both frequency and severity because of climate change.</p> <p>I note the Flooding Assessment report attached to PC100 is dated March 2022, which predates the worst flooding at the beginning of 2023. It also states the additional flooding effect to the (Riverhead Stream discharging) Northern part of the PC100 site (specifically to the Duke St, Mill Grove, Te Roera Place area) will be “less than minor”, stated as 30mm – small comfort when your house is underwater.</p> <p>We were fortunate to not have severe injury or loss of life in the area (to my knowledge) during the February 2023 flooding. We should not gamble on being this fortunate in the future.</p> <p>Unless and until the flooding risk is adequately mitigated, I would urge this application to be declined. I’m given to understand that Healthy Waters are “working on this” currently.</p>
186.2, 186.3, 186.9	Auckland Council	<p>The Section 32 Assessment Report identifies that the plan change area is traversed by a number of overland flow paths and that the northern portion is subject to flooding. A Stormwater Management and Flood Risk Assessment has been prepared in support of the plan change.</p> <p>ACS acknowledges that part of the plan change area has been identified as subject to flooding and therefore not suitable for urbanisation and is proposed to be rezoned Rural – Mixed Rural. However, this area appears to be reduced in extent when compared to the area shown in the FDS for removal from the future urban area. Furthermore, it does not align with the 100-year proposed flood extents shown in the Stormwater Management and Flood Risk Assessment. ACS wishes to understand the basis for how the extent of the Rural – Mixed Rural zone was determined.</p> <p>The Stormwater Management and Flood Risk Assessment recommends the application of the Stormwater Management Area Control – Flow 1 across the majority of the plan change area. ACS supports this.</p> <p>Additional information is required to understand changes in potential flood hazard to infrastructure and property downstream of the plan change area. This assessment should consider duration and frequency of flooding and potential impacts on the downstream network capacity. There are known flooding areas identified on the northern boundary of the plan change area, and potential flood risk to property downstream. Greater detail is required on the flood risk</p>

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		<p>through the design storm profiles and not just concentrated on peak flood levels. In the absence of this information, ACS maintains significant concerns regarding potential flooding impacts resulting from the proposed land use change and the stormwater management approach. Urban environments that are resilient to the likely current and future effects of climate change are a minimum requirement under Policy 1(f) of the NPS-UD.</p> <p>Decision sought: Amend the zoning of the land within the plan change so that the extent of the Rural – Mixed Rural zone encompasses all land in the plan change area that is within areas subject to significant risk of flooding and/or the National Grid Yard (Uncompromised). Retain the extent of the Stormwater Management Flow 1 area. Amend the Precinct to address concerns in this submission relating to the adverse stormwater effects of urbanisation and downstream flooding.</p>
189.1	Anne Clarke	<p>More thought needs to be given to stormwater than what they have provided. This concrete jungle will add more pressure to storm water issues for our community, who have already suffered greatly from flooding 3x during the "once in a hundred year" floods.</p>
190.1	Michelle Gillespie	<p>With more green space being taken up by higher density housing (small sections, townhouses, apartments) where there is little ability for the ground to absorb the rain during the downpours more chances of greater flooding to the surrounding areas.</p>
192.1	Olga Sakey	<p>PC100 involves rezoning land to Future Urban that are in identified 1% AEP floodplains.</p> <p>This will result in residential development occurring in land that is subject to natural hazards, which completely contradicts Auckland Council's own Future Development Strategy.</p> <p>In the past two years, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses.</p> <p>Avoiding further residential development in these areas in the future is vital, in light of more frequent and impactful weather events occurring as a result of climate change. PC100 will result in inappropriate residential development occurring in land that is subject to natural hazards, which not only endangers property but ultimately poses a risk to people and lives.</p>
193.1	Christopher Redditt 17 Princes Street	<p>The stormwater analysis conducted for the proposed development predates 2023 and fails to adequately address recent significant rain and hydrological events, including those contributing to the 2023 Auckland Anniversary floods in Riverhead. The current Annual Exceedance Probability (AEP) calculations likely underestimate the impact on surrounding areas. If the development proceeds, Auckland Council may face liability for exacerbating local floods and causing further damage to nearby properties, potentially leading to loss of property and life. Additionally, forthcoming flood mapping data from Niwa needs consideration. It's my belief that diverting additional stormwater downstream, given the current infrastructure and anticipated climate changes, poses significant challenges</p>
194.1	Rachel Spencer 37 Great North Rd	<p>Due to past inadequate development strategies, whenever there is rain of any significance, homes in the area on the cusp of the</p>

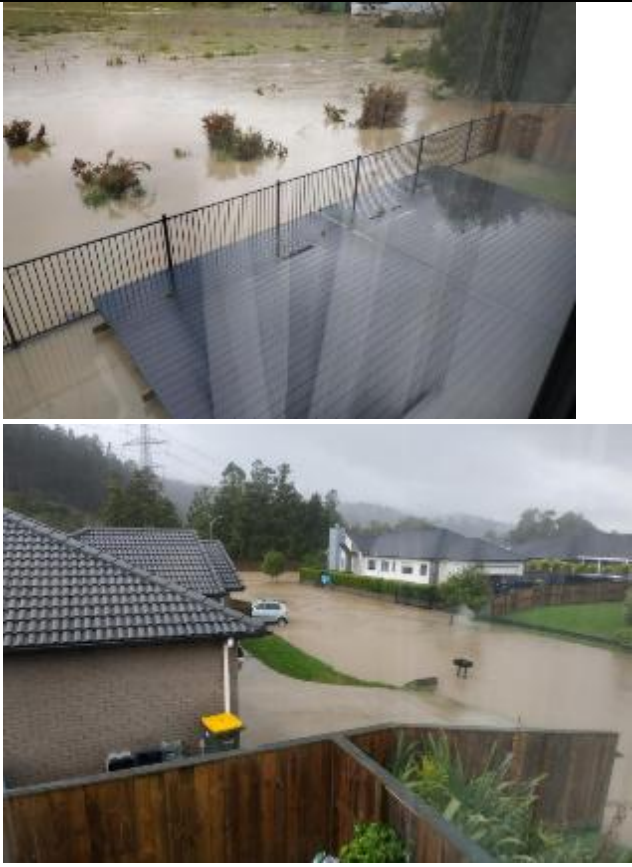
Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		proposed development, being Duke St, Wautiti Lane, and Crabfields Lane, are prone to flooding. It's implausible to assert that further development in this region won't exacerbate the existing issues. The developers' assurances lack credibility; engineering solutions alone cannot resolve these challenges.
196.1	Jen Mein	The other issue is the significant flooding that has occurred on the land that is proposed for the plan change. It is Council's responsibility to not let any further building occur around or on these areas which in turn would put the current housing already there and any new housing at risk of flooding damage. It is irresponsible after all the significant flooding we have had to approve such a plan change knowing that this will impact Riverhead with further flooding.
200.1	Danielle Jordan	I would also be concerned about flooding in the area, surely the floods in the last few years and cyclone Gabriel have been enough to realise that the area is far too overdeveloped housing wise and not enough areas like wetlands etc.
205.7, 205.16, 205.20	Luxembourg Development Company Ltd 30 Cambridge Road 340 Riverhead Road 1140 Coatesville-Riverhead Highway	Amend Precinct Plan 2 to delete the multi-purpose Green Corridor and replace it with an annotation for stormwater conveyance. Amend Policy 17 to delete references to the multipurpose green corridor; and focus on appropriate solutions for stormwater conveyance, along with treatment and retention/detention. Amend the stormwater flooding matters to address stormwater quality, quantity and flooding matters distinct from limiting mitigation measures to one solution in IX.8.2(2)(m)-(p).
208.1	Janelle Lisa Redditt	As the stormwater analysis for the proposed development was completed before 2023 it fails to consider the recent significant rain and weather events and the impact of the 2023 Auckland Anniversary floods in Riverhead. As such, the current Annual Exceedance Probability (AEP) calculations likely underestimate the true impact on our local community.  The completion of the proposed development will increase the impact of local flooding causing significant damage to existing properties, the livelihood and well-being of our community, and at worst cause loss of life.  There are significant challenges to the proposal of diverting additional stormwater downstream considering the capabilities of our current infrastructure and of course climate change.
210.1	Terence Klein	The Plan Change group indicates its flood control for the area within the development. However, the Council has not addressed the flooding that occurs in many areas of Riverhead, not just in the area of the proposed development. Much of the drainage problem is likely the tidal nature of the Rangitopuni Stream changing the local drainage base level. How will that be addressed to allow for effective drainage in the entire area?  The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have good water management infrastructure
211.1	Benjamin David Pennell 20 Crabb Fields Lane	The surrounding area is flood-prone, having been significantly impacted by floods in the last few years. Our concern is that the further development of impermeable land will only exacerbate the issues we have experienced. Climate change related weather events appear to be increasing in nature - both in frequency and

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		impact - and we do not see how the proposed development seeks to reduce the impact our community has experienced.
212.1	Jann Olding	Same relief sought as the RCA.
213.1	Natalie Vose 98 Riverhead Point Drive	<p>Inadequate Design Capacity</p> <p>While current designs claim to handle a 1 in 100-year event, recent flooding events in 2023 demonstrate these events occur more frequently and with greater intensity than anticipated.</p> <p>Existing developments in north-west Riverhead, Kumeu/Huapai were designed to these standards but still failed, resulting in significant residential and infrastructural flooding.</p> <p>Frequent Overflows and Inadequate Assessments</p> <p>The stormwater pond at Jessie Rise frequently overflows during regular rain events, indicating that the system is already operating beyond its intended capacity.</p> <p>The assessment performed (Appendix 10) appears outdated, and relying on current standards will likely result in repeated system failures.</p> <p>Increased Pressure on Infrastructure</p> <p>Further development using the existing design standards will lead to failures in storm and wastewater infrastructure, particularly once the design limits are exceeded.</p> <p>There is a need to reassess and upgrade the stormwater management strategy to accommodate future capacity requirements and to prevent flooding.</p>
217.1	Barbara Lynn Chatfield	Flooding and lack of infrastructure. Stormwater drainage and the amount of impermeable surfaces that will result.
220.1	Harshitha Murthy	<p>As referenced in the Section 32 Report, significant portions of the land proposed for rezoning are prone to flooding. Last year's Cyclone Gabrielle was a harsh lesson in the reality of severe wet weather and the level of damage that can be caused, especially as the global climate continues to warm. Even during Cyclone Gabrielle, areas of Auckland that were not identified to be at risk of flooding were submerged, making it even more imperative that flood risks be seriously considered.</p> <p>Intensifying housing on flood-prone areas will only saddle Aucklanders with greater concerns and costs in the future, as severe storms become more frequent. Urbanisation in this area is antithetical to Aotearoa's goals of climate resilience.</p>
221.1	Rebecca Stuart	<p>Stormwater flooding devastated a number of homes around the area in the Auckland Anniversary floods, and subsequently often since. These families have spent huge amounts of money trying to restore their properties to have them flooded again and again.</p> <p>These families are traumatised, and experience significant anxiety any time it rains heavily now.</p>
223.1	Kellie Christophersen 1050a Coatesville- Riverhead Hwy	The stormwater system on the highway is insufficient to carry enough volume in the heavy rain events. The development will add to these issues. Therefore, I am opposed to it until commitments are made to upgrade the stormwater and proper traffic management is taken care of.
225.1	Kelvin Stuart	Riverhead and it surrounding areas has been impacted by flooding on several occasions since 2021. it is my concern that additional built-up area and impermeable surface will only increase the risk of

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		flooding in the future. Overall I feel that bring forward this development will only put extra stress on the existing infrastructure.
228.1	Sandi Gamon	Same relief sought as the RCA.
230.1	Emma Hood	<p>Flooding already occurs in the areas that are part of the proposal. Our house on Te Roera Place flooded in the Auckland Anniversary 2023 floods. With their statement that the effect on Te Roera Pl/Duke St/Mill Grove is "less than minor/less than 30mm" we will flood again. The flooding that has occurred on Te Roera Pl/Duke St roads prevented us from safely getting to or leaving our home. See pictures attached. The current stormwater systems need fixing before any new development takes place.</p>   <p>Flooding Duke Street / Te Roera Place Auckland Anniversary 2023.</p> 

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		 <p data-bbox="612 757 1289 815">Flooding Auckland Anniversary 2023, behind and in front of our property before the property flooded.</p>  <p data-bbox="612 1164 1295 1223">Flooding Auckland Anniversary 2023, looking across the road to our property, after we flooded and had to evacuate.</p>  <p data-bbox="612 1720 1181 1751">Flooding Te Roera Place Auckland Anniversary 2023</p>



Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		 <p data-bbox="612 1122 1342 1223">Flooding Cyclone Gabrielle February 2023, supplied by a neighbour – we weren't yet back in our property after we flooded Auckland Anniversary.</p>
232.1	Trevor Gamon	Same relief sought as the RCA.
234.1	Philip Doughty 2 George Street	We have had significant flooding already. Our infrastructure can't cope with existing population let alone the proposal to double it.
239.1	Christina Doughty 2 George Street	The existing system is not handling current needs. Many of the recent downpours have resulted in our land flooding and/or significant flow through of water. Changes to the natural flow of water through the area and reducing green space is very concerning. Upgrades to the existing stormwater system need to be in place before construction and changing the landscape begin.
241.1	Mark Gibson 20 Kent Terrace	Stormwater provisions were put in place for the latest subdivision and more than once houses around duke street have been flooded. With greater development means more impervious surfaces and more risk of flooding.
244.1	Tracy Smytheman 130 Lloyd Road	The stormwater and flooding and transport recommendations are completely insufficient for the planned development. The Riverhead township and community are already overwhelmed in both matters with the development, expanded suburbanisation and population growth over the last 10 years, not to mention the huge stress and damage incurred the floods as a result of major storms over the last few years.
245.1	Rose-Muirie Cook 5 Te Roera Place	We live in part of Riverhead which was affected by the flooding in both August 21 and January 22. We had neighbours that were unable to move back into their house for over 6 months.

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		<p>The plan change says that the flood risk will only increase "less than minor" being 30mm - this is not acceptable for people who had houses underwater and others that were nearly underwater. The flooding assessment was also completed before the serious flooding in January 22 - so I do not believe it to be accurate.</p>
247.1	Deanne Chandler 22 Elliot St	<p>I am concerned about this development in relation to the potential for worse flooding in the area (serious flooding last year 2023).</p>
248.1, 248.6	Linda Barton-Redgrave 11 George St	<p>During Cyclone's Hale and Gabrielle early in 2023, the Rangitopuni River was roaring – the sheer force of the water caused huge trees to ram up against the bridge pillars, the drains throughout Riverhead township were transformed into rivers and ponds. The streets around Duke Street (which is next to the planned subdivision) were flooded. In that area I saw houses inundated with water, a car floating, and someone kayaking in the street. Lives were negatively impacted by the flooding.</p> <p>Even in ordinary weather, and with farmland to absorb the rain, the stream behind Duke Street flows steadily into the Rangitopuni River – where will the water overflow from a big housing development goes?</p> <p>Despite mitigation measures, such as building water retention tanks, there will still be a significant increase in water from impervious areas such as the paved area of new roads. Even with slow release of water, during an adverse weather event it's just not going to cope – it floods now so the proposed flood plain land is most likely to be inadequate. There can only be a negative impact for those neighbours who are downstream.</p> <p>We need an overall system of stormwater management to ensure there are no up or downstream flooding and adverse effects. This plan should take into account the worst possible flooding scenario and would include a large portion of land that is solely zoned for the purpose of managing water flow (and not able to be redesignated for residential).</p>
249.1	Shontelle Fawcner 29 Maude Street	<p>The area is severely affected by flooding during heavy rain and the proposed land has areas that are in the flood zone.</p>
251.1, 251.5	Desmond John Reid	<p>Council's decision to exclude 22 Duke Street from its FDS, and the consequent removal from PPC 100 seems to have set aside sound reasoning and has apparently been driven by political expediency, Last year's cyclone Gabrielle and Anniversary Weekend storms were very emotive. Both events were 1 in 200-year events, and the worst weather bombs in Auckland's recorded history.</p> <p>Formulated science and engineering modelling do not support Council's view of the flooding risk over my entire property, though some of 22 Duke Street was submerged during these events, both the farmhouse and the barn, each located in the most affected area, were not broached.</p> <p>The PPC 100 stormwater and flooding assessment relies on the inclusion of 22 Duke Street in its modelling. By excluding this property from the plan change, the applicant's modelling, as presented, is flawed.</p>

**Attachment C – Recommended changes to proposed precinct provisions (with recommended additions underlined and recommended deletions ~~striketthrough~~), should PPC 100 be approved**

**Precinct Plan – Riverhead Stormwater Management Area Control (Flow 1)**

The SMAF1 overlay is applied to the entire Riverhead Precinct.

**Objective IX.2.6**

Stormwater quality and quantity is managed to maintain the health and well-being of ~~avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on~~ the receiving environment and is enhanced over time in degraded areas.

**Policy IX.3.17 Stormwater Management**

Require subdivision and development to ~~be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including:~~

- (x) Be consistent with an approved stormwater management plan;
- (a) ~~Providing~~ Provide a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;\*
- (b) ~~Applying~~ water sensitive design to achieve water quality and hydrology mitigation;
- (c) ~~Requiring the~~ Use of inert building materials to eliminate or minimise the generation and discharge of contaminants;
- (d) ~~Requiring treatment of~~ Treat runoff from all impervious surfaces (except roofs) public road carriageways and publicly accessible carparks by a water quality device designed in accordance with GD01;
- (e) ~~Requiring runoff from other trafficked impervious surfaces to apply a water sensitive approach to treat contaminant generating surfaces, including cumulative effects of lower contaminant generating surfaces;~~
- (f) ~~Providing~~ Provide indigenous planting of ~~on~~ the riparian margins of permanent or intermittent streams; and
- (g) ~~Ensuring~~ Ensure development is coordinated with sufficient stormwater infrastructure.

*\*Note: Clause (a) above is not consistent with the stormwater management proposed in the current Stormwater Management Plan prepared by CKL. In addition, it is shown on IX.10.2 Riverhead: Precinct plan 2 that the green corridor is for stormwater conveyance but not treatment. Amendment to this clause might be required after clarification and further information is provided by the Applicant in their evidence.*

**Standard IX.6.4 Stormwater Quality**

Purpose: To ensure that stormwater is managed and treated prior to discharge to maintain and enhance the health and ecological values of the receiving environment.

(1) Stormwater runoff from all impervious surfaces (except roofs) new, or redeveloped, high contaminant-generating carparks, all publicly accessible carparks exposed to rainfall, and all roads must be treated with a stormwater management device(s) meeting the following standards:

(a) The device or system must be sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or

(b) Where alternative devices are proposed, the device must demonstrate it is designed to achieve an equivalent level of contaminant or sediment removal performance to that of 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'.

~~(2) For all other trafficked impervious surfaces, water quality treatment in accordance with the approved stormwater management plan must be installed.~~

(3) New buildings, and additions to buildings must be constructed using inert cladding, roofing, spouting and building materials ~~that~~ and avoid the use of high contaminant yielding building products which have:

(a) Exposed surface(s) or surface coating of metallic zinc of any alloy containing greater than 10% zinc; or

(b) Exposed surface(s) or surface coating of metallic copper or any alloy containing greater than 10% copper; or

(c) Exposed treated timber surface(s) or any roof material with a copper containing or zinc-containing algaecide.

(4) Roof runoff must be directed to a tank sized for the minimum of 5mm retention volume for non-potable reuse within the property.

### **Assessment Criteria IX.8.2.2 Stormwater and Flooding**

(m) Whether development is in accordance with ~~the~~ an approved Stormwater Management Plan and Policies E1.3(1)-(14).

(n) The design and efficacy of infrastructure and devices with consideration given to the likely effectiveness, ease of access, operation, ongoing viability and maintenance, and integration with the surrounding environment including the road corridor where relevant.

(o) Whether the proposal ensures that subdivision and development manage flooding effects (including cumulative effects) upstream or and downstream of the site ~~and in the Riverhead precinct~~ so that the risks to people and property (including infrastructure) are not increased for all flood events, up to a 100-year ARI flood event.

(p) The location, size, design and management of any interim flood attenuation areas that may be necessary to ensure that development does not increase flooding risks prior to upgrades of culverts.\*

*\*Note: No on-site flood attenuation is proposed by the Applicant based on the CKL report. Amendment to Assessment Criterion (p) above might be required after clarification and further information addressing the matters raised in this memo is provided by the Applicant in their evidence.*

### **IX.9 Special information requirements**

(NEW) An application for any land modification, subdivision and/or development which:

- Adjoins a permanent or intermittent stream; or
- Discharges stormwater to the Southern Stream and the unnamed stream to the west of the Riverhead Precinct and identified in Figure (NEW) below.

Must be accompanied by a Site Specific Watercourse Assessment prepared by a suitably qualified person. The assessment must include a stream reach assessment identifying any erosion hotspots, stream bank erosion and appropriate erosion mitigation measures.





**Attachment D – photos of the flood situation of the Auckland Anniversary weather event and locations of where the photos were taken**



267 Riverhead Road ★



13 Wautaiti Drive ★



2 TE ROERA PLACE ★



5 Mill Grove ★



4 Te Roera Place ★



Duke Street, the building/fence at the back of 7 Mill Grove ★



22 Duke St, viewing from 2 TE ROERA PLACE ★



3 Te Roera Place ★



Duke Street ★



Cnr Duke St / Te Roera Place ★





# Technical Specialist Memo

**To:** David Wrenn, Consultant Reporting Planner  
**From:** Martin Peake - Director, Progressive Transport Solutions Ltd  
**Date:** 28 August 2024

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**Subject: Private Plan Change 100 – Riverhead  
Traffic And Transportation Assessment**

## 1.0 Introduction

- 1.1 I have undertaken a review, on behalf of Auckland Council, of Private Plan Change 100 for Riverhead, lodged by Riverhead Landowner Group, in relation to traffic and transportation effects.
- 1.2 In writing this memo, I have reviewed the following documents:
- a) Integrated Transport Assessment, Flow Transportation Specialists, October 2023
  - b) Section 32 Assessment Report, Barker and Associates, 4 October 2023
  - c) Riverhead Precinct as notified

### *Qualifications and Experience*

- 1.3 I hold the qualification of a Masters in Civil Engineering with Management from the University of Birmingham in the UK (1993). I am a Chartered Engineer (UK) and a member of the Institution of Civil Engineers, and a member of the Chartered Institution of Highways and Transportation.
- 1.4 I have 30 years' experience as a traffic engineer. I have worked for several major consultant engineering firms, and as a Team Leader of one of Auckland Transport's Traffic Operations Teams. I have owned and operated my own traffic engineering consultancy since 2014. In these roles, I have worked in a variety of areas of transportation including traffic engineering, traffic modelling and temporary traffic management. I have provided expert traffic and transportation advice on a range of resource consents and plan changes across the Auckland region.

### *Involvement with Private Plan Change 100 - Riverhead*

- 1.5 I was engaged by Auckland Council in July 2022 to review the Private Plan Change to determine whether the information provided was sufficiently detailed and accurate to understand the traffic and transportation effects of the proposal.
- 1.6 I sought further information on traffic and transportation effects as outlined in Clause 23 Request for Further Information dated 19 August 2022 and 29 October 2022. These were responded to by the Applicant on 22 September 2022 and 14 December 2022, respectively. The information provided generally satisfied my request for further information.



1.7 I have visited the site on a number of occasions including 28 July 2022, 6 December 2022 and most recently on 18 and 22 August 2024.

*Expert Witness Code of Conduct*

1.8 I have read the Code of Conduct for Expert Witnesses, contained in the Environment Court Consolidated Practice Note (2023) and I agree to comply with it. I can confirm that the issues addressed in this Memo are within my area of expertise and that in preparing this Memo I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

**2.0 Key Transport Issues**

2.1 The key transport issues in relation to Private Plan Change 100 (**PPC100**) are summarised below.

- a) Alignment of PPC100 with traffic and transport plans and policies and Future Development Strategy;
- b) Appropriateness of SH16 and CRH traffic volumes used in the analysis;
- c) Access to the Wider Network for Active Modes and Public Transport;
- d) Reliance on design of SH16 / CRH roundabout;
- e) Extent and form of proposed road upgrades to be provided by PPS100;
- f) Access from CRH, Riverhead Road and road with separated cycle facilities;
- g) Trip rates and periods for analysis;
- h) Assumptions adopted in traffic volumes use for modelling traffic effects;
- i) Modelling of SH16 / CRH roundabout;
- j) Modelling of Riverhead Intersections; and
- k) Transport Infrastructure Upgrades and Activity Status.

2.2 The above issues are discussed in Section 4.0, submissions in Section 5.0 and the Precinct Provisions in Section 6.0.

### **3.0 Applicant Assessment of Traffic and Transportation**

#### Strategic Context

- 3.1 The Integrated Transport Assessment (**ITA**) Section 3 assesses Private Plan Change 100 (**PPC100**) against the strategic context including the Auckland Plan, Auckland Unitary Plan (**AUP**) and the Future Urban Land Supply Strategy (**FULSS**). Further analysis is included in the s32 Report prepared by Barker and Associates.
- 3.2 ITA Section 3.2 provides a high level assessment of PPC100 against the region-wide transport objectives and considers that PPC100 is aligned with relevant AUP objectives including achieving a quality compact urban form, providing land use activities that minimise the need for travel longer distances, and providing increased opportunities for local active mode use via upgrades to walking and cycling and facilities.
- 3.3 The s32 Report Section 6.4.2 provides an assessment against AUP Section B2.2 Urban Grown and Form, and Section 6.4.3 assesses alignment with Section B2.6 Rural and Coastal Towns and Villages. The analysis does not indicate that there is alignment with transportation objectives and policies other than it is considered that the PPC gives effect to Policy B2.2.7(c) with the development coordinated with infrastructure. No assessment is made against B3.3 Transport.
- 3.4 Both the ITA and the s32 Report discuss PPC100 in relation to FULSS. The assessment considers that the PPC aligns with the anticipated timing of the FULSS for Riverhead where Riverhead was identified as being development ready between 2028 and 2032. The ITA acknowledges that the PPC brings forward the development of the land but considers that the constraints in relation to transport can be managed.
- 3.5 Auckland Council's Future Development Strategy (**FDS**) was approved in late 2023 which supersedes the FULSS. The FDS pushes out the timing of development in Riverhead to 2050+ and includes prerequisite transport infrastructure required to support development. The FDS is not discussed in the documentation.
- 3.6 ITA Section 3.4 describes the transport network in relation to Auckland Transport's Future Connect. Future Connect sets out the anticipated function of the transport network in relation to different transport modes both currently and within the next 10-year period. The ITA identifies that there are no changes to the functions of the transport network within the Riverhead area over the next 10 years.
- 3.7 I discuss the alignment of PPC100 against the relevant traffic and transport RPS objectives and policies and against the FDS in Paragraphs 4.2 to 4.21.

#### Existing Transport Environment

- 3.8 ITA Section 4 sets out a description of the general traffic environment.
- 3.9 ITA Section 4.3.1 summarises the traffic volumes along CRH in both directions from traffic counts in 2022. Graphs showing the traffic profile of hourly traffic volumes over the day are presented for weekdays and for a Saturday and Sunday. The graphs clearly show that during the weekday, there is a distinct peak southbound towards SH16 in the morning peak with highest volumes between 0700-0900 before starting to drop after

0900. Volumes remain relatively constant throughout the rest of the day except for a small peak from around 1500 hours for the evening peak period. In the northbound direction traffic volumes steadily climb through the day to a peak between 1600-1800. It is noteworthy that the traffic volumes for the weekend, in particular Saturday, are much higher than the interpeak volumes during the week, and at times are not similar to the peak weekday flows.

- 3.10 ITA Section 4.3.2 presents traffic volumes on SH16 both east and west of the CRH intersection. The ITA does this to show the effect of the SH16 / CRH intersection on eastbound traffic flows in the morning peak. ITA Figure 10 shows west of the intersection that in the morning peak there is a dip in traffic volumes which does not recover until after 1000 hours, whereas in contrast, east of the intersection (ITA Figure 11) there is no such peak; traffic flows are relatively constant until around 1000 hours. The report highlights that this effect is due to SH16 traffic allowing traffic from CRH to exit onto SH16 to travel east.
- 3.11 The profiles for eastbound traffic show that the weekend (both Saturday and Sunday) SH16 traffic volumes are higher than the weekday traffic volumes throughout most of the day. In the westbound direction, the weekend day time traffic volumes are similar to the weekday evening peak flows.
- 3.12 I discuss the issue of the operation of the SH16 / CRH intersection and effect on the traffic volumes in terms of the appropriateness of the traffic volumes used in the traffic modelling in Paragraph 4.22, and Paragraph 4.61 and 4.62.
- 3.13 ITA Figure 14 shows base line traffic volume at the SH16 / CRH intersection based on the 2022 traffic volumes. The ITA makes an assumption on the volume of traffic turning right from CRH as this movement is currently banned for safety reasons.
- 3.14 ITA Section 4.5 presents crash data for the area and highlights typical crash patterns across the network and notes that the rural nature of the roads result in higher speeds. It also notes the lack of facilities for active modes and that PPC100 provides the opportunity for speed limits to be lowered as the surrounding area is urbanised which would improve safety.
- 3.15 For the SH16 / CRH intersection the assessment notes that the proposed upgrade to a roundabout by NZTA would assist at addressing the crash patterns at the intersection, and the interim measure to ban the right turn from CRH to SH16 was undertaken to address a crash pattern.
- 3.16 I agree with the analysis of the crash patterns within the vicinity of PPC100.
- 3.17 In terms of public transport, Section 4.6.1 states that PPC100 will have adequate accessibility to the existing public transport network. The report identifies there is currently a single bus route (Route 126) with an hourly service. The report notes that the PPC provides the opportunity to improve public transport facilities near the site.
- 3.18 Given the frequency of the bus service I consider that there is currently limited access to public transport from within the PPC100 area.

- 3.19 Section 4.6.2 discusses the existing walking and cycling provision and states that typically footpaths are on both sides of the road within Riverhead. It does note that there are no footpaths on Riverhead Road and some of the local road network northeast of the plan change area ( Cambridge Road and Queen Street) and footpaths only on one side of CRH between Riverhead Road and Short Street. There are no existing cycle facilities.
- 3.20 The ITA states that the Local Board are looking to address gaps in the footpath network but that there are no details of timing of any new footpaths.
- 3.21 ITA Section 4.6.3 describes the existing accessibility of private vehicles to the surrounding network and this highlights the proximity to the State highway network.
- 3.22 Section 4.7 describes the existing speed limits which are a mixture of 50km/h in the urban area of Riverhead, 60km/h between Riverhead and SH16 and 80km/h on Riverhead Road.
- 3.23 I generally agree with the description of the existing transport environment except that I consider that there is currently limited access to public transport.

#### Future Road Network

- 3.24 ITA Section 5.1 briefly describes the future Brigham to Waimauku SH16 upgrades which include a roundabout at SH16 / CRH, four lanes between Old North Road and Brigham Creek Road and a shared path between Kumeu and Brigham Creek. The ITA states that this is a funded project and that the Notice of Requirement had been lodged for Stage 2 of the project (which is between Brigham Creek Road and Kumeu). The ITA recognises the critical nature of the project and proposes that development should not be occupied prior to the completion of the roundabout.
- 3.25 I note that NZTA is currently seeking additional funding for this project and that a decision is expected in late-2024. Therefore, at this stage, there is no certainty as to when this project may progress.
- 3.26 ITA Section 5.2 briefly describes the SH16 Northwest Bus improvements which will deliver infrastructure for buses along SH16 to the central city. This will include interim facilities along the SH16 Northwestern Motorway at key interchanges and Westgate. The intention is to provide for rapid transit in the future.
- 3.27 I note that the bus improvements referenced extend to Westgate. Whilst there are other planned projects such as bus interchanges at Brigham Creek, I consider that accessibility to these from Riverhead and PPC100 will be limited, particularly for active modes, until such time as the SH16 upgrade is implemented. The current hourly bus service will have limited connectivity to these wider bus improvements.
- 3.28 ITA Section 5.3 summarises the Supporting Growth programme of roading improvements in Northwest Auckland and in particular for CRH. It notes that Notices of Requirements were lodged in September/October 2023. The NoRs being sought are for route protection. The projects are currently unfunded and there are no specific timeframes for their implementation. The ITA highlights that PPC100 is an opportunity

for some of the components of the projects to be delivered by developers which will assist in mitigating effects and providing a safe and efficient transport network.

- 3.29 With regards to the Supporting Growth NORs, these will support growth in Northwest Auckland and will form part of the prerequisite projects identified in the FDS.
- 3.30 I generally agree with the description of the future road network that is planned for Northwest Auckland and have noted some limitations above. I provide further comment on the proposed upgrade to the SH16 / CRH intersection in Paragraphs 4.28 to 4.34.

### Proposed Road Network

- 3.31 ITA Section 6.1 outlines the general design philosophy used for the design of the roads within PPC100 and roads that the PPC fronts. These include adopting Vision Zero in the safe design of the roads, adoption of Auckland Transport's Roads and Street Framework (**RSAF**) which is a planning tool to inform road design including taking into account the surrounding land uses and function of the road for the movement of people, and the Auckland Transport's Transport Design Manual (**TDM**).
- 3.32 Changes to speed limits are envisaged as outlined in ITA Section 6.2. These changes include the lowering of speed limits to be appropriate for an urban environment and include reducing speeds on parts of Riverhead Road and all of Lathrope Road to 50km/h and parts of Riverhead Road to 60km/h. Roads internal to the plan change are proposed to have treatments to limit speeds to 30km/h. The ITA notes that changes to speed limits would need to be progressed by Auckland Transport as they require changes to the bylaw.
- 3.33 To complement the speed limit changes, the PPC proposed gateway treatments where the speed limits change. These gateways are intended to signal to motorists a change in the environment and to reduce speeds. The gateways could be by way of road markings, signage, plantings or narrowings; actual measures would be determined during subsequent stages when roads are being designed. The intent of the reduced speeds is to improve safety and reduce the likely severity of crashes in accordance with Vision Zero.
- 3.34 I support the anticipated changes to the speed limits and I support the proposed complementary measures to be implemented as part of the roading upgrades.
- 3.35 ITA Section 6.3 describes in more detail the proposed road network that would support the plan change. This includes the internal roads and other roads that will be upgraded with the plan change.
- 3.36 The general philosophy adopted for the creation of the internal road network is to avoid vehicle access directly from CRH and Riverhead Road wherever possible as these roads are arterial roads. New intersections would be created with these roads that would then provide access to PPC100. A north-south collector road is proposed through the centre of the PPC area from Lathrope Road and would connect to Cambridge Road south of Queen Street. A roundabout intersection would be formed at Riverhead Road where it is crossed by the collector road. A second collector road is proposed east-west from a new roundabout intersection at the existing intersection of CRH / Riverhead Point Drive.

The Collector Roads would be supported by a network of local roads; key local roads are incorporated onto Precinct Plan 2. The Collector Roads are to have cycle facilities on both sides and all roads are to have footpaths. Additional footpath connections are proposed to further improve connectivity through the PPC area.

- 3.37 Local Roads are intended to be 18m wide and collector roads up to 25m wide with details of the design elements included in the Precinct Provisions in the Road Function and Design Elements Table.
- 3.38 For Riverhead Road through PPC100, this is proposed to be upgraded to 20 to 24m wide including central median, front, and back berms, dedicated footpaths and cycle paths separated from traffic. The road would be upgraded from the CRH / Riverhead Road roundabout to the proposed Collector Road roundabout where it would transition back to a rural environment; a threshold treatment will be used where the road transitions from urban to rural.
- 3.39 I note that the description of the extent of the upgrade to Riverhead Road in the Precinct Provisions is ambiguous and I discuss this in Paragraph 4.37.
- 3.40 Upgrades to CRH are proposed with varying cross sections due to existing constraints or development on the eastern side of the road. The road would be designed to urban standard. Between Riverhead Road and Riverhead Point Drive footpaths and separated cycle paths are proposed on both sides of the road. Allowances have been made for a local road access into the PPC area from CRH into the proposed local centre as well as a pedestrian crossing facility in the area to provide for pedestrian and cyclist access.
- 3.41 South of Riverhead Point Drive to Short Road, footpaths and separated cycle facilities would be provided on both sides of CRH. The cycle path would transition to shared path on the western side of CRH just north of Short Road. This change is intended to tie into the proposed Supporting Growth concept for the upgrade to CRH to SH16.
- 3.42 A new pedestrian crossing is proposed on CRH north of Riverhead Road between Princes Street and Edward Street.
- 3.43 Lathrope Road is proposed to be sealed and a footpath proposed on the northern side of the road only (as the southern side is outside the area of the plan change).
- 3.44 CRH and Lathrope Road are intended to accommodate buses (CRH is a current bus route and Lathrope Road may be a future bus route). CRH is also to be designed as an over-dimension route.
- 3.45 Section 6.7 outlines improvements to Cambridge Road and Queen Street. Cambridge Road is to be upgraded to urban standard with a 6m carriageway and footpath on the western side up to Queen Street. A footpath is proposed along Queen Street between Cambridge Road and CRH on the northern berm. This is to provide connections to bus stops, War Memorial Park and playground, existing village, and the new local centre.
- 3.46 There is some ambiguity over the extent of the upgrades proposed to Cambridge Road and I discuss this in Paragraphs 4.38 to 4.45.

- 3.47 ITA Section 6.9 summarises new intersections proposed or to be upgraded. These include:
- a) Coatesville-Riverhead Highway / Riverhead Road – upgrade existing
  - b) Coatesville-Riverhead Highway / Riverhead Point Drive – upgrade to roundabout with fourth leg
  - c) Coatesville-Riverhead Highway / Site access – provide new priority control intersection between Riverhead Point Drive and Short Road
  - d) Riverhead Road / Site access (330 m west of Coatesville-Riverhead Highway) – new intersection with new north and south approach roads
  - e) Riverhead Road / Lathrope Road – update existing priority control intersection.
- 3.48 All intersections (except Riverhead Road / Lathrope Road) would provide pedestrian / cycle crossing facilities where pedestrian facilities would be provided on raised tables, including Swedish tables at the roundabouts.
- 3.49 The existing Riverhead Road / Lathrope Road intersection is to be realigned to simplify the intersection layout and to reduce vehicle speeds through the intersection.
- 3.50 The intersection changes have been designed for the PPC to be contained within the existing road reserve (other than where land is within the PPC area).
- 3.51 Outside of Riverhead, right turn bays at Old Railway Road and Riverland Road are proposed (ITA Section 6.10). The ITA has assessed the need for the right turn bays and concluded that the requirement for the right turn bay at Riverland Road is currently low but at the Old Railway Road intersection it is high. With PPC100, including with just 60% of development, the right turn treatments would be necessary. The ITA notes that an Auckland Transport project at Old Railway Road has not progressed due to funding constraints. The PPC would provide the right turn bays. As discussed in Paragraph 4.46, I support the proposed upgrades to these two intersection.

#### Access Arrangements

- 3.52 ITA Section 7.1 outlines the principles of providing access to PPC100 for vehicles, active modes and to public transport.
- 3.53 The proposed road network (as described above) provides vehicle access to the PPC area and the various land uses proposed. It also facilitates alternative routes to the wider road network through a connection to Lathrope Road which connects to Riverhead Road.
- 3.54 Vehicle access restrictions apply to the Arterial roads (CRH and Riverhead Road) through the normal AUP provisions and any vehicle access directly onto these roads would be subject to the normal consenting processes. The PPC100 roading network has been designed to minimise the need for direct access onto the arterial roads.
- 3.55 I am concerned that the Precinct Provisions contradict the AUP with regards to the vehicle access restrictions on the arterial roads and I discuss this in Paragraph 4.49.
- 3.56 Walking and cycling facilities and connections are provided via footpaths on both sides of all local and collector roads and separated cycle facilities on the collector roads. Upgrades to CRH, Riverhead Road, Cambridge Road and Queen Street provide

additional footpaths on the wider network. Pedestrian and cycle crossings are provided at intersections along CRH and Riverhead Road as well as two new proposed crossings on CRH (one between Princes Street and Edward Street and the second in the vicinity of Grove Way to provide access to the local centre).

- 3.57 I consider that vehicle access restrictions should also apply to roads with separated cycle facilities as discuss this in Paragraph 4.50.
- 3.58 ITA Section 7.1.5 states that PPC100 will support public transport by providing safe and convenient pedestrian connections and through upgrades to shelters as part of the corridor upgrades. The ITA states that the Precinct will enable facilities to be provided on CRH, Riverhead Road, Lathrope Road, and the new internal collector roads. PPC100 will increase demand for public transport which could enable more frequent bus services in the future (subject to funding).

### Trip Generation

- 3.59 ITA Section 7.2 sets out for the different land uses trip generation rates and assumptions for the chosen rates.
- 3.60 For lower density residential development, a rate of 0.75 trips per dwelling and for medium density dwellings 0.6 trips per dwelling has been assumed. This is on the basis that as the network is congested, residents are likely to travel outside of the peak hours more, the development will occur over 10 years and that the PPC introduces new facilities such as retail offerings (e.g. supermarket) which will reduce the need to travel outside of Riverhead.
- 3.61 The ITA acknowledges that in the short to medium term due to the availability of facilities for non-private vehicle transport modes that higher trip rates that those above would be likely. Therefore, for sensitivity testing, a lower density dwelling rate of 0.95 trips per dwelling and for medium / high density dwellings 0.70 trips per dwelling has been adopted.
- 3.62 Trip rates for other land uses have been derived from industry standard sources or based on assumptions.
- 3.63 ITA Section 7.2.2 presents the trip generation and discusses the effect of internal trips (trips that can be made within Riverhead to existing or new facilities such as shops, schools etc.) and the effect of pass-by and multi-purpose trips.
- 3.64 The ITA presents factors for internal, pass-by and multi-purpose trips to the various land uses. However, for simplicity in undertaking the assessment the pass-by trips, which would only apply to supermarket, retail, and café trips, have not been applied. This affects only trips within Riverhead.
- 3.65 ITA Table 4 and 5 presents the total number of new trips generated by PPC100 and the total number of new trips from PPC100 external to Riverhead. This shows that in the AM peak that the total number of new trips (less multi-purpose trips) would be 2,355 with 1,055 travelling external to Riverhead. In the PM peak the total number of new trips would be 1,860 trips with 945 travelling externally.



- 3.66 I generally agree with assumptions for the trip generation rates but have concerns that if the school or retirement village were not to proceed that this would affect the traffic generation, particularly in the PM peak. In addition, I note that the assessment has concentrated on the weekday peaks. However, there are elevated traffic volumes on both SH16 and CRH on weekends (particularly Saturdays). I therefore have concern over the effects of PPC100 on weekends. I discuss these issues in Paragraphs 4.51 to 4.60).

### Distribution

- 3.67 ITA Section 7.2.3 outlines the methodology to determine the trip distribution both within Riverhead and to the wider road network. The assessment has utilised the Northwest SATURN model to inform the distribution as well as considering the traffic generation from the various parts of the site.
- 3.68 I agree with the methodology adopted to distribute trips. I have examined the trip distribution diagrams in ITA Appendix A and consider that the proportion of trips assigned to the various roads on the road network external to Riverhead to be appropriate.

### Modelling Methodology

- 3.69 ITA Section 7.4 sets out the modelling methodology adopted.
- 3.70 Key intersections for a future year of 2038 for weekday AM and PM peaks have been modelled using the intersection modelling package SIDRA. These have been modelled with and without the Plan Change. The intersections modelled are those directly affected by PPC100 as well as the CRH intersections with Old Railway Road and Riverland Road, and the SH16 / CRH intersection. The models assume that all the proposed intersection upgrades are complete.
- 3.71 In addition to 2038, the SH16 / CRH intersection has been modelled for 2031 with 60% of development with the higher (sensitivity) residential trip generation rates (as summarised in Paragraph 3.61) as well as for 2038 with the sensitivity trip rates. The 60% development has been modelled as this reflects the Riverhead Landowner Group landownership. The 2031 model year has been used as this represents the anticipated timeframe to achieve 60% of the development and is consistent with when FULSS anticipated development to occur.
- 3.72 The additional sensitivity modelling of the SH16 / CRH intersection was undertaken to demonstrate the performance of the intersection with the higher trip generation rates.
- 3.73 For deriving the traffic volumes at the SH16 / CRH intersection a combination of information from the Northwest SATURN traffic model and 2022 traffic counts on SH16 have been used to derive the future flows. A 2028 version of the SATURN model has been used to understand the growth in traffic compared to 2022 traffic counts. The 2028 version of the model included upgrades to SH16 as part of the Brigham Creek to Waimauku SH16 upgrade project but did not include wider network improvements such as the Alternative State Highway. The 2028 model included growth in Kumeu and

Huapai but no growth in Riverhead, as this was not anticipated to come on-line until 2033.

- 3.74 Growth factors derived from comparing the 2028 and 2038 traffic models with 2022 have been used to determine future traffic volumes on SH16.
- 3.75 I have some concerns on the traffic volumes used to derive the future year eastbound SH16 traffic volumes and I discuss this in Paragraphs 4.61 to 4.63.
- 3.76 The SATURN traffic model has very low traffic volumes for CRH compared to the actual observed counts and considers the modelled flows to be unreliable. The ITA has assumed that there will be no background growth in Riverhead between 2022 and the various future years as PPC100 will be the growth that will occur. Therefore, the base flows used in the modelling are the 2022 observed counts. The ITA considers this is the worst case as there is some rat-running on CRH which will redistribute once the SH16 upgrades occur and the 2022 flows have not been reduced to take that into account.
- 3.77 Westbound flows along SH16 at the SH16 / CRH intersection have been capped at 1,730 vehicles as it is assumed that the Brigham Creek Roundabout will constrain traffic.
- 3.78 As the right turn from CRH to SH16 at the SH16 / CRH intersection is currently banned, the ITA has assumed a notional 10% of traffic will make the turn once this is permitted when the roundabout is constructed.
- 3.79 No details of how the future year traffic volumes in Riverhead have been derived. I discuss this in Paragraphs 4.64 and 4.65.

#### Assessment of Traffic Effects - SH16 / CRH Roundabout

- 3.80 ITA Section 7.5 summarises the assessment of the operation of the SH16 / CRH intersection as an upgraded intersection to a roundabout as proposed by NZTA for the Brigham to Waimauku SH16 upgrade project. This includes two through lanes along SH16 and two left turning lanes on CRH (with one of these lanes being a short shared left and right turn lane).
- 3.81 The following scenarios have been assessed:
- a) 2031 Do-minimum background growth and SH16 upgrade (no plan change);
  - b) 2038 with Plan Change and long term trip rates (lower trip rates as summarised in Paragraph 3.60);
  - c) 2031 with 60% of the Plan Change and short term / sensitivity trip rates (as summarised in Paragraph 3.61); and
  - d) 2038 with 100% of the Plan Change and the short term / sensitivity trip rates (as summarised in Paragraph 3.61).
- 3.82 The results are presented in a series of tables in the ITA for each scenario and all approaches are forecast to operate at a LOS A, B or C. In the 2038 100% plan change scenarios, whilst the roundabout is forecast at a good level of service, in the AM peak

the degree of saturation on the CRH is approaching capacity at 0.88 with the long term trip rates and 0.95 in the sensitivity test. The 2038 scenarios excludes the Alternative State Highway project which would reduce traffic volumes along SH16 if constructed.

- 3.83 I have some concerns on the assessment of the intersection in relation to the layout of the intersection and traffic volumes used. I discuss the analysis of the intersection and extent of upgrade required in Paragraphs 4.66 to 4.75.

#### Assessment of Traffic Effects – Local Riverhead intersections

- 3.84 ITA Section 7.6 sets out traffic modelling for the local intersections within Riverhead. These intersections have been modelled utilising SIDRA for 2038 with and without the plan change.

- 3.85 The ITA reports that the majority of the intersections operate at an acceptable level of performance, typically LOS A to C. A couple of exceptions are noted being:

- a) At the CRH / Riverhead Road roundabout in the AM Peak, Kaipara Portage Road is forecast with a LOS D and E, delays of around 50 seconds and queues 120-150m in length
- b) At the CRH / Site access (south of Riverhead Point Drive) the site access in the AM peak is forecast to operate at LOS F with delays of 50 seconds.

- 3.86 With regards to a), the ITA considers that as the modelling has not taken into account pass-by associated with retail activity, the actual traffic volumes will be lower than those modelled. It also considers that the performance to be acceptable given that this is just for a short period of the day and the delays and queues are not excessive.

- 3.87 In relation to b), the ITA states that the approach is a single lane and that motorists have alternative options to avoid the intersection.

- 3.88 I discuss the assessment of the local Riverhead intersections in Paragraphs 4.77 to 4.79.

#### Wider Network Effects

- 3.89 ITA Section 7.8 provides an assessment of the safety effects of PPC100 on intersections outside of Riverhead.

- 3.90 Right turn bays are proposed to be provided at the CRH intersections with Old Railway Road and Riverland Road which will assist in improving safety at these intersections.

- 3.91 The ITA highlights that the Old North Road / Old Railway Road intersection has an existing safety issue which would require an upgrade, but this is likely to require additional land. The SIDRA modelling undertaken for the intersection shows that the plan change would not have a notable effect on the operation of the intersection and that the turning movements from the side roads are low.

- 3.92 I have reviewed the assessment and concur with the conclusions.

## Proposed Precinct Provisions / Implementation Plan

- 3.93 Section 8 of the ITA sets out the proposed transport infrastructure that is required to support PPC100 and the party responsible for providing that infrastructure. The identified infrastructure includes the NZTA upgrade to the SH16 / CRH intersection to a roundabout and upgrades to be implemented by the Riverhead Landowner Group to the roads in the vicinity of PPC100 that are directly affected.
- 3.94 The ITA states that in the event that the NZTA upgrade is delayed or does not occur, the Precinct Provisions include matters of discretion that would require any occupied development to address safety of the surrounding transport network, including the SH16 / CRH intersection.
- 3.95 The transport infrastructure upgrades are included in the Precinct Provisions under Standard IX6.1 and include the installation of right turn bays at the CRH / Old Railway Road and CRH / Riverland Road intersections; the right turn bays are in addition to the measures identified in the ITA. The ITA does not state who would be responsible for the installation of the right turn bays.
- 3.96 The Precinct Provisions have applied different activity statuses for different transport infrastructure.
- 3.97 I support the transport upgrades that have been identified in the ITA and the Precinct Provisions and discuss this further, including the activity status, in Paragraphs 4.80 to 4.85.

#### 4.0 Assessment of Traffic Effects

- 4.1 The following provides my assessment of traffic and transport effects and proposed management methods for the issues summarised in Paragraph 2.1 and as identified in Section 3.0.

#### Alignment of PPC100 with traffic and transport plans and policies and the Future Development Strategy

- 4.2 I have reviewed the analysis of the alignment of PPC100 against the relevant plans and policies, and I generally agree with the assessment in relation to the PPC100 providing for transport within the local Riverhead area. This would be achieved by the proposed network of walking and cycling facilities within PPC100, along roads to be upgraded as part of the PPC and the proposed additional pedestrian crossing facilities. Furthermore, the inclusion of land use activities such as the local and neighbourhood centres will provide facilities for existing and future Riverhead residents to be able to shop locally rather than travel to the wider area such as Kumeu or Westgate.
- 4.3 Whilst not required to be provided by the Precinct Provisions, the anticipated school, if provided, will assist in reducing the need for both existing and future residents to travel outside of Riverhead for schooling. The provision of walking and cycling and facilities would need to be designed to provide safe and attractive active mode connections to the school to minimise the need for short distance trips by private vehicle.
- 4.4 The FULSS was replaced in 2023 by the FDS. The FDS revised the timing of when development is anticipated in Riverhead from 2028-2032 to 2050+. It also introduced the requirement for prerequisite transport infrastructure required to support development. This infrastructure includes:
- a) Brigham to Waimauku SH16 Upgrade;
  - b) SH16 Main Road Upgrade;
  - c) Alternative State Highway;
  - d) Access Road upgrade;
  - e) Coatesville-Riverhead Highway upgrades; and
  - f) Northwest Rapid Transit extension to Huapai.
- 4.5 I consider that of these infrastructure works, the most relevant to PPC100 are the Brigham to Waimauku SH16 Upgrade, the Alternative State Highway, Coatesville-Riverhead Highway upgrades and the Northwest Rapid Transit Extension to Huapai.
- 4.6 The Brigham to Waimauku SH16 Upgrade includes the construction of a roundabout at the SH16 / CRH intersection as well as four-laning SH16 between the Brigham Creek Road roundabout and the Old North Road roundabout and active mode facilities along SH16.
- 4.7 The funding and timing of the Brigham to Waimauku SH16 Upgrade (including the SH16 / CRH roundabout) is currently uncertain. Whilst NZ Transport Agency (**NZTA**) lodged a Notice of Requirement (**NOR**) for this project in late 2022, the project is currently on hold subject to securing additional funding for its implementation. The project is more than just the provision of the roundabout and will provide both capacity and safety

improvements to SH16. As I discuss in Paragraphs 4.74 and 4.75, I consider that the four-laning of SH16 south of the roundabout would be required in addition to the roundabout to accommodate the future traffic from PPC100.

- 4.8 The CRH upgrade proposed includes:
- a) construction of a roundabout at the Old Railway Road intersection;
  - b) a right turn bay at Riverland Road intersection;
  - c) Urbanisation of CRH within Riverhead (south of Riverhead Road); and
  - d) provision of active mode facilities along the northern side of the road to connect Riverhead to the proposed active mode facilities along SH16 as part of the Brigham to Waimauku SH16 upgrade.
- 4.9 These upgrades require land from adjacent land owners. A NoR was lodged by the Supporting Growth Alliance on behalf of Auckland Transport for the CRH upgrade in 2023. However, there is currently no funding for its construction nor timeframe as to when it may be constructed other than the designation being in place for 20-years.
- 4.10 Upgrades to Riverhead Road have been identified by Auckland Transport as part of the strategic transport network for the area, but this project was not included in the NoRs lodged in 2023 and would be a separate project that would be pursued.
- 4.11 The Precinct Provisions include the construction of right turn bays at the Old Railway Road and Riverland Road intersections which would go some way to addressing existing and future safety issues at these locations. Where land is accessed from CRH, the PPC will also include upgrades to CRH to urban standard, including active mode facilities.
- 4.12 Whilst active mode facilities are proposed within the PPC area and along roads which are being upgraded where they have a frontage with the PPC, until the wider connections along CRH to SH16 and along Riverhead Road to Kumeu are provided, accessibility for cycling to the wider area (including Westgate and Kumeu) will continue to be limited.
- 4.13 The timing of the Alternative State Highway is unknown and is likely to be some time away given the scale and extent of the works required and the need to secure funding and land for its implementation. However, this is in the Government's Roads of National Significance programme and is therefore likely to have higher priority than other projects. This project would result in traffic relief to the existing SH16, but the existing corridor would need to accommodate development in the interim period. Therefore, based on my assessment in Paragraphs 4.74 and 4.75, I consider that it is necessary for the upgrades to SH16 between CRH and Brigham Creek Road to be implemented prior to the occupation of development rather than just the upgrades to the SH16 / CRH roundabout.
- 4.14 The Northwest Rapid Transit Extension to Huapai would provide greater access for Riverhead residents to public transport, which is currently very limited. There is no proposed improvements within the current Regional Public Transport Plan (**RPTP**) 2024-2033 for public transport. However, I acknowledge that the plan change would provide

additional demand for public transport in the future, but currently there is no funding or proposals to provide additional public transport services in Riverhead.

- 4.15 In relation to AUP Objectives and Policies on infrastructure I consider the most relevant are Urban Growth and Form Objectives B2.2.1(c) and (d), and B2.2.1(5), Policy B2.2.2(7)(c), and Infrastructure, Transport and Energy Objective B3.3.1(1)(e) and Policy B3.3.2((5)(a). I have replicated these below for reference:

*B2 Urban Growth and Form*

*B.2.2.1 Objectives*

*(1) A quality compact urban form that enables all of the following:*

- (c) better use of existing infrastructure and efficient provision of new infrastructure;*
- (d) improved and more effective public transport;*

...

*(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.*

*B2.2.2 Policies*

*Development capacity and supply of land use for urban development*

*(7) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following:*

...

- (c) integrate with the provision of infrastructure;*

*B3 – Infrastructure, Transport and Energy*

*B3.3 – Transport*

*B3.3.1 Objective*

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

...

- (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community*

*Policy B3.3.2*

*Integration of subdivision, use and development with transport*

*(5) Improve the integration of land use and transport by:*

- (a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;*
- (b) encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods;*
- (c) locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement*

*surrounding activities by supporting accessibility to a range of transport modes;*

*(d) requiring proposals for high trip-generating activities which are not located in centres or on corridors or at public transport nodes to avoid, remedy or mitigate adverse effects on the transport network;*

- 4.16 PPC100 includes Precinct Provisions that would prevent occupation of dwellings prior to the construction of the SH16 / CRH roundabout. The Plan Change also proposes intersection improvements (right turn bays) at the intersections of Old Railway Road and of Riverland Road with CRH as well as localised upgrades to CRH where these are adjacent to the PPC. Taking these factors into account, I consider that the PPC is partly aligned with the above objectives and policies by preventing development to be operational prior to the implementation of some elements of the prerequisite infrastructure or through the delivery of some elements of the CRH upgrades.
- 4.17 Until the upgrades to CRH and Riverhead Road are implemented, accessibility from Riverhead to the wider transport network for active modes will be limited as the connecting roads to SH16 and to Kumeu will remain as rural road with no facilities for walking, and more importantly cycling.
- 4.18 Furthermore, there are currently no funded plans to provide additional public transport services to Riverhead. Whilst the provision of public transport usually lags behind development (as the development provides demand for public transport), the FDS does not anticipate that development will occur until 2050+. Should PPC100 proceed, this would bring forward the need for improvements to public transport within Riverhead.
- 4.19 The proposed zoning includes Terraced Housing and Apartment Building Zone (THAB). The AUP zoning for THAB describes the zone as being “*predominantly located around metropolitan, town and local centres and the public transport network to support the highest levels of intensification.*”<sup>1</sup> Whilst the THAB zone is located around the local centre, public transport is currently very limited and is affected by existing congestion. It is acknowledged that Auckland Transport has indicated that there would be improvements to the frequency of public transport in the future, these are currently unfunded and there is no timings as to when they may occur. Therefore, this will limit accessibility from this zone to the wider transport network other than by private vehicle until improvements to public transport occur.
- 4.20 In summary, I consider that PPC100 partly aligns with traffic and transport AUP RPS Objectives and Policies by providing facilities within Riverhead itself for active modes, and public transport facilities, and through the partial implementation of elements of the planned prerequisite infrastructure identified in the FDS for CRH. The Precinct Provisions as proposed prevent dwellings being occupied until the SH16 / CRH roundabout is constructed and operational which would address effects on the wider road network, although as I discuss in Paragraph 4.75, I consider that this restriction should also apply to four-laning of SH16 east of CRH.

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<sup>1</sup> Auckland Unitary Plan – Terraced Housing and Apartment Building Zone H6.1 Zone Description



- 4.21 I consider that until the upgrades to CRH and Riverhead Road are complete and more frequent public transport services are provided, that Riverhead will be largely reliant on private vehicle travel for access to the wider transport network. The timing of when these upgrades would occur is currently unknown.

#### Appropriateness of traffic volumes on SH16 and CRH

- 4.22 The ITA Section 4.3.2 shows that the existing operation of the SH16 / CRH intersection affects the flow pattern along SH16 eastbound in the morning peak. The dip in traffic flows in the weekday morning peak (ITA Figure 10) west of the intersection indicates that at the location of the count site, the intersection operation limits the traffic volume that could pass over the counter. Therefore, the true demand citybound on SH16 will be underreported on the approach to the intersection. Furthermore, the traffic volumes east of the intersection will also underreport the true eastbound demand. These traffic volumes have been used in assessing future traffic volumes at the SH16 / CRH intersection, and therefore I have some concerns over the robustness of the traffic modelling which I discuss further in Paragraphs 4.62 to 4.63.
- 4.23 With regards to the CRH traffic volumes used in the assessment of traffic effects, these are taken from a count in 2022. Some submitters expressed concern that these traffic volumes would not be appropriate to use as they would have been affected by COVID and the effects of people working more from home at that time.
- 4.24 To assess the potential for this data to be affected by COVID, I have reviewed the count against other available counts in the same location. Unfortunately, I have not been able to source count data post 2022 in the same location. However, a count was available from the Auckland Transport website in 2018 pre-COVID. This count has a two-way weekday average traffic volume of 7,830 vehicles per day. This compares to the 2022 volume of 8,598 reported in Table 1 of the ITA. A further count in 2021 had a volume 7,422 vehicles per day. I have also reviewed traffic counts on SH16 from the NZTA website between 2018 and 2022. These counts show that there was a drop in traffic volumes in 2020 and 2021 compared to pre-COVID, and 2022 traffic flows were similar to or slightly greater than 2019. Based on a comparison of these counts I am satisfied that the use of the 2022 traffic volumes does not appear to have been unduly affected by COVID.

#### Access to the Wider Network for Active Modes and Public Transport

- 4.25 There are no dedicated cycle facilities either within Riverhead or on the surrounding roads. Footpath provision within Riverhead is variable. To the west of CRH there are various roads that provide access to residential properties that currently do not have footpaths or have footpaths either on one side of the road only or just for short sections. Footpath provision on the roads east of CRH is more complete.
- 4.26 I consider public transport is currently limited with just an hourly service in each direction. Buses experience significant delays accessing SH16 as they are caught in the general traffic congestion. This bus service has been funded by the local board and will need funding to continue operation.

- 4.27 Overall, I consider that the existing active mode provision in the vicinity of PPC100 to be limited and disconnected and that public transport provision is limited. This will be the case until upgrades occur to CRH and Riverhead Road and improvements to public transport services occur.

Reliance on design of SH16 / CRH roundabout

- 4.28 Notice of Requirements for The Bringham to Waimauku SH16 upgrade were lodged in late 2022. However, due to increases in costs for the construction of the project, it has been paused. NZTA are currently seeking additional funds to continue with the project which would need to align with the Government Policy Statement on Land Transport 2024. The NZTA submission states that subject to approval of funding in late 2024, the project is anticipated to be completed mid-2029. Therefore, at this stage, there is still uncertainty around funding and timing of the delivery of the project.
- 4.29 The SH16 upgrade includes the construction of a roundabout at SH16 / CRH. I have some concerns over the safety of the proposed roundabout arrangement and its efficiency.
- 4.30 The proposal includes for two approach lanes on CRH which would allow a double left turn from CRH to SH16. A double left turn arrangement is not a common arrangement and due to the high eastbound traffic volumes on SH16 using the two eastbound roundabout circulating lanes, I consider that motorists could be reluctant to use the second left turn lane. Should this be the case, this will limit the capacity benefits of the second lane for left turning vehicles. The arrangement may also result in safety issues as it may be difficult for motorists to appropriately identify gaps in the two eastbound approach lanes.
- 4.31 In addition, a pedestrian crossing is proposed on CRH which I understand would be a zebra crossing. This facility includes pedestrians (and cyclists) crossing two approach lanes on CRH. There are known safety issues on pedestrian crossings in such an arrangement as vehicles queued in one lane can block visibility to/from pedestrians for traffic in the second lane. Given that there will be regular queues from the roundabout across the crossing, I consider that this will be a safety concern. An alternative arrangement may be required such as a signalised crossing.
- 4.32 Furthermore, there is a signalised pedestrian crossing proposed on SH16 east of the roundabout. The operation of this signalised crossing will result in traffic stopping on SH16. Traffic will likely queue back into the roundabout and will impede vehicles on CRH from entering the roundabout.
- 4.33 The operation of both the SH16 and the CRH pedestrian crossings will impact on the efficiency of the roundabout. The effect of the crossings will depend on demand for them. I discuss this further in relation to the assessment of the operation of the roundabout in Paragraph 4.67 to 4.71 as the crossings have not been included in the traffic modelling.
- 4.34 I appreciate that the assessment has been undertaken on the current design for the SH16 / CRH roundabout and that the design is outside of the control of the Applicant. I also note that the design could be subject to change during detailed design and I raise

these issues as any changes to the design by NZTA, could impact on the efficient operation of CRH.

Extent and form of proposed road upgrades to be provided by PPC100

- 4.35 I agree with the general design philosophy adopted for the design of the PPC100 road network and roading upgrades. This will ensure that they are designed in a safe manner and will provide the appropriate functionality for the various road users and land uses.
- 4.36 With regards to the upgrade to Riverhead Road, Auckland Transport has identified Riverhead for a future upgrade as part of the strategic transport network within the area. This road would be upgraded to provide active mode connections to Kumeu. This would enhance the connectivity of Riverhead to the wider area and provide improved transport choice for existing and future residents. The upgrade proposed within PPC100 would need to be designed to future proof for the Auckland Transport upgrade with sufficient road reserve width set aside west of the proposed Riverhead Road / Collector Road intersection as allowed for in the Precinct Provisions Standard IX6.2 Road widening setback along Riverhead Road.
- 4.37 A description of the extent of the Riverhead Road upgrade is included in the Precinct Provisions as IX.11.1 Appendix 1 Road Function and Design Elements Table; this refers to the extent of upgrades being the eastern boundary of 307 Riverhead Road. I take this to mean the eastern side of the access way onto Riverhead Road as illustrated in Figure 1. To avoid ambiguity, I recommend that the wording in the table should be updated to refer to the eastern side of the 307 Riverhead Road vehicle access onto Riverhead Road rather than the eastern boundary.



Figure 1 - Extent of Upgrade to Riverhead Road

- 4.38 Cambridge Road at its southern end is a paper road with no connection from the southern end of the formed section of Cambridge Road to CRH for either vehicular traffic

or pedestrians or cyclists. The ITA states that Cambridge Road would be upgraded to 6m and include a footpath on its western side which would connect to a footpath provided along the western side of CRH from Riverhead Road.

- 4.39 Precinct Plan 3 shows the Cambridge Road upgrade along both the formed and unformed section of the road south of Queen Street and extending to CRH. However, the upgrades in Standard IX.6.1(5)(b) states that only the “*existing carriageway of the formed portion of Cambridge Road south of Queen Street*” would be upgraded to urban standard. The list of proposed or upgraded intersections in the ITA (and detailed in Paragraph 3.47 above) does not mention a new intersection between Cambridge Road and CRH. Standard IX.6.1(5)(a) does however state that the proposed footpath on the western side of Cambridge Road would connect to Riverhead Road. Therefore, there is ambiguity as to the extent of the Cambridge Road upgrade.
- 4.40 For legibility, I consider that the paper road section of Cambridge Road should be upgraded and connect to CRH. This is because the Collector Road through PPC100 connects to Cambridge Road south of Queen Street. If the connection was not provided, vehicle access would then have to occur through Alice Street, along Queen Street and Cambridge Road. In stating this, I am aware that there could be implications for the access to the Caltex Petrol Station on CRH.
- 4.41 A Submission from Z Energy (Submission 203.1) seeks clarification as to the extent of proposals along the paper road section of Cambridge Road. The submitter supports a footpath but raises concerns about the effects of vehicle access being provided over the paper road on the operation of the Submitter’s southern vehicle crossing.
- 4.42 The Applicant should confirm what the intended upgrades are along Cambridge Road.
- 4.43 If a connection to CRH is proposed, a concept design should be provided for the intersection to demonstrate that there is a feasible solution for the intersection which takes into account the vehicle crossing for the Caltex petrol station and the Princes Street intersection with CRH just to the south.
- 4.44 I consider that the Precinct Provisions (Standard IX.6.1 Staging of development with transport upgrades) and / or Precinct Plan 2 and 3 should be updated to clarify the intended upgrades.
- 4.45 I recommend that Cambridge Road be added to Appendix IX.11.2 Appendix 2 Road Function and Design Elements Table to detail the required upgrades. This is consistent with the Auckland Transport submission (Submission Point 161.51).
- 4.46 I support the proposed upgrades to the Old Railway Road and Riverland Road intersections to provide right turning bays. This will assist in improving safety at these intersections and would improve the efficiency of CRH for through traffic. I note that the Auckland Transport concept design for the upgrade of CRH includes a roundabout at the Old Railway Road intersection; this upgrade requires land outside of the road reserve. I do not consider that an interim design of the right turn bay should preclude the future roundabout arrangement.

- 4.47 The Road Function and Design Elements Tables (Appendix IX11.1 and IX11.2) has allowed for bus provision on only CRH and Lathrope Road (in addition to the Collector Roads) although Riverhead Road is an arterial road. The ITA states in Section 6.4 that there is no expectation that Riverhead Road would have buses operating along it. This is in contrast with the Auckland Transport submission (Submission Point 161.50) that states that as Riverhead Road is an arterial road, and that it should be designed to allow for buses. I agree that this should be the case as this will provide flexibility for future bus routes. I therefore recommend that the Appendix IX.11.2 Appendix 2 Road Function and Design Elements Table row for Riverhead Road should be updated to allow for Bus Provision.

*Access from CRH, Riverhead Road and road with separated cycle facilities*

- 4.48 I generally support the access arrangements for PPC100 as this will minimise effects on the operation of the existing arterial roads. The addition of pedestrian crossing facilities will improve access to public transport.
- 4.49 As highlighted in the ITA, CRH and Riverhead Road are arterial roads and Vehicle Access Restrictions apply in accordance with the AUP Standard E27. However, IX.11.2 Appendix 2 - Road Function and Design Elements Table states that there are no access restrictions on either of these roads. To be consistent with the AUP, I recommend that the table be updated to state that access restrictions apply. This will be particularly important for the safe operation of the separated cycle facilities which are required on these roads.
- 4.50 Furthermore, no access restrictions apply to the Collector Roads in IX.11.1 Appendix 1 - Road Function and Design Elements Table where separated cycle facilities are provided. It is typical practice that access restrictions apply on roads with cycle facilities (separated or shared paths) for the safety of cyclists. I, therefore, recommend that the table IX.11.1 Appendix 1 be updated so that access restrictions apply to roads with cycle provision.

*Trip rates and periods for analysis*

- 4.51 I generally agree with assumptions for the trip generation rates. For the residential rates, I consider the long term trip rates in Paragraph 3.60 to be too low and do not accept the rationale for the trips rates used. The traffic flow profiles for CRH traffic volumes during the day in ITA Figures 8 and 9 do not support the assumptions of travel outside of the peak hours. Furthermore, I do not consider that the time frame for the development would affect the trip rate. I agree there are new facilities (such as retail which may include a supermarket) the effects of these are taken into account with the factors applied for multi-purpose trips and internal trips within Riverhead.
- 4.52 I consider that the higher residential trip rates in Paragraph 3.61 to be more appropriate particular before any improvements to public transport services in Riverhead occur and prior to active mode connections being provided through the wider roading upgrades proposed by Auckland Transport and NZTA. These rates may reduce once improvements to public transport and active mode facilities are implemented, but I am of the opinion that they are unlikely to reduce to the lower rates assumed in the ITA due

to the overall location of PPC100 in relation to employment opportunities and education (noting that there is no certainty that a school would be constructed within PPC100).

- 4.53 With regards to the assumptions on the trip generation for the school, I consider that the trip rates adopted are appropriate. A much lower trip rate is used for the PM peak as this does not correspond to the afternoon school peak at the end of the school day.
- 4.54 Notwithstanding, whilst the ITA has assumed that a primary school will form part of the development, there is no certainty that this will be included within the PPC area. There are no requirements within the Precinct to set aside land for a school or to provide for education. Should a school not occur, this will alter the total trip generation from PPC100 and could alter the effects on the wider road network, particularly in the PM peak period where the school has an assumed low trip rate (0.15 trips per student) and a high assumed number of internal trips (80%).
- 4.55 In noting that the Precinct Provisions do not allow for a school, I have examined the Structure Plan included in the notified documentation and this also does not discuss the provision of a school. I appreciate that the Ministry of Education has different processes for identifying school sites and designating land for schools and that this could occur outside of the Plan Change process. However, there is no certainty that a school would be provided and thus the number and distribution of trips to the wider network would be affected if the land were used for other purposes, such as housing in accordance with the proposed land zoning.
- 4.56 As for the school, the ITA has assumed a retirement village or retirement apartments. There is no certainty that the PPC will include for a retirement village and thus if housing is implemented as an alternative, then this would impact on the traffic generation rates.
- 4.57 With regards to the proportion of internal trips for the supermarket, I consider that the 90% assumption to be high. The proportion of internal trips is likely to be dependent on the actual supermarket and the size of the store. However, I acknowledge that there is currently no supermarket within Riverhead and thus there will be trips from the existing residential area that will utilise this proposed store rather than travelling outside of Riverhead. Therefore, this will result in a reduction in the existing (background) traffic leaving Riverhead. The ITA has not made allowances for the reduction in background traffic due to possible changes in travel habits due to the new retail facilities proposed. Therefore, on balance, I accept the assumption of 90% internal trips.
- 4.58 The analysis has concentrated on the weekday peak periods. The ITA Section 7.3 states that this is because that the weekend includes a number of discretionary trips. This implies that some residents may choose not to undertake a trip because of congestion. Congestion frequently occurs at the SH16 / CRH intersection in the current situation on weekends. The graphs presented in the ITA (and replicated in Figure 2 below) show that traffic volumes for extended periods of the day on SH16 are higher than the weekday peak periods and flows on CRH are also elevated during the day time period compared to the weekend. Whilst the weekend may not be as critical in terms of journey to work, and I agree there is an element of discretion in making trips, I consider that analysis should be undertaken for the weekend period, particularly a Saturday due to the elevated flows observed.

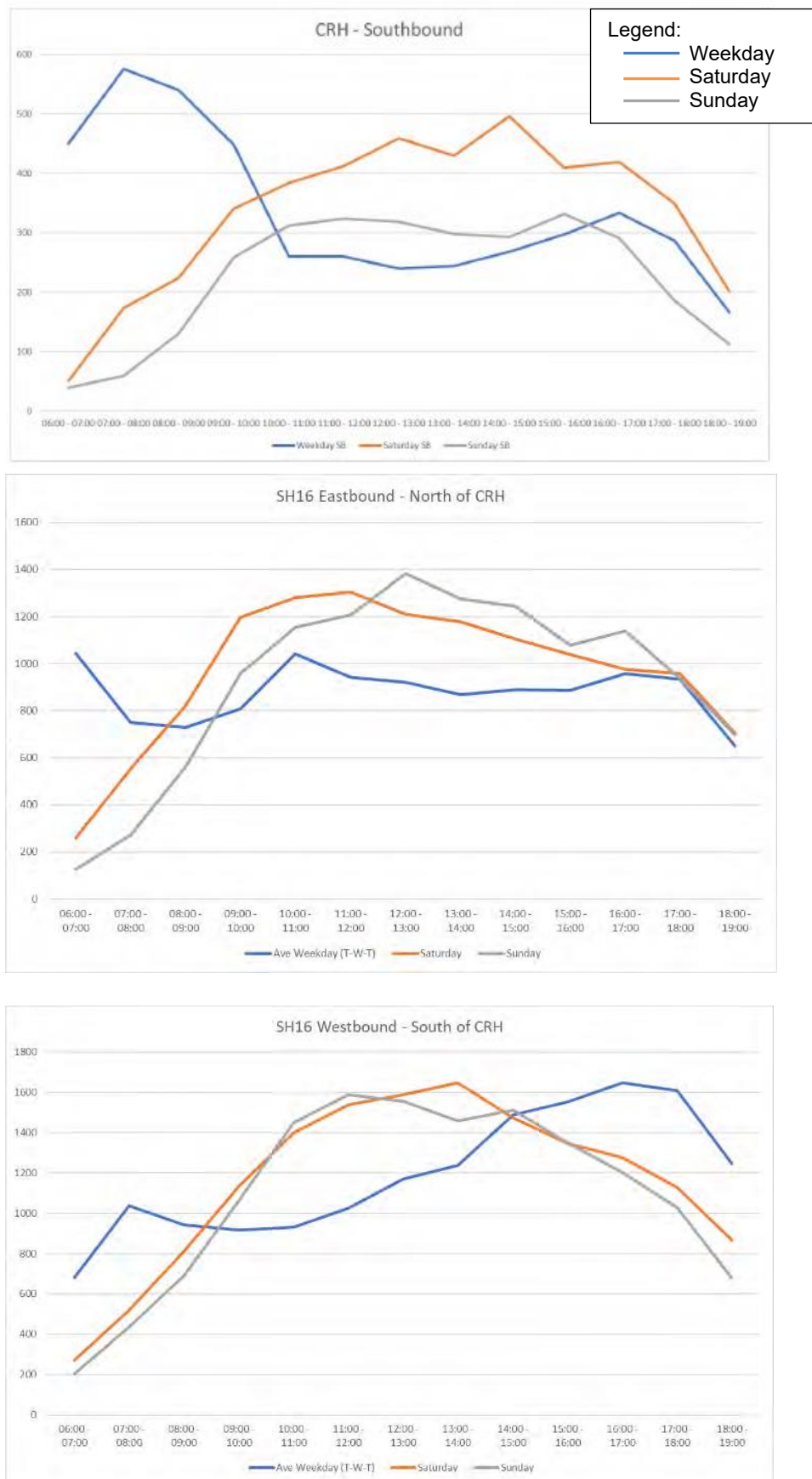


Figure 2 - Traffic Flow Profiles for CRH Southbound (top left), SH16 eastbound west of interchange (top right) and SH16 westbound (bottom) – Graphs extracted from ITA



- 4.59 In summary, whilst I generally agree with the trip rates used, I am concerned that should the mix of land uses change, particularly if a primary school was not to be included within PPC100, that this would affect the overall trip generation and thus the effects of PPC100 on the wider road network, particularly in the PM peak. To understand the potential scale of traffic generation without the school or retirement village, analysis should be provided of the number of forecast trips with the land assumed for the school/retirement village used for housing. If there is a significant difference in the number of trips, particularly external to Riverhead, then updated modelling should be provided.
- 4.60 I also consider that an assessment of weekend traffic generation should be undertaken due to elevated traffic volumes through much of the day on both SH16 and CRH.

Assumptions adopted in traffic volumes use for modelling traffic effects:

- 4.61 I generally accept the methodology used to derive the traffic volumes at the SH16 / CRH intersection for the various years assessed.
- 4.62 However, I am concerned that in the more critical AM peak period, that the eastbound flows along SH16 will be underestimated. This is because the traffic count on SH16 shows that the eastbound flow is currently constrained by the existing operation of the SH16 / CRH intersection. The traffic profile reported in the ITA Figure 10 (and replicated below in Figure 3) shows a dip in traffic during the AM peak which reflects this constraint.

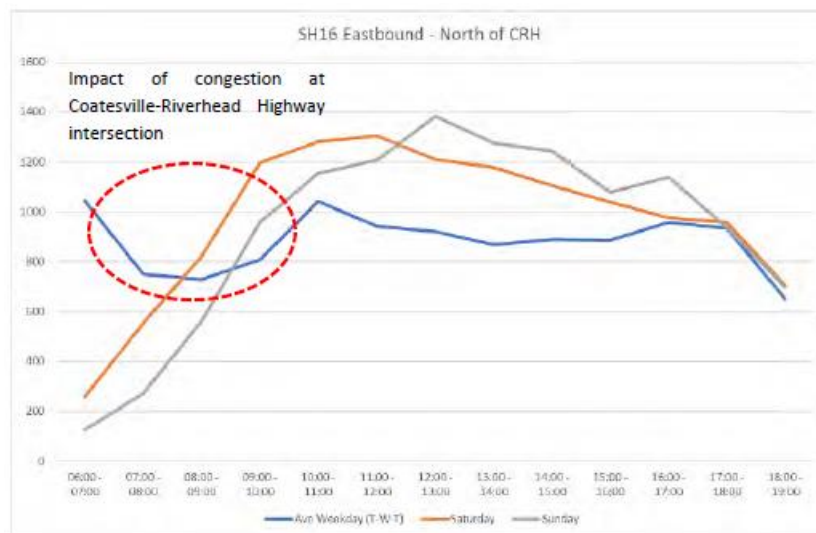


Figure 3 - SH16 Eastbound traffic flow profile, west of CRH (Figure 10 extracted from ITA)

- 4.63 Whilst I understand some adjustment has been made to take this into account, my view is that the traffic volume used is more representative of the counted throughput rather than the actual demand on eastbound SH16. Higher traffic volumes eastbound along SH16 would conflict with traffic from CRH and effect the efficiency of the CRH approach.
- 4.64 The ITA provides details as to how traffic volumes at the SH16 / CRH intersection have been forecast. However, there are no details of how traffic flows used in the traffic modelling of intersections within Riverhead itself have been derived. The ITA identified that the future year traffic volumes in the 2028 and 2038 SATURN model for CRH were both lower than the 2022 counts so I consider that the use of the SATURN model to determine Riverhead flows would not be appropriate.



4.65 Details of how traffic volumes within Riverhead have been derived should be provided.

#### Modelling of SH16 / CRH roundabout

4.66 The traffic modelling of the SH16 / CRH intersection upgraded to a roundabout indicates that the roundabout in 2031 would operate with an acceptable level of service. In the 2038 scenario the CRH approach to the roundabout is approaching capacity but is still indicated to operate at a satisfactory level of service.

4.67 However, I do have concerns over the assessment of the roundabout. As I discussed in Paragraphs 4.29 to 4.34, I raise concerns about the design of the roundabout in relation to the two left turning lanes and the pedestrian crossings.

4.68 The pedestrian crossings include a signalised pedestrian crossing on the SH16 eastern arm and a zebra crossing on CRH. The pedestrian crossings have not been included in the model but will affect the operation of the roundabout. The signalised crossing has the potential to stop all eastbound movements on SH16 and CRH and the zebra crossing on CRH will impact on the operation of that approach. The upgrades to SH16 and to CRH will provide connections for active modes, particularly cyclists to travel from Riverhead to Westgate via separated facilities and could result in frequent use of the crossings.

4.69 I have reservations over the safety of the double left turn movement from CRH due to it being an uncommon arrangement and the volume of traffic travelling eastbound on SH16. Whilst the SIDRA model does not indicate any particular issues with the operation of the approach in the 2031 scenarios, the efficiency of the approach will be dependent upon the actual utilisation of the second lane. If motorists perceive there to be safety risks or have difficulty in choosing gaps in the circulating flow then this could lead to motorists avoiding using the lane.

4.70 In addition to the issues around the design of the roundabout, I am also concerned that the input traffic volumes for the eastbound SH16 movement in the critical AM peak may be underestimated (refer to Paragraph 4.62 and 4.63). This is because I consider that the traffic volumes used as a basis for forecasting future volumes do not take into account the true demand on SH16 eastbound.

4.71 Based on the above, I consider that the traffic modelling is of an optimistic scenario and does not take into account factors that will affect the efficient operation of the roundabout. I consider further assessment of the roundabout is needed to take into account the operation of the pedestrian crossings, and true demand flow along SH16.

4.72 Whilst I have raised concerns on the safety and operation of the two left turn lanes on CRH, I acknowledge that this is based on the NZTA design and thus as the latest information, it is appropriate for the assessment to be based on that design. Should the design change, this could impact on the efficient operation of the intersection and may result in different traffic effects from the analysis presented.

4.73 Whilst further work is required to confirm the operation of the roundabout, I do consider that the intersection upgrade will benefit the operation of CRH and an upgrade is necessary to accommodate the forecast traffic from PPC100. Therefore, I support the

Precinct Provision Standard IX.6.1 that requires the upgrade to be complete prior to the occupation of dwellings.

- 4.74 Standard IX.6.1 only requires the upgrade of the SH16 / CRH intersection to a roundabout and not the associated upgrades to SH16 which includes four-laning.
- 4.75 The forecast traffic volumes eastbound on SH16 in the AM peak 2031 scenario with 60% of the development are approximately 2,050veh/hr and in 2038 with 100% development are 2,294veh/hr. This volume would exceed the capacity of a single lane of a rural road which includes accesses and intersections; flow breakdown is likely to occur if only a single eastbound lane were to be available. This is backed up by my on-site observations of the current operation of SH16 in the AM peak, where I observed traffic flows are already unstable with varying of levels of congestion occurring between CRH and Brigham Creek Road. The screen shot in Figure 4 shows just one instance of intermittent sections of slow eastbound traffic on SH16 between CRH and Brigham Creek Road (yellow and red lines).

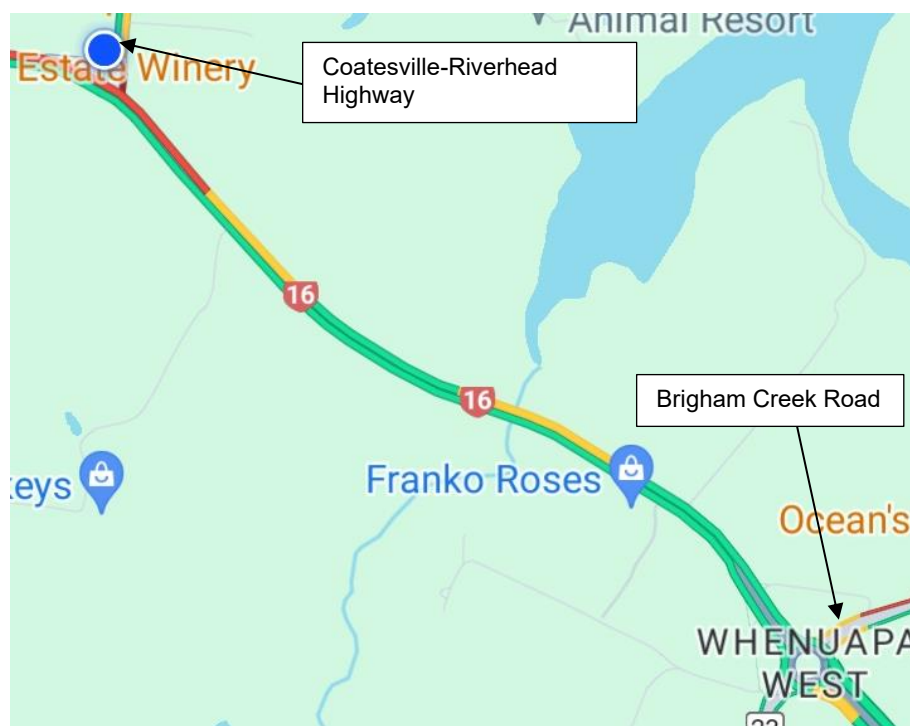


Figure 4 - Screen shot of Google Maps Traffic at 813am on Thursday 22 August

- 4.76 Unstable traffic conditions would be exacerbated by additional traffic flows associated with PPC100 should SH16 remain as a single eastbound lane. Therefore, I am of the opinion that the proposed precinct standard should also require a second eastbound lane to have been constructed east of the SH16 / CRH intersection, as is currently planned through the four-laning in the Brigham to Waimauku SH16 upgrade.

#### Modelling of Riverhead Intersections

- 4.77 Subject to confirmation of the basis of how the forecast traffic volumes have been derived, I accept the assessment of the local Riverhead intersections.
- 4.78 With regards to the intersections of CRH / Riverhead Road and CRH / Site Access (South of Riverhead Point Drive) as identified in Paragraph 3.85, I accept the explanation

for the CRH / Site access intersection and consider that adjustments to the design could be made, if necessary, at resource consent stage. Motorists will have options to use alternative routes to avoid congestion.

- 4.79 With regards to the CRH / Riverhead Road roundabout, I note that the effect of pass-by for retail activity in the AM peak period is likely to be minimal as retail trips are typically low in this time period. Notwithstanding, the trip rates used in the assessment for the retail and supermarket for the AM peak are the same as those for the PM peak. Therefore, I consider that the analysis overestimates the trips associated with the retail / supermarket and the effects on Kaipara Portage Road would be overestimated.

#### Transport Infrastructure Upgrades and Activity Status

- 4.80 I generally support the proposed transport infrastructure upgrades identified in the Precinct Provisions that are required to support PPC100. The exception is the extent of the upgrade to SH16. The Precinct Provisions only require the upgrade of the SH16 / CRH to a roundabout. However, as I discussed in Paragraph 4.75, I consider that SH16 east of CRH would also require two eastbound lanes and that this should be incorporated into Standard IX6.1(1)(a).
- 4.81 Standard IX6.1(1) Staging of development with transport upgrades in the Precinct Provisions includes the SH16 / CRH intersection upgrade and the two CRH right turn bays at Old Railway Road and Riverland Road. These have a Discretionary Activity status (Table IX4.1 Active Table – Precinct-wide activities (A4)). The other transport upgrades required (Standards IX6.1(20 to (6)) have been assigned a Restricted Discretionary activity status (Activity A5).
- 4.82 The Discretionary status for Standard IX6.1(1) conflicts with the Restricted Discretionary Activity (**RDA**) status that is indicated in the ITA. Given that the SH16 / CRH intersection upgrade is necessary to address the efficiency and safety effects of the development on the wider transport network and is part of the prerequisite transport infrastructure in the FDS for development in Riverhead, I do not agree with an RDA status. Furthermore, given the poor operation of the existing intersection and SH16, I consider that it is essential that the upgrades occur prior to development being occupied. Therefore, in my opinion a Non-Complying status would be more appropriate for Standard IX6.1(1). This would also be consistent with submissions from Auckland Transport and NZTA which seek Non-complying status for the SH16 / CRH intersection upgrade.
- 4.83 With regards to the other transport infrastructure required to support the development, an RDA status has been applied to those upgrades (Standard IX6.1(2) to (6)). Assessment Criteria IX8.2(4) provides detailed assessment criteria.
- 4.84 I consider that the infrastructure required by Standards IX6.1(2) to (6) is necessary to provide a well-connected, safe, and efficient local transport network within Riverhead, including active modes and connections to public transport. The upgrades will form part of the proposed Auckland Transport upgrades to CRH and to Riverhead Road and part of the prerequisite infrastructure identified in Auckland Council's Future Development Strategy.

- 4.85 Due to the importance of this infrastructure to support the development I consider a higher activity status such as Discretionary or Non-Complying (as sought by Auckland Transport) would be more appropriate. There is an expectation that where development occurs that upgrades to rural roads are delivered by developers. Should the upgrades not occur then this would result in poor outcomes for the development until such time as the upgrade is provided by Auckland Transport. This is important in this case as the development is occurring so far in advance of the anticipated FDS timings for development in Riverhead.
- 4.86 Notwithstanding, I acknowledge that the assessment criteria in IX8.2(4) are specific and detailed and require an assessment to be informed by an ITA. Therefore, should the activity status for Standards IX6.1(2) to (6) remain as RDA, I am comfortable that the matters identified would likely be appropriate for a detailed assessment.

## 5.0 Submissions

- 5.1 A total of 254 submissions were received on PPC100. I have reviewed the submissions in relation to issues raised on traffic and transportation. Due to the number of submissions and the nature of the submissions which were quite general in nature I have identified topics or themes and I provide my comments on these themes below.
- 5.2 Where submissions were more specific, I have provided individual responses on these submissions.
- 5.3 The two key themes that were raised were as follows:
- a) Traffic and traffic congestion
  - b) Lack of infrastructure or transport infrastructure needed before development occurs
- 5.4 In addition to these themes various other traffic and transport matters were raised.

### Traffic and Traffic Congestion

- 5.5 Of the submissions received, 96 submissions raised traffic or traffic congestion as the primary concern and were opposed to PPC100 seeking that the plan change be declined. Many of the submissions only referred to traffic as the concern with no elaboration.
- 5.6 Where submissions provided more detail, the issues raised can be summarised as:
- a) general congestion in the area including CRH, SH16 and the surrounding road network;
  - b) Inadequate public transport to support the development;
  - c) Existing footpaths inadequate being inadequate; and
  - d) Construction traffic impacts.
- 5.7 I deal with each of these below.
- a) General congestion in the area including CRH, SH16 and the surrounding road network*
- 5.8 The ITA provides a detailed review of the existing traffic conditions within Riverhead and on surrounding roads. It also recognises the existing constraints on SH16 and that there are planned upgrades for SH16 (including the SH16 / CRH intersection).
- 5.9 To mitigate the effects of the plan change, the applicant has proposed to undertake upgrades to roads within Riverhead where these are directly affected by PPC100 (such as upgrading to urban standard, provision of footpaths and separated cycle paths), providing additional pedestrian crossings and upgrades to the CRH intersections with Old Railway Road and Riverland Road. The Precinct Provisions require the SH16 / CRH intersection to be upgraded to a roundabout prior to the occupation of any dwellings.

5.10 I consider that subject to my comments in Section 4.0 that the existing traffic conditions have been appropriately identified and the effects assessed.

*b) Inadequate public transport to support the development*

5.11 With regards to public transport, there are currently no funded improvement for additional public transport services within Riverhead in the current Regional Public Transport Plan 2024-2033 (RPTP). However, in the future greater frequency of services into Riverhead are anticipated by Auckland Transport but these are unlikely to occur until land has been rezoned and development is occurring.

5.12 Notwithstanding, the Applicant has proposed to provide improvements to public transport infrastructure, such as bus stops, and to improve connections to bus stops by way of footpaths and pedestrian crossings so that as public transport.

5.13 Planned (but unfunded) transport infrastructure by Auckland Transport, such as upgrades to CRH include separated cycle facilities. This will connect to the proposed SH16 upgrades and improve accessibility of Riverhead to the wider area, including Westgate (and Brigham Creek) where there are existing or planned public transport interchanges.

*c) Existing footpaths inadequate being inadequate*

5.14 It is concurred that there are current gaps in the footpath network within Riverhead with some roads having footpaths only on one side or none at all. These roads tend to be in the areas west of CRH. PPC100 proposes to provide some of the missing footpaths such as along the northern side of Queen Street. This would connect to a new footpath on the western side of Cambridge Road that would extend from Queen Street to Riverhead Road; PPC100 fronts onto Cambridge Road along this section and the road will be upgraded to urban standard. An additional pedestrian crossing is proposed between Edward Street and Princes Street. Footpaths are also proposed along the section of Riverhead Road and CRH to be upgraded.

5.15 I consider that PPC100 will provide sufficient footpaths both within PPC100 and externally to connect to existing facilities. Pedestrian crossing facilities are also proposed.

*d) Construction traffic impacts*

5.16 Construction traffic will include heavy vehicle movements as well as construction workers. These workers will generally be travelling in the opposite direction to the peak traffic flows (i.e. arriving in the morning and departing in the afternoon). For the scale of development proposed, I expect that any subdivision or resource consent conditions will require a Construction Traffic Management Plan (CTMP) to manage construction traffic effects. The CTMP will amongst other things be able to limit times of working and / or movement of heavy vehicles. This is considered to be the most appropriate mechanism to manage the construction traffic effects as the CTMP can take into account the road environment (such as any completed upgrades to SH16 or CRH) and the scale of the works being undertaken.

Lack of Infrastructure / Transport Infrastructure needed before development

- 5.17 97 of the submissions received identified lack of infrastructure or the need for transport infrastructure to be in place prior to development proceeding.
- 5.18 As for the submissions relating to traffic, many of the submissions were general in nature but where more detail was provided the key concerns are summarised as:
- a) The need to upgrade SH16 (both the SH16 / CRH roundabout and four-laning of SH16 between Brigham and Old North Road) and / or for the Kumeu Bypass [Alternative State highway] to be constructed before development occurs;
  - b) Need for additional road capacity;
  - c) Requirement for improved public transport to Riverhead;
  - d) SH16 / CRH roundabout should have a dedicated left turn lane from CRH.
- a) and b) Upgrade SH16 and / or Kumeu Bypass prior to development and need for additional road capacity*
- 5.19 The Precinct Provisions for the plan change prevent the occupancy of any dwelling until the SH16 / CRH is upgraded to a roundabout and right turn bays on CRH at the Old Railway Road and Riverland Road intersections are constructed. Other roading upgrades within Riverhead relate to the works being completed prior to the occupancy of buildings where those building have vehicle access onto those roads where an upgrade is required.
- 5.20 The primary upgrades of the SH16 / CRH intersection and the two CRH intersections are considered to be the primary measures required to accommodate traffic from PPC100. However, as detailed in my assessment I also consider that the upgrades along SH16 to include two eastbound lanes is required (at least between CRH and Brigham Creek Road) to cater for the increased traffic volumes.
- 5.21 NZTA has recognised the need for increased capacity for SH16 and the Brigham to Waimauku SH16 upgrade includes four-laning SH16 between Brigham and Old North Road (Taupaki) roundabout. This project is currently paused as NZTA is seeking additional funding for its implementation. The NZTA submission states that the project is anticipated to be completed mid-2029.
- 5.22 The Government's Position Statement on Transport 2024 (**GPS**) sets out Roads of National Significance (**RoNS**). These roads include the Northwest Alternative State highway (Kumeu Bypass). Whilst there is no timing as yet associated with the project this road is set out as a priority for Government to support development in the Northwest of Auckland. This project, once constructed, would result in the reduction of some traffic from the existing SH16 past CRH.
- 5.23 From the above it is evident that the need for additional capacity has been recognised and that there are projects planned that would provide that capacity. The Precinct Provisions prevent occupancy of development prior to some of those projects being delivered.

*c) Requirement for improved public transport to Riverhead*

- 5.24 Some submitters considered that public transport in Riverhead should be improved. I discussed this matter in Paragraph 5.11.

*d) SH16 / CRH roundabout should have a dedicated left turn lane from CRH*

- 5.25 Some submitters have questioned the design of the SH16 / CRH roundabout and consider that the roundabout should have a dedicated left turn lane from CRH to SH16. The proposed upgrade to a roundabout is a NZTA project and has not been developed or designed by the Applicant; the Applicant is reliant on the design that has been prepared by NZTA.
- 5.26 With regards to the design, it is understood that the design has taken into consideration the traffic volumes from future development with Riverhead. In addition, the Alternative State Highway project will reduce traffic travelling along SH16 in the future. Therefore, this traffic reduction will assist motorists exiting CRH onto SH16. The Alternative State Highway project is part of the RoNS. The timing of this new road is currently unknown, but it is acknowledged that there may be a period of time once the development within Riverhead is fully constructed and the completion of the Alternative State Highway project.

*Other Submission Points*

- 5.27 Some submissions (176.1 and 179.1) have raised concern that if the Retirement Village is not constructed, then there will be a lack of cross-site connectivity and local roads, or that there is a lack of connectivity east-west (184.5). Subdivision, including subdivision establishing private roads, is a Restricted Discretionary Activity (**RDA**). I consider that the Assessment Criteria associated with this RDA would ensure appropriate assessment is undertaken for the location and connectivity of roads within PPC100.
- 5.28 Submitters (176.1 and 179.1) raised concern about pinch points on the local road network around the retirement village. I discuss the issue of the connections from Cambridge Road in Paragraph 4.40.
- 5.29 A submitter (Submission 157.4) considered that cycleways are required around Riverhead and to Westgate. The PPC100 would implement separated cycle ways on Riverhead Road and CRH as well as on the Collector Roads within the plan change area. Local roads would have low speeds and low traffic volumes such that cyclists should be able to use those roads without a dedicated facility. Auckland Transport's proposed CRH upgrade as well as NZTA's Brigham to Waimauku SH16 Upgrade includes separated cycle facilities which would provide connections from Riverhead to Westgate. Furthermore, Auckland Transport has also identified a project for the upgrade of Riverhead Road to provide a facility for active modes to travel from Riverhead to Kumeu. The timing of the Auckland Transport projects is currently uncertain.
- 5.30 One submitter (93.1) expressed concern about parking in the vicinity of the Riverhead Memorial Park (War Memorial Park). The plan change does not propose any specific measures at this stage that would affect parking. However, pedestrian crossing facilities are proposed on CRH between Princes Street and Edward Street. This crossing



together with the other active mode facilities will enable residents to walk and cycle to the park. This would reduce demand for parking.

- 5.31 Submitter 251.5 raised concern that zoning the land at the northern end of PPC100 would result in the opportunities for improved road access along Duke Street being lost. It is recognised that Duke Street does not currently have footpaths on either side apart from the south side at its western end near relatively new residential development; this is an isolated footpath does not connect to the wider footpath network. The Plan Change could provide opportunities for active mode connections to Te Roera Place. It is considered that the rezoning of this land does not preclude upgrades to Duke Street occurring.

### Response to Specific Submission Points

#### *Submitter 45.1 – Glenn Gowthorpe*

- 5.32 The submitter raises concerns that the traffic flows used in the traffic models from 2022 are flawed as traffic patterns have now changed with people returning to work back in the office rather than at home post-COVID 19. I discuss this in Paragraph 4.23 and consider that the traffic volumes were not affected by COVID 19.

#### *Submitter 135 – Paul Seymour*

- 5.33 In submission point 135.2, the submitter request that the Activity Status of (A4) and (A5) should be non-complying. I concur that Activity Status (A4) should be non-complying as this relates to Standard IX.6.1(1) for the upgrade of the SH16 / CRH intersection and the upgrades to the two CRH intersections with Old Railway Road and Riverland Road. These upgrades are necessary to support the traffic generated from PPC100 and for safety of CRH and these intersections. However, I acknowledge that the SH16 / CRH upgrade is outside of the control of the Applicant and that should this not proceed or be delayed further than mid-2029 as anticipated by NZTA then this would prevent dwellings being occupied. However, the non-complying status would not necessarily prevent an application being sought for earlier occupation; the Applicant would just need to demonstrate the effect of doing so or an alternative measures of managing the effects.
- 5.34 For Activity Status (A5) I consider that this should be a Discretionary activity as they are under the control of the Applicant and are important transport measures to support the development. Discretionary status would enable the transport environment at the time of application to be taken into account. However, should they remain a Restricted Discretionary Activity I am comfortable that the assessment criteria in IX8.2(4) are sufficiently detailed to provide a robust assessment.
- 5.35 Submission point 135.3 requests that the Assessment Criteria IX8.2(4)(f) should refer to 'peak' rather than 'inter-peak' in relation to the operation of key local road intersections. I agree that the criteria should be amended to peak as it would be important for the intersections to operate at a good level of service to allow for the efficient movement of buses as well as for general traffic.
- 5.36 Submission point 135.5 states that schools are a critical piece of infrastructure that have wider transport effects. I concur that traffic associated with schools can have an effect

on the safe and efficient operation of the transport network. Whilst the ITA has assumed a school would be included within PPC100, there is no requirement for one to be provided and there is no certainty that this would occur.

- 5.37 A school within PC100 would service both residential development within the plan change area and Riverhead at large. The network of roads and walking and cycling facilities would assist in enable students to use active modes to travel to school. Should the school not occur, this is likely to result in additional private vehicle trips outside of Riverhead.
- 5.38 I appreciate that there are procedures outside of the Plan Change process that the Ministry of Education would use for the designation of school land. Objective IX2.(8) refers to development being supported by education facilities and Policy IX.3.(6) refers to providing for education facilities, however these are not shown on the precinct plan nor on the Structure Plan that supports PPC100.

### 161 – Auckland Transport

- 5.39 Auckland Transport has submitted a detailed submission.
- 5.40 The submission opposes PPC100 as the rezoning of the land occurs without the provision of identified upgrades to Riverhead Road and CRH to support growth in Riverhead. Auckland Transport recognise that the upgrades to some road frontages will be provided but also acknowledges that they do not provide the full extent of upgrade works. Auckland Transport is concerned about the lack of public transport within Riverhead and the active mode connections beyond Riverhead. It therefore considers that the plan change does not give effect to some NPS-UD and RPS objectives and policies.
- 5.41 Auckland Transport has sought a range of amendments to the Precinct Provisions to address concerns as to how the plan change would provide infrastructure, mitigate transport effects, and create a well-function environment.
- 5.42 I have reviewed the requested changes by Auckland Transport as they relate to traffic and transport and I support the requested changes proposed by Auckland Transport (submission points 161.5 through 161.51).
- 5.43 I do not have specific comments on each of the amendments sought other than as below:
- a) Submission point 161.18 seeks Activity (A4) and (A5) to be non-complying. I support (A4) being non-complying. Activity (A4) is the provision of the SH16 / CRH intersection upgrade and two intersection upgrades on CRH. Activity (A5) is for upgrades to the roads surrounding the plan change area. Auckland Transport has identified the need to upgrade CRH and Riverhead Road to support development and whilst the precinct would not provide the full upgrades, they go some way to doing so. Should they not be provided, this would impact on the safe and efficient operation of the road network within Riverhead. I consider that the Activity Status should be a Discretionary or Non-Complying activity as discussed in Paragraph 4.83 to 4.86.

- b) Submission point 161.42 which requests an additional Special Information Requirement to require a Transport Design Report to accompany any proposed new key road intersection or upgrading of key road intersections. I support this addition as this has been commonly adopted in other recent Precinct Provisions for Private Plan Changes.

Submitter 167 – NZ Transport Agency

- 5.44 NZTA opposes PPC100 unless relief sought in its submission is addressed.
- 5.45 The NZTA supports the policies and standards in relation to buildings not being occupied prior to roading infrastructure being constructed and the Special Information Requirements that ensure NZTA would be consulted on an application for development prior to the upgrade of the SH16 / CRH intersection.
- 5.46 NZTA requests at submission point 167.2 that Activity Status (A4) for non-compliance with Standard IX.6.1(1) should be Non-Complying. I concur as the infrastructure is necessary to address effects of PPC100 on this key intersection that non-complying status is appropriate.

Submitter 186 – Auckland Council as Submitter

- 5.47 Auckland Council as Submitter (**ACS**) raises concern that PPC100 is progressing in advance of the required transport infrastructure but acknowledges that the Applicant has gone some way to providing some of that infrastructure or having provisions in place that require development to be staged with transport infrastructure. ACS considers that amendments are necessary to the Precinct Provisions to address the funding and delivery of transport infrastructure.
- 5.48 Submission point 186.4 requests that the Precinct Description be updated to identify that transport upgrades are required prior to subdivision and development.
- 5.49 The Precinct Description refers to the coordination of subdivision and development with transport infrastructure but is not directive that some of that infrastructure would need to be in place prior to dwellings or buildings being occupied. I concur that the Precinct Description should be updated accordingly.
- 5.50 Submission point 186.5 requests that new objective and policies be updated to identify that transport upgrades are required prior to subdivision and development.
- 5.51 The Precinct Objectives and Policies (IX2.(5) and IX.3.(4)) refers to the coordination of subdivision and development with transport infrastructure but is not directive that some of that infrastructure would need to be in place prior to dwellings or buildings being occupied. I concur that the objective and policies should be refined.
- 5.52 Submission point 186.6 requests new rules and standards that classify subdivision or development that occur in advance of transport upgrades to be non-complying. I concur with this request and consider that Activity (A4) should have Non-Complying status rather than Discretionary.

### Submitter 202 – F Boric & Sons

- 5.53 Submission point 202.2 requests that Standard IX.6.1(1) Staging of development with transport upgrades should refer to the occupation of 'buildings' rather than 'dwellings' so that commercial dwellings are not operational prior to the necessary transport infrastructure. I concur that the standard should be amended and this would be consistent with Policy IX.3(4) and the Standards IX.6.1(2) to (6) which all refer to buildings rather than dwellings.
- 5.54 Submission point 202.3 requests that Activity (A4) should be non-complying. As previously discussed, I agree that this should be non-complying.
- 5.55 Submission point 202.5 requests that the full extent of the Stage 2 works of the NZTA Brigham to Waimauku SH16 Upgrades required by Standard IX.6.1(1)(a) are complete and operational prior to the occupation of buildings. For the reasons I outline in Paragraph 4.74 and 4.75, I consider that at least the SH16 / CRH roundabout upgrade and the works east of the roundabout to Brigham Creek Road to provide two eastbound lane should be complete and operational.
- 5.56 Submission point 202.6 requests an amendment to Assessment Criteria IX.8.2(4)(g) as a consequence to submission point 202.5 so that the assessment refers to the whole of the Stage 2 works rather than just the roundabout. I concur that a consequential update to the criteria is required and the wording should be updated to match the extent of the upgrade required by Standard IX.6.1(1)(a) as discussed in the previous paragraph.
- 5.57 Submission point 202.7 requests that civil infrastructure and construction works be delayed until the Stage 2 upgrades to SH16 are complete. As I discussed in Paragraph 5.16, I consider that the construction can be left to the subdivision and consenting stage to be managed through Construction Traffic Management Plans as the direction of flow of construction traffic at peak times would be in the opposite direction of peak traffic flows travelling to / from Riverhead.
- 5.58 Submission point 202.8 requests that the traffic modelling should be updated to include the pedestrian crossings on CRH and on SH16. I concur that these facilities should be included in the traffic modelling as they have the potential to affect the operation of the roundabout. I discussed this in Paragraph 4.68 to 4.71.
- 5.59 Submission point 202.9 requests that further analysis is required on weekend volumes on the operation of the SH16 / CRH intersection. I concur and recommended further analysis in Paragraph 4.58.

### Submission 203 – Z Energy

- 5.60 Submission point 203.1 seeks clarification over the extent of works on Cambridge Road and how this may affect the access to the Caltex garage accessed from CRH. I concur that the information provided on the extent of the upgrade is ambiguous and that the works should be clarified (refer to Paragraph 4.39).
- 5.61 Submission point 203.2 seeks that the pedestrian crossing on CRH between Princes Street and Edward Street is located so that pedestrian and vehicle safety in the vicinity

of the vehicle crossings for the Caltex station are not compromised. I concur that the crossing should be positioned safely and I consider that this is a matter of detail that can be addressed at subdivision or resource consent stage.

- 5.62 Submission point 203.3 seeks that Z Energy are consulted about any changes to the road in the vicinity of the Caltex site access. I concur that if site access to the Caltex station is affected that Z Energy should be consulted. However, there is no specific mechanism in the Precinct Provisions for this to occur, particularly as public and limited notification is not required by IX.5(1). This would be addressed if normal notification rules would apply for Restricted Discretionary Activities.

Submission 205 – Luxembourg Development Company Limited

- 5.63 This submission relates to a number of landowners and businesses that are directly affected by PPC100.
- 5.64 Submission Point 205.7 seeks deletion of specific measures on Precinct Plan 1 including key local roads, key pedestrian connections to the Collector Roads and the straightening of bends on the Collector Roads. I do not support the deletion of these items as these elements provide guidance to the users of the Precinct Provisions and identify measures required by Standard IX.6.1(2) to (6).
- 5.65 Submission point 205.10 raises concern about the timing of vesting of land for road widening and that land in different ownership may affect the ability to complete the works. I agree that further detail should be provided to confirm how upgrades would be undertaken where land is in different ownership.
- 5.66 Submission point 205.14 requests the deletion of Policy 8 which requires key local roads and pedestrian connections to be provided in general accordance with Precinct Plan 2. I do not support the deletion of Policy 8. The provision of roads and their design is a Restricted Discretionary Activity and therefore changes from the Precinct Plan can be assessed at subdivision / development stage.
- 5.67 Submission point 205.23 requests that the minimum Collector Road reserve width be reduced to 21m and that the local road width be reduced to 16m. I do not have concerns with the reduction in the road reserve widths. These would typically provide for the necessary transport infrastructure. These widths are minimums and therefore, if required, the roads could be wider.
- 5.68 Submission point 205.24 requests that road widening is to be determined through detailed design. I do not consider that the Precinct Provision need to address this point.

Submission 214 – Ministry of Education

- 5.69 The Ministry of Education is neutral on PPC100.
- 5.70 Submission point 214.3 seeks that the Precinct Provisions provide the appropriate level of provision for buses (including school buses to any future school site) and providing for the safety of pedestrians travelling to and from school. I consider that the Precinct Provisions adequately address these matters with some amendments that I have

recommended on the need for Riverhead Road to be designed for buses and for some roads to have vehicle access restrictions where there are separated cycle facilities.

- 5.71 Submission point 214.4 requests that in accordance with the Section 5.1 of the ITA that development in advance of the relevant supporting transport infrastructure should have a Restricted Discretionary Activity status to ensure that it is appropriately assessed. RDA status applies to all the local road upgrades within Riverhead (Activity (A5)). The Precinct Provisions have development in advance of the SH16 / CRH upgrade works or the upgrades to the CRH intersections as Old Railway Road and Riverland Road as Discretionary, although I recommend (as detailed above) that this should be Non-Complying. Therefore, I consider that the Precinct Provisions provide at least the minimum level of assessment requested by the Submitter.
- 5.72 Submission point 214.5 requests the Precinct Provision provide greater specificity and strategic alignment with Auckland Transport to ensure that the PPC outcomes can be delivered (such as speed limit reductions) where there is reliance on these matters to mitigate some of the effects of the proposed rezoning. The setting of speed limits requires changes to the bylaws and is separate process to the RMA. Therefore, I do not consider it is appropriate to include specific measures in the Precinct Provisions in this regard.
- 5.73 Submission point 214.6 requests roading standards to be provided for the surrounding roads (local and/or collector roads) with respect to any future school site and clarity on the responsibility for establishment of the surrounding roads and associated walking and cycling features. The Precinct Provisions clearly sets out the road standards in the in Appendix 1 IX.11.1 and Appendix 2 IX.11.2 Road Function and Design Elements Tables for internal and external roads, respectively. The establishment of the roads is the responsibility of developers. It would not be appropriate to include for specific standards in relation to how roads should be designed adjacent to a school as a school is not currently included within the PPC100.
- 5.74 Submission point 214.7 requests the establishment of a safe cycle / walking connection across CRH within the Implementation Plan. Standard IX.6.1(5)(d) requires the provision of a pedestrian crossing facility on CRH between Edward Street and Princes Street when Cambridge Road is upgraded. Other standards also require the provision of walking / cycling infrastructure at intersections. Therefore, I consider that the precinct currently addresses this request.

## 6.0 Precinct Provisions

6.1 I have reviewed the Precinct Provisions and provide below my comments and recommendations on changes to address the traffic and transport effects discussed in my review above. To avoid repetition, I have not incorporated changes proposed by Auckland Transport in their detailed submission that I support.

6.2 Objective IX.2(5) refers to the subdivision and development being coordinated with the supply of “sufficient” transport infrastructure. It is not clear what is meant by sufficient. In relation to transport, I consider it would be more appropriate to have a separate objective that is more specific. I suggest the following wording which is consistent with Policy (4):

### *IX.2 Objectives*

*(5) Subdivision and development are coordinated with the supply of sufficient ~~transport~~, water, energy and communications infrastructure.*

*(5A) Transport infrastructure and upgrades required to support sub-division and development are provided prior to occupancy of dwellings or buildings.*

6.3 Policy (10) on the design of the roads does not provide reference to pedestrians and public transport facilities. I consider that this should be included within this policy. I recommend the following amendment:

### *IX.3 Policies*

*(10) Require streets to be attractively designed and to appropriately provide for all transport modes by:*

*(a) Providing for safe access for cyclists on collector and arterial roads;*

*(b) Providing a level of landscaping that is appropriate for the function of the street; ~~and~~*

*(c) Providing for the safe and efficient movement of vehicles including public transport;*

*(d) Provide safe and attractive public transport facilities; and*

*(e) Provide for the movement of pedestrians along and across the street network.*

6.4 IX.6 Standards excludes the AUP E27.6.1 Trip Generation standard for applying to the Precinct. I disagree that this should be excluded as there may be instances where trip generation may need to be assessed if the development includes activities not already assessed, anticipated or different from that assessed. E27.6.1 already provides an exception that trip generation does not need to be assessed where the activity aligns with an already approved ITA, although I note that the decisions version of Plan Change 79 deletes this exception. Therefore, I do not consider that it is necessary or appropriate

to exclude the E27.6.1 Trip Generation standard. I recommend that this exception is deleted.

### *IX.6 Standards*

*All relevant overlay, Auckland-wide and zone standards apply in this precinct except for the following:*

#### *Precinct-wide*

...

#### *• ~~E27.6.1~~ Trip Generation*

- 6.5 Amendments to Standard IX6.1 Staging of development with transport upgrades are required to ensure that the timing of when infrastructure is required and / or the extent of the transport upgrades is appropriate.
- 6.6 For Standard IX6.1(1) this currently only requires the upgrades to SH16 / CRH intersection and the two intersections on CRH to occur prior to the occupation of a dwelling. However, other development may occur on the site first, e.g. the development of the local centre which is anticipated to include a supermarket. Therefore, I consider that the reference to dwelling in the standard should be replaced by building; this would be consistent with Standards IX.6.1(2) to (6).
- 6.7 As I have recommended above, the upgrade to SH16 should also include two eastbound lanes on SH16 between CRH and Brigham Creek Road. Therefore Standard IX.6.1(1)(a) should be updated accordingly.
- 6.8 I recommend the following amendments:

#### *IX6.1 Staging of development with transport upgrades*

*(1) Prior to the occupation of a ~~dwelling~~ building within the Riverhead Precinct, the following transport infrastructure must be constructed and operational:*

*(a) Upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection to a roundabout, and the provision of two eastbound lanes on Main Road (SH16) from Coatesville-Riverhead Highway to Brigham Creek Road, as part of the SH16 Brigham Creek to Waimauku project, led by Waka Kotahi NZ Transport Agency*

- 6.9 For Standard IX.6.(2) and (3), I consider that the description of the works should include reference to pedestrian crossing facilities on CRH and walking and cycling infrastructure at the intersections. I also recommend that the description in (3)(c) be amended to clarify the extent of upgrade along Riverhead Road. I recommend the following amendments.

*(2) Prior to occupation of a building on a site with vehicle access to and/or from Coatesville-Riverhead Highway, the following road infrastructure upgrades must be constructed and operational:*



(a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including walking/cycling infrastructure along and across Coatesville-Riverhead Highway, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and

(b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout including walking and cycling infrastructure, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.

(3) Prior to occupation of a building on a site with vehicle access to and/or from Riverhead Road, the following road infrastructure upgrades must be constructed and operational:

(a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including walking/cycling infrastructure along and across Coatesville-Riverhead Highway, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and

(b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout including walking and cycling infrastructure, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and

(c) Upgrade and urbanise Riverhead Road, from the eastern boundary of the vehicle crossing of 307 Riverhead Road onto Coatesville-Riverhead Highway to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct 3.

6.10 A setback for road widening is provided for Riverhead Road within Standard IX6.2 Road Widening setback along Riverhead Road. Sections of CRH are also proposed to be widened. It is not clear if an equivalent set back is also required for CRH. If this is required than an equivalent standard would be required for CRH that refers to the relevant sections. The following is suggested:

IX6.2. Road widening setback along Riverhead Road and Coatesville-Riverhead Highway

Purpose: To provide for the future required widening of Riverhead Road and Coatesville-Riverhead Highway.

(1) A 2m wide road widening setback must be provided along that part of the frontage of the land adjoining Riverhead Road and Coatesville-Riverhead Highway shown as subject to the 'Required Road Widening' notation on the IX.10.3 Riverhead: Precinct plan 3.

*(2) The setback must be measured from the legal road boundary that existed at the year of 2022. No buildings, structures or parts of a building shall be constructed within this 2m wide setback.*

*(3) Any minimum front yard setback required in the underlying zoning for the land adjoining Riverhead Road and Coatesville-Riverhead Highway shall be measured from this 2m wide road widening setback.*

- 6.11 The Matters of Discretion for IX.8.1(3) for four or more dwellings on site, include (a)(ii) Traffic. There are no specific Assessment Criteria in relation to traffic in IX.8.2(3). The following criteria are recommended:

*(3) For four or more dwellings on site:*

*(aa) The extent to which traffic generated from the site affects the safe and efficient operation of the transport network.*

- 6.12 Assessment Criteria IX.8.2(2) for new buildings prior to subdivision, and subdivision, including subdivision establishing private roads does not sufficiently ensure that there is assessment of access to public transport or public transport facilities. The following amendments are recommended:

*(2) For new buildings prior to subdivision, and subdivision, including subdivision establishing private roads:*

*Location of roads*

*(f) Whether a high quality and integrated network of local roads is provided within the precinct that has a good degree of accessibility including to public transport, and supports a walkable street network and provides for public transport (where appropriate). Whether roads are aligned to provide visual and physical connections to open spaces, including along the stream network, where the site conditions allow.*

*Design of roads*

*(g) Whether the design of new collector and local roads accord with the road design details provided in IX.11.1 Appendix 1.*

*(h) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network. As a general principle, the length of a block should be no greater than 200m, and the perimeter of the block should be no greater than 600m.*

*(h-A) Whether the design of the new collector roads provides or future proofs for public transport facilities.*

- 6.13 If Activity (A5) is amended to Discretionary or Non-Complying, the Matters of Discretion IX.8.1(4) and Assessment Criteria IX.8.2(4) are not required and should be deleted. In the event that the Activity status remains as Restricted Discretionary, I propose amendments to the Assessment Criteria IX.8.2(4) which would reflect that Riverhead

Road should provide for buses, that the operation of intersections should be assessed for the peak periods as this will be important for the efficient movement of buses and that the extent of the works on SH16 includes for the four-laning of SH16 and the two intersection upgrades on CRH at Old Railway Road and Riverland Road. The amendments are detailed below:

*(4) For development and subdivision that does not comply with Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades, Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct:*

...

*(e) The extent to which localised intersection widening will allow for safe, protected active-mode facilities and bus stop infrastructure on Coatesville-Riverhead Highway and Riverhead Road. ~~The extent to which localised intersection widening will allow for safe, protected active-mode facilities on Riverhead Road.~~*

*(f) Whether the transport network at key intersections within Riverhead can operate safely and efficiently during the inter-peak periods, with an overall intersection Level of Service (LOS) no worse than LOS D. The key intersections to consider include Coatesville Riverhead Highway/Riverhead Road, Coatesville Riverhead Highway/Riverhead Point Drive and Riverhead Road/Lathrope Road.*

*(g) The extent to which safety improvements have been implemented at the Coatesville Riverhead Highway/SH16 intersection, along SH16 between Brigham Creek and Coatesville-Riverhead Highway and the upgrades to the Coatesville-Riverhead Highway / Old Railway Road intersection and Coatesville-Riverhead Highway / Riverland Road intersection.*

- 6.14 I recommend changes to the tables in IX11.1 Appendix 1 and IX11.2 Appendix 2 to ensure that the collector roads include access restrictions (due to the separated cycle facilities), and to ensure Riverhead Road includes Bus Provision and to include upgrades to Cambridge Road. I note that Auckland Transport's submission requested footnotes to the tables which I support.
- 6.15 The submission from Luxembourg Development Company Limited (Submission 205.23) requested reducing the minimum width of collector and local roads. I support the proposed amendment.
- 6.16 I provide recommended amendments to the tables in Attachment 1.

## 7.0 Conclusions and Recommendations

- 7.1 The following conclusions and recommendations are made respect to traffic and transportation issues.
- 7.2 PPC100 is being progressed in advance of the anticipated timing for development in Riverhead either in relation to FULSS or the replacement Future Development Strategy which indicates development in Riverhead from 2050+. The prerequisite transport infrastructure that the FDS identifies as being required for development in Riverhead is not currently in place and there is no funding or certainty over the timing. Of particular note is the NZTA Brigham to Waimauku SH16 upgrade and the Auckland Transport strategic network projects for upgrades to Coatesville-Riverhead Highway and Riverhead Road.
- 7.3 There are no current funded improvements to public transport for Riverhead.
- 7.4 The Plan Change proposes to go some way to either providing some of the prerequisite transport infrastructure through upgrades to part of the arterial roads directly affected (Coatesville-Riverhead Highway and Riverhead Road) or to limit occupation of development until specific transport infrastructure is constructed and operational (upgrade of SH16 / Coatesville-Riverhead Highway to a roundabout, and upgrade of the CRH intersections with Old Railway Road and Riverland Road).
- 7.5 I consider that PPC100 only partly aligns with the relevant traffic and transport Regional Policy Statement Objectives and Policies in relation to coordinating development with transport infrastructure. Until the full upgrades to Coatesville-Riverhead Highway, Riverhead Road and the Brigham to Waimauku SH16 are complete Riverhead will be reliant on private vehicle use to travel to the wider network as Riverhead will be surrounded by rural roads with no facilities for active modes (particularly cyclists) to travel to surrounding areas (Kumeu or Westgate). Any new or improved public transport will be subject to funding. These improvements may not occur for some time or development may require prerequisite transport projects to be brought forward.
- 7.6 I consider that subject to the identified transport infrastructure within Riverhead that PPC100 would have good connectivity for active modes within Riverhead itself. Access for active modes and public transport would be limited until the completion of the upgrades to Coatesville-Riverhead Highway and Riverhead Road resulting in a reliance on private vehicle use.
- 7.7 Given the above limitations on the transport infrastructure I consider that it is necessary that the essential parts of the infrastructure needed to support PPC100 are complete and operational prior to development being occupied and I generally support the Precinct Provisions Standard IX6.1 Staging of development with transport upgrades. However, I consider that where development or subdivision is not compliant with these Precinct Provisions that the activity status should either be Non-Complying in relation to upgrades to SH16 / Coatesville-Riverhead Highway intersection (IX6.1(1)) and as a minimum Discretionary for upgrades to the road directly affected by PPC100 (IX6.1(2) to (6)).
- 7.8 I have some concerns about the robustness of the traffic modelling in relation to the SH16 / Coatesville-Riverhead Highway roundabout and consider that further

assessment is required to demonstrate that the roundabout would operate at an acceptable level of performance with PPC100.

- 7.9 The traffic assessment has assumed a school and a retirement village will be constructed. However, there is no certainty that either of these facilities will be provided as there is no specific zoning or Precinct Provisions that would require either to be provided. If one or both of these were not to occur, this would affect the traffic analysis undertaken as the trip rates, particularly external to PPC100 would be affected.
- 7.10 As I have identified there are some gaps in the assessment where additional analysis is required to enable me to confirm my opinion on whether the traffic effects have been adequately assessed or effects can be sufficiently avoided, remedied, or mitigated. These matters are outlined below:
- a) To understand the potential scale of traffic generation without the school or retirement village, analysis should be provided of the number of forecast trips with the land assumed for the school/retirement village used for housing. If there is a significant increase in the number of trips, particularly external to Riverhead, then updated modelling should be provided.
  - b) Provide analysis that demonstrates that the AM peak traffic volumes used for the modelling of the SH16 / Coatesville-Riverhead Highway roundabout have appropriately taken into account eastbound traffic demands (not throughput) along SH16.
  - c) The analysis of the SH16 / Coatesville-Riverhead Highway roundabout should be updated to include the proposed pedestrian crossing facilities on SH16 and Coatesville-Riverhead Highway and with any revised traffic figures for SH16.
  - d) Traffic modelling should be provided for the SH16 / Coatesville-Riverhead Highway roundabout for a weekend (Saturday).
  - e) An assessment of the need to connect Cambridge Road at its southern end with Coatesville-Riverhead Highway should be provided taking into account the legibility of the proposed road network and the connection of the Collector Road to Cambridge Road. If a connection is required, concept plans should be provided to demonstrate how an intersection between Cambridge Road and Coatesville-Riverhead Highway would operate with the adjacent Princes Street intersection and the access to the Caltex petrol station.
  - f) The extent of upgrade works to Cambridge Road between Queen Street and Coatesville-Riverhead Highway should be clarified and the Precinct Provisions updated to ensure there is consistency between the descriptions in Standard IX6.1(5) and the Precinct Plans. This should take into account any adjustments from e) above.
  - g) Provide details of how the traffic turning volumes used in the analysis of the local Riverhead intersections have been derived.

- h) Provide details as to how upgrades to roads would be undertaken where land is in different ownership.

7.11 Subject to additional information from the items outlined above, I have the following recommendations.

- a) The proposed upgrades to the SH16 / Coatesville-Riverhead Highway intersection to a roundabout should also include the provision of two eastbound lanes on SH16 between Coatesville-Riverhead Highway and Brigham Creek Road; this is required to accommodate traffic from PPC100 and for the efficiency of SH16.
- b) To more appropriately address traffic effects identified, amend the Precinct Provisions as detailed in Section 6.0.

Martin Peake

28 August 2024

**Attachment 1 – Recommended Amendment to Appendix 1: Road Function and Design Elements Table**

IX.11.1 Appendices

Appendix 1: Road Function and Design Elements Table – Internal road within precinct

Road Function and Design Elements Table										
Road Description	Proposed Role and Function of Road in Precinct Area	Min. Road Reserve	Total number of lanes	Speed Limit (Design)	On-street parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision
Collector Road (without adjacent reserve)	Collector Road (Type 1)	25m 21m	2	40km/h	Optional	No Yes	Yes Separated on both sides	Yes Both sides	Trees each side	Yes
Collector Road (With adjacent reserve which includes a shared path alongside )but outside road) reserve)	Collector Road (Type 1)	21m	2	40km/h	Optional	No Yes	Yes Separated on both sides	Yes Both sides	Trees each side	Yes
Local Roads	Local Road (Type 2)	18m 16m	2 (on-street parking with staggered yellow lines)	30km/h	Optional	No	No	Yes Both sides	Trees each side	No



IX.11.2 Appendices

Appendix 2: Road Function and Design Elements Table – External roads to the precinct

Road Function and Design Elements Table										
Road Description	Proposed Role and Function of Road in Precinct Area	Min. Road Reserve	Total number of lanes	Speed Limit (Design)	On-street parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision
Coatesville-Riverhead Highway Between Kaipara Portage Road and Riverhead Point Drive	Arterial Road	Existing width (varies) plus localised intersection widening	2	50	No	Yes	Yes Separated on both sides	Yes	Yes	Yes
Coatesville-Riverhead Highway From Riverhead Point Drive to 80m south of Short Road	Arterial Road	Existing with localised widening on the western boundary to allow for intersections and tie-in works for the future shared path on Coatesville-Riverhead Highway, south of Short Road.	2	50	No	Yes	Yes Separated on both sides	Yes	Yes Western side only	Yes

Road Function and Design Elements Table										
Road Description	Proposed Role and Function of Road in Precinct Area	Min. Road Reserve	Total number of lanes	Speed Limit (Design)	On-street parking	Access Restrictions	Cycle Provision	Pedestrian Provision	Street Trees	Bus Provision
Riverhead Road  From the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway	Arterial Road	24m, with 2m widening each side plus localised intersection widening	2	50	No	<del>No</del> Yes	Yes  Separated both sides	Yes	Yes	<del>No</del> Yes
Lathrope Road	Local Road	Existing width (20m)	2	50	No	No	No	Yes  Northern side only	No	Yes
<u>Cambridge Road</u>	<u>Local Road</u>	<u>Varies (formed 6m carriageway)</u>	<u>2</u>	<u>50</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>Yes</u>  <u>West side only</u>	<u>No</u>	<u>No</u>