

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

Date:	Thursday 10 September 2020
Time:	9.30am
Meeting room:	Council Chambers
Venue:	Level 2, Civic Annex, Henderson Service Centre
	6 Henderson Valley Road, Henderson, Auckland

## **PRIVATE PLAN MODIFICATION PC38**

## **HEARING REPORT**

## 522-524 SWANSON RD, RANUI

## WESTERN PARK VILLAGE LIMITED

COMMISSIONERS

Chairperson

Peter Reaburn

Paulette Kenihan SENIOR HEARINGS ADVISOR

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

## WHAT HAPPENS AT A HEARING

At the start of the hearing, the Chairperson will introduce the commissioners and council staff and will briefly outline the procedure. The Chairperson may then call upon the parties present to introduce themselves to the panel. The Chairperson is addressed as Mr Chairman or Madam Chair.

Any party intending to give written or spoken evidence in Māori or speak in sign language should advise the hearings advisor at least five working days before the hearing so that a qualified interpreter can be provided.

Catering is not provided at the hearing. Please note that the hearing may be audio recorded.

#### Scheduling submitters to be heard

A timetable will be prepared approximately one week before the hearing for all submitters who have returned their hearing appearance form. Please note that during the course of the hearing changing circumstances may mean the proposed timetable is delayed or brought forward. Submitters wishing to be heard are requested to ensure they are available to attend the hearing and present their evidence when required. The hearings advisor will advise submitters of any changes to the timetable at the earliest possible opportunity.

## The Hearing Procedure

The usual hearing procedure (as specified in the Resource Management Act) is:

- The applicant will be called upon to present his/her 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 his/her 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 may
  also be represented by legal counsel or consultants and may call witnesses on their behalf.
  The hearing panel may then question each speaker. The council officer's report will identify
  any 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 information (evidence) in support of your application or your submission please ensure you provide the number of copies indicated in the notification letter.
- Only members of the hearing panel can ask questions about submissions or evidence. Attendees may suggest questions for the panel to ask but it does not have to ask them. No cross-examination - either by the applicant or by those who have lodged submissions – is permitted at the hearing.
- After the applicant and submitters have presented their cases, the chairperson may call upon council officers to comment on any matters of fact or clarification.
- When those who have lodged submissions and wish to be heard have completed their presentations, the applicant or his/her 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 chairperson then generally closes the hearing and the applicant, submitters and their representatives leave the room. The hearing panel will then deliberate "in committee" and make its decision by way of formal resolution. You will be informed in writing of the decision and the reasons for it.



# A NOTIFIED PLAN MODIFICATION TO THE AUCKLAND UNITARY PLAN BY WESTERN PARK VILLAGE LIMITED

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## Reporting officer, Jo Hart, Planner

Reporting on a proposed private plan modification to rezone from business-light industry to mixed housing urban and terrace and apartment building at 522-524 Swanson Rd, Ranui. Recommendation is that PPC38 under the Auckland Unitary Plan be **approved** without modifications

## APPLICANT: WESTERN PARK VILLAGE LIMITED

SUBMITTER:	
Page 303	Kiwirail Holdings Limited (Kiwrail)

FURTHER SUBMITTER:	
Page 307	Kainga Ora Homes and Communities



## Hearing Report for Proposed Plan Change 38 (Private) 522-524 Swanson Road, Ranui (Western Park Village Limited) to the Auckland Unitary Plan (Operative in part)

Section 42A Hearing Report under the Resource Management Act 1991

Report to:	Hearing Commissioners
Hearing Date:	10 September 2020
File No:	Hearing Report – Plan Change 38 (PPC38)
File Reference	U:\CPO\RLP\FC\LUP\UP MODIFICATIONS\PC038 – 522-524 Swanson Road (Private)
Report Author	Jo Hart, Principal Planner, Planning North West and Islands, Plans and Places
Report Approver	Warren Maclennan, Manager Planning North West and Islands, Plans and Places
Report produced	28 August 2020

**Summary of Proposed Plan Change 38 (Private) 522-524 Swanson Road, Ranui :** Rezone 2.5 hectares of land at 522-524 Swanson Road, Ranui from Business-Light Industry to Residential Mixed Housing Urban and Terrace Housing and Apartment Building zone.

Plan subject to change	Auckland Unitary Plan (Operative in Part)
Number and name of change	Proposed Plan Change 38 (Private) 522-524 Swanson Road, Ranui (Operative in Part)
Status of Plan	Operative in part
Type of change	Proposed private plan change

Committee date of approval (or adoption) for notification	26 November 2019 (accepted for notification under delegation to Manager, Planning North West and Islands)
Parts of the Auckland Unitary Plan affected by the proposed plan change	AUP(OP) Maps
Date of notification of the	5 December 2019
proposed plan change and whether it was publicly notified or limited notified	Public Notification
Plan development process used – collaborative, streamlined or normal	Normal
Submissions received (excluding withdrawals)	1
Date summary of submissions notified	27 February 2020
Number of further submissions received	1
Legal Effect at Notification	Νο
Date of site visit	18 December 2019
Main issues or topics emerging from all submissions	Reverse sensitivity effects, particularly noise and vibration, on residential development located adjacent to the rail corridor

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## Abbreviations

Abbreviations in this report include:

Abbreviation	Meaning
PPC38	Proposed Plan Change 38
RMA	Resource Management Act 1991
AUP(OP)	Auckland Unitary Plan (Operative in Part)
PAUP	Proposed Auckland Unitary Plan
LI	Business – Light Industry
МНО	Residential – Mixed Housing Urban Zone
MHS	Residential – Mixed Housing Suburban
AT	Auckland Transport
Parks	Auckland Council Parks Sports and Recreation
MHG	Mt Hobson Group
ТНАВ	Residential – Terrace Housing and Apartment Buildings Zone
The Application/applicant's report	Private plan change request by Western Park Village Limited (including s32 and Assessment of Environmental effects). Prepared by Mt Hobson Group.
AEE	Assessment of Environmental Effects
ITA	Integrated Transport Assessment

Attachments	
Attachment A	The Applicants Report - Proposed Plan Change 38 (Private) 522-524 Swanson Road, Ranui (Western Park Village Limited)
	Appendix 1: Urban Design Report
	Appendix 2: Preliminary Infrastructure Assessment
	Appendix 3: Integrated Transport Assessment
	Appendix 4: Acoustic Assessment
	Appendix 5: Economic Analysis
	Appendix 6: s32 Analysis
	Appendix 7: Te Kawerau ā Maki Letter
	Appendix 8: Contamination DSI Summary
	Appendix 9: Flooding Assessment
	Appendix 10: Certificate of Title
	Appendix 11: Mana Whenua Response
Attachment B	Copy of submission and further submission
Attachment C	Specialist Assessments
	Appendix 1: Urban Design Assessment
	Appendix 2: Economic Analysis
	Appendix 3: Geotechnical Assessment
	Appendix 4: Land Contamination Assessment
	Appendix 5: Stormwater Assessment
	• Appendix 6: Noise Assessment (includes further information request, response from Mt Hobson Group and further response from noise expert)
Attachment D	AUP(OP) Section E25 Noise and Vibration provisions
Attachment E	Council Decision to accept PPC38 under Clause 25 to First Schedule RMA
Attachment F	Qualifications

## 1. EXECUTIVE SUMMARY

- Plan Change 38 (Private) 522-524 Swanson Road, Ranui (Western Park Village Limited) ('PPC38' or 'Plan Change') to the Auckland Unitary Plan (Operative in Part) ('AUP(OP)') seeks to rezone approximately 2.5 hectares of land at 522-524 Swanson Road, Ranui from Business – Light Industry Zone ('LI') to Residential Mixed Housing Urban ('MHU') and Terrace Housing and Apartment Building Zone ('THAB').
- 2. PPC38 relates to the planning maps contained in the Auckland Council GIS viewer. No other changes are proposed to the AUP(OP).
- 3. The private plan change request was made under Clause 21 of Schedule 1 to the Resource Management Act 1991 ('**RMA**') and was accepted by Auckland Council ('**Council**'), under clause 25(2)(b) of Schedule 1 to the RMA on 26 November 2019.
- 4. PPC38 was publicly notified by the council on 5 December 2019 and the closing date for submissions was 23 January 2020. The council received one submission on PPC38. The council's Summary of Decisions Requested was publicly notified on 27 February 2020 with the period for making further submissions closing on 12 March 2020. One further submission was received.
- 5. This hearing report has been prepared in accordance with section 42A of the RMA.
- 6. This report addresses the merits of PPC38, with reference to an assessment of effects on the environment and the issues raised in submissions. The discussion and recommendations in this report are intended to assist the Hearing Commissioners, and those persons or organisations that lodged submissions on PPC38.
- 7. The topics covered by the submission relate to the potential for reverse sensitivity effects, particularly noise and vibration, on proposed residential development located adjacent to the rail corridor.
- 8. The recommendations contained within this report are not the decisions of the Hearing Commissioners.
- 9. The applicant has provided a table of its Section 32 Analysis (refer to Appendix 6 of the applicant's report) in accordance with section 32 of the RMA as part of the private plan change request as required by clause 22(1) of Schedule 1 of the RMA. In accordance with an evaluation under section 32, I consider that the provisions are the most appropriate to achieve the objectives of the AUP(OP) and the purpose of the RMA.
- 10. It is recommended that PPC38 be approved with no amendments.

## 2. BACKGROUND

## 2.1 Request

- 11. The applicant for PPC38 is Western Park Village Limited ('the applicant'). The private plan change was lodged with the council on 15 November 2019. PPC38 seeks to rezone parts of the site currently zoned LI to a split zone of MHU (approximately 14, 470m2) and THAB (approximately (10.910m2). The area of the site currently zoned as Residential Mixed Housing Suburban ('MHS') is excluded from the proposed plan change rezoning.
- 12. The site is currently split zoned MHS (approx. 1278m<sup>2</sup>) and LI (approx. 24987m<sup>2</sup>) as shown in Map 1 below.



Map 1: Existing AUP(OP) zoning of 522-524 Swanson Road, Ranui

- 13. The applicant has provided the following reports and documents to support their application for PPC38:
  - Private plan request and assessment of effects
  - Appendix 1 Urban Design Report
  - Appendix 2 Preliminary Infrastructure Assessment
  - Appendix 3 Integrated Transport Assessment
  - Appendix 4 Acoustic Assessment
  - Appendix 5 Economic Analysis
  - Appendix 6 s32 Analysis
  - Appendix 7 Te Kawerau ā Maki Letter
  - Appendix 8 Contamination DSI Summary
  - Appendix 9 Flooding Assessment
  - Appendix 10 Certificate of Title
  - Appendix 11 Mana Whenua Response.

## 2.2 Context

## Existing environment

- 14. The applicant has provided a description of the site and surrounds. I visited the site on 18 December 2019 and I concur with the applicant's assessment set out in Section 4 of the application.
- 15. The subject site, known as Western Park Village at 522-524 Swanson Road, Ranui is located approximately 450 metres west of the Ranui local centre. The area is approximately 2.5 hectares and is in the shape of an 'L' (refer to Photo 1 below).

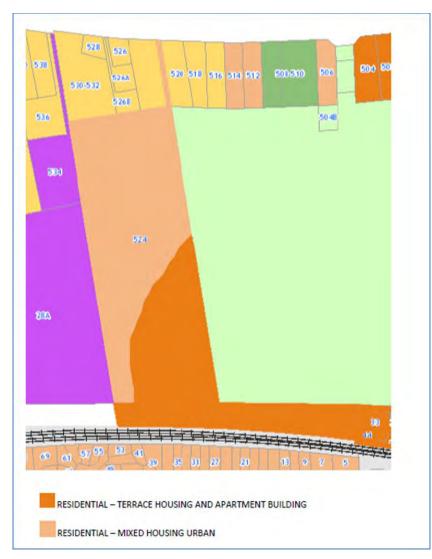


Photo 1: Aerial of 522-524 Swanson Road, Ranui

- 16. Currently the site contains a substantial number of temporary and permanent buildings providing residential accommodation, toilet and cooking facilities, and an administration type block in the north-eastern corner of the site. Many of these structures have been in place on the site for a number of years.
- 17. The site is relatively flat from the road frontage towards the south before falling to a stream which traverses the site from the south-western corner to exit approximately halfway up the eastern boundary. The site then rises from the stream towards the east. The highest part of the site is a narrow corridor which runs between the Ranui Domain (to the east) and the railway line located to the south of the site. The existing buildings on the site are located to the north/west of the stream with the area of land to the east being vacant and grassed.
- 18. Single storey residential dwellings on individual sites are located to the immediate north of Ranui Domain and adjoin the site to the east along its Swanson side frontage. This type of residential development also characterises the land to the north of the site across Swanson Road.
- 19. The land located to the immediate north-west of the site is occupied by a local church. Several properties zoned LI are located to the south-west of the site and consist of industrial uses

including a bus depot and storage businesses. The site is bounded in the south by the western line railway tracks.

- 20. Western Park Village Limited has owned the site since 1998 and it has been used for temporary and permanent accommodation for the community for the last 50 years or so. Prior to this, the site was used as a traditional holiday park/campground and now houses a range of accommodation units still used for transient use. The site tends to cater for those members of the community who cannot obtain housing elsewhere, or are waiting for social housing allocations.
- 21. The area proposed to be rezoned MHU extends from the northern part of the site currently zoned MHS to the northern side of the stream. The area proposed to be rezoned THAB extends from the southern side of the stream to the western line railway to the south, and Ranui Domain and the land currently zoned THAB to the east (refer to Map 2). The only change is to the AUP(OP) zone maps. There are no changes to any other spatial layers or text in the AUP(OP).



Map 2: Proposed rezoning of 522-524 Swanson Road, Ranui

22. Western Park Village Limited's intention is to develop the land in a manner consistent with the proposed rezoning of the site, being intensive residential development in a range of sizes and forms. Due to the current social housing aspect of the existing site, Western Park Village Limited has had preliminary discussions with both Kiwibuild and Auckland Community House providers as to the practicality of incorporating social housing into any future development of the land to provide for the needs of the community. A concept master plan has been prepared as part of

the Urban Design Assessment report (in Appendix 1 of that report). The Urban Design report gives only an indication of the potential density that could be achieved on the site which is in the order of 75 to 180 units (a gross total site density of 1:250m<sup>2</sup>).

## 3. EXISTING PLAN PROVISIONS

## 3.1 Current plan provisions for the site and surrounds

- 23. The PPC38 area is currently zoned MHS and LI and is subject to the following controls in the AUP(OP):
  - Controls: Macroinvertebrate Community Index Urban
  - Stormwater Management Area Control Swanson 5, Flow 2 [rp]

## 3.2 Business – Light Industry Zone

- 24. The majority of the site (524 Swanson Road, Ranui) is zoned LI. The purpose of this zone is to provide for industrial activities that do not generate objectionable odour, dust or noise. This includes manufacturing, production, logistics, storage, transport and distribution activities.
- 25. Due to the industrial nature of the zone, activities sensitive to air discharges are generally not provided for. This includes dwellings and integrated residential developments which are non-complying activities within this zone. Further information on this zone can be found in *H17 Business Light Industry Zone.*

## 3.3 Residential – Mixed Housing Suburban Zone

- 26. The rest of the site (522 Swanson Road) is currently zoned MHS. The purpose of this zone is to enable intensification, while retaining a suburban built character. This zone is the most widespread residential zone and covers many established suburbs and some greenfield areas. Much of the existing development in the zone is characterised by one or two storey, mainly standalone buildings, set back from site boundaries with landscaped gardens.
- 27. The objectives and policies of this zone seek to increase housing capacity, intensity and choice. Development is encouraged to be in keeping with the built character of existing neighbourhoods and provide quality on-site amenity for residents, adjoining sites and the street.
- 28. Further information about this zone can be found in *H4 Residential Mixed Housing Suburban Zone.*

## 3.4 Overlays and controls

- 29. The relevant overlays and controls that cover the site are not proposed to be amended through PPC38. There are no overlays which apply to the site. The following controls apply:
  - Macroinvertebrate Community Index
  - Stormwater Management Area Control Swanson 5, Flow 2 [rp]
- 30. The Macroinvertebrate Community Index is an index that measures the water quality of freshwater streams and is divided into four land use categories native, exotic, rural and urban.

These indexes provide a guideline on the health of streams based on the presence or lack of macroinvertebrates.

31. The Stormwater Management Area Control seeks to protect and enhance Auckland's rivers, streams and aquatic biodiversity in urban areas. Stormwater Management Area Flow 2 areas typically discharge to streams with moderate to high values and sensitivity to stormwater, but generally with higher levels of existing impervious area within the catchment. Future development and redevelopment is enabled, but is subject to standards to reduce the effects of stormwater runoff.

## 4. PROPOSED PLAN CHANGE PROVISIONS

- 32. PPC38 seeks to rezone parts of the site currently zoned LI to a split zone of Residential MHU (approximately 14,470m2) and THAB (approximately (10.910m2). The area of the site currently zoned as MHS is excluded from the proposed plan change rezoning. No further precincts, overlays or controls are sought.
- 33. The MHU zone provides for a reasonably high-intensity zone with developments typically up to three stories in a variety of sizes and forms including detached dwellings, terrace housing and low-rise apartments. This supports increasing the capacity and choice of housing within neighbourhoods as well as promoting walkable neighbourhoods.<sup>1</sup>
- 34. The THAB zone is a high-intensity zone providing for urban residential development in the form of terrace housing. The zone is predominantly located around metropolitan, town and local centres and the public transport network to support the highest level of intensification. The purpose of the zone is to make efficient use of land and infrastructure and increase the capacity of housing.<sup>2</sup>

## 5. HEARINGS AND DECISION MAKING CONSIDERATIONS

- 35. Clause 8B (read together with Clause 29) of Schedule 1 of RMA requires a local authority to hold a hearing into submissions on a proposed private plan change.
- 36. PPC38 was accepted by the council under clause 25(2)(b) of Schedule 1 of the RMA under general delegation on 6 August 2019. A record of this decision is attached as Attachment F to this report.
- 37. In this report I summarise and discuss submissions received on PPC38. I make recommendations on whether to accept or reject each submission. Any conclusions or recommendations in this report are not binding on the Hearing Commissioners.
- 38. The Hearing Commissioners will consider all the information in submissions together with evidence presented at the hearing.

<sup>&</sup>lt;sup>1</sup> Chapter H5 – Mixed Housing Urban Zone – Auckland Unitary Plan (operative in part) 2016

<sup>&</sup>lt;sup>2</sup> Chapter H6 – Terrace Housing and Apartment Buildings Zone – Auckland Unitary Plan (operative in part) 2016

39. This report relies on the assessments from the following experts on behalf of the council and specialist Auckland Council officers (refer to Table 1). The assessments are attached in **Attachment C** to this report.

Matter	Reviewing specialist
Stormwater	Iresh Jayawardena, Senior Healthy Waters Specialist, Auckland Council
Geotechnical	Charlie Brightman, Principal Geotechnical Specialist, Auckland Council
Land Contamination	James Corbett, Principal Contaminated Land Specialist, Auckland Council
Noise	Rhys Hegley, Partner, Hegley Acoustic Consultants Limited
Economics	Derek Foy, Associate Director, Market Economics Limited
Urban Design	Matt Riley, Senior Associate, Barker and Associates Limited

## Table 1: Specialists and their relevant matters

## 6. STATUTORY AND POLICY FRAMEWORK

- 40. Private plan change requests can be made to the council under Clause 21 of Schedule 1 of the RMA. The provisions of a private plan change request must comply with the same mandatory requirements as council-initiated plan changes. The private plan change request must contain an evaluation report in accordance with section 32 of the RMA (clause 22(1), Schedule 1, RMA)).
- 41. PPC38 is a private plan change request made to the council by the applicant in accordance with Clause 21 of Schedule 1 of the RMA.
- 42. PPC38 was accepted by the council under clause 25(2)(b) of Schedule 1 of the RMA under general delegation on 6 August 2019. A record of this decision is attached as **Attachment E** to this report.
- 43. PPC38 was publicly notified on 5 November 2019, with one submission received by the council. The summary of submissions was publicly notified by the council on 27 February 2020 with one further submission received.

## 7. STATUTORY AND POLICY ASSESSMENT

## 7.1 Resource Management Act 1991

- 44. The RMA requires that councils (and unitary authorities) consider a number of statutory and policy matters when developing or considering proposed plan changes. PPC38 was developed under the relevant statutory and policy matters. The submission and further submission have also been considered under the relevant statutory and policy matters.
- 45. The key directions of the RMA with regard to consideration of private plan changes are set out in the below paragraphs.

RMA Section	Matters
Part 2	Purpose and principles of the RMA.
Section 31	Outlines the functions of territorial authorities in giving effect to the Resource Management Act 1991
Section 32	Requirements preparing and publishing evaluation reports. This section requires councils to consider the alternatives, costs and benefits of the proposal
Section 67	Contents of regional plans – sets out the requirements for regional plan provisions, including what the regional plan must give effect to, and what it must not be inconsistent with
Section 72	Sets out that the purpose of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of this Act.
Section 73	Sets out Schedule 1 of the RMA as the process to prepare or change a district plan
Section 74	Matters to be considered by a territorial authority when preparing a change to its district plan. This includes its functions under section 31, Part 2 of the RMA, national policy statement, other regulations and other matter
Section 75	Contents of district plans – sets out the requirements for district plan provisions, including what the district plan must give effect to, and what it must not be inconsistent with
Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities. It also sets out the process for private plan change applications.

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

## 7.2 Part 2 of the Resource Management Act 1991

46. Part 2 of the RMA sets out the overarching purpose of the Act. The applicant has addressed how it considers that the proposed private plan change achieves the purpose of the RMA in Sections 8.3 to 8.9 of their Assessment of Environmental Effects and Statutory Analysis report ("**the applicants report**"). In summary, the applicant considers the private plan change request

is consistent with Part 2 of the RMA as it achieves the purpose of the Act being the sustainable management of natural and physical resources.

47. I generally concur with the analysis contained in the applicant's report for PPC38.

## 7.3 National policy statements

48. Pursuant to Sections 74(1)(ea) and 75 RMA, the relevant national policy statements ('**NPS**') must be given effect to in the preparation of the proposed plan change and in considering submissions. The National Policy Statement on Urban Development Capacity is the only NPS considered to be of relevance to PPC38.

## 7.3.1 National Policy Statement on Urban Development July 2020

- 49. The National Policy Statement on Urban Development July 2020 (NPS-UD) sets out the objectives and policies for planning for well-functioning urban environments under the RMA. The NPS-UD came into effect on 20 August 2020 replacing the National Policy Statement on Urban Development Capacity 2016 ('**NPS-UDC**').
- 50. The NPS-UD removes overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure.<sup>3</sup>
- 51. Key changes in the NPS-UD from the NPS-UDC include:
  - a requirement for planning decisions to contribute to well-functioning urban environments (Objective 1)
  - specific reference to amenity values, climate change, housing affordability and the Treaty of Waitangi (te Tiriti o Waitangi) (Objectives 2, 4, 5 and 8)
  - a requirement for local authorities to enable greater intensification in areas of high demand and where there is the greatest evidence of benefit city centres, metropolitan centres, town centres and near rapid transit stops (Objective 3)
  - removal of minimum car parking rates from district plans
  - a requirement for local authorities to be responsive to unexpected plan change requests where these would contribute to desirable outcomes.
- 52. For the purpose of the NPS-UD, Auckland Council is a Tier 1 urban environment. Not all land falling within the Auckland Council is urban environment. Urban environment, as defined in the NPS-UD, is any area of land that is, or is intended to be, predominantly urban in character, and is, or is intended to be, part of a housing and labour market of at least 10,000 people. The site subject to PPC38 falls within the urban environment.
- 53. Guidance material provided by the Ministry for the Environment indicates that all objectives within the NPS-UD apply from 20 August 2020, This includes decisions made in relation to Plan Changes, such as PPC38. I consider that there are NPS-UD objectives and policies which are of particular relevance to consider when making a decision on PPC38. These are Objectives 1,

<sup>&</sup>lt;sup>3</sup> https://www.mfe.govt.nz/about-national-policy-statement-urban-development

2, 3, 4, 5 and 8 and Policies 1, 2, 3(d), 4, 6 and 9. The NPS-UD also contains 'subparts'. I also consider that subparts 3.11, 3.21, 3.32 and 3.33 are of relevance.

- 54. I consider that PPC38 aligns with the objectives and policies of the NPS-UD in that the plan change:
  - provides an opportunity to improve housing affordability
  - enables more people to live in area of an urban environment which is near a local centre zone and is well-serviced by existing public transport
  - provides an opportunity for an urban environment, including its amenity value, to develop and change over time
  - provides for additional development capacity
  - supports reductions in greenhouse gas emissions and resilient to the current and future effects of climate change.
- 55. The applicant's report assessed PPCC38 against the NPS-UDC in paragraphs 8.11 to 8.25. within the applicant's report. My initial assessment, undertaken before PPC38 was notified, agreed with the applicant's assessment. The applicant has not assessed the NPS-UD as the private plan change request was lodged, and notified, prior to the bill being enacted or coming into effect on 20 August 2020.
- 56. Auckland Council must amend its regional policy statement or district plan to give effect to the provisions of the NPS-UD as soon as practicable. This will need to be done through Plan Change(s) to the AUP(OP).
- 57. Subsequent Plan Change(s) to the AUP(OP) to give effect to the NPS-UD may result in an amendment to the height provisions of the AUP(OP). However, I consider that rezoning the site from LI to MHU and THAB meets with the intent of the NPS-UD in that the objectives and policies of the two residential zones provide for:
  - higher density residential living with an increase in housing capacity and choice with access to centres and public transport
  - development in keeping with the existing neighbourhood's character
  - quality on-site residential amenity for residents and the street

## 7.4 National Environmental Standards

## 7.4.1 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

- 58. The applicant has identified that the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) is relevant to the private plan change request. I concur that the NESCS is relevant.
- 59. Sections 7.41, 8,10 and Appendix 8 (Contamination DSI Summary) of the applicant's report discusses contaminants in the soil. While the site has not been used for industrial activities for some time, investigations show that the site had been subject to activities listed on the Hazardous Activities and Industries List (HAIL) in the past. Several of the samples showed the presence of arsenic, copper and lead above background levels in a number of locations. Further discussion of the potential environmental effects can found in Section 8 of this report.

## 7.5 Auckland Unitary Plan (operative in part) - Regional Policy Statement

- 60. Section 75(3)(c) of the RMA requires that a district plan must give effect to any regional policy statement.
- 61. Regional Policy Statements of relevance to PPC38 include:
  - B2. Urban Growth and Form
  - B3. Infrastructure, transport and energy
  - B10. Environmental Risk (Land contaminated).

<b>Table 3:</b> Relevant provisions of the RPS in the AUP(OP)
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RPS section	Relevant sub-sections
B2 Urban growth and form	B2.2 Urban growth and form
	B2.3 A quality built environment
	B2.4 Residential growth
B3 Infrastructure, transport and energy	B3.3 Transport
B6 Mana Whenua	
B7 Natural Resources	B7.3 Freshwater systems
B10 Environmental risk	B10.2 Natural hazards and climate change
	B10.4 Land - contaminated

- 62. The applicant has provided an assessment against the objectives and policies of the AUP(OP) Regional Policy Statement ('**RPS**') in Sections 8.26 to 8.35 the report. I have read the applicant's assessment against the relevant RPS objectives and policies and agree with the findings for the reasons set out below.
- 63. In summary, the key findings of the applicant's assessment are that the proposed zoning changes to the site:
  - enables the growth of residential development by providing for medium-high density use (within the Rural Urban Boundary) in close proximity to amenities such as centres, transportation nodes and public open spaces (B2 Urban growth and form)
  - through the combination of the residential zones, provides the most efficient and effective manner in which to promote sustainable management of the site and surrounding area (B2 Urban growth and form)

- provides for the intensification of residential land use adjacent to existing infrastructure, including key public transport networks (B3 Infrastructure, transport and energy)
- the consultation undertaken with iwi is consistent with recognising the principles of the Treaty of Waitangi, the relationship of Mana Whenua with Treaty Settlement Land, and the values of Mana Whenua during the resource management decision making process (B6 Mana Whenua)
- provides an opportunity for the enhancement and protection of a freshwater stream which traverses the site (B7.3 Freshwater systems)
- protects human health and the quality of air, land and water by identifying, managing and remediating, if required, land that contains any contaminants (B10.4 Land – contaminated).
- 64. While the applicant did not address *B10.2 Natural hazards and climate change*, I find that PPC38 supports B10.2.1 in that the applicant has indicated that development is intended to be located, or designed, so as to reduce the risk to people, property and infrastructure. Assessment, and management of risk, will be required during the resource consent stages. Further discussion of the potential environmental effects can be found in Section 8 of this report.

## 7.6 District Plan

- 65. The applicant has not provided a full assessment against the objectives and policies of the AUP(OP) district plan in terms of the proposed THAB and MHU provisions. However, Section 5.9 and 7 of the applicant's report discusses the suitability of the site for residential development and makes reference to bulk, location and dominance controls of *H5.3(2) and H6.3(2)*. In summary the applicant's report states that:
  - PPC38 will enable the residential development of a scale, bulk and form that is consistent with the surrounding environment
  - the combination of the two zones allows for the density of development to change over the site, with the densest development near the train station, and the less dense development closer to Swanson Road and existing lower density zones
  - the new zones would introduce greater on-site amenity controls than provided for under the existing zone of Business Light Industry.
- 66. I am satisfied that PPC38 is consistent with the objectives of the AUP(OP) for MHU and THAB zones in that the two zones provide for:
  - higher density residential living with increase in housing capacity and choice with access to centres and public transport
  - development in keeping with the existing neighbourhood's character
  - quality on-site residential amenity for residents and the street
- 67. The policies outlined in the two zones refer to development specific management, but no development proposal is associated with PPC38. However, these policies will provide some certainty around the quality and issues associated with the change in use on site during the resource consent process.
- 68. Any future resource consent for development will also need to be assessed against any other relevant district plan objectives, policies and standards of the AUP(OP).

## 7.7 Auckland Plan

- 69. 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.
- 70. The Auckland Plan 2050, prepared under section 79 of the Local Government (Auckland Council) Act 2009, is a relevant strategy document that council should have regard to when considering PPC38.
- 71. The Auckland Plan contains the following directions and focus areas that are of particular relevance to PPC38:
  - a) Develop a quality compact urban form to accommodate Auckland's growth (Direction 1)
  - b) Create urban spaces for the future, focusing investment in areas of highest population density and greatest need (Focus area 5)
  - c) Make better use of existing transport networks (Focus area 1)
  - d) Make walking, cycling and public transport preferred choices for many more Aucklanders (Focus area 4)
  - e) Better integrate land-use and transport decisions (Focus area 5).
- 72. PPC38 is consistent with the directives of the Auckland Plan 2050. It supports a quality compact urban form through the provision for medium to high density housing. The site is close to rapid and frequent public transport routes. The site is in close location to the Ranui Town Centre and is conducive to walking, cycling and accessing public transport. This is consistent with the transport and access outcome of the Auckland Plan 2050.

## 7.8 Any relevant management plans and strategies prepared under any other Act

- 73. Other relevant plans and strategies to be considered under Section 74(2)(b)(i) and of relevance to PPC38 are summarised below.
  - The Long-Term Plan 2018 2028 sets out Council's budget over the 2018 2028 period and identifies key projects to be delivered. These include planned transport improvements, including completion of the City Rail Link, and more generally bus priority measures and level rail crossing improvements. Ranui will benefit from the increase in services as a result of this plan. The rezoning of land in the Ranui Town Centre and surrounding areas is beneficial so that as many people can live within close proximity and take advantage of these transport improvements.
  - The <u>Regional Public Transportation Plan 2015</u> is a requirement of the Land Transport Management Act, and identifies the public transport services to be delivered within Auckland in a 10 year time period. Key directions and projects of relevance include:
    - a) delivery of four main city-shaping projects, including the City Rail Link
    - b) increasing services on the rapid and frequent networks, with the aim to have services every 10 minutes during peak travel times
    - c) increasing and improving the walking and cycling and other choices for access to public transport services, focussing on improving safety.

74. PPC38 is considered to be consistent with these plans and strategies. Increasing the supply of residential land in close proximity to public transport will assist with enabling the key directions of the RPTP 2015 and the LTP 2018 – 2028.

## 7.9 Non-statutory plans and strategies

## 7.9.1 Henderson-Massey Local Board Plan 2017

- 75. The Henderson-Massey Local Board was completed in 2017. It includes six outcomes to guide council and the communities work to make Henderson-Massey a better community for all.
- 76. The subject site at 522-524 Swanson Road, Ranui is located within the Henderson-Massey Local Board boundary. PPC38 assists in meeting some of the outcomes of this plan.
- 77. Outcome 1 of the Henderson-Massey Local Board Plan is 'a network of vibrant and loved urban neighbourhoods' and Outcome 5 is 'it is easy to get around without a car'. PPC38 will support outcome 1 and 5 by providing an increase in residential land which once developed will accommodate more residents living in close proximity of the Ranui Town Centre, and the public transport network. This in turn will contribute towards making Ranui one of the 'thriving hearts' of the Henderson-Massey community.
- 78. Henderson-Massey Local Board, along with Auckland's other local boards, is currently seeking feedback on their draft local board for 2020. The proposed outcomes are similar in that these continue to support local travel options which are easily available, meets a wide range of needs, and provides for growth, while protecting the environment.

#### 7.10 Section 32 evaluation

- 79. Section 74 of the RMA requires that a plan change must have particular regard to an evaluation report prepared in accordance with Section 32 of the RMA.
- 80. Section 32 of the RMA requires an evaluation report examining the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. Section 32 requires the report to examine whether the provisions are the most appropriate way of achieving the objectives.
- 81. The applicant has prepared an assessment against Section 32 to demonstrate that the provisions are the most appropriate way to achieve the objectives of PPC38, the objectives and policies of the district plan and the purpose of the RMA. This is contained in the applicant's report (Section 9) and in Appendix 6. Some of the key observations are:
  - retaining the existing zoning does not provide for its existing use as temporary accommodation or for future residential development
  - retaining the existing zoning, given its close proximity to the Ranui Town Centre, Ranui Domain and public transport network, does not support the regional objectives and policies of the AUP(OP) of high quality and high density residential use along transport corridors and close to open space
  - the THAB and MHU zones are considered to be the most effective and efficient means of increasing the housing supply in the area
  - the THAB and MHU zones takes advantage of close proximity to the Ranui Town Centre, Ranui Domain and public transport networks while enabling a transition of density across the site

- the THAB and MHU zones seek high quality amenity on-site as well as consideration of the amenity of neighbouring properties
- rezoning the site to MHU and THAB is considered the most appropriate and efficient way
  of meeting the objectives and policies of the AUP(OP) and all other relevant statutory
  planning documents.
- 82. I consider that the Section 32 evaluation report provided by the applicant, the further and the ongoing Section 32 evaluation provided in this report, sufficiently demonstrates that the proposed zoning is the most appropriate way of achieving the objectives of the AUP(OP) and the purpose of the RMA.

## 8. ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

- 83. Clause 22 of Schedule 1 to the RMA requires private plan changes to include an assessment of environmental effects that are anticipated by PPC38, taking into account Clauses 6 and 7 of Schedule 4 of the RMA.
- 84. An assessment of actual and potential effects on the environment ("**AEE**") is included in Section 7 of the applicant's report. The applicant identifies and evaluates the following types of effects:
  - a) urban design
    - o character and amenity
    - o bulk, location and dominance
    - o design and amenity
  - b) transport
  - c) infrastructure
    - o wastewater
    - o water supply
    - o stormwater
    - $\circ$  overland flow path
  - d) Mana whenua
  - e) natural resources
    - o trees
    - o **stream**
  - f) contaminated land
  - g) geotechnical
  - h) heritage
  - i) reverse sensitivity effects.
- 85. A review of the AEE, including its supporting documents, and the further information provided pursuant to Clause 23 to Schedule 1 RMA, is provided below.

## 8.1 Urban Design Effects

#### Applicant's assessment

- 86. The effects arising from the proposed THAB and MHU rezoning of the site are addressed in Section 7 and Appendix 1 of the applicant's report.
- 87. The urban design assessment considers the AUP(OP) height, bulk, form and appearance provisions of the existing zone compared to the proposed zones of the site. The assessment also discusses design and associated amenity provided by the proposed residential zones both onsite and on adjacent sites. The key conclusions of the urban design assessment include the following:
  - the proposed combination of MHU and THAB zones are more appropriate than the existing LI zone given the site's opportunities and constraints and adjacent land's characteristics including the adjoining Ranui Domain, Ranui Local Centre, and the adjacent Ranui rail station
  - the proposal provides for superior amenity and a better land use 'edge' to Ranui Domain than would be likely under the existing zone
  - the mix of densities proposed will enable a variety of house and household types, serving housing choice in a way that concentrates density where it will be most effectively located (close to green or open spaces, a local centre, and key transport links)
  - the proposal is compatible with the built form characteristics of Ranui (as currently planned under the AUP(OP)
  - the proposal is consistent with the quality compact form sought by the AUP(OP) and the specific matters set out in Chapter B2: Urban Form
  - the proposal will result in some adverse urban design effects, such as new shadowing effects, although none are considered to be unusual or severe and less adverse than could occur under the existing zone. Positive urban design effects will also occur or be enabled through future development of the site.

## Peer review

- 88. Mr Matt Riley, consultant Urban Design Specialist (Senior Associate, Barker and Associates Limited), reviewed the relevant sections of the applicant's report including Appendix 1.<sup>4</sup> Mr Riley considers that the applicant's specialist urban design report (urban design report):
  - uses a methodology which is robust and enables filtering of good urban design practice and principles that align with
  - correctly identifies the key characteristics of the site and its opportunities and constraints
  - enables a clear understanding of the merits of the requested rezoning with a logical flow from wider strategic and spatial concerns, through to connectivity, and integration with and effects on adjoining sites.

<sup>4</sup> Appendix 1 - Urban design assessment and neighbourhood design statement, Ian Munro, August 2019.

- 89. Mr Riley notes that while the concept plan shows only one way in which the site might be laid out, it represents a conceivable development form consistent with the MHU and THAB zonings. Also noted is that the concept plan includes 528 and 530-532 Swanson Road. This layout is also shown in the Integrated Transport Assessment ('**ITA**'). Mr Riley considers that is unusual to test a development concept in part on lots that are outside the plan change boundaries. He considers that if access through these sites is not achievable then access could be gained through the main part of the site to the north-east. This is discussed further in paragraph 117.
- 90. Mr Riley has assessed the urban design report using similar headings of contribution to a quality urban form and connectivity. He has broadened the review to include the wider spatial arrangements, both in the wider area and adjoining sites.

## Contribution to a quality compact form

91. Mr Riley considers that the locational characteristics of the site, within walking distance of local centre, railway station and large area of public open space, are supportive of the requested zone change to medium to higher density residential. Such zonings would allow potential residents easy access to the services of the Ranui Local Centre, convenient public transport access, and recreational opportunities offered by the open space.

## Spatial arrangement of proposed zones

- 92. Mr Riley considers that proposed location and extent of MHU zoning and THAB is a logical and appropriate response to the characteristics of the site and the surrounding area. The placement of MHU zoned land at northern end of site, and retention of MHS zoning on that part directly adjoining Swanson Road, allows for graduation in building scale and height
- 93. While THAB could be located at northern end of site, allowing for increased intensity close to Ranui Local Centre, limiting THAB to southern end of site places it where it can be easily visually absorbed clear of the existing low-scale nature of Swanson Road.

## Relationship with Ranui Domain

- 94. Mr Riley agrees with the urban design report on the merits of the proposed change in zoning of the site from LI to residential zones in terms of its relationship to Ranui Domain. A summary of his key points are below:
  - the proposed change in zoning would likely result in a higher quality built edge to Ranui Domain with a likely greater variation in building mass and form that would be seen under an LI zone scenario, and with increased building articulation and 'fine grain' use of materials.
  - the THAB zoning would also result in improved safety outcomes for Ranui Domain due to the inherent nature of the likely multi-unit residential development and how it would be assessed through AUP(OP) e.g. high degree of glazing (and probable balconies) overlooking the reserve, providing passive surveillance of it
  - the THAB zoning has lower permitted height level (16m) than in the LI zone (20m). This combined with assessment process for new buildings is more likely to result in building forms that are less bulky, and therefore less visually dominant.
  - the THAB zone is of higher relevance to quality of the interface outcomes with Ranui Domain than the MHU zoning requested for the northern part of the site. The area of THAB area is more visually contiguous with the Domain than MHU which is set back from Ranui Domain or behind proposed THAB zoning.
  - given the single ownership and large site area, it is likely that any development in the proposed MHU zone part of the site would be in a comprehensive, larger-scale

manner for four or more dwellings. This would allow assessment of the design and appearance of the proposed buildings with the opportunity for similar positive outcomes as described for the THAB zone.

95. In summary, Mr Riley considers that the requested THAB and MHU zones would produce higher quality visual and safety outcomes as seen from and relative to Ranui Domain.

## Relationship with Business – Light Industry zoned land

- 96. Mr Riley agrees with the urban design report, when looking at wider Auckland region zoning, that having adjoining LI and residential zoned sites is not unusual. He also agrees that:
  - amenity and spatial relationships between the two zones can be adequately managed by bulk and location controls in the AUP provisions for LI, MHU and THAB
  - the residential development would naturally respond to the opportunities and constraints, tending to orientate outlook and living areas of dwellings towards Ranui Domain rather than towards adjoining LI sites
- 97. Mr Riley agrees, in regard to reverse sensitivity effects, that the proposal will be less successful than the LI zone at producing a compatible business amenity along the site's western boundary with adjoining LI zoned lots. However, he considers that this must be seen within the context of the significance overall built form and land use benefits of the requested zoning changes.

## Relationship with railway line

- 98. Mr Riley considers whether the proposed THAB zoning is appropriate in the southern arm of the site given that it directly adjoins the western line of the Auckland Commuter system,. However, he agrees with the urban design report that there is established precedent in this locality, with THAB zoning applying to lots directly to the east of both sides of the railway track. He also notes that a review of the AUP(OP) zoning maps shows that this is a common zoning throughout the Auckland region for lots adjoining railway tracks where they are also close to a railway station.
- 99. Mr Riley agrees that a logical layout of multi-unit residential development on this part of the site would be to place the more regularly occupied part of dwellings, such as principal living areas and outdoor spaces, on the north side of this area, away from the railway line. Furthermore, as identified in the assessment, it would be logical to place a vehicle access lane on the south side of this area, creating a separation between dwellings and the railway line.

## Connectivity

- 100. Mr Riley considers that it is desirable for medium to higher density residentially zoned areas to be well connected and integrated into the surrounding area, enabling convenient, direct and safe movement to nearby services and public transport stops.
- 101. Due to the nature of the site, it is not possible to get a road through which connects at both the northern end (Swanson Road) to its south-eastern end. The layout shown in the concept design in Appendix 1 of the urban design report shows an accurate reflection of what could occur, that being a long 'cul-de-sac' road. This layout could not be achieved if access is not secured through 528 and 530-532 Swanson Road which are outside the plan change area. (Note that the tenure of these lots is discussed further below in paragraph 117). However, Mr Riley is satisfied that an appropriate built form result could be achieved through the resource consenting process.
- 102. Mr Riley does not consider that the inevitable cul-de-sac nature of any road coming into the site from Swanson Road, would not undermine the overall connectivity of the site. Mr Riley considers that within this location, close to a centre and railway station, the emphasis is rightly on pedestrian connectivity.

- 103. Mr Riley notes that the concept design shows a road adjoining Ranui Domain towards its southern end. In urban design terms, adjoining a public open space with a road edge is typically considered to be good practice, as a road can contribute to the activation of the open space and facilitate public use of it.
- 104. Mr Riley notes that Figure B1 of the ITA shows a potential future route connecting east from the site through to the cul-de-sac head of Carlas Way. He considers the particular route shown to not be appropriate from a safety perspective, as it passes through a relatively narrow and unobserved space on the south side of the rugby league buildings.
- 105. In summary, Mr Riley considers that the site could be developed under its requested MHU and THAB zonings through subdivision and resource consent processes in a manner that provides good connectivity, with an emphasis on pedestrian connectivity.

## Submission from KiwiRail

- 106. Mr Riley has reviewed the submission from KiwiRail in regard to the concern expressed in that submission regarding residential development adjoining the railway line.
- 107. KiwiRail's submission refers to the concept design shown in the urban design assessment. The concept design shows a vehicle access along the southern end of the plan change area adjoining the railway line.
- 108. Mr Riley considers that such a layout would be a positive result in this part of the site, increasing the physical distance between dwellings and the railway line, thereby reducing actual and perceived adverse amenity effects. He also considers that placing the vehicle access on the south side of the site, adjoining the railway line, is a logical and very probable form of development. However, securing this particular layout, is not central to Mr Riley's support for THAB zoning in this area.
- 109. As Mr Riley correctly points out the AUP(OP) does not require such specific access arrangements or separation distances on other residentially zoned sites that adjoin the railway network. KiwiRail's submission is discussed in Section 10.2 of this report.
- 110. Mr Riley's report concludes with the following:

In my view, the characteristics of the site and its location make it well-suited to a change in zoning to MHU and THAB. I consider that any potential adverse built form, amenity or interface issues are either able to be adequately addressed through subsequent subdivision and resource consent processes or are overall outweighed by the positive urban design aspects of the requested zoning change.

## <u>Comments</u>

- 111. I agree with the applicant's assessment for the following reasons:
  - PPC38 is consistent with the objectives and policies of B2. Urban Growth and Form, H6. Residential – Terrace Housing and Apartment Building Zone, and H5. Residential – Mixed Housing Urban Zone
  - rezoning the site to THAB and MHU is appropriate given both the current use of the site for temporary housing accommodation as well as the applicant's future plans to develop the site for residential
  - the combination of the development standards enables the design and layout of any new development, along with any potential adverse environmental effects, to be

managed, and assessed where a resource consent is required, to achieve the planned urban character of the zone

- 112. I rely on the expertise of Mr Riley in regard to his assessment of urban design effects of rezoning the site from LI to MHU and THAB.
- 113. I agree with Mr Riley's conclusion that any potential adverse urban design effects will be adequately assessed under the MHU and THAB provisions of the AUP(OP) as part of future subdivision and resource consent processes.
- 114. In regard to Mr Riley's comments around tenure of 528 and 530-532 Swanson Road, my understanding of the reason for including these properties in the concept plan is that these are owned individually and/or jointly by the some of the same landowners as 522-524 Swanson Road, Ranui. These properties are outside of the area subject to PPC38 and therefore out of scope of the matters to consider when making a decision on PPC38.

#### 8.2 Transport effects

#### Applicant's assessment

115. The applicant's report, in paragraphs 7.18 to 7.2 and Appendix 3, addresses the transport effects of PPC38. The applicant's report states:

The Integrated Transport Assessment in Appendix 3 concludes that the predicted increase in vehicle movements as a result of the proposed plan change is not expected to generate a significant adverse effect on the existing road network, with the existing transport environment capable of accommodating the additional traffic. An indicative intersection layout between the site and Swanson Road initially confirms that a new access layout into the site is feasible and can service up to 200 dwellings on the application site. The site is sufficient to cater for future car and bicycle parking demand within the boundaries of the site and there is the potential for future pedestrian connections to be constructed providing safe and efficient access to the Ranui Train Station. Overall, there are considered to be no potential adverse effects on the surrounding transport network that would make the proposed plan change inappropriate or unsupportable.

#### <u>Comments</u>

- 116. Auckland Transport (**'AT**') staff reviewed the applicant's report and Integrated Transport (**'ITA**') in draft form prior to an Auckland Council decision to accept the private plan change for notification and subsequent processing.
- 117. AT's initial concerns include:
  - only one indicative access arrangement shown of a new intersection but no mention of the impacts on the new access arrangement on 526 Swanson Road or other options if this if this not feasible
  - through site connectivity including future road connections and onto adjoining land e.g. walking and cycling connections to Ranui Domain and the Ranui train station
  - the stream crossing/floodplain has not been discussed in terms of access for the proposed THAB zoned land
- 118. There were various other matters raised relating to insufficient information being provided in the draft ITA including:

- intersection width, treatment and layout onto Swanson Road
- any land requirements associated with the road and intersections that are not under the control of the land owner
- confirmation of sufficient capacity within the public transport network
- recognition of all improvements to be at the cost of the developer
- transportation modelling
  - i. traffic distribution figures ITA should use EB/WB split figures in Figures 7 and 8 not figures based on Table 2 for AM/PM.
  - ii. no mention of queue length surveys
- road safety engineering
  - i. ITA does not give sufficient attention to safety
    - vulnerable road users
    - local primary school
    - walking distance to Don Buck School is not realistic
    - appropriate pedestrian facilities for bus stops on Swanson Road outside the site will also need to be provided
    - support for pedestrian connection to Robertson Road or Carlas Way.
- lack of information regarding stormwater runoff, treatment and flooding
- layout of internal road cul-de-sac/crescent layout would not be ideal as it will reduce opportunities for better connections
- traffic engineering:
  - i. proposed new road and corresponding right turn bay should meet the required standards
  - ii. speed calming should be installed along the new road and designed for speed of 30km/h.
- 119. AT, in comments provided on the draft ITA, do note that stormwater treatment, urban design and traffic engineering matters would be dealt with during a future resource consent process.
- 120. An email, dated 30 July 2020, received from Mt Hobson Group confirmed that the draft ITA, dated 7 August 2019, was updated to reflect AT's comments in the lodged version, dated 15 November 2019.
- 121. As noted in the introduction of the ITA<sup>5</sup>, the plan change only covers the area on the site currently zoned as LI. Connections to Swanson Road are outside of the plan change area. However, an ITA is required to provide certainty that the type of residential development proposed on the site

<sup>5</sup> Integrated Transportation Assessment Report – 522-524 Swanson Road, Ranui. Proposed Plan Change. Commute Transportation Consultants. 15 November 2019.

through the rezoning from light industry to residential is integrated within the surrounding transport network and alternative modes of travel have been considered. An ITA should also consider efficiency, safety and accessibility to and from the development; and that any potential adverse transport effects could be effectively avoided, remedied or mitigated.

- 122. No detailed development plans have been prepared at this stage with the ITA being based on 'a conservative estimate' of maximum development of up to 200 dwellings. No approval for the ITA as lodged has been given. An updated ITA will be required for future development on the site and assessed for adequacy as part of a subdivision and resource consent process..
- 123. Swanson Road is an arterial road and any vehicle access would require a restricted discretionary resource consent under the provisions of the AUP (E27.6.4.1). This will enable a more detailed assessment of the traffic effects of any activities seeking access onto Swanson Road. The internal road will also be finalised and assessed as part of later resource consent stages.
- 124. The RPS on Urban Growth and Form B2.2 encourages development in this location through policy B2.2.2.(5), as the site is near Ranui Town Centre, public transport, social facilities and employment opportunities. The RPS on Residential Growth (B2.4) also supports PPC38, through Objective B2.4.1(3), for the same reasons as B2.2.2.(5). The Ranui Train Station and the Swanson Road bus connection will provide public transport connections to the site.
- 125. The indicative type of residential development proposed by the applicant will trigger the need for resource consents under Chapter H5: Residential Mixed Housing Urban, Chapter H6: Terrace Housing and Apartment Buildings Zone, E27:Transport and E38: Subdivision Urban.
- 126. Further policy support is provided within *Chapter E27 Transport. Policy E27.3(1)* requires subdivision, use and development which generates trips resulting in potentially more than minor adverse effects on the safe, efficient and effective operation of the transport network to:

manage adverse effects on and integrate with the transport network by measures such as travel planning, providing alternatives to private vehicle trips, staging development or undertaking improvements to the local transport network.

127. In regard to residential zones, the matters for discretion as a restricted discretionary activity, particularly for THAB, include 'the effects on the neighbourhood character, residential amenity and the surrounding residential area from all of the following...(ii) traffic'.<sup>6</sup> In regard to the assessment criteria H6.8.2(2)(I) states:

(*I*) the extent to which the activity avoids or mitigates adverse effects on the safe and efficient operation of the immediate transport network.

- 128. I consider the AUP(OP) provisions to be the most appropriate mechanism to manage any transport effects associated with development in the MHU and THAB zones. Therefore, I am satisfied that the proposed PPC38 amendments are the most appropriate way of achieving the objectives of the AUP(OP) and RMA.
- 129. No submissions from any submitter were received on this matter. While AT has not lodged a submission they have had the opportunity to review this section of the report. AT advised, by email dated 6 August 2020, that they have no further comments to add.
- 130. I also note that there is building line restriction listed on the Certificate of Title (Appendix 10 of the applicant's report). This date backs to 1953 when it looks like Swanson Road was formerly known as the Swanson-Kumeu Main Highway. My understanding is that this restriction is still

<sup>&</sup>lt;sup>6</sup> H6.8.1 (a)(ii) Matters of discretion. Chapter H: Terrace and Apartment Building Zone.

enforceable while it shows on the Certificate of Title but that the registered owner of the property can apply to have the building line restriction removed.<sup>7</sup>

## 8.3 Effects on Infrastructure

#### Applicant's assessment – Wastewater and Water Supply

131. The infrastructure effects arising from the proposed THAB and MHU rezoning of the site are addressed in paragraphs 7.26 to 7.31 and Appendix 2, in regard to wastewater and water supply, of the applicant's report.

#### Wastewater

132. In regard to wastewater, the applicant's report states:

The initial assessment undertaken on the site and initial communications with Watercare confirms that there is insufficient in some of the downstream environments for a redevelopment of the proposed site. Following consultation with Watercare, a number of connection points have been found, which are explored in detail in the Preliminary Infrastructure Assessment in Appendix 2. Ultimately, the assessment concludes that there are options for future connections to the network to service potential developments on the site.

#### Water Supply

133. In regard to water supply, the applicant's report states:

An assessment of the estimated water demand for a residential use of the application site has been considered by Fraser Thomas in the report in Appendix 2. The assessment and further correspondence with Watercare confirms that there is no capacity constraints in the current water network and that any future residential development on the site could be adequately serviced. Comments have been made by Watercare as to the material of any proposed pipes through the site given that the extent of contamination of the soil is unknown. These matters would be addressed during resource consent and detailed design stages.

## Comments:

134. Watercare staff have reviewed the private plan change request. An updated design was prepared based on Watercare's feedback after the applicant met with several Watercare representatives. Watercare confirmed that the specific design criteria can be discussed at resource consenting and engineering approval stage and had no concerns about the proposed private plan change process.

## Applicant's assessment – Stormwater

#### <u>Stormwater</u>

135. In regard to stormwater, the applicant's report states:

<sup>&</sup>lt;u>Thttps://at.govt.nz/about-us/working-on-the-road/road-processes-for-property-owners/removal-of-building-line-restrictions/</u>

As the site is located within a Stormwater Management Area Control (Flow 2) noted under the AUP(OP), future development of the site will be required to undertake retention and detention of stormwater runoff. The size of the application is considered sufficient to allow for the management of stormwater runoff to take place. In addition, the proposed zoning of the site places limitations on the area of impervious surfaces on the site for future development, which the current zoning does not control. These matters will be adequately dealt with during future resource consenting on the site due to the existing Auckland-wide provisions of the AUP(OP).

## **Overland Flow path**

136. In regard to the overland flow path, the applicant's report states:

The Auckland Council GIS Viewer depicts an overland flow path flowing through the site from the southern boundary through to the Ranui Domain. This is reflected on site by the existing waterway that divides the site. A floodplain is also identified running in parallel to the overland flow path. Because of the concentrated nature of the overland flow path and the floodplain as well as the Auckland-wide provisions of the AUP(OP), future development will need to give consideration to the effects of these features on site. With the proposed zoning change to residential on the site, future housing development, containing more vulnerable activities, are subject to additional assessment criteria than development under the current light industry zoning. Therefore, the potential adverse environmental effects of development in, on or close to overland flow paths will be more comprehensively managed under the proposed zoning change for the site.

#### Peer review

- 137. Stormwater management, streams and flooding effects have been reviewed for council by Dr Iresh Jayawardena, Senior Healthy Waters Specialist. Dr Jayawardena's review is attached in Attachment C to this report.
- 138. In regard to stormwater management, the review accepts the site will be subject to the existing provisions of the AUP(OP). Dr Jayawardena considers that the effective mitigation of stormwater from the development, and how this will be achieved, can be assessed at the detailed site design and development stage.
- 139. In regard to stream restoration and protection, Dr Jayawardena notes that a permanent river traverses across the site. He considers that the draft AEE did not adequately assess actual and potential effects on the stream and how the proposed development meets the relevant policy directives with regards to stream restoration and enhancements opportunities as provided under the AUP(OP).
- 140. In regard to flooding, Dr Jayawardena notes that the proposal is for medium to high-density residential re-development within an existing flood plain present on the site. He considers that the applicant should provide a riparian buffer to accommodate development within the plan change. Matters to take into account include the predicted meander alignment of the stream, parallel stormwater management and treatment opportunities, stream habitat diversity and geotechnical stability of adjacent land.
- 141. Residential activities are considered to be more vulnerable under the provisions of the AUP(OP) than the existing LI zone. Dr Jayawardena considers that the application needs to demonstrate that residents can gain safe access and egress during a flood to manage risk, and that finished floor levels will be above the flood plain. If a flood risk assessment has been prepared, this will be required to be reviewed by Healthy Waters. An updated flood risk assessment would also be assessed at the time of development.

- 142. A resource consent for future development will be subject to the Auckland Council's Stormwater Network Discharge Consent (NDC). The site size is 2.5Ha and falls under brownfield large category under the NDC. A stormwater management plan detailing the stormwater approach will need to be submitted to have the discharge authorised by the NDC for Healthy Waters review and approval. A standalone discharge consent will need to meet the information requirements of Chapter E8: Stormwater – Discharge and Diversion of the AUP.
- 143. In conclusion, the review states:

With regard to the stormwater management effects and the provisions of the Auckland Unitary Plan (Operative in Part) (AUP:OP), no significant information gaps have been identified. Provided that the zone change proposed is to accommodate medium to high-density residential facilities, the effects on stormwater is considered less significant compared to the exi[s]ting Light Industry Zoning.

#### <u>Comments</u>

- 144. I rely on the expertise of Dr Jayawardena. While I acknowledge Dr Jayawardena's comments on stream protection and flooding, it is my opinion that these are best addressed through the resource consent process when there is a development proposal. The benefit of addressing these issues at the resource consent level is that specific methods and devices can be identified as appropriate to the scale of development.
- 145. I consider that the operative provisions in the AUP(OP)<sup>8</sup> will be sufficient to avoid, remedy or mitigate potential effects related to stormwater discharge and diversion associated with any development in the PPC38 site. Therefore, I am satisfied that the operative provisions of the AUP(OP), as unaltered by PPC38, are the most appropriate way of achieving the objectives of the AUP(OP) and RMA.
- 146. Healthy Waters have had the opportunity to review this section of the report. Dr Jayawardena, in an email dated 20 August 2020, advised that there were no additional comments to add, except to reiterate the following:

Healthy Waters holds a Regionwide Stormwater Network Discharge Consent (NDC) for the diversion and discharge of stormwater from the public network. The site size is 2.5ha and falls under the Brownfield Large category under NDC. Therefore, a Stormwater Management Plan is required to be submitted to support any future Resource Consent/Subdivision application for development or redevelopment of the site. The SMP should demonstrate how it meets Schedule 4 and Schedule 2 of the NDC and a determination on whether it is the Best Practicable Option for the site and the catchment for managing stormwater effects from any future development. Healthy Waters recommend addressing any information/issues that has been requested at the plan change stage to include at later development and design processes. Then it can be assessed at the Resource Consent stages in detail.

## 8.4 Economic Effects

Applicant's assessment

<sup>&</sup>lt;sup>8</sup> Chapter B – Regional Policy Statement: B7 Natural Resources; Chapter E Auckland-wide: Natural Resources – E1 Water Quality and integrated management, E3 Lakes, rivers, streams and wetlands, Chapter E8 Stormwater – Discharge and diversion, and E10 Stormwater management area – Flow 1 and Flow 2.

147. The applicant's report, in paragraphs 7.32 to 7.37 and Appendix 5, addresses the economic effects associated with PPC38. The applicant's report states:

Overall, the conclusion provided by the Economic Cost Benefit Analysis Report in Appendix 5 is that the 'loss' of industrially zoned land on the application site will be inconsequential as the site contributes a very small portion of the industrially zoned land in the surrounding area and as it has never been used for industrial purposes, it has never added value to the industrial land supply in Ranui. Furthermore, the use of the application site for its zoned purpose, being industrial activities, would lead to a commercial loss due to the lack of industrial land in Ranui. The development of intensive residential housing on the site would contribute to the lack of affordable housing in Auckland and provide a significant economic benefit.

#### Peer review

- 148. Mr Derek Foy, consultant economic specialist (Associate Director, Market Economics Limited) for Auckland Council, reviewed the relevant application material including Appendix 5 of the applicants report.<sup>9</sup>
- 149. Mr Foy did not agree with some of the justification in reaching the assessment in regard to residential activity being the most obvious and appropriate zoning to Business Light Industry. However, he did agree with the assessment itself. Mr Foy's report states:

Ultimately, I agree with that assessment, although disagree with some of the justification UE use to reach that conclusion. My primary disagreement is that the UE report states that redeveloping the Site for industrial use would result in significant commercial loss to the landowner, compared to use for existing residential activities. The cost to the landowner is not a relevant consideration in RMA terms, and should not be factored in when deciding the most appropriate use of the Site.

- 150. Mr Foy has considered if the merits of the proposal hinge on whether social housing is provided on the site as discussed in the applicant's report. However, in his opinion, Mr Foy considers that it does not, and any residential dwellings on the site would represent an appropriate and efficient use of the site.
- 151. Mr Foy agrees with the applicant's report in that the very small loss of the LI zoned land would have no material impact on the supply of industrial land. He also agrees with the applicant's report in its justification for the need for THAB zone on the site. Mr Foy considers that the mix of residential zones proposed is the most appropriate zoning for the site, and preferable to lower density residential zoning.
- 152. Mr Foy agrees with the costs and benefits assessment of the applicant's specialist report, and the conclusion indicating that PPC38 is appropriate from an economic perspective. However, he notes that there is no certainty that government temporary housing would result from PPC38. Or that smaller, affordable dwellings would be provided. He does agree that the dwellings would likely be priced towards the lower end of the market, providing an economic (and social) benefit.
- 153. Mr Foy's report concludes:

<sup>&</sup>lt;sup>9</sup> Economic Cost-Benefit Analysis: Proposed Plan Change of 522-524 Swanson Road, Ranui (Draft), 12 February 2019, Urban Economics Limited.

In my opinion there is one key economic issue arising from the PPC38 application, and the very small loss of industrial land is unlikely to result in anything more than minor adverse effects, and a number of positive effects would be expected as a result of PPC38.

In my opinion, from an economic perspective the residential zoning proposed in PPC38 is the most appropriate zoning for the Site, and I support PPC38 on economics grounds.

## <u>Comments</u>

154. I rely on the expertise of Mr Foy, in that from an economic perspective, the residential zones are the most appropriate zoning for the site. The loss of industrial land is unlikely to result in any more than minor adverse effects. The site has been used as a campground since the 1950s, and temporary accommodation, for the last 30 years at the least. The landowners have no intention to develop the land for its current zoned purpose. Their intention is undertake residential development on the site under the proposed residential zones.

#### 8.5 Natural Resources

- 155. In regard to effects on natural resources, the applicant's report addresses trees and the stream at paragraphs 7.39 and 7.40 (and Appendix 9 Stream Model Assessment) respectively.
- 156. The applicant considers that there will no loss of significant vegetation or ecological areas as a result of the proposed plan change. There no notable trees or significant ecological areas identified on the application site.
- 157. In regard to the stream, the applicant's report states:

There is an existing unnamed natural watercourse located through the site that passes through a pond within the Ranui Domain and traverses the application site. The unnamed watercourse is a tributary to the Swanson Stream and is further detailed in the Stream Model Assessment in Appendix 9. The assessment also concludes that there is unlikely to be an esplanade reserve requirement due to the average width of the watercourse being less than 3m during full yearly flows and that residential development in the future will be at very little risk of flooding that can be accommodated with raised ground levels on the application site.

#### Comments:

- 158. There are no notable trees or significant ecological areas identified in the AUP(OP) GIS viewer/planning maps on the site.
- 159. The objectives, policies and standards for both Residential MHU and THAB require that development which:
  - creates an urban landscape streetscape character in line with the zone
    - i. MHU minimum landscaped area must be at least 35 per cent of the net site area; 50 per cent of the area of the front yard must comprise landscaped area
    - ii. THAB minimum landscaped area must be at least 30 per cent of the net site area.
  - maintains a reasonable standard of residential amenity for adjoining sites

- are adequately set back from streams to maintain water quality and provide protection from natural hazard; 10 metre setback from the edge of all other permanent and intermittent streams.
- 160. As discussed in paragraph 135 above, a permanent stream traverses the site. While the applicant considers that esplanade reserve may not be required, a 10 metre setback is required under the MHU and THAB yard provisions. As noted by Dr Jayawardena, development on the site will need to assess the actual and potential effects on the stream. This assessment will need to assess how the proposed development meets the relevant policy directives with regards to stream restoration and enhancements opportunities as provided under the AUP(OP).<sup>10</sup>
- 161. I consider that any potential adverse effects can be adequately assessed under the relevant objectives, policies and standards of AUP(OP) as part of future subdivision and resource consent processes.

#### 8.6 Contaminated land effects

162. The applicant's report, in paragraph 7.41 and Appendix 8, addresses contaminated land effects. The applicant's report states:

A Detailed Site Investigation (DSI) was undertaken on the site in September 2018 by Fraser Thomas Consultants (see Appendix 8). The DSI confirmed that the site had been subject to HAIL activities in the past and two samples detected DDT and Arsenic. However, all of the samples taken from the site complied with the applicable NES Soil high-density residential land use standards and the AUP(OP) permitted activity discharge criteria. While further sampling is likely to be undertaken prior to the redevelopment of the site, the DSI undertaken at the site confirms that the proposal to re-zone the land for residential purposes is unlikely to give rise to any concerns in terms of effect on human health.

#### Peer review

- 163. Mr James Corbett, Principal Contaminated Land Specialist, Auckland Council, reviewed the relevant sections of the applicant's report and applicant's specialists report.<sup>11</sup>
- 164. Mr Corbett's memo (refer to **Attachment C**) notes that a full Detailed Site Investigation (DSI) was not available to review. A review was therefore unable to determine if the DSI meets investigation and reporting standards required under the NESCS or the AUP(OP).
- 165. Mr Corbett's review has raised several queries around the sampling strategy and the sufficiency of sampling to demonstrate compliance with the relevant soil contaminant standards and criteria. He considers that it is not possible to determine that the site is suitable for the proposed land use based on the information at hand.
- 166. Mr Corbett's memo concludes:
  - <sup>10</sup> B7 Toitū te whenua, toitū te taiao Natural Resources

<sup>11</sup> Fraser Thomas Memorandum: 524,528, 530 and 532 Swanson Road, Ranui – Detailed Site Investigation. Reference 32662. 13 September 2018.

The NESCS allows for discretionary consent where the activity on a piece of land identified as HAIL and the information provided does not meet the requirements for permitted, controlled or restricted discretionary activity, and in particular the absence of a complete Detailed Site Investigation. Matters of discretion include the adequacy of the DSI, the suitability of land for the proposed activity given the amount and kind of soil contamination, the approach to remediation or ongoing management and the adequacy of the site management plan or site validation report.

In relation to Unitary Plan E30 the Detailed Site Investigation is incomplete and does not meet the criteria for a controlled activity, and requirements for a site management plan (contaminated land), a remedial action plan (contaminated land), relevant to the site and the proposed disturbance or remediation to be prepared and submitted to Council for consideration among other criteria.

- 167. Mr Corbett recommends that the applicant:
  - undertakes the additional investigations raised in the DSI Summary recommendation
  - considers information gaps and issues including the requirements of the NESCS and AUP Chapter E30 in regard to land contamination
  - updates the detailed site investigation report and submit the full report for assessment.

#### <u>Comments</u>

- 168. I rely on the expertise of Mr Corbett that additional information is required to be able to fully assess the potential effects of contaminated land on the site. There is no detailed development plans for the site. For this reason, I consider that the subdivision and/or resource consent stage is the most appropriate time for any additional information to be provided, including mitigation methods to address any potential adverse effects of contaminated land.
- 169. In addition to the provisions of Chapter E30, the following provisions of the AUP(OP) are also relevant in the identification, assessment, management, remediation and accidental discovery of contaminated land:
  - B10.4 Land Land contaminated (Regional Policy Statement, Chapter B10 Nga tupono ki to taiao – Environmental risk)
  - E11.6.1(2)(e) and E12.6.1(2)(e) Accidental discovery rule relating to evidence of contaminated land
- 170. I consider that the standards within the AUP(OP) and the relevant National Environmental Standard provisions are appropriate to deal with any potential contamination and its remediation, at the time of development.

#### 8.7 Geotechnical

171. The applicant's report, in paragraph 7.42, of the applicant's report addresses geotechnical effects. The applicant's report states:

The site is relatively flat, with little change in the topography over the site area. The DSI undertaken for the site (Appendix 8) has considered the possibility of fill activities having been undertaken on the rear of the site in the past. Prior to any intensive land development on the site, a detailed geotechnical investigation will be undertaken to confirm the stability of the site

and whether any removal or fill will be required. The proposed plan will not alter the need for an investigation to be undertaken and as such, there are considered to be no reasons from a geotechnical perspective to prevent the proposed plan change.

#### <u>Peer review</u>

- 172. Mr Charlie Brightman, Principal Geotechnical Specialist, Auckland Council, reviewed the relevant section of the applicant's report and the applicant's specialists report.<sup>12</sup>
- 173. Mr Brightman's memo (refer to **Attachment C**) notes that no detail has been submitted on the anticipated extent of earthworks. However, Mr Brightman expects that earthworks will be minor based on the predominantly level ground on the site.
- 174. The memo also notes that no specific ground investigation has been undertaken for the applicant's report. However, the Fraser Thomas site investigation summary refers to shallow intrusive investigation commissioned to sample site soils for contamination. The Fraser Thomas memo identified areas of fill located on the eastern side of the stream crossing the south eastern part of the site, but does not contain detail of the overall site ground conditions to be able to review the potential geotechnical risks.
- 175. Mr Brightman's memo considers, in the absence of detailed site-specific ground investigation, the typical anticipated geotechnical constraints based on the available site information, are:
  - unsuitable materials on site areas of possible non-engineered fill are present on the south-eastern part of the site to the east of the stream. These materials are of unknown strength and composition, which may require excavation and removal off site if unsuitable for proposed infrastructure/building foundations or reuse in site earthworks
  - groundwater drawdown in the case of deep excavations near the watercourse e.g. apartment building excavations) groundwater is likely to be encountered and associated dewatering will result in groundwater drawdown and possible settlement effects on surrounding land
  - slope stability while most of the site is relatively flat, slope instability may occur in areas of land over steepened by streams and creeks or steep cut or fill gradients
  - watercourse erosion there is a risk that watercourse bank erosion may occur due to high water flows during flooding leading to slope instability. Erosion measures may be required.
  - building foundations multi-storey building such as apartment buildings proposed for the south-eastern part of the site are likely to require deep foundations (piles) to found within competent ground conditions below that fill understood to be present on that area of the site
  - soil expansivity shrink/swell ground movements are expected in the Puketoka Formation Alluvium soils. Assessment of ground shrinkage/swelling potential based on an interpretation of site-specific laboratory results will required for a resource consent application

<sup>12</sup> Fraser Thomas Memorandum: 524,528, 530 and 532 Swanson Road, Ranui – Detailed Site Investigation. Reference 32662. 13 September 2018.

- stability of excavations near the railway corridor deep excavations (e.g. apartment building basement excavations) will need side support. A comprehensive assessment will be required for resource consent application including, but not limited to, wall deflection, associated settlement, effects on the existing neighbouring land and infrastructure (e.g. railway) and remedial solutions (if needed) to be submitted for review at time of a future resource consent.
- 176. Mr Brightman's memo concludes:

At the plan change stage, it is appropriate to comment on the suitability of the land for rezoning. We consider that the site is suitable to support the proposed private land change, provided that detailed assessments, specific engineering designs of earthworks, associated remedial measures, structures, infrastructure and appropriate construction methodologies are submitted. 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.

#### <u>Comments</u>

177. I rely on the expertise of Mr Brightman, in regard to the geotechnical effects, that the site is suitable to be rezoned through PPC38. I agree that the resource consent stage is the most appropriate time to address any potential geotechnical issues associated with development of the site.

#### 8.8 Heritage

178. The applicant's report, in paragraph 7.43, addresses effects on heritage. The applicant's report states:

A review of the surrounding area has confirmed that there are no heritage areas (including the Waitakere Ranges Heritage Area), scheduled buildings, Heritage New Zealand listed buildings, known archaeological sites, sites of significance to Mana Whenua or notable trees in close proximity to the application site. Therefore, the proposed plan change will not have any effect relating to heritage values. Any future development applications would likely include normal Accidental Discovery Protocols which will manage the discovery of any items of heritage value at that time.

#### Comments:

- 179. I agree with the applicant's report in that there are no sites and places of significance to Mana Whenua, scheduled historic heritage or archaeological sites identified in the AUP. However, there is still the possibility of accidental discovery of historic heritage, and kōiwi, archaeology or artefacts of Māori origin.
- 180. Chapters E11: Land Disturbance Regional and E12: Land disturbance District of the AUP(OP) relates to the management of the adverse effects of land disturbance, such as the amount of sediment generated through erosion and discharged into water bodies during earthworks. The management of land disturbance during earthworks extends to the impact on historic heritage, special character and Mana Whenua cultural heritage.
- 181. Policies 11.2(a) and 12.3(2)(b) require the avoidance, remediation or mitigation of adverse effects on accidently discovered sensitive material. Policies 11.3(3) and 12.3(4) require the

management of earthworks on Mana Whenua cultural heritage that is discovered during land disturbance.

182. I am satisfied that the provisions of *E11: Land Disturbance – Regional* and *E12: Land Disturbance – District*, and relevant standards of the AUP(OP) are appropriate to deal with accidental discovery as part of a resource consent process for development of the site.

#### 8.9 Mana Whenua values

#### Applicant's assessment

183. The applicant's report, in paragraph 7.38, addresses mana whenua values. The report states:

There are no known archaeological sites or sites of significance to Mana Whenua located on the site. However, due to the scale of the plan change proposed and as the site is located within a Statutory Acknowledgement Area, consultation with iwi, particularly Te Kawerau a Maki, has been undertaken (refer to section 10 below). As the site is currently being used for housing and providing a need to members of the community that are overlooked by other social housing providers, the plan change is not considered to result in any adverse effects on Mana Whenua values of the land or surrounding area. The support received from Te Kawerau a Maki is attached to this application in Appendix 7.

#### <u>Comments</u>

- 184. I agree with the applicant that there are no mapped archaeological sites or sites of significance to Mana Whenua shown in the AUP GIS maps.
- 185. However, as discussed above in 8.8, there is still the possibility of accidental discovery of historic heritage, and kōiwi, archaeology or artefacts of Māori origin. There may also be other values associated with the site that can't be mapped.
- 186. The applicant has engaged with iwi groups with an interest in the area providing an opportunity for feedback before the request was formally lodged with council. This included Te Kawerau ā Maki, Te Ākitai Waiohua, Ngāti Whātua o Ōrākei, Ngāti Whātua o Kaipara and Te Rūnanga o Ngāti Whātua. No responses were received from Te Ākitai Waiohua or Ngāti Whātua o Ōrākei.
- 187. Ngāti Whātua o Kaipara deferred their input to Te Kawerau ā Maki. Te Rūnanga o Ngāti Whātua deferred their input to Ngāti Whātua o Kaipara. Te Kawerau ā Maki provided a letter which supported only the private plan change at this stage and indicated an interest in having further involvement during any subsequent resource consent process.
- 188. All eleven iwi authorities with an interest in the Auckland region were sent letters when the plan change was publicly notified. No submissions from iwi authorities were received.

#### 8.10 Social effects

189. The applicant's report does not specifically address the social effects under a separate heading. However, a description of the social housing function that is provided for on the site is discussed in paragraph 2.2 of the Introduction:

The site is currently used for temporary and permanent accommodation and is known as the Western Park Village. It began being used as a traditional holiday park/campground in the 1950s, providing short term accommodation for a tariff. Slowly, over the course of the last 50

years, the site has developed on an 'ad hoc' basis and currently provides short term residential accommodation for those members of the community who cannot find housing elsewhere. Due to the improvised nature at which the site has grown and developed, the current owners wish to formalise the use of the site for residential housing and provide more permanent options for the occupants.

- 190. The applicant has had preliminary conversations with Kiwibuild and other Auckland community housing providers as to the feasibility of incorporating social housing into the site and meeting the needs of the community. It is my understanding that the applicant intends to have further discussions with community housing providers in regard to social housing being provided on the site.
- 191. The applicant is cognisant of the social housing function they currently provide on the site. The applicant has advised that the transition of Western Park Village's residents to other housing, both during and after development of the site, is important to them.

#### 8.11 Open Space

- 192. The applicant's report has not specifically addressed the effects on Ranui Domain under a single heading. However, the applicant's report does include discussion on Ranui Domain in relation to the following:
  - site and locality description
  - reverse sensitivity and the suitability of residential as an adjacent activity
  - urban design and amenity
  - access
  - statutory assessments of National Policy Statements and provisions of the AUP(OP).
- 193. The applicant's report, in paragraph 7.11, considers that the rezoning from LI to MHU and THAB will result in:
  - a reduction in the general building bulk and building coverage on the site
  - less shadowing and loss of daylight on Ranui Domain
  - the visual quality of the interface between the site and Ranui Domain will be to a higher standard than possible under the LI zone.
- 194. Paragraph 7.24, in relation to pedestrian and cycle access, considers that future development of the application site is likely to provide connections to the existing path through Ranui Domain. The existing path leads to the Waitemata Seagulls League Club and the car park in the south-eastern corner of Ranui Domain.
- 195. The applicant's met with representatives from Auckland Council Parks department on 26 June 2019. The applicant's report states:

In principle, there was no resistance or significant concern regarding the proposed plan change. Discussions were had about the likely location of building bulk and massing on the site, however, these details are better suited to resource consent applications for future development on the site. Given the site's location adjacent to the Ranui Domain, residential activity appeared to be preferred by the Park department over industrial activity.

#### Peer review

- 196. Auckland Council Park's staff reviewed the private plan change prior to its acceptance. At that time, there were no significant concerns. Discussions were had with the applicant about the likely location of building bulk and massing on the site to avoid loss of sunlight on Ranui Domain. However, it was agreed that these details, including connections to Ranui Domain, or alternatively provision of a reserve within the site, are better suited to resource consent applications for future development on the site.
- 197. No submissions from any submitter were received on this matter. Auckland Council representatives from Parks, Sports and Recreation ('**Parks**') have had the opportunity to review this section of the report. While there is general support for the rezoning of the site from LI to MHU and THAB, the review raised several issues. The main issues raised through this review include:
  - pedestrian connection to Ranui Domain
  - road layout
  - interface between future residential development and Ranui Domain
  - reverse sensitivity

#### Pedestrian connection to Ranui Domain

198. Ranui Domain has an existing pathway along the southern and south-western edges connecting Robertson Road and Carlas Way to Swanson Road through the park as well as more direct route through the centre of the park. A connection to this path network via linkages from the subject site is recommended. The number of connections would depend on the road layout.

#### Road layout

199. Ranui Domain currently has very little in the way of road frontage. This affects the perceived and physical safety of the park. The layout of roading to provide a road along the park's edge could assist in providing passive surveillance as well as reducing reverse sensitivity effects from Ranui Domain on future residential development.

#### Interface between future residential development and Ranui Domain

200. Ranui Domain has very little passive surveillance as the majority of the surrounding houses have high close-boarded fences and very little positive interface with the reserve. Future residential development with living spaces which provide an outlook to the park, whether separated by a road or not, would be encouraged.

#### Reverse sensitivity

- 201. Ranui Domain has existing sports fields and floodlights and is heavily utilised by organised sports such as rugby. It is likely that the demand on these fields will increase and they will be upgraded to withstand higher use including better lighting which will increase the hours the park is utilised. It is not uncommon for residents adjacent to high use parks to lodge complaints with Auckland Council on reverse sensitivity effects e.g. lighting and noise, of the activity occurring on these parks.
- 202. Parks do have a concern over the standard provisions of the AUP(OP) should the private plan change be approved. In particular, a subdivision application, should the zoning change to residential, would be a 'restricted discretionary' activity. There is the potential that there would be no formal consultation process required as the matters of discretion for MHU and THAB do

not provide any scope to consider reverse sensitivity of the noise and lighting from the existing sports and recreation park adjoining the subject site.

#### <u>Comments</u>

- 203. I agree with Parks that the subdivision provisions in E38: Subdivision Urban in the AUP(OP) limits the council in what it can consider in the matters of discretion. Reverse sensitivity is addressed in Objective E38.2(5) in regard to 'Infrastructure' in relation to network utilities and electricity generation activities. 'Infrastructure' does not include 'Parks Infrastructure' which has its own definition in the AUP(OP): General infrastructure located in Open Space zones to support management of, and access to open space'. 'Parks Infrastructure' is not mentioned in relation to the subdivision provisions although there are provisions for subdivision occurring in open space zones.
- 204. In regard to the AUP(OP) provisions for THAB particularly, development of dwellings or an integrated residential development are restricted discretionary activities. The MHU and THAB zone matters of discretion for restricted discretionary activities are limited to the management of effects of the residential site on adjoining sites e.g. height and bulk of buildings to maintain access to daylight and sunlight, visual amenity, and to achieve attractive and safe streets and public open spaces. If the development meets all the standards, then the resource consent application can be considered without public or limited notification.
- 205. An application for a resource consent for a restricted discretionary, discretionary or noncomplying activity is subject to the normal test for notification under the relevant sections of the RMA, unless otherwise specified by a rule applying to the particular activity.<sup>13</sup> Multiple sections of the AUP(OP) will be relevant to the site and its future development and notification will be determined on the overall activity status of a proposal.
- 206. Resource consents can include conditions, in regard to noise, that relate to acoustic design, use of insulation materials, and ventilation systems that enable habitable rooms to be occupied without the need to open windows or external doors. These are normally applied where new habitable rooms are situated close to significant sources of noise e.g. rail lines, motorways.
- 207. This may be of more relevance to the southern boundary adjacent to the rail corridor (refer to Sections 8.12 and 10.2). Nevertheless, in my view, any future development on the site will need to consider the balance between the connectivity and passive surveillance outcomes sought by Parks with the reverse sensitivity issues arising from the activity within Ranui Domain.
- 208. No detailed development plan has been lodged, with just a concept plan used to provide an indicative number of dwellings on the site. Consultation with Auckland Council Parks, as landowner, and AT, as road controlling authority, would be required for connections from the site to Ranui Domain and the wider active and public transport network. Ideally, the location of buildings and the boundary treatment e.g. type of landscaping, mitigation for reverse sensitivity effects, adjacent to Ranui Domain, should also be considered as part of any discussions.
- 209. The Auckland Design Manual (ADM) does provide some guidance for different types of developments, including terraced housing developments.<sup>14</sup> Section 2.4 Site Design (Terraced Housing Design) of the ADM states:

<sup>&</sup>lt;sup>13</sup> Chapter C: General rules, C1.13(2) Notification

<sup>&</sup>lt;sup>14</sup><u>http://www.aucklanddesignmanual.co.nz/sites-and-buildings/terraces#/sites-and-buildings/terraces/guidance/introduction</u>

It is important to understand the context of a site, because one of the key drivers for the site design of terraced housing developments should be the surrounding built environment. This includes the movement network, urban structure, the form of buildings and spaces, and the expectations of the community.

A comprehensive analysis will ensure that no opportunities are missed.

- 210. The ADM encourages design of terraced housing developments that:
  - creates a safe and secure environment with ample opportunities for natural surveillance of the street and adjacent open spaces. This includes:
    - i. the orientation of living areas and family-friendly units to overlook public or communal open spaces
    - ii. boundary treatment which:

•

- contributes to a positive, attractive and safe public realm
- offers a defined edge between public, communal and private open space
- supports and improves route, street and open space connections.
- 211. As discussed above in Section 8.1 in regard to urban design effects, rezoning the site from LI to THAB and MHU zones would likely result in achieving higher quality visual and safety outcomes as seen from and relative to Ranui Domain.
- 212. An assessment against the objectives, policies and standards of the AUP(OP) will be required during any future subdivision and/or resource consent process. As stated above in paragraph 208, the type of notification will be determined on the overall activity status of the proposal.

#### 8.12 Reverse sensitivity effects

213. The applicant's report, in paragraph 7.4, and Appendix 10, addresses reverse sensitivity effects of rezoning the applicant's site from LI to MHU and THAB. The report states:

Under the provisions of the AUP(OP), consideration is given to situations where different zones interface with one another, with the less sensitive zoning often required to comply with more development controls. In this case, the light industrially zone to the west of the application site will be subject to a reduced noise limit and development setbacks from the boundary as a result of the proposed zone change of the site from industrial to residential. However, these industrially zoned properties to the west of the application site already have adjoining interfaces with residentially zoned land and thus, are already restricted in the nature of their emissions and development. Nonetheless, an Acoustic Assessment has been undertaken for the proposed plan change and is attached to this application in Appendix 10 [4].

The assessment concludes that the provision of an acoustically treated fence along the boundary of the application site and its industrial neighbour will contribute to an acoustically appropriate environment for future residents while avoiding a significant adverse effect on the industrial activities on the neighbouring property. The design of such fence will be undertaken during resource consenting stage of any future development on the site. In addition, it is noted that through the formal plan change and hearing process, the potential to use legal mechanisms (such as an encumbrance) on the subject land which requires the incorporation of noise mitigation measures within future noise sensitive activities can be explored.

#### Peer review

Noise

- 214. Mr Rhys Hegley, specialist noise consultant for Auckland Council, reviewed the draft applicant's report and acoustic assessment prior to notification of PPC38. Mr Hegley raised the following issues:
  - the applicant has not considered the effects that PPC38 may have on the rail operator adjacent to the southern boundary. The objectives and policies of E25 Noise and Vibration offer protection to infrastructure, which produce high levels of noise, from reverse sensitivity effects
  - 2. Policy E25.3(6) seeks to protect the Business-Light Industry site to the west of the proposal from the activities sensitive to noise of any proposal. The SLR report states that it is expected that mitigation measures can be implemented by the applicant which achieves compliance with the new noise standards (following rezoning without the requirement for either of the neighbouring sites to modify their current operation. Is there currently any form of boundary fence between the sites that acts to provide noise mitigation?
  - 3. the onus of providing a suitable internal noise level within the proposed residential units has been placed upon the existing light industrial neighbour (through the proposed rezoning) as opposed to the developer through the adoption of an internal noise limit within the proposed dwellings through E25.6.10
  - 4. the assessment appears limited to the current activity on the neighbouring Light Industry site. Define the limitations on the generation of noise that the proposal would place upon the western Light Industrial zone as a result of the proposal (with the proposed mitigation)
  - 5. the appropriateness, within a residential zone, of the proposed mitigation measure of a 3-4 metre high boundary fence on the common boundary between the applicant's site and the western light industrial site given the 4 metre boundary setback for residences suggested within the Acoustic Assessment by SLR
  - 6. Policy E25.3.11 recognises that activities occurring in the Open Space Sport and Active Recreation zone (to the eastern boundary of the applicant's site) may generate high levels of noise and requires that adverse effects are avoided, remedied or mitigated having regard to the sensitivity of the receiving environment. Within the AUP, Ranui Domain has no noise rules to comply with at the site of the proposal. Rezoning the site results in the imposition of E25.6.17 on the activities of the open space zone.
- 215. A detailed response, dated 3 August 2020, from Mt Hobson Group ('**MHG**'), has been received. Mr Hegley has provided a further response, dated 6 August 2020, to the additional information provided by the applicant. The applicant's response to the issues above followed by a further response from Mr Hegley is provided below in paragraphs 218 to 226.

#### <u>Issue 1</u>

216. In regard to Mr Hegley's first point above, the memo states:

*In considering potential reverse sensitivity effects it is important to establish what by the term. Reverse sensitivity has been described by the Environment Court as*"

...the legal vulnerability of an established activity to complaint from a new land use. It arises when an established land use is causing environmental impact on nearby land, and the new, benign activity is proposed for the land. The sensitivity is this: if the new use is permitted the established use may be required to restrict its operation or mitigate its effects so as not to adversely affect the new activity.

In the context of the proposed plan change, there are considered to be no reverse sensitivity impacts on the rail operator, as the land alongside the NAL throughout Auckland is extensively developed with existing residential properties; including the land directly south of the site, on Pooks Road, and on the same side of the NAL, on Carlas Way.

On this basis, the proposed plan change would not materially change the existing land use within the locality of the site or land adjacent to the NAL railway corridor such that the operation of the rail corridor could in some way be restricted by the rezoning and future development of residential activities on the site.

217. In response to the applicant's memo, the memo from Mr Hegley states:

As part of my RFI, I queried whether the proposal to establish a residential development next to the North Auckland Line (NAL) would result in reverse sensitivity to the NAL. The MHG response was that based on the large amount of residential use that already borders the NAL, the proposal will not materially change the land use in the area and would therefore not affect the operation of the rail.

I note that a proportion of the existing residential dwellings that face the NAL would have been consented under the Legacy District Plan and would therefore have been required to be designed to control internal levels of rail noise in accordance with Rule 1.2 of that Plan. Nonetheless, I generally agree with MHG's comments and my view is that there would be negligible effects on the operation of the rail corridor as a result of the proposal.

#### Issues 2 to 5

218. In regard to Mr Hegley's second issue, the memo states:

Yes, there is currently a 2-3m high fence along the western boundary of the site.

It is noted however that the full wording of the Policy referred to is:

(6) Avoid activities sensitive to noise from establishing in industrial zones where adverse effects (including reverse sensitivity effects) arise that cannot be otherwise appropriately remedied or mitigated.

This policy is directed at noise sensitive activities establishing within industrial zones and is essence met by Standard E25.6.10 which requires any noise sensitive spaces to be designed to meet internal noise standards. This is how the plan deals with 'appropriately remedied or mitigated' part of the policy. The policy is not considered to be relevant to the plan change.

#### 219. In regard to the third issue, the applicant's memo states:

In the interests of simplicity, the Plan Change does not seek to introduce any non-standard plan rules such as internal noise limited but rather to change the zone only. The only way to include this type of rule would be to either seek to change Chapter E27 (e.g. by making specific reference to the plan change land within Rule E25.6.10) or introduce a site-specific overly (precinct) with specific standards. This was not considered to be appropriate in light of the way the AUP currently deals with interface issues (by a slight reduction in the permitted noise levels on the industrial zone land). It is noted that the owner of the adjacent land did

not respond to letters sent by the applicant or make a submission on the plan change request, which can be taken to indicate no opposition to the plan change.

220. In response to the fourth issue, the applicant's memo states:

It is not possible to second guess future industrial uses on the site and so the assessment has been made based on what currently exists, and with acknowledgement of the fact that this may change. The limitations on the generation of noise are those that result from the AUP requirements between Industrial and Residential land as discussed in our assessment (and already applicable to the north and south of the industrial land.

221. In response to the fifth issue, the applicant's memo states:

The introduction of a 3-4m high wall along the shared boundary is not considered to result in unacceptable amenity impacts for future residents. It is noted that the residential Mixed Housing and THAB zones allow fences up to 2.5m high set 1m back from the boundary without consent so this form of mitigation is considered to be acceptable from a design and appearance point of view.

It is also noted that any future building on the Light Industry zoned land would need to be set back 5m from the boundary, with 3m of this set back planted.

222. In response to the applicant's memo for issues two to five, the memo from Mr Hegley states:

#### Policy E25.3 (6)

Based on the current Light Industrial zoning, the neighbours to the west are permitted to generate a level of 65dB LAeq at all times within the boundary of 522 – 524 Swanson Road (E25.6.5). By rezoning the proposal to Residential, this level could reduce to 55dB LAeq daytime and 45dB LAeq night time (with the addition of low frequency criteria) in accordance with E25.6.19. My concern was that this reduction in noise levels could result in limitations on what could occur on the neighbouring Light Industrial zone to the west, constituting an adverse effect.

In their response, MHG notes that Policy E25.3(6) does not apply to the proposal, as it relates to the establishment of a noise sensitive activity in an Industrial zone, which the proposal would no longer be as a result of the Plan Change. This is a valid point in terms of the wording of the AUP and the way in which I phrased my question. However, my issue remains that the effects of the Plan Change on the neighbouring Light Industrial sites (through a reduction in the permitted noise levels) does not appear to be fully described by the application.

In simple terms, the proposal would result in a 10dB reduction the daytime noise that the western Light Industrial sites could generate within the boundaries of 522 – 524 Swanson Road and a 20dB reduction at night time. As a guide, a 10dB reduction is an apparent halving in level. Based on this, I do not agree with the MHG response that this is a slight reduction in limits.

In the original SLR assessment, one of the mitigation measures offered was the addition of a 3–4m high wall on the common boundary with the comment that it would "...further enhance the likelihood of the neighbouring sites achieving compliance with the new noise standards (following rezoning) without the requirement for either of the neighbouring sites to modify their current operations". The MHG response to my RFI on this issue notes that there is already a 2-3m high fence on this boundary, with no comment on its efficacy. Given that the fence suggested by SRL as a mitigation measure appears to already exist (at least in part), it cannot be relied upon a second time for mitigating the effects of the proposal. I therefore remain unclear as to how the fence should be considered in the application and would like this clarified before, or at, the hearing. I also note that the AUP noise limits apply on the receiving side of the boundary wall. As such, any reduction in the receiving level equates to a corresponding reduction in the source level.

My view is that the reduction in boundary noise levels that would result from the Plan Change would result in a limitation on the activities that could be undertaken within the Light Industrial zone. If this were not the case, the AUP limits at the residential interface would also apply between all Light Industrial sites across the city. The fact that they do not indicates that it is preferable to have higher levels. That the AUP does provide interface rules with the residential zone recognises the reality that at some point, zones must meet. However, it stands to reason that a Light Industrial site with more relaxed noise limits would be preferable to one without. As such, it is my view that, in general terms, the proposal will have an adverse effect.

The SLR report looks at some specific Light Industry uses noting that activities such as amplified music (from church services) or 22 truck movements could occur during the day time. Under the present zoning, these activities could also occur at night<sup>15</sup> whereas SLR state that with the reduced interface limits, activities would be reduced to one night time truck movement. This provides an example of the reduction in intensity that the proposal would impose on the activities of the neighbouring Light Industrial zone.

I have also considered the specific effects on the existing Light Industrial activities, which the SLR assessment notes as a house relocation company. It has been my experience that such activities could comply with the residential interface rules but that doing so typically requires some form of mitigation/ site management. I am not familiar with the activities currently undertaken to comment further but note SLR's opinion that the current activities would comply with the interface rules.

MHG note that it is not possible to second guess future industrial uses of the site. I agree with this noting that a reduction in noise limits would be a likely factor in those future uses.

Given the potential for reverse sensitivity effects, I queried whether there was scope within the Plan Change to leave the boundary noise limits unchanged and place the onus on the new residential units to control the expected high levels of external noise to internal levels that are appropriate for residential amenity, as is currently the case should any residential accommodation be constructed within the Light Industrial zone (E25.6.10). The MHG response to this issue noted that doing so would be complex for a "slight reduction in permitted noise levels" and the fact that "the owner of the adjacent land did not respond to letter send by the applicant or make a submission of the plant change request, which can be taken to indicate no opposition to the plan change".

I cannot comment on whether such an approach is too difficult under the AUP but repeat my comment above that the reduction in permitted levels is significant rather than slight. As to the lack of response from the neighbour to the proposal, this could be viewed in several ways, including a lack of understanding of the process, noise levels and their effects.

Overall, it is my view that in principal, the proposal will have an adverse effect on the western Light Industrial sites due to the constraints placed upon them through the lowering of noise limits. This situation currently occurs at any Residential zone interface with a Business or

<sup>&</sup>lt;sup>15</sup> The intensity of activities may be decreased at night due to the removal of the averaging provision during the night time.

Industrial zone and is therefore neither unexpected by the AUP nor unmanageable. It does, however, result in a significant change to this particular site.

My conclusion with respect to the effects that the proposed zone interface rules will have on the current activities of the Light Industrial zone, is that they will likely range from negligible to manageable.

#### <u>Issue 6</u>

223. In response to the sixth issue, the applicant's memo states:

As noted by Hegley Acoustics, the AUP contains clearly defined noise limits for recreational activities in the open space zone within Standard E25.6.17. This standard and noise limit enable relatively high levels of noise to reflect the higher level of noise generated by such activities and the positive impacts of sports and recreation in the community balanced with the noise they generate.

The closest site boundary is approximately 20-25m to the existing sports field with future housing likely to be at least 4m back from this boundary. Based on SLR's experience, sports fields generate levels of approximately 60dB LAeq 20m from the side of the pitch during the busiest/noisiest scenarios (match play) – this would indicate compliance with the AUP limits for such activities and therefore limited potential for reverse sensitivity effects.

The fact that the future dwellings would be establishing adjacent to an existing sports field would also assist in minimising the likelihood of reverse sensitivity issues as owners/occupiers would be well aware of the sports field ahead of time.

It is noted that Council Parks did not raise any concerns in terms of the proposed plan change, which perhaps indicates that they also have no concerns and likely regard residential as a better neighbour / adjacent amenity than a possible industrial development, even with the potential creation of additional noise controls.

224. In response to the applicant's memo for the sixth issue, the memo from Mr Hegley states:

#### Policy E25.3 (11)

While the eastern sports fields operate without a noise limit to the current Light Industrial zone of the proposal, the proposed rezoning would introduce the limits of E25.6.17. My query related to an assessment of any reverse sensitivity effects that may arise from the proposed noise limits.

The MHG response notes that SLR anticipate levels of up to 60dB LAeq when measured at 20m from sporting activities. Given that the 20m distance matches that between the sports fields and common boundary of the proposal (which is the assessment location), it can be seen that the noise from sporting activities would be up to 60dB LAeq. This matches the daytime limit of E25.6.17, noting that this limit only applies for three hours on weekdays and six hours on Saturdays.

There remains a potential issue with night time compliance, such as sports practices. However, in general, I agree with the MHG assessment that there is "...limited potential for reverse sensitivity effects".

#### <u>Comments</u>

Noise

- 225. I rely on the expertise of Mr Hegley in regard to his assessment of reverse sensitivity effects of noise due to rezoning the site from LI to MHU and THAB.
- 226. I generally agree with Mr Hegley in that:
  - there would be negligible effects on the operation of the rail corridor given the large proportion of existing residential dwellings located adjacent to the rail corridor, both here and elsewhere across the network
  - rezoning the site from LI to MHU will have an adverse effect on the LI sites to the west due to the constraints placed upon them through the lowering of the noise limits. This may result in a limitation on the future activities or development that could be undertaken within the LI zone
  - the effects that the proposed zone interface rules will have on the current activities of the LI zone to the west will likely range from negligible to manageable
  - while there remains a potential issue with night time compliance, such as sports practices, for Ranui Domain, there is limited potential for reverse sensitivity effects.
- 227. I consider it appropriate that the applicant provides an explanation, as requested above by Mr Hegley, on how the existing 2-3m fence between the applicant's site and the LI sites to the west should be considered in the private plan change request. In Mr Hegley's view, the fence is already there, in part, and cannot be relied upon a second time for mitigating the effects of a proposal to rezone the site.
- 228. Further discussion of reverse sensitivity effects associated with Ranui Domain and the operation of the rail corridor can be found in Section 8.11 and Section 10 respectively.

#### Management of effects and development constraints

- 229. It is not unusual for residential activities to be located with an interface with a light industrial zone or next to a rail corridor. The properties to the north of the LI zoned land and to the west of the site is zoned residential (MHS and Single House zones). The properties to the east of the site, and between Ranui Domain and the rail corridor are zoned THAB, as are those to the south of the site on the opposite side of the rail corridor.
- 230. However, as discussed above, rezoning the site from LI to MHU and THAB places additional limitations, in regard to noise, on the adjacent properties. This is both in regard to the management of effects of activities from those sites and any changes in development on those sites. This includes the sites zoned LI to the west, Ranui Domain to the east and the rail corridor to the south of the site.
- 231. The objectives and policies of E25 Noise and Vibration 'seek to control the levels of noise and vibration created by activities to limit the adverse effects of noise and vibration on amenity values, human health and to protect existing noisy activities from reverse sensitivity effects'.
- 232. Objective 25.2(3) and Policy 25.3(7) of E25. Noise and Vibration indicate that some responsibility should be placed on the applicant's adjoining site (refer to **Attachment D** for a copy of the E25). Noise and Vibration section of the AUP(OP)). Objective E25.2(3) states:
  - (3) Existing and authorised activities and infrastructure, which by their nature produce high levels of noise, are appropriately protected from reverse sensitivity effects where it is reasonable to do so.

- 233. The corresponding policy. Policy 25.3(7) states:
  - (7) Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on:

(a) existing or authorised infrastructure;

. . .

- 234. However, there is no corresponding standard which requires sites zoned MHU or THAB to mitigate reverse sensitivity effects on the adjacent sites. The MHU and THAB zone matters of discretion for restricted discretionary activities are limited to the management of effects of the residential site on adjoining sites.
- 235. As discussed above in Section 8.11, resource consents can include conditions, in regard to noise, that relate to acoustic design, use of insulation materials, and ventilation systems that enable habitable rooms to be occupied without the need to open windows or external doors. This is particularly relevant to the southern boundary adjacent to the rail corridor.
- 236. The applicant's report acknowledges that there will be limitations placed on the adjoining LI site, through reduced noise limits and setbacks from the boundary. The applicant's report indicates there is an intention to provide an acoustic fence along the boundary of the site at the interface of the adjoining LI to the west. The design of this fence would be undertaken during the resource consent stage of any future development. The applicant's report also mentions other legal mechanisms, such as an encumbrance, on the subject land which requires the incorporation of noise mitigation measures within future noise sensitive activities could be explored.
- 237. I agree with the applicant's report that an acoustic fence on the site's boundary could be a way to mitigate any potential adverse reverse sensitivity effects from the adjacent LI site. I also agree that the appropriate time for the design of the fence would be during the resource consent stage. However, the height of this fence would also need to take in to account any potential adverse effects, such as loss of access to daylight and sunlight, on the residential sites.
- 238. Covenants and encumbrances can address issues between two private parties by placing restrictions on the title of a site undertaking a development, such as house design or fences. The council generally does not have any responsibility to enforce private covenants, unless the land is owned by council.
- 239. As pointed out by Mr Hegley, several of the nearby housing developments, Pooks Road to the south of the rail corridor and Carlas Way to the east of site's boundary, were consented under the legacy provisions of the Waitākere District Council District Plan. However, the conditions relating to reverse sensitivity effects, from the rail corridor, on these consents were similar to those that can be used on resource consents under the AUP(OP). Resource consents and associated conditions have been discussed above in paragraphs 202 to 207.

#### 8.13 Climate change and natural hazards

- 240. In June 2019, Auckland Council declared a climate emergency that included a commitment for all decision-makers to consider the climate implications of their decisions. In particular, consideration needs to be given in two key ways:
  - how the proposed decision will impact on greenhouse gas emissions and the approach to reduce emissions
  - what effect climate change could have over the lifetime of a proposed decision and how these effects are being taken into account.

- 241. The request to rezone land from LI to MHU and THAB will have the potential to reduce greenhouse gas emissions for the following reasons:
  - potential connections to Ranui Domain, local streets and transport facilities, including Ranui Train Station, will support walking, cycling and public transport
  - there will be opportunities to enhance and improve the amenity of the natural environment with landscaping within the site, including adjacent to the stream.
- 242. Chapter B10 Nga tūpono ki te taiao Environmental risk relates to the issues of natural hazards, climate change, hazardous substances, and genetically modified organisms. The objectives of B10.2 Natural Hazards and climate change, supported by policies in B10.2.2 require that:
  - communities are more resilient to natural hazards and effects of climate change
  - risks to people, property and infrastructure and the environment from natural hazards are not increased in existing developed areas
  - new subdivision, use and development avoid the creation of new risk to people, property and infrastructure
  - effects of climate change on natural hazards are recognised and provided for
  - functions of natural systems, including floodplains, are protected from inappropriate subdivision, use and development
  - the conveyance function of overland flow paths is maintained.
- 243. The site does have a stream running through it which shows as an overland flow path and as being within a flood plain. The applicant has addressed these at a high level in the request. The provisions of the AUP will need to be considered at the time a resource consent is lodged with the applicant showing how the development mitigates or avoids flood related risks including those upstream or downstream of the site. With the proposed zoning change to residential on the site, future housing developments, containing more vulnerable activities, are subject to additional assessment criteria than development under the current LI zone.
- 244. As discussed above in Section 8.3, Healthy Waters have recommended that the applicant needs to demonstrate that residents can gain safe access and egress during a flood to manage risk, and that finished floor levels will be above the flood plain. The applicant considers that residential development at the intended scale has the ability to manage stormwater through design and layout of the proposed dwellings.
- 245. A stormwater management plan detailing the stormwater management approach will also be required and will be assessed for approval within Auckland Council's Network Discharge Consent (NDC) process. The applicant will be required to show how the requirements of Schedule 4 of the NDC, which sets out the conditions of the consent, will be met from the proposed development.
- 246. I consider that the provisions of the AUP(OP) are sufficient to address any potential adverse effects of climate change and natural hazards. The identification of risks, and their assessment, will be required as part of a future resource consent process. An appropriate management approach is dependent on the type of development, the location and scale of the activity, and how the buildings are designed and placed on the site.

#### 9. CONSULTATION

#### 9.1 Mana Whenua

247. The applicant advises that it is has engaged with the following iwi groups with an interest in the area (see below) providing the opportunity for feedback before the request was formally lodged with council. No changes were required to be made to the private plan change documentation as a result of this engagement. There was an interest to be involved further during the resource consent process.

Mana Whenua Group	Organisation	Response
Te Kawerau ā Maki	Te Kawerau lwi Tribal Authority and Settlement Trust	A meeting was held on 28 June 2019 with Robin Taua-Gordon (Heritage and Environment Officer) from the Te Kawerau Iwi Tribal Authority and Settlement Trust. A formal letter has been provided which confirms that Te Kawerau ā Maki have no objections to the private plan change. The letter of support is limited to the plan change only and does not relate to any future resource consent applications associated with any future building developments on the site.
Te Akitai Waiohua	Makaurau Marae Maori Trust	No response has been received
Ngāti Whātua Ōrākei	Ngāti Whātua Ōrākei	No response has been received
Ngāti Whātua o Kaipara	Nga Maunga Whakahi o Kaipara Development Trust	Responded to the email and deferred their input to Te Kawerau ā Maki
Te Rūnanga o Ngāti Whātua	Te Rūnanga o Ngāti Whātua	Responded to the email and deferred their input to Ngāti Whātua o Kaipara

- 248. Ngāti Whātua o Kaipara deferred their input to Te Kawerau ā Maki. Te Rūnanga o Ngāti Whātua deferred their input to Ngāti Whātua o Kaipara. Te Kawerau ā Maki provided a letter which supported only the private plan change at this stage and indicated an interest in having further involvement during any subsequent resource consent process. No responses were received from Te Akitai Waiohua or Ngāti Whātua o Ōrākei.
- 249. All eleven iwi authorities with an interest in the Auckland region were sent letters when the plan change was publicly notified. No submissions from iwi authorities were received.

250. A summary of consultation undertaken in preparation of PPC38 is provided in the applicant's report (Section 10), attached as **Attachment A** to this report.

#### 9.2 Local boards

- 251. PPC38 is located within the boundary of the Henderson-Massey Local Board.
- 252. A memo, dated 13 March 2020, was forwarded to the local board. Informal feedback from the local board has been received. This is generally supportive of the private plan change in that the plan change provides the opportunity for residential development that offers good quality social housing which is affordable. The feedback also raises points around the next stage of the development process such as consideration of design, reverse sensitivity, the provision of a quality interface to Ranui Domain, and connections to Ranui town centre, and public transport.
- 253. A report to the Henderson-Massey's Local Board business meeting on 21 July 2020 provided the opportunity for the local board to provide its formal view. This allows the local board to present its view at a hearing (if one is required). The minutes from this meeting are as below:

Resolution number HM/2020/97

MOVED by Chairperson C Carter, seconded by Member B Loader:

That the Henderson-Massey Local Board:

- a) provide the following feedback on Private Plan Change 38 to the Auckland Unitary Plan:
  - *i.* support the private plan change as the change of zone would better reflect the current uses in the surrounding area.
  - *ii.* note that the traffic assessment indicates there would be few traffic management issues.
  - iii. note the NZ Rail submission that considered reverse sensitivity effects and suggest the development provides for building materials that provide noise attenuation and internal automatic venting.
  - *iv.* note that the following should be considered at further stages of the development process:
    - provision for safe crossing points on Swanson Road and a designed median to allow for safe right turns in and out of the site
    - o an improved interface with 524 Swanson Road
    - construction of a walk/cycle bridge across the stream as Ranui Domain will likely provide the future residents of 524 Swanson Road with the nearest playground and recreational green space.

provision of a riparian margin and that any ecological report and planting plan should also include analysis of flora and fauna and water quality.

- b) appoint Member Brenda Brady to speak on behalf of the local board views at a hearing on the plan change
- c) delegate authority to Chairperson Chris Carter to make a replacement appointment in the event the local board member appointed in Resolution b) is unable to attend the plan change hearing.

CARRIED

#### **10. NOTIFICATION AND SUBMISSIONS**

#### **10.1 Notification details**

- 254. PPC38 was notified on 5 December 2019 and the submission period closed on 23 January 2020. A total of one submission, from KiwiRail Holdings Limited (KiwiRail), was received.
- 255. PPC38 was notified for further submissions on 27 February 2020 and the submission period closed on 12 March 2020. One further submission, from Kāinga Ora Homes and Communities, was received.
- 256. The submission was received on time. There are no late submissions. Copies of the submission and further submission are attached as **Attachment B** to this report.

#### 10.2 Analysis of submissions and further submissions

#### Submission 1 – KiwiRail Holdings Limited

- 257. KiwiRail's submission does not state whether it opposes or supports PPC38 (refer to **Attachment B**). KiwiRail's submission relates to the following main issues:
  - the current zoning of the site is inappropriate given the proximity to the rail corridor. Rezoning the site to enable residential development will result in an increase in sensitive activities that may give rise to safety and reverse sensitivity effects
  - proximity of the site to good rail transport is acknowledged but the plan change fails to consider the issues associated with rail noise and vibration that arise when incompatible activities are established nearby (in terms of both adverse effects on sensitive users and potential reverse sensitivity effects on the rail corridor
  - the AEE includes a summary of the consultation undertaken with KiwiRail, at which time KiwiRail recommended provision for setback and acoustic treatment for sensitive dwellings. The acoustic assessment provided with PPC38 does not refer to rail noise or vibration. PPC38 does not provide for these matters and there is a lack of certainty how this will addressed in the future.
- 258. KiwiRail is seeking the following relief:
  - add a concept plan to the plan change which any development on the site is required to comply with providing that building development along the southern boundary and in the southeast east part of the site will be set back from the boundary by 5m.
  - amend the plan change by:
    - i. providing an adequate assessment of rail noise and vibration effects and mitigation measures, as is done with the industrial zone; and
    - ii. insert noise and vibration requirements into the plan change to apply to any development within 100m of the corridor boundary.

#### Comments:

259. The provisions that KiwiRail are seeking are similar to those sought in their submission to the Proposed Auckland Unitary Plan ('PAUP'). KiwiRail's submission (Submissions 4336-92 and 4336-93 to 96) sought amendments for a 4m yard in all zones adjacent to the rail corridor and to the assessment criteria for residential and business zones to include 'where they are within

100 metres from the rail corridor so that reverse sensitivity effects are to be taken in account when assessing applications.'

- 260. The PAUP proposed an overlay<sup>16</sup> with provisions that applied to the land adjoining heavily trafficked roads or rail lines. The provisions also sought to 'avoid the reverse sensitivity effects that can occur when activities sensitive to noise are in located in proximity to strategic land transport infrastructure'.
- 261. In its recommendation,<sup>17</sup> the Independent Hearing Panel (IHP) recommended that the overlay be deleted as the 'panel was concerned with proceeding with the extensive application of this overlay in the absence of a rigorous cost benefit assessment, including no assessment of who should appropriately bear the costs involved'.
- 262. A building setback from the rail corridor was proposed by Auckland Council and supported by KiwiRail late in the hearing process. The building setback was designed to introduce a 2.25 metre buffer on either side of the rail corridor and within that buffer to control development such that safe distances are maintained around the electrified rail infrastructure. The IHP, in the same recommendation as above, stated:

The Panel was concerned that these provisions would apply in a blanket fashion along the rail corridor whether needed or not, that is an issue that could be addressed through application of KiwiRail's designation powers if needed, and that the costs of the Overlay would fall entirely on property owners with insufficient evidence that such an approach would lead to an efficient outcome. In this context the Panel recommends that the building setback from the rail corridor not be included in the plan.'

- 263. The Council's decision accepted the IHP recommendation in relation to the Overlay and the setback. The AUP(OP) does not contain a requirement for a setback from the rail corridor and I do not recommend that a setback be considered. To apply a setback in this case is a departure from the objectives and policies of the AUP(OP). In my view, this issue should be considered at an Auckland-wide level rather than on a single site.
- 264. As acknowledged above in the IHP's recommendation, KiwiRail are a requiring authority with the ability to alter its designations if it wishes to. In addition, as discussed above in Sections 8.11 and 8.12, resource consents for development on adjoining sites can include conditions which, in regard to noise, relate to acoustic design, use of insulation materials, and ventilation systems that enable habitable rooms to be occupied without the need to open windows or external doors. These are normally applied where new habitable rooms are situated close to significant sources of noise e.g. rail lines, motorways
- 265. A precinct plan can be used to enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions. A precinct plan may provide for the management of effects and/or additional matters of discretion for Council to consider when making a decision on a resource consent. However, the applicant is relying on the provisions of the AUP(OP) and is not proposing either a precinct plan or amendments to provisions.
- 266. I consider that the proposed rezoning of the site from LI to MHU and THAB does not warrant the use of a precinct plan. In my view, there are no local differences on this site that need to be recognised by a place-based provision. As discussed above in Section 8.12, it is common within

<sup>&</sup>lt;sup>16</sup> Chapter J.1.5 High Land Transport Noise Overlay, Proposed Auckland Unitary Plan.

<sup>&</sup>lt;sup>17</sup> Auckland Unitary Plan Independent Hearings Panel. Report to Auckland Council Hearing Topic 043/044 (Transport), July 2016.

Auckland's urban environments for residential development to be located adjacent to the rail corridor.

267. I consider that the objectives, policies and standards of the AUP(OP) are sufficient to avoid, remedy or mitigate any potential effects associated with any development on the PPC38 site. Therefore, I am satisfied that the operative provisions of the AUP(OP), as unaltered by PPC38, are the most appropriate way of achieving the objectives of the AUP(OP) and RMA.

#### Recommendations on Submissions

- 268. I recommend that **Submission 1** be **rejected** for the reasons above.
- 269. There are no amendments associated with this recommendation.

#### Further submission 1 – Kāinga Ora – Homes and Communities

- 270. The further submission opposes the relief sought by KiwiRail (refer to **Attachment B**). The reasons for Kāinga Ora's submission are:
  - the submission does not promote the sustainable management of natural and physical resources and otherwise inconsistent with purpose and principles of the RMA
  - the relief sought in the submission is not the most appropriate in terms of section 32 of the RMA
  - rejecting the relief sought in the submission would more fully serve the statutory purposed than would implementing that relief.
- 271. The specific relief sought is set out the attachment of the further submission. In summary, the further submission opposes:
  - an amendment to add a concept plan that development is required to comply with a setback of 5m along the southern boundary and southeast part of the site
  - the inclusion of a new provision to manage potential health effects from rail noise and vibration where buildings containing noise sensitive activities are located adjacent to the railway corridor.
- 272. Kāinga Ora considers that a concept plan with a 5m setback:
  - places an overly restrictive burden on landowners without a corresponding burden on infrastructure providers to manage effects to adjacent land uses generate by the operation of infrastructure
  - unnecessarily constrains the future use of private land to achieve an intensive and compact form
  - constitutes a de-facto extension of the infrastructure provider's designation.
- 273. Kāinga Ora considers the inclusion of a new provision to manage potential health effects:
  - is significant in its geographic extent and applies to alterations and buildings as well as new buildings
  - creates potential administrative and cost burdens for the community and consenting authorities

- is inconsistent with the planning rules that currently govern other residential sites abutting the same rail corridor and which are already zoned MHU or THAB
- lacks clarity or explanation as how the rules would be implemented and monitored in practice
- is unbalanced in its scope and content
- places the onus and cost of managing effects generated by the requiring authority and their operations on landowner.
- 274. The reasons for the relief sought by Kāinga Ora are similar to those discussed above in Section 8.12 on reverse sensitivity and paragraphs 257 to 265 in Section 10.2. I consider no further discussion of the further submission is required.

#### 11. CONCLUSION

- 275. PPC38 seeks to rezone the site at 522-524 Swanson Road from LI to a mix of MHU and THAB. No other amendments to the AUP(OP) are proposed.
- 276. I have undertaken an assessment of effects, supported by a peer review from relevant specialists. This assessment finds that any potential adverse effects of PPC38 can be suitably addressed by the AUP(OP) provisions. While my noise expert has expressed a general concern over the limitations placed on adjoining properties, it is my view that the provisions of the AUP(OP) provides sufficient scope to assess and address any effects at the resource consenting stage when more detailed designs are available.
- 277. One submission from KiwiRail was received in regard to the reverse sensitivity effects, particularly of noise and vibration, of locating residential development adjacent to the rail corridor. One further submission was received from Kāinga Ora which opposed the relief sought in KiwiRail's submission.
- 278. Having considered the submission and further submission and reviewed all relevant statutory and non-statutory documents, I recommend that Private Plan Change 38 522-524 Swanson Road, Ranui, should be approved as notified.
- 279. The approval of PPC38:
  - a) will assist the council in achieving the overall purpose of the Resource Management Act 1991
  - b) will give effect to the relevant National Policy Statements and the AUP(OP) Regional Policy Statement; and
  - c) is consistent with the Auckland Plan 2050.

#### 12. RECOMMENDATIONS

- 280. I recommend that the Hearing Commissioner reject the submission from KiwiRail Holdings Limited as I have outlined in section 10 of this report.
- 281. I recommend that PPC38 to the Auckland Unitary Plan be approved without modifications.

#### 13. SIGNATORIES

	Name and title of signatories	
Author		
	And	
	Jo Hart, Principal Planner, Planning North, West and Islands	
Reviewer	WMarlinna	
	Warren Maclennan, Manager, Planning North West and Islands	

## ATTACHMENT A

## **APPLICATION MATERIAL**

# **PRIVATE PLAN CHANGE REQUEST**

## 522-524 SWANSON ROAD, RANUI

# ASSESSMENT OF ENVIRONMENTAL EFFECTS AND STATUTORY ANALYSIS

PREPARED FOR: WESTERN PARK VILLAGE LIIMTED

**NOVEMBER 2019** 

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#### 1. EXECUTIVE SUMMARY

- 1.1 This report is submitted in support of a private plan change on behalf of Western Park Village Limited ("the applicant') for the site at 522-524 Swanson Road, Ranui. The plan change seeks to rezone the site from Business Light Industry into a combination of both Residential Mixed Housing Urban and Residential Terrace Housing and Apartment Zone under the Auckland Unitary Plan (Operative in Part).
- 1.2 The proposal will allow for the site to be developed for medium intensity housing within an existing neighbourhood. This is considered to be the most appropriate use of the site for the following reasons:
  - The site is well connected to the existing transport network, including public transport.
  - The site is considered to be appropriate for residential development as it has not been used for light industrial uses and is currently used for residential purposes;
  - The site is located on the periphery of the existing industrial area and requires development that demonstrates greater sensitivity along the interface with neighbouring residential and open space zones;
  - The nature of residential development is inherently better at managing any potential issues that may arise from the development restrictions on site, such as flooding, overland flow and contaminated land.
- 1.3 The proposed rezoning is considered to achieve the high-level objectives and policies of the Regional Policy Statement as it will enable the development of much needed housing within an area identified for growth. The specialist reports submitted as part of this plan change assess the relevant urban design, transport, infrastructure and economic matters associated with the proposed rezoning and confirm that it is appropriate within the context of the wider area.
- 1.4 An evaluation of the proposal has been undertaken in accordance with Section 32 of the Resource Management Act (1991) and concludes that the proposed rezoning of the site will achieve the objectives and policies of the Auckland Unitary Plan (Operative in Part) and the purpose of the Resource Management Act (1991) in an effective and efficient manner.
- 1.5 This requested private plan change has been assessed against the relevant statutory tests outlined in Section 75 of the Act.

#### 2. INTRODUCTION

- 2.1 This report is submitted in support of a private plan change on behalf of Western Park Village for the site at 522-524 Swanson Road, Ranui. The plan change seeks to alter the existing zoning on the site from Business Light Industry to a combination of Residential Mixed Housing Urban (MHU) and Residential Terrace Housing and Apartment Zone (THAB) under the Auckland Unitary Plan (Operative in Part).
- 2.2 The site is currently used for temporary and permanent accommodation and is known as the Western Park Village. It began being used as a traditional holiday park/campground in the 1950s, providing short term accommodation for a daily tariff. Slowly, over the course of the last 50 years, the site has developed on an 'ad hoc' basis and currently provides short term residential accommodation for those members of the community who cannot find housing elsewhere. Due to the improvised nature at which the site has grown and developed, the current owners wish to formalise the use of the site for residential housing and provide more permanent options for accommodation for the occupants. The site's location close to the Ranui train station, town centre and the Ranui Domain make the site an appropriate location for more intensive housing. The owner has also been in discussions with both Kiwibuild and Auckland community housing providers as to the feasibility of incorporating social housing into the site and meeting the needs of the community.
- 2.3 As the existing zoning of the site under the Auckland Unitary Plan (Operative in Part) is Business Light Industry, a private plan change has been determined to be the most appropriate route to achieving more permanent accommodation on the site, rather than a non-complying consent application.
- 2.4 This private plan change request contains the following specialist reports and input:
  - Urban Design Assessment prepared by Ian Munro (Appendix 1);
  - Infrastructure Assessment prepared by Fraser Thomas Consultants (Appendix 2);
  - Transport Assessment prepared by Commute Transport Limited (Appendix 3);
  - Acoustic Assessment prepared by SLR Consulting (Appendix 4); and
  - Economic Cost Benefit Analysis prepared by Adam Thompson (Appendix 5)
  - Contaminated Land Detailed Site Investigation Summary (Appendix 8)
  - Flooding Assessment (Appendix 9).

### 3. THE APPLICANT AND PROPERTY DETAILS

Site Address:	522-524 Swanson Road, Ranui
Legal Description:	Lot 1 DP 206224, Lot 1 DP 202726, Pt Lot 3 DP 41212 CT attached under Appendix 13
Site Area:	2.65 ha (approx.)
Applicant's Name:	Western Park Village Limited
Statutory Plan:	Auckland Unitary Plan (Operative in Part)
Zoning	Business Light Industry Zone
Other limitations/designations:	<u>Control</u> : Stormwater Management Area Control – Swanson 5, Flow 2 <u>Control</u> : Macroinvertebrate Community Index
Address for Service:	Mt Hobson Group PO Box 37964 Parnell Auckland 1151 ATTN: Kelsey Bergin and Mark Benjamin

#### 4. SITE AND LOCALITY DESCRIPTION

#### Site description

- 4.1 The subject site is located on the southern side of Swanson Road, some 450m west of the Ranui local centre and is known as the Western Park Village. The site includes the land at 522and 524 Swanson Road, covering an approximate area of 2.6 ha. The land is in the shape of an 'L' and is shown in Figure 1 overleaf.
- 4.2 Currently, the site contains a substantial number of temporary and permanent buildings providing residential accommodation, toilet and cooking facilities and an administration type block in the north eastern corner of the site. Many of these structures have been in place on the site for a number of years.
- 4.3 In terms of topography, the site is relatively flat from the road frontage towards the south before falling to a stream which traverses the site from the south western corner to exit approximately halfway up the eastern boundary. The site then rises from the stream towards the east. The highest part of the site is the narrow corridor which runs between the Ranui Domain and the railway line located to the south of the site. The existing buildings on the site are located to the north/west of the stream with the area of land to the east being vacant and grassed.
- 4.4 Vehicle access to the site is provided from the north eastern corner of the site where it fronts Swanson Road and all reticulated services are available on the site.

#### Immediately surrounding properties

4.5 The site is bound to the east by the Ranui Domain, which is set back from Swanson Road behind a row of residential dwellings. The Domain has a size of approximately 6ha and contains a large stormwater pond, as well as playing fields and the Waitemata Seagulls League club rooms to the south. An existing pedestrian footpath is located through the Domain, connecting Swanson Road to Robertson Road and Carlas Way, and from Carlas Way to the Ranui Train Station. The distance from the subject site to the train station along the footpath is approximately 465m. The Domain is used all year round for outdoor recreational activities and is a popular destination by the local community on the weekends.

4.6 To the immediate north of the Domain and adjoining the site to the east along its Swanson Road frontage are single storey residential dwellings on individual sites. This suburban style development also characterises the land to the north of the site across Swanson Road. The land located to the immediate west of the site is occupied by a local church and industrial land uses. The site is bounded in the south by the western line railway tracks.

#### Wider site context

- 4.7 The Ranui Local Centre, including the Ranui Library and a number of shops, is located approximately 239m east of the site along Swanson Road, and the Ranui Train Station lies approximately 340 m to the east-southeast of the site. The land between the local centre and the train station is zoned as Terraced Housing and Apartment Zone, as is the land to the south of the railway line. Across the train lines to the south of the site is an established urban neighbourhood, with the Henderson Valley Scenic Reserve and Waitakere Ranges bordering the wider area to the west and south. The north-western motorway (SH16) is located approximately 3.5 km to the north-east of the site.
- 4.8 In general, to the west of the site is a medium-sized concentration of light industry zoned land categorised by a range of activities, including a bus depot and storage businesses. Another 'pocket' of light industry zone land is located approximately 1.2km to the east of the site on land centred on Brick Street and Mihini Road. The wider environment is considered to be mixed, but generally suburban in terms of the existing scale and intensity of activities.

#### Transport environment

4.9 The site is accessed from Swanson Road, which is identified as an arterial road under the AUP(OP), with a posted speed limit of 50 km/h. It is a major route that connects Swanson in the west with Henderson in the east. Outside the subject site, Swanson Road is characterised by a single lane of traffic in either direction, with a centralised flush median. Pedestrian footpaths are provided on both sides of Swanson Road, providing connections to the Ranui Town Centre, and a bus stop is located immediately outside the subject site on Swanson Road.

#### Zoning

4.10 The site and its surroundings are currently zoned as a mixture of zones under the Auckland Unitary Plan (Operative in Part). Currently, the majority of the site is zoned as Business Light

Industry, with a smaller section of the northern part of the site zoned as Residential Mixed Housing Suburban. The site is generally surrounded by the following zoned land:

- To the west, predominately Business Light Industry, with Residential Single Housing Zone and Mixed Housing Suburban adjacent to the site along Swanson Road;
- To the north and north-west of the site, a combination of both Residential Single House Zone and Mixed Housing Suburban, with pockets of Open Space amongst the houses, and Rural Countryside Living beyond.
- To the east and north east of the site, the land is generally zoned as Open Space

   Sport and Active Recreation Zone, Residential Terrace Housing and Apartment Building and Residential Mixed Housing Suburban.
- To the south of the site, the land is zoned as Residential Terrace Housing and Apartment Zone closest to the train station, with the remaining area characterised by both Residential Single House Zone and Residential Mixean.
- 4.11 Undoubtably, the wider context in which the site is located is dominated by residential zoning, at a variety of scales. The location of the site is shown in Figure 1 overleaf, with the current zoning of the site and the wider area shown in Figure 2 overleaf.



*Figure 1: Aerial photograph showing the location of the site (outlined in blue)* 

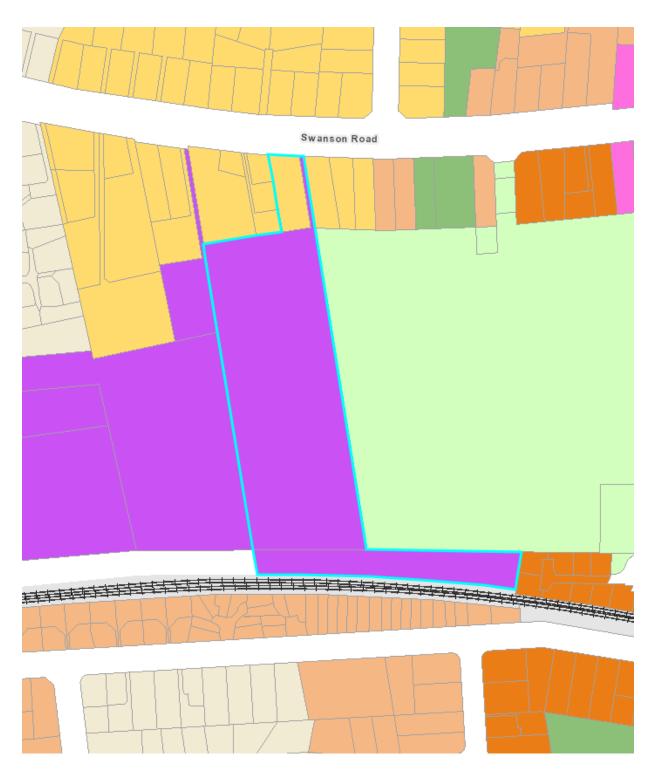


Figure 2: The zoning of the subject site (in blue) and the wider surrounding area.

# 5. PROPOSED PLAN CHANGE

### Overview

- 5.1 Western Park Village is seeking to rezone the land to facilitate growth and the development of medium to high density residential dwellings within the site. In summary, this private plan change seeks to rezone the site from Business Light Industry to a combination of Residential Mixed Housing Urban (MHU) and Residential Terrace Housing and Apartment Zone (THAB). The proposed MHU zoning would cover approximately 14,470m<sup>2</sup> of the site, with the remaining 10,910m<sup>2</sup> of the site zoned as THAB. The area of the site currently zoned as Residential Mixed Housing Suburban is excluded from the proposed plan change rezoning.
- 5.2 The site will remain subject to the existing controls identified on the AUP(OP) planning maps, being the Macroinvertebrate Community (Urban) and the Stormwater Management Area (Swanson 5, Flow 2). All Auckland-Wide and zone provisions of the AUP(OP) will apply to the rezoned land and no additional provisions (e.g. precincts) are proposed as part of this plan change.

## Reasons for the Private Plan Change

- 5.3 Clause 22(1) of the RMA requires that a plan change request explains the purpose of, and reasons for, the proposed plan change. The applicant has owned the site since 1998 and it has been used for temporary and permanent accommodation for the community for the last 50 years or so. Prior to this, the site was used as a traditional holiday park / campground and now houses a range of accommodation units still used for transient use. The site, known as the Western Park Village, tends to cater for those members of the community who cannot obtain housing elsewhere, or are waiting for social housing allocations.
- 5.4 The intention of the applicant is to develop the land in a manner consistent with the proposed zoning of the site, being intensive residential development in a range of sizes and forms. Due to the current social housing aspect of the existing site, the applicant has already began engaging with both Kiwibuild and Auckland Community Housing providers as to the practicality of incorporating social housing into any future development of the land to provide for the needs of the community.

- 5.5 The site has never been used for industrial purposes and the intention by the current owners is never to use the site for industrial purposes. Considering the site's close proximity to the Ranui Domain, train station and town centre, as well as many neighbouring sites also zoned for residential activity, the change to residential zoning on the site is considered to be entirely appropriate.
- 5.6 The current objectives, policies and rules of the Business Light Industry zone makes the proposed intensive residential use of the site difficult. This is because the emphasis of the Light Industry zone is the efficient location and function of industrial activities, with other activities, that may compromise the functionality of industrial activities and result in reverse sensitivity effects, to be avoided. Specifically, Policy H17.3(3) states "avoid activities that do not support the primary function of the zone". Dwellings are provided for in the activity table as a non-complying activity and while resource consent may be sought for such an activity, an assessment against section 104D(b) of the Resource Management Act (the 'gateway test') would appear unlikely to be supportable. In addition to this, all resource consent applications for residential in the Light Industry zone MUST be publicly notified.<sup>1</sup> in light of the above, a plan change has been determined as the best option to secure the most efficient and effective development of the site. A plan change is also considered to be a more transparent and open approach that will enable zoning that properly reflect the type and density of residential development sought.

#### Suitability for Industrial Development

5.7 The current zoning of the site provides for the use of the land for industrial activities. Under the AUP(OP), these include garden centres, motor vehicle sales, service stations, bus depots, recycling facilities and manufacturing warehouses. These activities can occur as a permitted activity, without the need for resource consent from Auckland Council. Given the residential zoning to the north, south and east of the site, as well as the large Ranui Domain zoned as open space, these activities would not be considered compatible with the surrounding area. As industrial activities tend to use hazardous substances or potentially generate noxious odours and high volumes of noise, there is risk for these to have a direct effect on the

<sup>&</sup>lt;sup>1</sup> AUP(OP) Rule H17.5(1) states that any application for resource consent for H17.4.1(A3) Dwellings; and H17.4.1(A4) Integrated residential development must be publicly notified:

surrounding environment, particularly that of the Ranui Domain which is used year-round by sports clubs and community groups.

5.8 In addition, the presence of overland flow paths and associated flood risk through the site creates some challenges in establishing industrial activities on the site given the nature of industrial development being predominately large format buildings and large expanses of impervious area. Development may be restricted to the northern extent of the site to avoid development close to the floodplain and overland flow paths.

### Suitability for Residential Development

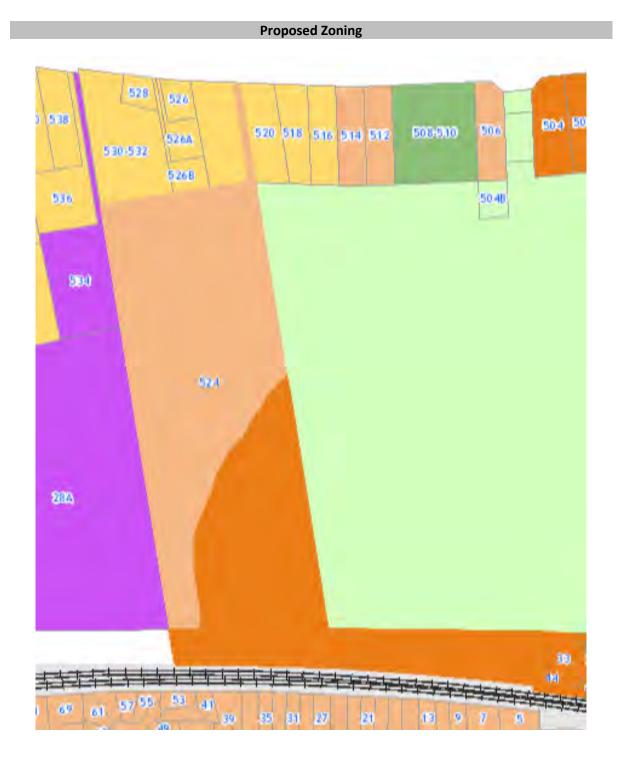
5.9 The proposed rezoning of the site will enable residential development of the site to provide for new and permanent housing. The requested rezoning of the site to a combination of Mixed Housing Urban and Terrace Housing and Apartment Buildings will enable residential development of a scale, bulk and form that is consistent with the surrounding environment. The combination of the two zones also allows for the density of development to change over the site, with the densest development nearest the train station, and the less dense development closer to Swanson Road and existing lower density zones. Residential development at the intended scale has the ability to manage stormwater through design and layout of the proposed dwellings with lesser impact to the function of existing overland flow paths and reduced risk associated with the flood plain. As such, residential development is able to utilise more of the site without creating or exacerbating flood risk.

#### Proposed zoning

5.10 The two figures overleaf show the existing and proposed zoning of the site under this proposed plan change request.



# Current Zoning: Business Light Industry



RESIDENTIAL – TERRACE HOUSING AND APARTMENT BUILDING

RESIDENTIAL – MIXED HOUSING URBAN

# 6. STATUTORY PLANNING FRAMEWORK

# Statutory Context

- 6.1 Schedule 1 of the Resource Management Act (RMA) sets out the process for changes to district and regional Plans. Clause 21 of that schedule states that any person may request a change to a district or regional plan and Clause 22 requires that the request to change a plan must be made to the appropriate local authority in writing. A request for a plan change shall explain:
  - The purpose of, and reasons for, the proposed plan change (see section 5);
  - Contain an evaluation report prepared in accordance with section 32 (refer Appendix 6); and
  - Where environmental effects are anticipated, the request shall describe those effects, taking into account clauses 6 and 7 of Schedule 4, in such detail as correspond with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the plan change (see section 7).

# Section 32 Analysis

6.2 Section 32 of the Act requires any proposed plan change to provide an assessment of the effectiveness, efficiency, costs, benefits and risks of the requested plan change including alternative options. A full section 32 analysis is provided in **Appendix 6** to this report, with a summary of the analysis outlined in section 9.

## Section 25 Evaluation

- 6.3 Section 25 of Schedule 1 of the Act states that a local authority may reject a private plan change request based on the following:
  - (a) Whether the request or part of the request is frivolous or vexatious; or
  - (b) within the last 2 years, the substance of the request or part of the request—
    - (i) has been considered and given effect to, or rejected by, the local authority or the Environment Court; or
    - (ii) has been given effect to by regulations made under section 360A; or
  - (c) the request or part of the request is not in accordance with sound resource management practice; or

- (d) the request or part of the request would make the policy statement or plan inconsistent with Part 5; or
- (e) in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than 2 years."
- 6.4 An assessment of these matters is provided below.

#### Whether the request is frivolous or vexatious

- 6.5 As previously outlined within this report, the existing use of the application site is for temporary residential accommodation. This use has been in place for approximately 50 years, prior to which the site was used as a more traditional holiday park / campground. The site has never been used for industrial purposes and the intention is that it will never used for industrial purposes. The site is bound to the north, south and east by residentially or open space zoned land and is in close proximity to both the Ranui Train Station and the Ranui Town Centre. The initial feedback received from stakeholders is that the plan change is supportable and appropriate given the site's use and surrounding environment.
- 6.6 This application for the plan change request also contains a section 32 evaluation and is supported by a range of specialist assessments in relation to key matters considered to be material to the request, including transport, infrastructure and urban design. In this way, the proposed plan change request is not considered to be either frivolous or vexatious.

#### Whether the request has been considered within the last two years

6.7 An attempt was made to include the rezoning of the land during the further submission phase of the notification of the Auckland Unitary Plan. However, no action came out of the further submission and no further attempts to rezone the land have occurred. No formal resource consent applications for residential development on the land have been lodged with Auckland Council, no appeals have been made to the Environment Court and as the site is not within the coastal marine area, section 360A is not relevant. Whether the request is in accordance with sound resource management practice

6.8 The term 'sound resource management practice' is not defined in the RMA but has become a common term within the planning discipline. Guidance is provided in the High Court decision of Malory Corporation Limited v Rodney District Council, where the following conclusion was made:

"the words 'sound resource management practice' should, if they are to be given any coherent meaning, be tied to the Act's purpose and principles. I agree too with the Council's observations that the words should be limited to only a coarse scale merits assessment, and that a private plan change which does not accord with the Act's purposes and principles will not cross the threshold for acceptance or adoption."

- 6.9 As will be assessed further within this report, the rezoning of the application site to align with its current use is considered to make a positive contribution to the need for housing within Auckland, particularly within the established residential nature of the surrounding environment. Adverse effects of future development proposals can be managed through the provisions of the Auckland Unitary Plan (Operative in Part).
- 6.10 This request is supported by a range of specialist reports, who all conclude that the proposed plan change is an appropriate outcome that will result in sustainable management of natural and physical resources. Consultation has been had with Auckland Transport, Watercare, Auckland Council Parks and Mana Whenua and no concerns relating to the proposed plan change were raised. Overall, the proposed rezoning of the site contained within this plan change request is considered to be made in accordance with sound resource management practice.

#### Whether the request would make the plan inconsistent with Part 5 of the RMA

6.11 Part 5 of the RMA sets out the role and purpose of planning documents created under the RMA, including that they must assist a local authority to give effect to the sustainable management purpose of the RMA. As assessed within the contents of this report, the proposed plan change is considered to be entirely consistent with the sustainable management of the natural and physical resources of the application site and the surrounding environment. The proposed plan change seeks to amend the zoning of the application site to

enable use and development to provide for the social wellbeing of the community while avoiding, remedying or mitigating adverse effects on the environment.

## Whether the plan has been operative for less than 2 years

6.12 The district plan provisions of the Auckland Unitary Plan relevant to this request were made operative on 15 November 2016. The provision have therefore been operative for more than two years.

Section 25 conclusion

6.13 As outlined above, the assessment under section 25 of Schedule 1 of the RMA confirms that the proposed plan change should not be rejected based on the tests stated.

# 7. ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

- 7.1 Clause 22(2) Schedule 1 of the Act requires an assessment of the anticipated environmental effects of any private plan change in accordance with Schedule 4 of the Act. The following assessment is an analysis of both positive and negative actual and potential effects arising from the proposal, including:
  - Urban Design;
  - Transport;
  - Infrastructure;
  - Economic Analysis;
  - Mana Whenua Values;
  - Contaminated Land;
  - Geotechnical; and
  - Reverse Sensitivity Effects.
- 7.2 These matters are addressed below, with reference to specialists reports where relevant.

## **Urban Design**

7.3 An Urban Design Assessment has been prepared by Ian Munro (see **Appendix 1**) to assess the urban design outcomes of the proposed plan change as they relate to the wider neighbourhood. A summary of the matters addressed in the assessment are provided below.

# Character and amenity

7.4 As outlined in the Urban Design Assessment, the environment surrounding the site has been identified as a general mix of uses and development but is predominately suburban in terms of scale and the intensity of activities. Apart from the portion of land to the west of the site zoned as Light Industry, the rest of the wider, surrounding environment is overwhelmingly zoned for residential purposes and is characterised by existing residential dwellings. Dispersed amongst the different residential zones and dwellings are pockets of open space for various purposes to support the established residential use. The wider Ranui area is characterised by this established neighbourhood, supported by transport options and a serviceable town centre.

- 7.5 Because of this existing environment and character, Mr Munro identifies key urban design opportunities for the site, including:
  - The site's location adjacent to a large public open space and within walking distance of the Ranui local centre and rail station.
  - The site is largely flat and generally free of development constraints;
  - While zoned for light industrial activities, the site has not been used for industrial purposes for a significant amount of time (possibly never) and therefore, the plan change would not result in the loss of employment land or generating activities;
  - The size of the site would enable a comprehensive development outcome to be achieved, with future development activating the site's boundaries with the Ranui Domain.
- 7.6 The zoning of the site proposed under this plan change would expect a higher quality amenity outcome for any future development than the existing zoning. Future development on the site would be subject to more stringent urban design assessments to align the new built form with the intended built character of the area more so than the business focus of the zoning at present. The nature of the surrounding area is such that the proposed residential plan change is entirely appropriate and will positively contribute to both the character of the neighbourhood and the amenity onsite and on adjacent sites.

# Bulk, location and dominance

7.7 The proposed rezoning of the site from Business Light Industry to both Mixed Housing Urban and Terrace Housing and Apartment Zone will allow the site to be redeveloped in a manner that is consistent with the existing character of the neighbourhood, as well as the anticipated built form outcomes intended for the area. The new zones would introduce greater on-site amenity controls, lower height limits and the requirement of new developments to seek resource consent for new buildings (unlike the existing industrial zone).

- 7.8 Both objectives H5.3(2) and H6.3(2) of the AUP(OP) require the height, bulk, form and appearance of development and the provision of sufficient setbacks and landscaped areas to achieve an urban built character of predominately three (MHU) or five, six or seven storeys (THAB), in a variety of forms. Both of these residential zone provisions include development standards that manage the bulk and form of any future development so that development is in keeping with the character of the surrounding urban landscape and provides for on-site and neighbouring amenity.
- 7.9 The combination of two residential zones on the site is sought to ensure a balance of intensity across the site, especially when considering the existing surrounding land uses. The highest intensity of development, enabled by the THAB zone, is generally restricted to the southern area of the site where it adjoins the rail corridor, the southern boundary of the Ranui Domain and other neighbouring THAB zoned sites. The remainder of the site, in close proximity to the lower density Mixed Housing Suburban zone, is proposed to be zoned as Mixed Housing Urban, to enable, as the Urban Design Assessment outlines, a successful balance and transition in intensity over the site.
- 7.10 A comparison of the standards required for development within the existing and proposed zoning of the site is provided in the table below.

Standard	Light Industry	ТНАВ	MHU
Height	20m	16m	11m
HIRTB	6m + 35° adjoining residential and	3m + 45°	3m + 45°
	open space zones		
Yards	5m rear and side (only adjoining residential, open space or some special purpose zones) 10m riparian	1.5 m front 1m side and rear 10m riparian	<ul><li>2.5 m front</li><li>1m side and rear</li><li>10m riparian</li></ul>
Maximum	n/a	70%	60%
Impervious Area			

Building	n/a	50%	45%
Coverage			
Landscaped	Outdoor storage or	30%	35%
Area	rubbish screened		
	by landscaping or		
	1.8m high fence		
Construction of	Permitted	Restricted	Restricted
new buildings		Discretionary	Discretionary

- 7.11 As the table above shows, the general size and bulk of development permitted under the current zoning is greater than would be provided for under the proposed zoning change. A reduction in the general building bulk on site and a restriction on building coverage will result in development of a more modest scale that, as outlined within the Urban Design Assessment in **Appendix 1**, will result in less shadowing and loss of daylight on the adjacent Ranui Domain and greater on-site amenity. The visual quality of the interface between the site and the Domain will be achieved to a higher standard than what is possible under the Light Industry Zone. The larger bulk proposed for the site, being the THAB zone to the south of the site, is set back sufficiently from Swanson Road so as not to appear prominent or widely visible from the streetscape.
- 7.12 Development under the Business Light Industry zone does not allow for the efficient use of the site, nor will it provide for development that is consistent with the existing character of the area. The applicant does not seek any changes to the development standards of the proposed zone, or to any other controls of the Auckland-wide provisions of the AUP(OP). The development controls under both the THAB and MHU zones provide sufficient control to enable future residential development to be of a similar scale as the existing residential environment as well as to meet the planned outcomes of the AUP(OP).

## Design and amenity

7.13 As outlined above, the current zoning of the site (Business Light Industry) does not afford many controls in terms of the design of buildings or on-site amenity. While the bulk of new development under the zone is required to be set back from residential boundaries, no urban design principles or best practice outcomes are required to be achieved. Indeed, no resource consent is required for new buildings within the Light Industrial zone that achieve the little standards that are provided, giving Auckland Council little chance to control the standard of development.

- 7.14 Conversely, new development within both the MHU and THAB zone are controlled by a large number of standards and the objectives and policies encourage attractive and safe streets, open spaces, daylight access, privacy and a management of visual dominance effects. As outlined in the Urban Design Assessment, these controls will result in superior urban design effects than the existing zone.
- 7.15 Due to the size of the site and its orientation primarily to the north and south, residential redevelopment could result in a structure of buildings that enjoy an eastern, northern or western orientation, providing for more than adequate access to sunlight and avoiding predominately south-facing units.
- 7.16 The other key design and amenity aspect of the proposed site is the existing stream that passes through the middle of the site. Under the current zoning, other than a development setback, no additional consideration is required to be given to this stream environment. Under the proposed zoning it is very likely that the retention and enhancement of the stream would be undertaken to provide for a positive on-site amenity provision for future development.

## Conclusion

7.17 While the site is bound by industrial zoning to the west, the rest of the surrounding area is predominately suburban and residential in character. The proposed zoning change on site is considered to be the most appropriate in seeking the planned outcomes of the AUP(OP), being high density housing near public transport routes, as well as contributing to and enhancing the existing character of the surrounding neighbourhood.

## Transport

7.18 The requested rezoning of the site will result in changes to the transport demands of the site within the context of the existing roading network. An Integrated Transport Assessment (ITA)

has been prepared for the proposed plan change by Commute Transportation Consultants and is attached to this report in **Appendix 3.** The ITA has focused on addressing the following:

- Potential future trip generation and its impact on the surrounding transport network;
- The safety of a future intersection on Swanson Road allowing access into the site; and
- Access to the site by vehicles, cyclists and pedestrians.

# Existing Transport Environment

7.19 Under the Auckland Unitary Plan (Operative in Part), Swanson Road is identified as an arterial road and is major route that connects Swanson in the west with Henderson in the east. Near the site, Swanson Road has a single lane of traffic in each direction, separated by a flush median, with a speed limit of 50 km/h. There are pedestrian footpaths provided on both sides of Swanson Road, with a signalised pedestrian crossing approximately 440m east of the site. The site is located to a pair of bus stops on Swanson Road, providing connections to the Henderson Interchange, and the Ranui Train Station is located approximately 350 m from the site.

# Trip Generation

7.20 The Integrated Transport Assessment in Appendix 3 has assessed a potential trip generation of future residential development on the site as approximately 115 movements per hour. Based on the existing industrial zoning on the site, the 'permitted' threshold for development on the site is approximately 90 vehicle movements per hour for industrial activities.

# Residential Parking

# Car parking

7.21 The proposed plan change will see the site rezoned from Business Light Industry to Residential Mixed Housing Urban (MHU) and Terrace Housing and Apartment Zone (THAB). Under the

AUP(OP), the MHU zone requires a minimum of 1 parking space per dwelling (with two or more bedrooms) whereas the THAB has no minimum or maximum parking requirements. With a conservative figure of 200 dwellings that could potentially occur on the application site, a minimum number of 100 car parking spaces would need to be provided to satisfy the standards under Chapter E27 of the AUP(OP). As concluded by the Integrated Traffic Assessment in **Appendix 3**, there is sufficient space on the site to cater for this requirement and will not result in any potential non-compliance for future development resource consents on the site.

#### Bicycle parking

7.22 The required number of bicycle parks for any future development would be dependent on the typology of the residential development proposed. Development of 20 dwellings or more requires 1 bike park per dwelling for those without a dedicated garage. This would typically be relevant for apartment developments which do not necessarily favour garaging. While the total number of spaces to be provided on the site will be determined during future resource consenting stages on the site, there is sufficient space within the site to allow for a compliant number of bike parks, as concluded by the Integrated Transport Assessment in **Appendix 3**.

#### <u>Access</u>

### Vehicle Access

7.23 There are currently four existing vehicle crossings accessing the site off Swanson Road. Due to the potential trip generation from the site following future residential development, a priority controlled intersection onto Swanson Road has been assessed as an appropriate access into the site, allowing for both right turn entry and exit from the site (in addition to left turn entry and exit onto Swanson Road). An indicative location of the intersection is provided on Page 14 of the Integrated Transport Assessment in **Appendix 3**. The future intersection providing access into the site would be located at sufficient distance away from the nearest intersections off Swanson Road, avoiding potential conflict within the existing transport network. While the detailed design of the intersection will occur during the resource consent applications for future development, the conclusion of the assessment in **Appendix 3** is that the initial design can accommodate safe movements within the surrounding transport network.

Pedestrian and Cycle Access

7.24 The rezoning of the site, particularly with the THAB zone located to the south of the site, aligns with the strategic direction of the AUP(OP) and Auckland Transport by establishing high density residential developments in close proximity to public transport nodes. There is an existing path that runs through the Ranui Domain, leading to the Waitemata Seagulls League Club and car park in the south-eastern corner of the domain site. Future redevelopment of the application site is likely to provide connections to this existing path through the Domain, providing safe and delineated access to the Ranui train station for both pedestrians and cycle users.

#### **Conclusion**

7.25 The Integrated Transport Assessment in **Appendix 3** concludes that the predicted increase in vehicle movements as a result of the proposed plan change is not expected to generate a significant adverse effect on the existing road network, with the existing transport environment capable of accommodating the additional traffic. An indicative intersection layout between the site and Swanson Road initially confirms that a new access layout into the site is feasible and can service up to 200 dwellings on the application site. The site is sufficient to cater for future car and bicycle parking demand within the boundaries of the site and there is the potential for future pedestrian connections to be constructed providing safe and efficient access to the Ranui Train Station. Overall, there are considered to be no potential adverse effects on the surrounding transport network that would make the proposed plan change inappropriate or unsupportable.

#### Infrastructure

7.26 A Preliminary Infrastructure Report has been prepared for the proposed plan change, following consultation with Watercare, and is attached to this report in **Appendix 2**. A summary of the preliminary assessment, with comments on additional matters, is provided below.

#### <u>Wastewater</u>

7.27 The initial assessment undertaken on the site and initial communications with Watercare confirms that there is insufficient capacity in some of the downstream environments for a redevelopment of the proposed site. Following consultation with Watercare, a number of connection points have been found, which are explored in detail in the Preliminary Infrastructure Assessment attached to this request in **Appendix 2.** Ultimately, the assessment concludes that there are options available for future connections to the network to service potential residential developments on the site.

#### Water Supply

7.28 An assessment of the estimated water demand for a residential use of the application site has been considered by Fraser Thomas in the report in **Appendix 2.** The assessment and further correspondence with Watercare confirms that there are no capacity constraints in the current water network and that any future residential development on the site could be adequately serviced. Comments have been made by Watercare as to the material of any proposed pipes through the site given that the extent of contamination of the soil is unknown. These matters would be addressed during resource consent and detailed design stages.

#### <u>Stormwater</u>

7.29 As the site is located within a Stormwater Management Area Control (Flow 2) noted under the AUP(OP), future development of the site will be required to undertake retention and detention of stormwater runoff. The size of the application site is considered sufficient to allow for the management of stormwater runoff to take place. In addition, the proposed zoning of the site places limitations on the area of impervious surfaces on the site for future development, which the current zoning does not control. These matters will be adequately dealt with during future resource consenting on the site due to the existing Auckland-wide provisions of the AUP(OP).

#### **Overland Flow Path**

7.30 The Auckland Council GIS Viewer depicts an overland flow path flowing through the site from the southern boundary through to the Ranui Domain. This is reflected on site by the existing waterway that divides the site. A floodplain is also identified running in parallel to the overland flow path. Because of the concentrated nature of the overland flow path and the floodplain as well as the Auckland-wide provisions of the AUP(OP), future development will need to give consideration to the effects of these features on site. With the proposed zoning change to residential on the site, future housing developments, containing more vulnerable activities, are subject to additional assessment criteria than development under the current light industry zoning. Therefore, the potential adverse environmental effects of development in, on or close to overland flow paths will be more comprehensively managed under the proposed zoning change for the site.

#### **Conclusion**

7.31 Overall, there are considered to be no infrastructure constraints to the proposed zoning change of the site under this plan change request. There are sufficient existing provisions of the AUP(OP) that ensure appropriate assessments are conducted at the time resource consents are sought for future development.

#### **Economic Analysis**

7.32 An Economic Cost Benefit Analysis Report for the proposed plan change has been undertaken by Adam Thompson and is attached to this request in **Appendix 5**. The report assesses the industrial land supply in the area and the economic costs and benefits of future development on the application site. These matters are summarised below.

#### Industrial Land Supply

7.33 There is currently 57 hectares of industrially zoned land in Ranui, of which the application site contributes 2.7 ha, or 5% of the total land supply in the local area. However, 10% of the industrially zoned land within Ranui is currently vacant and the remaining land is being underutilised for industrial uses. In the wider Waitakere area, the site equates to just 0.5% of

the total industrial land zoned under the AUP(OP). As explained within the report in **Appendix 5**, there is little demand for industrial land within Ranui, given the distance of the suburb from major transport networks, markets and employees. This is reflected in the low price for industrial land in Ranui compared to land elsewhere in Auckland.

- 7.34 Through the changes in statutory documents in Auckland, there has been a significant increase in the availability of industrial land between the legacy district plans and the AUP(OP). New industrial land has been zoned in areas better suited to industrial development, such as Whenuapai, where the land is serviced by motorway connections and closer to metropolitan centres such as Albany.
- 7.35 The proposed rezoning of the application site will technically result in a loss of industrially zoned land in the Ranui and wider Waitakere area. However, the site has not been used for industrial purposes perhaps ever, but certainly not in the last 30-50 years. Therefore, the site has never contributed to the industrial land supply and its rezoning is considered to result in inconsequential effects. This is furthered by the establishment of housing, open space and key transport corridors that have been developed on neighbouring sites, creating an environment that is not compatible with the current industrial zoning of the site.

#### Economic Costs and Benefits

7.36 As outlined within the Analysis Report, the largest economic cost relating to any future development on the application site would be the operation of industrial activities. Due to the low value of industrial land in Ranui, the use of the site for its zoned purpose under the AUP(OP) would lead to an economic loss for the landowner. On the other hand, development of the land for residential purposes, particularly given the site's location adjacent to the Ranui Domain, would significantly increase the value of the land. It is noted that the Analysis Report further assesses both the potential for government provided temporary social housing as well as intensive private residential development on the site, determining that temporary social housing would provide a superior economic outcome over time. Whether the future use of the site will be government based or private development will be determined by future resource consent applications, but it is noted that the proposed rezoning of the site will enable either, or both, of these uses to occur.

#### <u>Conclusion</u>

7.37 Overall, the conclusion provided by the Economic Cost Benefit Analysis Report in **Appendix 5** is that the 'loss' of the industrially zoned land on the application site will be inconsequential as the site contributes a very small portion of the industrially zoned land in the surrounding area and as it has never been used for industrial purposes, it has never added value to the industrial land supply in Ranui. Furthermore, the use of the application site for its zoned purpose, being industrial activities, would lead to a commercial loss due to the lack of demand for industrial land in Ranui. The development of intensive residential housing on the site would contribute to the lack of affordable housing in Auckland and provide a significant economic benefit.

#### Mana Whenua Values

7.38 There are no known archaeological sites or sites of significance to Mana Whenua located on the site. However, due to the scale of the plan change proposed and as the site is located within a Statutory Acknowledgement Area, consultation with iwi, particularly Te Kawerau a Maki, has been undertaken (refer to section 10 below). As the site is currently being used for housing and is providing a need to members of the community that are overlooked by other social housing providers, the plan change is not considered to result in any adverse effects on Mana Whenua values of the land or surrounding area. The support received from Te Kawerau a Maki is attached to this application in **Appendix 7.** 

#### **Natural Resources**

<u>Trees</u>

7.39 There are no notable trees or significant ecological areas identified on the application site. Therefore, there will be no loss of significant vegetation or ecological areas as a result of the proposed plan change.

### <u>Stream</u>

7.40 There is an existing unnamed natural watercourse located through the site that passes through a pond within the Ranui Domain and traverses the application site. The unnamed watercourse is a tributary to the Swanson Stream and is further detailed in the Stream Model Assessment in **Appendix 9.** The assessment also concludes that there is unlikely to be an esplanade reserve requirement due to the average width of the watercourse being less than 3m during full yearly flows and that residential development in the future will be at a very little risk of flooding that can be accommodated with raised ground levels on the application site.

#### **Contaminated Land**

7.41 A Detailed Site Investigation (DSI) was undertaken on the site in September 2018 by Fraser Thomas Consultants (see **Appendix 8**). The DSI confirmed that the site had been subject to HAIL activities in the past and two samples detected DDT and Arsenic. However, all of the samples taken from the site complied with the applicable NES Soil high-density residential land use standards and the AUP(OP) permitted activity discharge criteria. While further sampling is likely to be undertaken prior to the redevelopment of the site, the DSI undertaken at the site confirms that the proposal to re-zone the land for residential development is unlikely to give rise to any concerns in terms of effects on human health.

#### Geotechnical

7.42 The site is relatively flat, with little change in the topography over the site area. The DSI undertaken for the site (**Appendix 8**) has considered the possibility of fill activities having been undertaken on the rear of the site in the past. Prior to any intensive land development on the site, a detailed geotechnical investigation will be undertaken to confirm the stability of the site and whether any removal of fill will be required. The proposed plan change will not alter the need for an investigation to be undertaken and as such, there are considered to be no reasons from a geotechnical perspective to prevent the proposed plan change.

#### Heritage

7.43 A review of the surrounding area has confirmed that there are no heritage areas (including the Waitakere Ranges Heritage Area), scheduled buildings, Heritage New Zealand listed buildings, known archaeological sites, sites of significant to Mana Whenua or notable trees in close proximity to the application site. Therefore, the proposed plan change will not have any effect relating to heritage values. Any future development applications would likely include normal Accidental Discovery Protocols which will manage the discovery of any items of heritage value at that time.

#### **Reverse Sensitivity Effects**

7.44 Under the provisions of the AUP(OP), consideration is given to situations where different zones interface with one another, with the less sensitive zoning often required to comply with more development controls. In this case, the light industrially zone to the west of the application site will be subject to a reduced noise limit and development setbacks from the boundary as a result of the proposed zone change of the site from industrial to residential. However, these industrially zoned properties to the west of the application site already have adjoining interfaces with residentially zoned land and thus, are already restricted in the nature of their emissions and development. Nonetheless, an Acoustic Assessment has been undertaken for the proposed plan change and is attached to this application in Appendix 10. The assessment concludes that the provision of an acoustically treated fence along the boundary of the application site and its industrial neighbour will contribute to an acoustically appropriate environment for future residents while avoiding a significant reverse sensitivity effect on the industrial activities on the neighbouring property. The design of such fence will be undertaken during resource consenting stage of any future development on the site. In addition, it is noted that through the formal plan change and hearing process, the potential to use legal mechanisms (such as an encumbrance) on the subject land which requires the incorporation of noise mitigation measures within future noise sensitive activities can be explored.

## Summary of effects

- 7.45 Overall, the proposed rezoning is considered unlikely to generate any unacceptable adverse effects on the environment. The proposed bulk and amenity of the site will be of a higher quality with less visual impact than is currently allowed under the site's zoning. The proposed plan change is supported from an urban design perspective and there are no traffic safety or capacity reasons that would prevent the zoning change. While infrastructure on site would need to be upgraded to support the development, there are viable options available. The rezoning of the land to enable future intensive residential development would result in a significant economic benefit when compared to the use of the land associated with its industrial zoning and potential reverse sensitivity effects can be mitigated through acoustically treated fencing.
- 7.46 In general, the positive effects of the proposed plan change are significant, and the rezoning of the land will result in a better environmental outcome than the existing zoning on the site.

# 8. STATUTORY ASSESSMENT

- 8.1 The Resource Management Act (1991) (RMA) sets out the statutory framework, within which resources are managed in New Zealand. The following section analyses the relevant statutory provisions that apply to proposed changes to regional and district plans. Schedule 1 of the RMA sets out a hierarchy of tests in order to determine whether a requested plan change is appropriate.
- 8.2 Clause 21 of the RMA sets out the matters for consideration when considering a request for a private plan change, the consent authority must, subject to Part 2 of the Act, have regard to;
  - i) Part 2 of the Resource Management Act (1991);
  - ii) the relevant tests under Section 32;
  - iii) National Environmental Standards;
  - iv) National Policy Statements;
  - v) Regional Policy Statement; and
  - vi) Regional Plans

## Part 2 of the Resource Managements Act

- 8.3 The purpose of the RMA is to promote the sustainable management of natural and physical resources. As stated in section 5 of the Act, this means:
  - 5(2) In this Act, sustainable management means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while
    - (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
    - (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
    - (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.
- 8.4 The requested private plan change achieves the purpose of Section 5 of the RMA as it provides for the use and development of land in a more efficient manner and reflects the changing

demands of land use within the wider area. The proposed residential zoning is considered the most appropriate use of the site as it enables the development of high quality and high intensity residential use, while avoiding, remedying and mitigating the effects on neighbouring sites and the streetscape through more stringent standards, objectives and policies. The proposed zoning is also considered to be most compatible with the residential character of the area. As discussed earlier in the report, the development of future land use under the proposed zoning will not have adverse effects on the existing natural elements of the surrounding environment. Indeed, the proposed zoning places greater emphasis on the need to enhance these environmental features more so than the current zoning requires.

- 8.5 Section 6 sets out matters of national importance relative to the natural character of the coastal environment, protection of outstanding natural features, protection of areas of significant public access along coastal marine areas, lakes and rivers, and the relationship of Maori and their culture with the land. Of relevance to this proposed plan change is the relationship of Maori with land given the site's location within the Statutory Acknowledgement Area for Te Kawerau a Maki. Consultation has been undertaken with Te Kawerau a Maki (see Section 10 and Appendix 7) who have confirmed their support for the proposal. Any future development on the site will be subject to the assessment under Section 95B and consideration of Te Kawerau a Maki's values will be taken into account.
- 8.6 Section 7 requires particular regard be had to 'other matters.' The consultation undertaken with iwi, particularly Te Kawerau a Maki, has provided for their kaitiakitanga and ensures their involvement with the development of the site going forward. The proposed plan change provides for the efficient use of the land by enabling more intensive residential development through the loss of industrial land that has never contributed to the supply of industrial land supply in the area. The proposed plan change will allow for residential intensification of the area at a scale and intensity considered appropriate within the context of the existing residential neighbourhood.
- 8.7 Development of the site for residential purposes in considered to be less obtrusive to the natural amenity of the site in comparison with industrial uses. As such, the proposed residential zoning is considered to enable a level of development that achieves a balance between meeting housing demands within the area as well as making a positive contribution to the neighbourhood. The proposed zoning will provide for residential development that is

commensurate to the existing built form of the area and anticipated built form objectives for the zone.

- 8.8 Section 8 requires the principles of the Treaty of Waitangi be taken into account. The proposal is not considered to be contrary to the principles of the Treaty of Waitangi as consultation with iwi has been undertaken and support for the plan change has been received.
- 8.9 Overall, the application is considered that the proposed plan change is consistent with Part 2 of the RMA, as it achieves the purpose of the Act being the sustainable management of natural and physical resources.

#### **National Environmental Standards**

<u>NES Soil</u>

8.10 A Detailed Site Investigation has been undertaken on the site and has determined the presence of contaminants from past HAIL activities (see **Appendix 8**). As such, any subsequent resource consent to develop the site will require further assessment of the contaminant levels of the site and any required remediation in order to ensure suitability for residential development. Requirements under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES Soil) can be adequately managed through the resource consent process and is not considered to be of relevance to this plan change application.

#### **National Policy Statements**

#### National Policy Statement on Urban Development Capacity 2016

- 8.11 The National Policy Statement on Urban Development (2016) (NPSUD) provides direction to Councils on planning for urban environments. It recognises the national significance of well-functioning urban environments, with particular focus on ensuring local authorities enable urban environments to grow and change in response to the changing need of the community and provide enough space for the population to live and work.
- 8.12 The NPSUD sets out objectives that apply to all decision-makers when making planning decisions that affect an urban environment. As the proposed plan change seeks to contribute

to the urban development capacity of Auckland, an assessment of the relevant objectives is provided below.

#### **Objective Group A – Outcomes for planning decisions**

- 8.13 OA1 Effective and efficient urban environments that enable people and communities and future generations to provide for their social, economic, cultural and environmental well-being
- 8.14 OA2 –Urban environments that have sufficient opportunities for the development of housing and business land to meet demand, and which provide choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations, working environments and places to locate businesses.
- 8.15 OA3 Urban environments that, over time, develop and change in response to the changing needs of people and communities and future generations

### Assessment

8.16 The application site has been used for temporary housing for the last 30 years at least, if not 50 years. It has never been used for industrial activities and has never contributed to the supply of industrial land in the Waitakere area, despite its zoning. The site's location adjacent to the Ranui Domain, within walking distance to the Ranui Train Station and the surrounding residential development presents a unique opportunity to enable the development of housing to provide for the needs of the surrounding community. The proposed plan change will enable the development of the site to response to the urban environment that has developed in the surrounding area by providing a range of dwelling types near a local centre, open green space and transportation options. The current zoning of the site does not allow for such development to occur. In this way, the proposed plan change is considered to be consistent with the Group A objectives.

## **Objective Group B – Evidence and monitoring to support planning decisions.**

8.17 OB1 - A robustly developed, comprehensive and frequently updated evidence base to inform planning decisions in urban environments.

#### Assessment

8.18 This plan change request is accompanied by comprehensive expert analyses and assessments, including an Economic Cost-Benefit Analysis (**Appendix 5**), an Integrated Transport Assessment (**Appendix 3**), an Urban Design Assessment (**Appendix 1**), Preliminary Infrastructure Assessment (**Appendix 2**) and an Acoustic Assessment (**Appendix 10**). These expert opinions have been relied upon to provide a comprehensive evidence base for the proposed plan change. As such, this request is considered to be consistent with the relevant objective under Group B.

#### **Objective Group C – Responsive planning**

- 8.19 OC1 Planning decisions, practices and methods that enable urban development which provides for the social, economic, cultural and environmental wellbeing of people and communities and future generations in the short, medium and long-term.
- 8.20 OC2 Local authorities adapt and respond to evidence about urban development, market activity and the social, economic, cultural and environmental wellbeing of people and communities and future generations, in a timely way.

#### Assessment

- 8.21 The purpose of the proposed plan change is to enable urban development to be undertaken at a scale and intensity to provide for the wellbeing of the community. The existing use undertaken on the application site provides housing to members of the community who cannot seek housing options elsewhere for many reasons. However, the expansion of these facilities cannot be carried out under the current zoning for the site. The decision by the applicant to seek a plan change, rather than a (series of) notified non-complying resource consent applications, will provide for the wellbeing of people and the community in the longer term and is considered to be a more appropriate and sustainable planning practice.
- 8.22 The expert analysis and assessment provided with this proposed plan change confirm that the proposed rezoning of the site from industrial to residential has positive benefits, particularly on the social, economic, cultural and environmental wellbeing of the community, by enabling residential use at a scale and intensity that is commensurate of the character of the existing environment responsive to the surrounding uses.

## **Objective Group D – Coordinated planning evidence and decision making**

- 8.23 *OD1 Urban environments where land use, development, development infrastructure and other infrastructure are integrated with each other.*
- 8.24 OD2 Coordinated and aligned planning decisions within and across local authority boundaries

## Assessment

8.25 The requested plan change enables any future residential development to build upon the existing infrastructure connections and provide new connections in such a way as to avoid any adverse impact on the capacity of the surrounding infrastructure network, including wastewater, stormwater as well as the transport network. Consultation has been held with several local authority organisations, including Watercare, Auckland Council Parks and Auckland Transport, and the development of future uses on the site will coordinate these infrastructure providers to ensure an integrated solution.

### **Auckland Regional Policy Statement**

- 8.26 The Auckland Regional Policy Statement (ARPS) is contained within the Auckland Unitary Plan (Operative in Part) and outlines the significant resource management issues for the Auckland Region. The ARPS identifies nine key issues and of relevance to this application are the following:
  - B2 Urban growth and form;
  - B3 Infrastructure, transport and energy;
  - B6 Mana Whenua;
  - B7 Natural resources; and
  - B10 Environmental risk.
- 8.27 The provisions of the AUP(OP) must give effect to the ARPS and therefore, the proposed plan change will be assessed against the relevant objectives and policies below.

#### B2 Urban growth and form

8.28 The relevant objectives and policies of Part B2 aim to achieve the outcome of sustained urban growth in order to create and maintain compact urban form through residential and

commercial growth in appropriate locations within close-proximity to amenities such as centres, transportation nodes and public open spaces.

8.29 The proposed plan change seeks to rezone the application site to enable the growth of residential development, providing for medium-high density use. The proposed change is considered appropriate given the site's location adjacent to the Ranui Domain, the Ranui Train Station and the Ranui Town Centre. As outlined within this report and the Urban Design Assessment in **Appendix 1**, the surrounding character of the area is suburban in nature and, as assessed under s32 of the RMA in **Section 9 and Appendix 6** of this report, the combination of the residential zones proposed on the site presents the most efficient and effective manner in which to promote sustainable management of the site and surrounding area. In this way, the proposed plan change request is considered to be consistent with the relevant objectives and policies of Part B2 of the ARPS.

#### B3 Infrastructure, transport and energy

8.30 The relevant objectives and policies of Part B3 seek an efficient and safe transport network that integrates with a quality compact urban form and locating high trip generating activities close to key public transport services. The application site is bound to the south by the railway line that connects the area with Britomart. The Ranui train station is within walking distance of the site and the proposed rezoning seeks to intensify the residential land use adjacent to this transport corridor. The Integrated Transport Assessment (**Appendix 3**) prepared for the proposed plan change has demonstrated that a new intersection from the application site onto Swanson Road can be accommodated without significant adverse effects to the network, providing alternative forms of transport for future development of the site. While resource consent applications for future development on the site will determine more specific detail of the infrastructure effects, the proposed rezoning of the site under this plan change request is generally consistent with the relevant objectives and policies of Part B3 of the ARPS.

#### B6 Mana Whenua

8.31 The relevant objectives and policies of Part B6 recognises the principles of the Treaty of Waitangi, the relationship of Mana Whenua with Treaty Settlement Land and the values of Mana Whenua during the resource management decision making process. In addition, the

values of Mana Whenua heritage is protected, and Maori economic, social and cultural wellbeing is supported.

8.32 The application site is located within a Statutory Acknowledgement Area and as such, Mana Whenua have been consulted prior to the lodgement of this formal plan change request. Te Kawerau a Maki have confirmed that there are no objections to the plan change (see Appendix 7) and support the rezoning of the site to residential use. This proposed plan change, and the support from Mana Whenua, relates to the rezoning of the application site only and does not extend to any physical development. However, the approval from Te Kawerau a Maki and the consultation with iwi during this proposed plan change process is consistent with the relevant objectives and policies of Part B6.

#### **B7.3** Freshwater Systems

8.33 Under Part B7.3 of the Regional Policy Statement, the relevant objectives and policies seek to minimise the loss of freshwater systems, the enhancement of degraded freshwater systems and the integrated management of development to ensure provisions for stormwater, wastewater and water supply are adequately provided for, avoiding discharges or runoff into freshwater systems. There is an existing freshwater waterbody present on the site that has not been enhanced or protected in any meaningful way. With the proposed change in zoning of the site to residential, the opportunity to improve the quality of this stream will be greater, in order to provide for the amenity of future residents on the site. In addition, all future development on the site will be connected to existing wastewater and stormwater networks (following necessary upgrades and with the required retention/detention), which will enhance the quality of the freshwater system on the land.

## B10.4 Land – Contaminated

8.34 The relevant objectives and policies of Part B10.4 seek to protect human health and the quality of the environment from effects arising from contamination, to identify land which may be contaminated and to remediate land where the level of contamination present is unsuitable. Limited detailed sampling of the site has already been undertaken (see Appendix 8), confirming the presence of some contaminants above background levels. However, all samples readily complied with the applicable national environment standard criteria for high-

density residential land use and with the discharge criteria for permitted activities under the AUP(OP). As samples containing above background levels have been detected, any future land use of the site will require resource consent under the NES (Soil), which will direct whether management or remediation of the site is necessary.

Conclusion

8.35 Overall, the proposed plan change request is considered to be consistent with the relevant objectives and policies of the Auckland Regional Policy Statement.

## 9. SECTION 32 ANALYSIS

9.1 Clause 22 of Schedule 1 of the RMA states that a request for a plan change must contain an evaluation report prepared in accordance with section 32 of the RMA. Section 32 requires the analysis of the requested plan change as well as alternative options to determine the most appropriate method in achieving the objectives of the Auckland Unitary Plan. As such, the following options have been explored to consider the best means of addresses the sustainable management purposes of the Act. A summary is provided below, with a full s32 analysis attached to this report in **Appendix 6.** 

#### Option One: Do nothing

- 9.2 This is the status quo option, to retain the existing zoning on the site which would enable development to occur in accordance with the provisions of the Business Light Industry Zone. This current zoning on the site allows for light industrial uses to be established, such as manufacturing, storage and warehousing, with no control over maximum building coverage, impervious areas and a height limit of 20m. Residential accommodation within this zone is identified as a non-complying activity due to the lower amenity values typically associated with light industrial activities.
- 9.3 This option is not considered to be appropriate given the existing use of the application site for residential purposes and the lack of any uses in the past for industrial activities. Due to the site's proximity to the Ranui Domain, Train Station and surrounding residential properties, the existing zone is not considered to support the regional policies and objectives of the AUP(OP).

#### Option Two: Rezone the site to Business Mixed Use

9.4 This option has been considered as the Business Mixed Use zone allows for both residential and commercial activity, which has been considered a possibility for the site given the adjacent industrial and residential zoning. The Business Mixed Use encourages a mixtures of non-residential and residential activities while achieving a high level of amenity. However, the zone does not require a mixture of development so residential use is not a priority for the zone. In general, this zone is not considered to be the most effective or efficient means of increasing the supply of housing in the area.

Option Three: Rezone the land to Residential Mixed Housing Suburban

9.5 This option has been considered as the Residential Mixed Housing Suburban Zone enables residential development to occur and the properties to the immediate north of the application site are zoned as such. Development within this zone is generally restricted in terms of height, bulk and coverage but would result in a higher quality interface with the public open space to the east of the site. However, overall, while this option provides for residential housing with on-site amenity, it does not provide for the intensity of housing sought under the AUP(OP) when considering the site's proximity to public transport, public open space and a town centre.

## *Option Four: Rezone the land to both Residential Mixed Housing Urban and Residential Terrace Housing and Apartment Zone*

9.6 These two zones provide for the highest density of housing and greater choice in housing types within the Auckland Region. These two options have been considered to take advantage of the site's location close to the Ranui Train Station and Ranui Domain while also enabling a transition of density across the site to the lower intensity existing suburban zoned properties along Swanson Road. These zone seek high quality on site amenity as well as consideration of the amenity of neighbouring properties and overall, is considered to be the most appropriate and efficient way of meeting the objectives of the AUP(OP) and all other relevant statutory planning documents.

#### Risk of acting or not acting

9.7 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 above and in Appendix 6. For this reason, an assessment of the risk of acting or not acting is not required.

#### Summary of reasons for deciding on the provisions

9.8 When comparing the other potential zoning options for the application site, it is considered that the proposal is the most efficient and effective and gives effect to the AUP(OP) and Auckland Regional Policy Statement. In particular, the proposed rezoning recognises and responds to the characteristics of the site, including its location close to the Ranui Train Station and its shared boundary with the Ranui Domain.

- 9.9 The provisions of the zone, in conjunction with all relevant Auckland-wide rules of the AUP(OP), will ensure environmental effects of future development proposals are avoided, remedied or mitigated in a more effective and efficient manner.
- 9.10 The proposal is considered to achieve a level of development which is consistent with the existing residential nature of the wider surrounding area, particularly to the north, east and south of the site. In addition, the site is able to provide for the anticipated built form and scale of development provided for within both the Mixed Housing Urban and Terrace Housing and Apartment Zones. Residential development of the site at the intended scale provides greater flexibility and opportunity to further develop the site in the future for more intensive uses in accordance with the anticipated changing demands of the area.
- 9.11 The requested zone and all relevant provisions to be applied to the site have been assessed as part of a section 32 analysis process and, on-balance, the requested rezoning of the site to Residential – Mixed Housing Urban and Terrace Housing and Apartment Zones is considered to be the most appropriate, effective and efficient means of achieving the purpose, objectives and policies of the AUP(OP).

## **10. CONSULTATION**

10.1 Prior to the formal preparation and submission of this private plan change request, a number of interested groups and stakeholders were consulted. The details of the consultation with these groups is provided below.

#### **Auckland Council Parks**

10.2 A meeting was held with two representatives of the Council Parks department (Roma Leota and Mimouk Hannan) on 26 June 2019. In principle, there was no resistance or significant concern regarding the proposed plan change. Discussions were had about the likely location of building bulk and massing on the site, however, these details are better suited to resource consent applications for future development on the site. Given the site's location adjacent to the Ranui Domain, residential activity appeared to be preferred by the Park department over industrial activity.

#### **Auckland Transport**

10.3 A meeting was held with two representatives of Auckland Transport (Alastair Lovell and Kelly Seekup) on 3 July 2019. In principle, there was no resistance or significant concern regarding the proposed plan change. A draft intersection design was prepared by Commute Transportation Consultants and presented at the meeting, noting that detailed design of any new roads will feature during the resource consent application. As requested by Auckland Transport, an Integrated Transport Assessment has been prepared for this proposed plan change request and this is attached to this report in **Appendix 3**.

#### Watercare

10.4 A meeting was held with several representatives of Watercare (Ilze Gotelli, Nita Dharmadhkari and Nathan Donald) on 24 June 2019. A preliminary infrastructure design was presented by Fraser Thomas and alternative connections to their infrastructure was proposed by Watercare based on downstream capacity constraints on the network. An updated design based on Watercare's feedback has been prepared and is provided in **Appendix 2** to this report. Watercare confirmed their specific design criteria can be discussed at resource consenting and engineering approval stage and had no concerns about the proposed plan change.

#### Mana Whenua

10.5 Five iwi groups with known interests in the area were consulted by email on 10 June 2019. Of these five, only Te Kawerau a Maki expressed an interest in engaging regarding the plan change with Te Akitai Waiohua and Ngati Whatua Orakei not responding, Te Runanga o Ngati Whatua deferring to Ngati Whatua o Kaipara who then deferred to Te Kawerau A Maki). A meeting was held with Robin Taua-Gordon from Te Kawerau a Maki to discuss the proposed plan change. Correspondence is provided in **Appendix 12** and a summary is provided in the table below.

Iwi	Organisation	Response
Te Kawerau a Maki	Te Kawerau Iwi Tribal Authority &	A meeting was held with 28 June 2019
	Settlement Trust	with Robin Taua-Gordon. A formal letter
		has been provided by Robin and this is
		attached to this report in Appendix 7.
Te Akitai Waiohua	Makaurau Marae Maori Trust	No response has been received.
Ngati Whatua	Ngati Whatua Orakei	No response has been received.
Orakei		
Ngati Whatua o	Nga Maunga Whakahi o Kaipara	Responded to the email and deferred their
Kaipara	Development Trust	input to Te Kawerau a Maki.
Te Runanga o Ngati	Te Runanga o Ngati Whatua	Responded to the email and deferred their
Whatua		input to Ngati Whatua o Kaipara

#### Kiwirail

10.6 Given the proximity of the site to the rail line, Kiwirail have also been consulted regarding the proposed plan change. The response received on 24 June 2019 does not oppose the plan change but outlines their building design and setback standards for development in close proximity to the railway. As for all details relating to the potential future use of the site, the building design and setback from the railway will be confirmed during the resource consenting of future land use on the site.

#### Henderson Massey Local Board

10.7 An email was sent to the Henderson Massey Local Board Chairman (Shane Henderson) on 10 June 2019. The response provided was that the local board would provide their formal views through the standard planning process following formal lodgement of the proposed plan change request.

### Neighbouring properties

10.8 The applicant has undertaken informal conversations with some of the surrounding neighbours but has not at this stage engaged formally. It is acknowledged that the notification of this private plan change request will enable surrounding properties to submit on the proposed plan change and the applicant intends to engage prior to the formal notification of the plan change request.

## 11. CONCLUSION

- 11.1 This report has been prepared in support of a request from Western Park Village to Auckland Council for a private plan change at the site at 522-524 Swanson Road, Ranui. The plan change seeks the rezoning of the site from Business – Light Industry to a combination of Residential – Mixed Housing Urban and Residential – Terrace Housing and Apartment Zones.
- 11.2 The request has been made in accordance with the provisions of Schedule 1 and Section 32 of the Resource Management Act and is considered to provide the necessary level of assessment of the key principle issues relating to the request.
- 11.3 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. Other potential effects are able to be managed through the application of the AUP(OP) zone and Auckland-wide provisions.
- 11.4 An assessment against the provisions of section 32 of the RMA has been provided within this report. This includes an analysis with respect to the extent to which the purpose of the proposal is the most appropriate to achieve the purpose of the RMA and an examination of whether the purpose of the proposal is the most appropriate way to achieve the objectives.
- 11.5 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 1**

# **URBAN DESIGN ASSESSMENT**

# urban design assessment and neighbourhood design statement 524 SWANSON ROAD

for

WESTERN PARK VILLAGE LTD

by

IAN MUNRO

august 2019

# executive summary

This report documents an independent analysis of an application for a Private Plan Change to rezone approximately 2.65ha of land currently zoned Business Light Industry Zone, for Western Park Village Ltd at 524 Swanson Road, Ranui. The application has been made to Auckland Council under the Resource Management Act **1991 ("RMA")** in terms of the Auckland Unitary Plan (Operative in Par**t)** "AUP: OP". The key conclusions of this report are that:

- a. The proposed combination of Mixed Housing Urban and Terraced Housing and Apartment Building residential zones are more appropriate than the existing Light Industry zone given the site's opportunities and constraints, and adjacent land's characteristics including the adjoining Ranui Domain, Ranui Local Centre and the adjacent Ranui rail station.
- b. The proposal provides for a superior amenity and better land use 'edge' to the Ranui Domain than would be likely under the existing zone.
- c. A concept master plan, used to test how the site could be developed under the proposed AUP: OP planning rules, demonstrates that the land has dimensions and characteristics capable of accommodating an integrated, well-connected and spatially coherent residential development outcome.
- d. The proposal relies on the standard zone frameworks within the AUP: OP and this is agreed with. There are no remarkable site or local characteristics that would warrant an overlay or precinct being also used to add bespoke controls.
- e. The mix of densities proposed will enable a variety of house and household types, serving housing choice in a way that concentrates density where it will be most effectively located (close to green or open spaces, a Local Centre, and key transport links).
- f. The proposal is logical, small-scale and self-contained, the residential zones are consistent with the approach that underpins the AUP: OP, including of note the proximity of the site to the Ranui centre (Local Centre zone). In this circumstance, there is no need for a broader structure plan-type exercise to be undertaken.
- g. The proposal is compatible with the built form characteristics of Ranui (as currently planned under the AUP: OP), and present nothing out of the ordinary or remarkable that could be regarded as being out of step or conflicting in urban design terms.
- h. The proposal will result in a number of adverse urban design effects, although none are considered to be unusual or severe in the context of business-to-residential land re-zoning. These relate to 'standard' development effects, such as new shadowing effects from new buildings and so on, and are considered to be less adverse than could occur under the existing Light Industry zone that applies to the Site. Positive urban design effects will also occur or be enabled through future subdivision. Overall, the proposal is consistent with the quality compact urban form sought by the AUP: OP and the specific matters set out in Chapter B2: Urban Form.

The private plan change application could be accepted on urban design grounds.

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# 1. introduction

- 1.1 This report documents an independent analysis of an application for a Private Plan Change to re-zone approximately 2.65ha of land currently zoned Business Light Industry Zone, for Western Park Village Ltd at 524 Swanson Road, Ranui. The application has been made to Auckland Council under the Resource Management Act **1991 ("RMA")** in terms of the Auckland Unitary Plan (Operative in Part) "AUP: OP".
- 1.2 For full details of the proposal, the application and planning analysis (s.32 report) is referred to.

# 2. scope and involvement

- 2.1 Ian Munro has been engaged by Western Park Village Ltd to provide urban design services related to a Private Plan Change application.
- 2.2 The process followed to undertake this urban design assessment is as follows:
  - a. Provisions of the AUP: OP were read and considered.
  - b. Briefing meetings with the applicant's expert team were held.
  - c. A site visit was undertaken. This took in the existing Site and its surrounds including the Ranui Local Centre, Ranui Domain and Ranui train station.
  - d. A concept master plan was developed and used to help the applicant inform the land use zones that the proposal is based on.
  - e. This report was prepared.
- 2.3 As a part of undertaking the above, it was identified that the Site and its context, and the urban design issues the proposed re-zoning has raised, did not warrant the undertaking of any form of broader structure planning-type exercise.

# 3. urban design framework

3.1 Although historically focused on the way in which private space and development impacted on public space, 'urban design' now encompasses a

wide range of potential considerations. This is best evidenced by the breadth of matters included in MfE's 2005 New Zealand Urban Design Protocol. As a result of this breadth urban design analyses, when based only on preferred or 'ideal' urban design prerogatives, do not always match well with the specific matters relevant to Resource Management Act proceedings. Practical challenges faced by urban designers working under the RMA, and which have been factored into this assessment, include that:

- a. urban design outcomes only apply to the extent that they are relevant to the specific resource management issues relevant to each specific proposal;
- b. RMA plans need to be interpreted in light of what the specific objectives and policies mean and with reference to the methods used by each Plan to implement those provisions not against what outcomes an urban designer might consider to be preferred or ideal in pure urban design terms; and
- c. the RMA provides for positive environmental effects but does not require them (unless a NPS or Plan requires them).
- 3.2 For this assessment it is not considered necessary to identify urban design outcomes or precedents beyond the provisions of the AUP: OP. However, based on direction at AUP: OP Appendix 1.3, the Auckland Plan, Auckland Design Manual, and the Henderson-Massey Local Board Plan (2017) have been reviewed and considered.
- 3.3 The key provisions of the AUP: OP relevant to the proposal in urban design terms are Appendix 1 (structure plan guidelines); B2 RPS (urban growth and form); E38 (urban subdivision); H5 (Mixed Housing Suburban zone); H6 (Terraced Housing and Apartment Building zone); and H17 (Light Industry zone).
- 3.4 Having considered the relevant provisions of AUP: OP and related documents identified above, the planning outcomes and environmental effects to be addressed can by synthesised (for simplicity) into the following topic headings:
  - a. The development should contribute to a quality compact urban form that supports and enhances the Ranui township.
  - b. The development should achieve a well-connected, integrated built form outcome, with residential areas having high amenity, and being healthy, attractive and safe.
  - c. Non-residential activities support the needs of people and the local community.
  - d. The development should maintain or enhance the character of Ranui township and the area, and provide adequately for infrastructure.
  - e. Open spaces should be well integrated and physically connected where possible.

- f. Reverse sensitivity effects with adjacent land uses are managed.
- g. The proposal should demonstrate how the site's opportunities and constraints have been positively responded to
- h. Overall urban design merit.

# 4. site and context analysis

## site analysis

- 4.1 **The following are the site's key u**rban design characteristics:
  - a. The site is approximately 2.65ha. It is accessed via Swanson Road and is on the south-side of that road. The site has an "L" shape that follows the western boundary of Ranui Domain for a length of approximately 247m, and then wraps along the Domain's southern boundary between it and the railway line for approximately 120m.
  - b. The site is relatively flat in the north-south direction but does grade downwards from the side boundaries towards its centre following an existing small stream. The stream runs diagonally across the site from south-west to north-east. The reduction in contour is, on each of the western and eastern sides, from approximately 32.5m down to 28m. The gradient is not considered a development constraint of any note, but the stream is expected to be retained.
  - c. The site was formerly zoned for industrial use under the Waitakere District Plan and is zoned for light Industrial use under the AUP: OP (allowing relatively low-amenity buildings up to 20m in height). However the site has for some time now been operated as a short-stay / social housing activity based on small cabin-type units. These have been configured in informal residential block layouts, and occupy the part of the site north of the stream. The back part of the site south of the stream remains vacant.
  - d. To the immediate west is Ranui Domain. This is a relatively large and square-shaped open space. It contains, in its northern part, a wetland and small lake (the stream on the subject site feeds it), and south of that are grassed playing fields. A pedestrian walkway meanders through the Domain and connects Swanson Road to Robertson Road and Carlas Way. The access at Carlas Way in turn leads to the Ranui Train Station, approximately 265m from the Domain, and approximately 465m from the central 'body' of the Site.

- e. The Domain does not reflect a preferred urban design solution, being effectively ringed by the backs of adjoining properties on all sides.
- f. To the immediate south is the railway line and across that is MHU-zoned residential land.
- g. To the immediate north are residential (MHS) zoned properties at 526, 526A, 526B, 528, and 530-532 Swanson Road. Part of the Site, the former 522 Swanson Road, is also zoned MHS. These properties are occupied by detached residential dwellings.
- h. To the immediate west is Light Industrial-zoned land at 524 Swanson Road and 28A Airdrie Road. These are rear-sites and are used for commercial activities. The largest, 28A Airdrie Road is used to base a relocatable dwelling operation.
- i. To the north-east is the Ranui Local Centre. This is approximately 239m east of the site, and the Local Centre zone runs for a further 271m east of that (including the width of roads that break up the zone area's continuous length). Bus stops on Swanson Road are also located at the commencement of the centre.
- j. More generally, to the west is a medium-sized concentration of Light Industrial zoned land. 1.2km to the east of the site is another mediumsized pocket of Light Industrial zoned land centred on Brick Street and Mihini Road. East of Ranui Domain and south of the Ranui Local Centre is an area of THAB-zoned land that extends southwards to Ranui Train Station. Overall, the locality reflects a mix of zones and includes provision for high density housing in a manner that is consistent with the urban form strategy of the RPS (locating density where there are local services, amenities, and transport access.
- k. Swanson Road is an arterial road and is relatively important in the urban structure of west Auckland. It provides access west to the Waitakere Ranges and the western beach settlements, and eastwards is a key link through to Henderson.
- I. Overall, I would describe the environment as mixed but suburban in terms of the existing scale and intensity of activities. This is enabled for substantial change, for both business and residential zoned land, under the AUP: OP planning framework.

## site opportunities

4.2 On the basis of the above analysis, the following are the site's key urban design opportunities:

- a. The site adjoins a large public open space and is close (a convenient walking distance) of both a rail station and a Local Centre. This is well-positioned for higher density residential development.
- b. The site is largely flat and, other than the stream, free of development constraint.
- c. Although zoned for Light Industrial use, the site has not been used for that purpose for some time, and its use for non-employment uses would in that respect not result in the practical or real-world loss of employment land.
- d. The site is large enough and (at least in its principal / central area) of a shape that could accommodate a comprehensive development outcome taking a variety of potential forms. These characteristics are considered the most likely to lead to a high-quality outcome.
- e. The site is not occupied by any existing buildings or infrastructure that would constrain future development options; the site is effectively a blank canvas.
- f. Development on the Site could help to 'front' and activate the long western boundary of Ranui Domain. This would be a desirable improvement to the Domain's current lack of consistent 'frontage'.

## site constraints

- 4.3 On the basis of the above analysis, the following are the site's key urban design constraints:
  - a. The site does not have a wide frontage, effectively relying on the former 522 Swanson Road lot to provide sufficient width for road access.
  - b. The alignment of the stream, running diagonally, is inefficient relative to the geometry of the remainder of the site, and it is expected that the stream and its riparian margin would be retained (it is understood that the stream may in places trigger a 20m-wide esplanade reserve and in others a 10m-wide riparian strip).
  - c. The Light Industrial zone to the west would limit the practical desirability of 'loading' high density development along that boundary.
  - d. The dimensions of the site's southern 'arm' along the Domain's southern boundary are not generous and abut the railway corridor. This will limit real-world design options here.

# 5. the proposal

- 5.1 The proposal has been fully described in the application documents prepared by Mt. Hobson Group Ltd. This includes the proposed re-zoning plan. However, specifically in terms of urban design its key characteristics are:
  - a. The former 522 Swanson Road is proposed to remain zoned Mixed Housing Suburban with no changes proposed.
  - b. The northern 'half' of the site extending down to the stream is proposed to change from Business: Light Industry zone to Mixed Housing Urban zone.
  - c. The 'southern' half of the site south of the stream, and including the southern 'arm' around the Domain is proposed to change from Business: Light Industry zone to Terraced Housing and Apartment Buildings zone.
  - d. No Precinct or other Overlay is proposed; the new zones would be subject to the standard AUP: OP provisions in chapters E38 (urban subdivision), H4 (MHS), H5 (MHU) and H6 (THAB).
  - e. Of note, the re-zoning would introduce a number of onsite amenity and landscaping controls that are superior than the Light Industry zone, and include a lower threshold for the requirement for resource consent for new buildings. The residential and subdivision policy frameworks also emphasise design quality that are missing from the Light Industry zone framework.
  - f. The re-zoning would substantially reduce the enabled building height and building coverage on the site, from 20m height / 100% building coverage to 11m height / 45% building coverage (MHU) and 16m height / 50% building coverage (THAB).
  - g. To give an indication of potential density that could be achieved on the site as proposed, and assuming that the MHS zoned part of the site will be substantially required for vehicle (street) access, the order of 75 180 units depending on average densities achieved. This would average at approximately 105 units (a gross total site density of 1:250m2.
- 5.2 A concept master plan was prepared and this is included as Attachment 1. The concept master plan explored the issues associated with future residential development within the zones. It also included land at 528 and 530-523 Swanson Road from the point of view of testing different types of access into the site that may be used. This test, which included a variety of housing typologies, yielded approximately 150 units on the site, although this did not consider apartment buildings taller than 3-storeys. The concept master plan is not proposed to be a 'final' subdivision or development plan; it is a means of testing the potential built form effects that the proposed re-zoning could give rise to only.

## 6. assessment

the development should contribute to a quality compact urban form that supports and enhances Ranui township

- 6.1 This topic is primarily derived from B2.2.1(1), B2.2.2(4), B2.6.1(1), B2.6.2(1), and Appendix 1 in the AUP: OP.
- 6.2 In my opinion the proposal will successfully contribute to the quality compact urban form sought for Auckland, and also both support and enhance Ranui. My key reasons for this are:
  - a. The retained MHS-zoned part of the site will have no discernible urban design effects and has not been considered further.
  - b. Intensification of the site would provide a greater population of customers of the centres' social and other services than at present or if the site were used for lower-intensity light industrial uses.
  - c. That the site is within walking distance of a major open space, a train station, bus stops and a local centre mean that the additional population can provide for many of people's daily needs without adding additional vehicular traffic to the network.
  - It is likely that the re-zoning will result in a notably higher-quality interface with the Ranui Domain (including residential frontage based on the E38, H5 and H6 AUP: OP provisions) than in the more permissive Light Industry zone. This will have practical amenity value benefits for the Domain.
  - e. The proposed zoning framework achieves a successful balance of increasing intensity due to the proximity of the centre and rail station, and lowering intensity due to the Light Industry zone (west) and MHS (north) that exist. In my opinion the proposed zone distribution will integrate well with the existing pattern. Use of the stream as a natural boundary between the two zones is also considered logical and easy to administer in the absence of a cadastral boundary to rely on.
  - f. The zone change, and that it would introduce the combination of greater on-site amenity controls, a lower building height limit, and a greater likelihood of resource consents for development including reference to policies seeking design quality, all mean that development will be very likely to be much higher quality than the largely permissive Light Industry zone. Greater design quality will in my opinion directly relate to the "quality" aspect of the AUP: OP's quality compact urban form.

- g. Provision of residential development along the railway line is an established precedent within the locality and although the site's southern 'arm' is proportionally narrow, the master plan test undertaken shows how the provision of a rear vehicle access lane (as one solution) could provide separation for units from the railway line. It also demonstrates units that retain a northwards orientation to Ranui Domain (allowing units to have outdoor amenity spaces away from the noise of the rail corridor), and sufficient space also for outdoor living spaces, also north-facing and separated from the rail corridor. This gives me confidence that the rezoning would be appropriate.
- h. I considered whether an alternative residential zoning solution might be more appropriate than proposed but I concluded that in urban design terms the proposed mix of MHS (retained), MHU and THAB were optimal. My key reasons were:
  - i. MHS along Swanson Road will maintain the existing character of that frontage, and the width of the Site at that point is not wide enough to realistically accommodate larger scale development in any event.
  - ii. Given the proximity of the Ranui Domain, rail station and local centre, I considered that THAB zone for the entire site could be appropriate, but overall the transitional 'step' of MHU to the MHS zone, and provision of greater housing choice that two zones would provide the site, were convincing counterbalances.
  - iii. I did not consider that MHU or MHU zone for the entire site would be an efficient use of the land given its proximity to the Doman, centre and rail station.
  - iv. Use of the on-site stream as a zone boundary is in my opinion logical and appropriate.
  - v. I did not consider Single House zone or any other residential zone appropriate given the importance of using the land efficiently and the lack of any character or other sensitivity on the Site that could justify restriction of housing yield.
- 6.3 On the basis of the above, I consider that:
  - a. In terms of the relevant AUP: OP provisions, I consider the proposal will result in development that is consistent with the quality built-form outcomes sought in the MHU and THAB zones. I consider the proposal will maintain the coherence and compact qualities of Ranui, and is likely to enhance the amenity values of Ranui Domain.
  - b. The proposal will result in superior urban design effects than could arise from the Light Industry zone, and compared to the informal housing use that occurs at present. On balance, I consider the re-zoning is positive in urban design terms.

c. In overall consideration of the above, I consider that the proposal represents the most appropriate urban design outcome for the PPC land and it is supported. It is superior to the existing zone.

the development should achieve a well-connected, integrated built form outcome, with residential areas having high amenity, and being healthy, attractive and safe

- 6.4 This topic is primarily derived from B2.3.1(1), B2.3.1(3), B2.3.2(1), B2.3.2(2), B2.4.1(2), B2.4.2(8), B2.4.2(9), B2.6.1(1), B2.6.2(1) and Appendix 1 in the AUP: OP.
- 6.5 In my opinion the proposal will achieve this outcome. My key reasons for this conclusion are:
  - a. The proposal adjoins a large public reserve and based on E38, H5 and H6 AUP: OP provisions that encourage quality outcomes and integration with public spaces I consider it very likely that through subdivision and development residents on the site will enjoy a convenient connection to the Ranui Domain and train station.
  - b. Retention of the existing stream and its enhancement with a combination of Esplanade Reserves and possibly Riparian Strips (a detail subdivision design matter) will enhance on-site amenity values and provide the site with a further physical integration with the Domain.
  - c. The proximity of the Domain, rail station, bus stops and Local Centre all within a flat and convenient walk will promote public health.
  - d. The site's shape and size will require a convenient and efficient internal movement system that will facilitate vehicular, cycle and pedestrian connectivity with Swanson Road, Ranui Domain, and Ranui train station. H5 and H6 zone controls and design requirements will in my opinion make it very unlikely that development on the site would not successfully front and activate the internal movement routes that will be eventually determined.
  - e. Having a residential and Light Industry zone interface could not be counted as the highest possibly amenity interface, but is one that is very common across Auckland under the AUP: OP and it has been assumed on that basis that it is a satisfactory arrangement. I consider that it is likely that units on the Site would 'back' onto the western LIZ boundary, using space and an orientation of outdoor spaces, doors and windows facing east and away from the boundary to maintain an appropriate onsite amenity. I see no urban design reasons why a satisfactory outcome in line with what could be ordinarily expected in such a zone interface arrangement, would not be achieved. This has been indicated on the

concept master plan (although it is also noted that a road alignment along the western boundary could also potentially provide a greater spatial separation (but would also result in visual exposure to lower-amenity LIZ outcomes on the neighbouring site, hence it was not shown on the concept master plan and is regarded as the inferior of the two options).

- f. The southern rail line interface has been discussed above and for those reasons a suitable on-site amenity can be achieved.
- g. The concept master plan has shown that the site's dimensions and the practicality of providing efficient access through the site from Swanson Road make it likely that a well-structured, activated series of public spaces (including Ranui Domain) could be achieved on the site.
- The site's generally north-south orientation lends itself to a structure of lots and buildings that enjoy an eastern, northern or western orientation. There seems a very low prospect of sustained south-facing units, or units that cannot enjoy ample sun and daylight access.
- i. Overall, I consider the site's characteristics and favourable orientation of the site, and the design requirements of AUP: OP chapters E38, H5 and H6 will together make it difficult to not achieve an attractive, healthy and safe on-site environment, with positive benefits also likely for Ranui Domain.
- 6.6 On the basis of the above, I consider that:
  - a. In terms of the relevant AUP: OP provisions, I consider the proposal will result in development that is consistent with the quality built-form outcomes sought in the MHU and THAB zones. I consider the proposal will support a well-connected and integrated built form outcome that will be healthy, attractive and safe.
  - b. The proposal will result in superior urban design effects than could arise from the Light Industry zone, and compared to the informal housing use that occurs at present. On balance, I consider the re-zoning is positive in urban design terms.
  - c. In overall consideration of the above, I consider that the proposal represents the most appropriate urban design outcome for the PPC land and it is supported. It is superior to the existing zone.

# non-residential activities support the needs of people and the local community

6.7 This topic is primarily derived from B2.3.1(1), B2.4.1(5), B2.4.2(10), B2.5.1(3), B2.5.2(7) and Appendix 1 in the AUP: OP.

- 6.8 The proposal in my opinion will be appropriate. My key reasons for this conclusion are:
  - a. No non-residential activities (zones) are planned as part of the PPC, although through a subsequent resource consent residentially-compatible activities could occur under the proposed AUP: OP zone frameworks (such as visitor accommodation).
  - b. The site is zoned Light Industry and the re-zoning would reduce the availability or supply of local non-residential land. That the site has not been used for business or employment purposes for some time now means that this will not be a real-world effect of merit (i.e. the site is already a real-world residential site).
  - c. The increase in local population enabled by the re-zoning will be likely to support local employment within the Local Centre zone.
  - d. Although the THAB zone provisions do provide for limited (commercial) non-residential use, it is in my opinion very unlikely that a dairy, cafe or similar would prove viable on the site given how far the THAB zone is proposed from Swanson Road and hence its naturally restrained customer catchment. For that reason, I consider it is very likely that the future commercial demand generated by residents on the Site will be accommodated within the Local Centre zone, and this is supported.
  - e. New residents on the site will be able to enjoy a variety of local employment opportunities, including along the Lincoln Road commercial corridor, Henderson and Henderson Valley, and further afield via the rail or bus systems.
- 6.9 On the basis of the above, I consider that:
  - a. In terms of the relevant AUP: OP provisions, I consider the proposal will not undermine the ability of non-residential activities to support the needs of people and the community.
  - b. The proposal will result in adverse non-residential activity effects to the extent that an area of Light Industrial zone would be removed from the pool of employment land in the area. That the land has been used for residential purposes for some time now does in the real-world mean that this is a theoretical or potential future effect rather than one of a loss of existing business land or employment.
  - c. In overall consideration of the above, I consider that the proposal represents the most appropriate urban design outcome for the PPC land and it is supported.

## the development should maintain or enhance the character of Ranui township and the area, and provide adequately for infrastructure

- 6.10 This topic is primarily derived from B2.3.1(1), B2.3.2(1), B2.4.1(2), B2.4.2(8), B2.4.2(9), B2.6.1(1), B2.6.2(1), and Appendix 1 in the AUP: OP.
- 6.11 In my opinion the proposal will maintain and otherwise positively contribute to Ranui's character values. My key reasons for this conclusion are:
  - a. In terms of infrastructure, I understand that the change in zone from LIZ to MHU and THAB will not fundamentally change the servicing issues facing the site or the availability of public networks (which would be addressed at the time of resource consent for subdivision or development).
  - b. In terms of the Ranui Domain, and in any development scenario, the proposal is likely to lead to less shadowing and loss of daylight on Ranui Domain (due to reduced height limits and greater requirements for on-site open space and amenity). It is also likely that a higher visual quality Domain interface will be achieved than would be possible under the LIZ, and if land use frontage can be achieved the character and amenity benefits for Ranui Domain could be substantial compared to the existing LIZ scenario.
  - c. The proposal will lead to greater demand for use of the Ranui Domain, rail station and Ranui Local Centre. Greater use of the Domain and Local Centre would in particular support the character and success of those, including by way of contributing to greater vibrancy.
  - d. Retention and improvement of the stream will maintain and enhance this very specific amenity and character value of the locality (noting the relevance of this is due to the stream and associated wetland areas being an important part of the Ranui Domain's character).
  - e. The proposal will however be of modest scale and not prominent or widely visible in Ranui. For that reason, it will not have an obvious character effect on the wider neighbourhood. While a LIZ site will be lost, a relatively substantial employment area to the west will be retained and also not result in an obvious change in the area's overall urban character.
  - f. The proposed zone distribution is consistent with the general AUP: OP 'hierarchy' around centres, and will be compatible with the existing pattern around Ranui generally.
- 6.12 On the basis of the above, we consider that:
  - a. In terms of the relevant AUP: OP provisions, I consider the proposal will maintain and positively contribute to the character of Ranui and the focal

point of its Local Centre zone. I also consider that the proposal will likely enhance the amenity of the Ranui Domain, as a key community gathering and recreational space, compared to the existing LIZ.

- b. The proposal will in my opinion result in neutral overall character effects on the wider Ranui neighbourhood and will be well integrated into it. In terms of the Ranui Domain, I consider the proposal will have positive character effects compared to the existing LIZ, and likely lead to an improvement of amenity values within the Domain due to being overlooked by a well-designed MHU and THAB housing development. If land use frontage can be achieved as well, then I consider that the benefits of re-zoning on Ranui Domain could be substantial given its lack of land use frontage or public exposure generally.
- c. In overall consideration of the above, I consider that the proposal represents the most appropriate urban design outcome for the PPC land and it is supported. I consider that it is superior to the existing LIZ.

# open spaces should be well integrated and physically connected where possible

- 6.13 This topic is primarily derived from B2.2.1(1), B2.3.1(1), B2.3.1(3), B2.7.1(1), B2.7.2(1), B2.7.2(2), and Appendix 1 in the AUP: OP.
- 6.14 In my opinion the proposal will appropriately integrate open spaces together. My key reasons for this conclusion are:
  - a. The proposal would provide for retention and enhancement of the stream, which would connect directly to the waterbody within Ranui Domain. A residential land use on the Site is considered more likely to celebrate and integrate the stream feature as a frontage device (subdivision layout) or amenity feature than a more utilitarian Light Industrial use may.
  - b. The proposal would provide for a more-probable positive interface along the Site's boundary with Ranui Domain, likely to include some form of land use 'frontage' or at least activation and passive surveillance, than a Light Industrial activity or the existing informal residential use.
  - c. There is no obvious demand for additional public open spaces on the Site, although in the concept master plan an on-site recreational space was identified at the junction of the stream and Ranui Domain boundary. Such a space, possibly as a communal open space for high density housing, could be investigated further at the time of subdivision or development (but would not of itself be a planning requirement).
- 6.15 On the basis of the above, I consider that:

- a. In terms of the relevant AUP: OP provisions, I consider the proposal will provide for integration with the Ranui Domain, and will likely result in an enhancement of the Domain's amenity and character values. However, given the discrete and relatively small size of the proposal, a broader integration of open spaces together or creation of fundamentally new public open spaces is not possible.
- b. The proposal will in my opinion result in positive open space effects (although these would not be significant in scale or magnitude), relating to a more-probable positive Site boundary interface with Ranui Domain and an enhanced but overall small area of on-site stream margin (Esplanade Reserve or riparian margin).
- c. In overall consideration of the above, I consider that the proposal represents the most appropriate urban design outcome for the PPC land and it is supported. I consider that it is superior to the existing LIZ on the basis that the proposed zone has greater opportunity for the Council (through resource consent to maximise the potential for development integration with the Domain and on-site stream.

## reverse sensitivity effects with adjacent land uses are managed

- 6.16 This topic is primarily derived from B2.5.1(3), B2.5.2(10), B2.7.1(3), and Appendix 1 in the AUP: OP.
- 6.17 In my opinion, the proposal will appropriately manage reverse sensitivity effects on adjacent activities. My key reasons for this conclusion are:
  - a. The proposal will result in reverse sensitivity 'overs and unders'. In terms of the Ranui Domain to the east of the Site, the proposal will likely result in a more-compatible and higher amenity interface than a light industrial development, but in fairness a light industrial development would not of itself be incompatible with the Domain or its use.
  - b. The proposal will be more successful than the LIZ and a light industrial development at providing a compatible residential amenity interface with the MHS sites immediately north of the site and that front Swanson Road.
  - c. The proposal will be less successful than the LIZ and a light industrial development at providing a compatible business amenity along the site's western boundary with other LIZ sites.
  - d. In terms of the southern boundary, I consider that in general a residential zone is less desirable and compatible than a business-zoned site adjoining a rail corridor.
  - e. However, in terms of the western boundary, the AUP: OP commonly provides a LIZ-to-residential-zone buffer, relying on the standard

development controls in each zone to manage reverse sensitivity effects. The concept master plan indicates that a conventional back-to-back configuration along the linear boundary could be possible, and as noted earlier, it would be alternatively possible to provide a vehicle access along that boundary as a means of providing a greater spatial buffer (although the trade off in visual amenity from exposing the LIZ site renders this option less preferable). But in any event, I see no reason why the typical LIZ / residential zone interface provided for in the AUP: OP framework could not be achieved in this instance.

- f. The same principle applies to the rail corridor, although I note the distinction between the likelihood of residential zoning providing a reverse sensitivity effect on the railway operator, and the presence of the rail line creating nuisance effects on the Site itself that would need to be managed through the subdivision and development process. In that respect, the likelihood of the proposal creating a reverse sensitivity effect on the rail line or operations is very low. In terms of on-site amenity, this has bene addressed previously and would be as per the remainder of the rail corridor that is adjoined by a residential zone.
- g. Also in terms of the adjacent LIZ land to the west, it is noted that the Site is in and has been for some time in informal residential use anyway, so in that respect the fundamental residential / business interface would not actually change.
- h. Overall, I consider that any reverse sensitivity effects on adjacent land arising from the proposal would be acceptable and not problematic on LIZ land to the west, of no practical consequence to the south or east, and likely to be better for the Ranui Domain than the existing LIZ provides for, and better for the MHS land to the north.
- 6.18 On the basis of the above, I consider that:
  - a. In terms of the relevant AUP: OP provisions, I consider the proposal will allow reverse sensitivity effects on LIZ land to the west to be adequately managed through the standard LIZ and MHU / THAB zone frameworks and controls. The proposal will not give rise to reverse sensitivity effects of concern on the railway line or operations. It will reduce reverse sensitivity risks on MHS zoned land to the north, and be likely to reduce reverse sensitivity risks on the Ranui Domain to the east, all when compared to the existing LIZ and what that zone provides for on the Site.
  - b. The proposal will in my opinion result in positive (avoidance or reduction of reverse sensitivity) effects on land to the north and east, be less desirable generally but not give rise to reverse sensitivity effects to the south, and will result in adverse but acceptable reverse sensitivity risks on LIZ land to the immediate west.
  - c. In overall consideration of the above, I consider that the proposal represents the most appropriate urban design outcome for the PPC land

and it is supported. I consider that it is, overall, superior to the existing LIZ on the basis of enhanced benefits of the public space in Ranui Domain and less likely reverse sensitivity effects on MHS zoned land to the north.

# the proposal should demonstrate how the site's opportunities and constraints have been positively responded to

- 6.19 At the fundamental design and layout level, the way in which a proposal responds to its site characteristics, opportunities and constraints is regarded by urban designers as one of the key ways that potential adverse effects can be avoided, remedied or mitigated (and that potential positive effects can be maximised). In this respect, this topic relates to all of the AUP: OP RPS provisions relevant to the PPC.
- 6.20 In my opinion, the proposal represents a logical and successful response to its context. My key reasons for this conclusion are:
  - a. Provision of high-density residential zones close to a large park, a rail station and a Local Centre are all consistent with best-practice urban design generally, and are in line with the principles of the AUP: OP.
  - b. The concept master plan demonstrates that the site is of a size, shape and internal proportions that can accommodate a workable urban form outcome that manages internal amenity and layout, integrates the stream and its future planted margin, and integrates appropriately with the Ranui Domain. Although the concept master plan is not indicative of a future subdivision, its purpose at a plan-change / re-zoning level is to help inform the capability of the land to achieve acceptable outcomes. In this case, the master plan does not seek to identify either the best theoretical development outcome that may be consented in the future or the 'worst'. Rather it is limited to satisfying that there is at least one acceptable solution, noting that the E38, H5 and H6 zone frameworks proposed each set out clear outcome-based policy frameworks and consent requirements to be achieved.
  - c. The concept master plan also shows how a variety of housing types and choices could be provided including apartments, terraced houses, detached houses, street-loaded, frontage lane-loaded, and rear-lane loaded units. I consider the site is suitable for a variety of layouts and configurations.
  - d. That the site is in well-established informal residential use and will not result in a real-world loss of actual employment land will also lessen the effects of the proposal on employment opportunity in the locality. It is however helpful that there is a relatively large amount of employment land provided in this locality, such that the reduction of the Site from the LIZ zone will make a trivial reduction in theoretical opportunity. From an

urban design perspective, the proposal will not change the fundamental character of the area as one rich in living and working options.

- e. I consider that the likelihood of the Ranui Domain and the on-site stream being well-integrated into development so as to maximise their amenity values is greater in the scenario of the proposed residential use rather than the more permissive and utilitarian LIZ provisions.
- f. The retention of 11m (MHU) and 16m (THAB) height on the Site (accepting that via resource consent additional height could be potentially granted), and on-site open space and amenity requirements within each of those residential zones, is likely to provide less shadowing, more afternoon sunlight, and less overall building dominance along the Ranui Domain boundary than is enabled under the LIZ provisions.
- 6.21 On the basis of the above, I consider that:
  - a. In terms of the relevant AUP: OP provisions, I consider the proposal can be seen as a logical and, overall, somewhat unremarkable response to the Site's opportunities and constraints. Formalising the residential use of the site in a location that can support high density housing is a logical urban design response.
  - b. The proposal will in my opinion result in, overall less adverse urban design and urban form effects than could occur under the more permissive and lower-amenity LIZ zone provisions.
  - c. In overall consideration of the above, I consider that the proposal represents the most appropriate urban design outcome for the PPC land and it is supported. I consider that it is superior to the existing LIZ zone.

## overall urban design merit

- 6.22 In light of the above analyses, I have turned my mind to a cumulative and overall assessment of urban design merit.
- 6.23 I consider the proposal has been strengthened by inclusion of a concept master plan to substantiate the land use zone outcomes that could be achieved. In my experience generally as well as with this specific proposal, the use of an indicative plan has allowed for a much deeper level of analytical scrutiny to occur. It gives me higher confidence as to what outcomes are likely to result from the proposed zones.
- 6.24 The proposed zone framework is logical and the use of a natural 'edge' in the on-site stream as a zone boundary is also logical. MHU and THAB zones will be compatible with the real-world environment, and the potential benefits for residents in terms of proximity to the Ranui Domain, local centre and rail station are obvious. The opportunity to use a residential development outcome to enhance the amenity of the Ranui Domain's western edge is also regarded as a

positive attribute to the proposal and is a key reason that it is preferred to the existing LIZ zone.

- 6.25 The concept master plan gives me confidence that the zones proposed will be of a sufficient size and design that the 'downstream' resource consent provisions triggered in AUP: OP chapters E38 (urban subdivision), H5 (mixed housing urban), and H6 (terraced housing and apartment buildings) can be comfortably met. Specifically:
  - a. A subdivision pattern that responds positively to the land's character is likely, based in part on the distribution of zones proposed and retention of the stream.
  - b. A connected street pattern is possible, that limits or even avoids rear lots. This will maximise public space benefits while also providing private outdoor spaces behind houses. While the site will not be able to achieve a connected road network external to itself, it will be possible to integrate pedestrian and cycling linkages to the wider environment through Ranui Domain.
  - c. A variety of lot sizes and housing types is likely.
  - d. No new public open spaces (recreation reserves) are considered necessary, but utilisation and integration with the adjoining Ranui Domain will have benefits for amenity values on both the Site and the Domain.
  - e. New streets are very likely to be well-overlooked and visually interesting spaces, based on the applicable zone frameworks.
  - f. The development will promote walking trips to local employment and public open spaces.
  - g. There are no reasons why the high-quality built form characters sought in the various residential zones cannot be achieved.
- 6.26 On balance, I consider the proposal to successfully reflect the outcomes sought by the AUP: OP for land rezoning, and that any adverse effects arising from subdivision and development of the land will be appropriate in urban design terms. Numerous positive effects are also likely. Overall, I consider the proposal to be relatively unremarkable and logical.

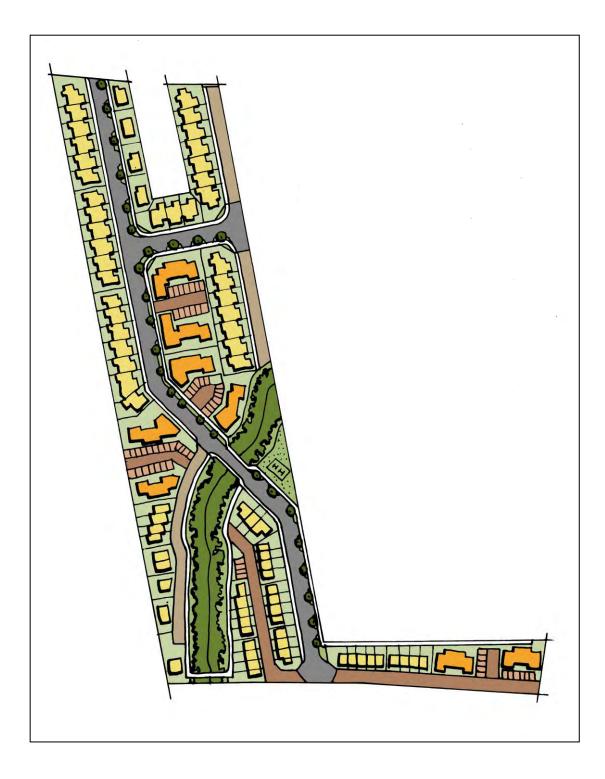
# 7. conclusions

7.1 This report documents an independent analysis of an application for a Private Plan Change to re-zone approximately 2.65ha of land currently zoned Business Light Industry Zone, for Western Park Village Ltd at 524 Swanson Road, Ranui. The application has been made to Auckland Council under the Resource Management Act **1991 ("RMA")** in terms of the Auckland Unitary Plan (Operative in Part) "AUP: OP". The key conclusions of this report are that:

- a. The proposed combination of Mixed Housing Urban and Terraced Housing and Apartment Building residential zones are more appropriate than the existing Light Industry zone given the site's opportunities and constraints, and adjacent land's characteristics including the adjoining Ranui Domain, Ranui Local Centre and the adjacent Ranui rail station.
- b. The proposal provides for a superior amenity and better land use 'edge' to the Ranui Domain than would be likely under the existing zone.
- c. A concept master plan, used to test how the site could be developed under the proposed AUP: OP planning rules, demonstrates that the land has dimensions and characteristics capable of accommodating an integrated, well-connected and spatially coherent residential development outcome.
- d. The proposal relies on the standard zone frameworks within the AUP: OP and this is agreed with. There are no remarkable site or local characteristics that would warrant an overlay or precinct being also used to add bespoke controls.
- e. The mix of densities proposed will enable a variety of house and household types, serving housing choice in a way that concentrates density where it will be most effectively located (close to green or open spaces, a Local Centre, and key transport links).
- f. The proposal is logical, small-scale and self-contained, the residential zones are consistent with the approach that underpins the AUP: OP, including of note the proximity of the site to the Ranui centre (Local Centre zone). In this circumstance, there is no need for a broader structure plantype exercise to be undertaken.
- g. The proposal is compatible with the built form characteristics of Ranui (as currently planned under the AUP: OP), and present nothing out of the ordinary or remarkable that could be regarded as being out of step or conflicting in urban design terms.
- h. The proposal will result in a number of adverse urban design effects, although none are considered to be unusual or severe in the context of business-to-residential land re-zoning. These relate to 'standard' development effects, such as new shadowing effects from new buildings and so on, and are considered to be less adverse than could occur under the existing Light Industry zone that applies to the Site. Positive urban design effects will also occur or be enabled through future subdivision. Overall, the proposal is consistent with the quality compact urban form sought by the AUP: OP and the specific matters set out in Chapter B2: Urban Form.

7.2 The private plan change application could be accepted on urban design grounds and represents the most appropriate urban design outcome available.

## APPENDIX 1 – CONCEPT PLAN DESIGN TEST (NO SCALE)



# **APPENDIX 2**

# PRELIMINARY INFRASTRUCTURE ASSESSMENT

Project No. 23546

Watercare Services Ltd Private Bag 92 521, Wellesley Street, Auckland 1141 Email: ilze.gotelli@water.co.nz

Attn: Ms Ilize Gotelli

Dear Ilze

# 522, 524, 528, 530, 532 SWANSON ROAD – PRELIMINARY WASTEWATER AND WATER INFRASTRUCTURE ASSESSMENT

Further to our updated preliminary infrastructure report dated 2 April 2019 and the meeting with Watercare Services Ltd officers of 24/6/2019, we finalise the preliminary assessment to address the capacity limitations advised by and the requirements of Watercare in terms of water and wastewater infrastructure to accommodate the proposed development and submit this for Watercare review.

### 1.0 PRELIMINARY WASTEWATER AND WATER INFRASTRUCTURE ASSESSMENT

### 1.1 WASTEWATER ASSESSMENT

The analysis and calculations are undertaken on the basis of a proposed 200 lot or unit residential subdivision.

Subsequent to the Watercare assessment of 31/1/2019, a meeting was had with Watercare Services Ltd officers on 24/6/2019. The existing wastewater infrastructure issues, the impact of the proposed development thereon and options to facilitate wastewater and water to service the development were discussed.

Watercare presented a GIS plot of a wastewater model over the extent of the existing receiving and adjacent wastewater network capacity to the proposed development site. It was noted that the model needed to be updated with surveyed WWMH data in some locations (i.e. WWMH 435445). The wastewater pipe networks are identified on the attached drawings as Line '\*' for ease of reference. This model identified that:

- It agreed with the FTL analysis that the reticulation running north through the site and Ranui domain and across Swanson Rd (Line A) was under capacity in sections, and furthermore capacity issues also occurred as the line continued to the west to the branch wastewater line (Line E). If the development discharged to this branch then a significant length of the network would need to be upgraded through private property.
- An option is to discharge to Line C running to the west of the site that has capacity. However, Line C discharges to the 300 mm dia branch wastewater line (Line E) where a section is flat and under capacity.
- A second option is to discharge to Line D, located some 150 m to the west at 557 Swanson Road, that discharges to the 300 mm dia branch wastewater line (Line E) downstream of the flat section of pipe.

Watercare indicated that it would want the development to divert sufficient wastewater flow from Line A to one of the proposed options, Lines C or D such that Line A was not operating under capacity.

To do so proposed wastewater pipeline Line 3 would need to cross under the stream that runs through the subject site from Line A as an aerial crossing of the stream would not meet the CoP for being clear of the 1% AEP flood waters. This stream crossing results in the proposed pipeline (Line 1) being upto 4.5 m deep crossing and running along the berm of Swanson Road to connect to Line D, refer to drawings 23546/WW8-10 and the preliminary wastewater catchment analysis spreadsheets.

Connection to Line C does not appear to be viable due to the greater depth of Line 2.

The depth of line 1 would require greater diameter manholes than standard. It would be envisaged however that a cost share could be agreed due to the development relieving an existing capacity issue to Line A.

Connection to Line D would require Right of Entry agreement to be obtained from private landowners to the existing wastewater network connection around 557 Swanson Road (right of way access requires 3 Right Of Entry approvals). It would appear that there are a number of options for connection that require only one or two ROE further along Swanson Road. The connection point can be evaluated in detail and owners approached in conjunction with wastewater design to support resource consent preparation.

### 1.2 WATER SUPPLY

We estimate that the Average Water Demand is 1.53 L/s and the Peak Day Water Demand is 3.06 L/s. We assumed 200 residential dwellings in the development.

A Detailed Site Investigation was completed the on 13 September 2018 that found that the site has been subject to HAIL activities and that further sampling and testing will be required to determine the extent of arsenic contamination and to confirm the consent status of the proposed development, refer to the report that has been provided previously.

Watercare have provided an assessment dated 31/1/2019 (copy attached) that stated that there are no capacity constraints identified in the current water network as at the date of their letter. Watercare did express an issue that the watermain materials must be selected to protect the assets from deterioration due to the presence of contaminated soils as defined in the Fraser Thomas Detailed Site Investigation.

At the meeting with Watercare Services Ltd officers on 24/6/2019 this was discussed and it was resolved that such issues can be adequately addressed in the Resecure consent and EPA and do not pose an infrastructure constraint to the development. Furthermore, Watercare pointed out that depending on the height of the dwellings, pressure boosting may be required.

### 2.0 CONCLUSION

A preliminary infrastructure report in terms of water and wastewater infrastructure for the subject site where the analysis and calculations have been undertaken on the basis of a proposed 200 lot or unit residential subdivision have found the following:

- a) Various existing public wastewater pipelines within and about the site have capacity issues.
- b) A meeting had with Watercare Services Ltd officers on 24/6/2019 resulted in the following being advised, with this subsequent analysis determining the viability of the wastewater connection options:
  - i. the reticulation running north through the site, Ranui domain and Swanson Rd (Line A) was under capacity in sections was not desirable as a connection for the development.

- ii. It is desirable to Watercare that diversion of sufficient wastewater flow from Line A to one of the proposed conveyance options, Lines C or D be incorporated in the preliminary design such that Line A had capacity
- iii. An option is to discharge to **Line C** running to the west of the site that has capacity however, this line was found to be too shallow on the basis of this preliminary analysis.
- iv. A second option to discharge to Line D has been assessed and on the basis of the scope of this preliminary design is viable.
- c) Watercare have confirmed that there are no current capacity constraints to water supply to the site, however depending on the height or elevation of the dwellings, pressure boosting may be required.

### 3.0 DISCLAIMER

The professional opinion expressed herein has been prepared solely for, and is furnished to our client, Western Park Village Ltd and for the information of Auckland Council, on the express condition that it will only be used for the purpose for which it is intended.

No liability is accepted by this firm or by any Principal, or Director, or any servant or agent of this firm, in respect of its use by any other person, and any other person who relies upon any matter contained in this report does so entirely at its own risk. This disclaimer shall apply notwithstanding that this report may be made available to any person by any person in connection with any application for permission or approval, or pursuant to any requirement of law.

We do not assume any liability for misrepresentation or items not visible, accessible or present at the subject site during the time of the site inspection; or for the validity or accuracy of any information provided by our client or third parties that have been utilised in the preparation of this report.

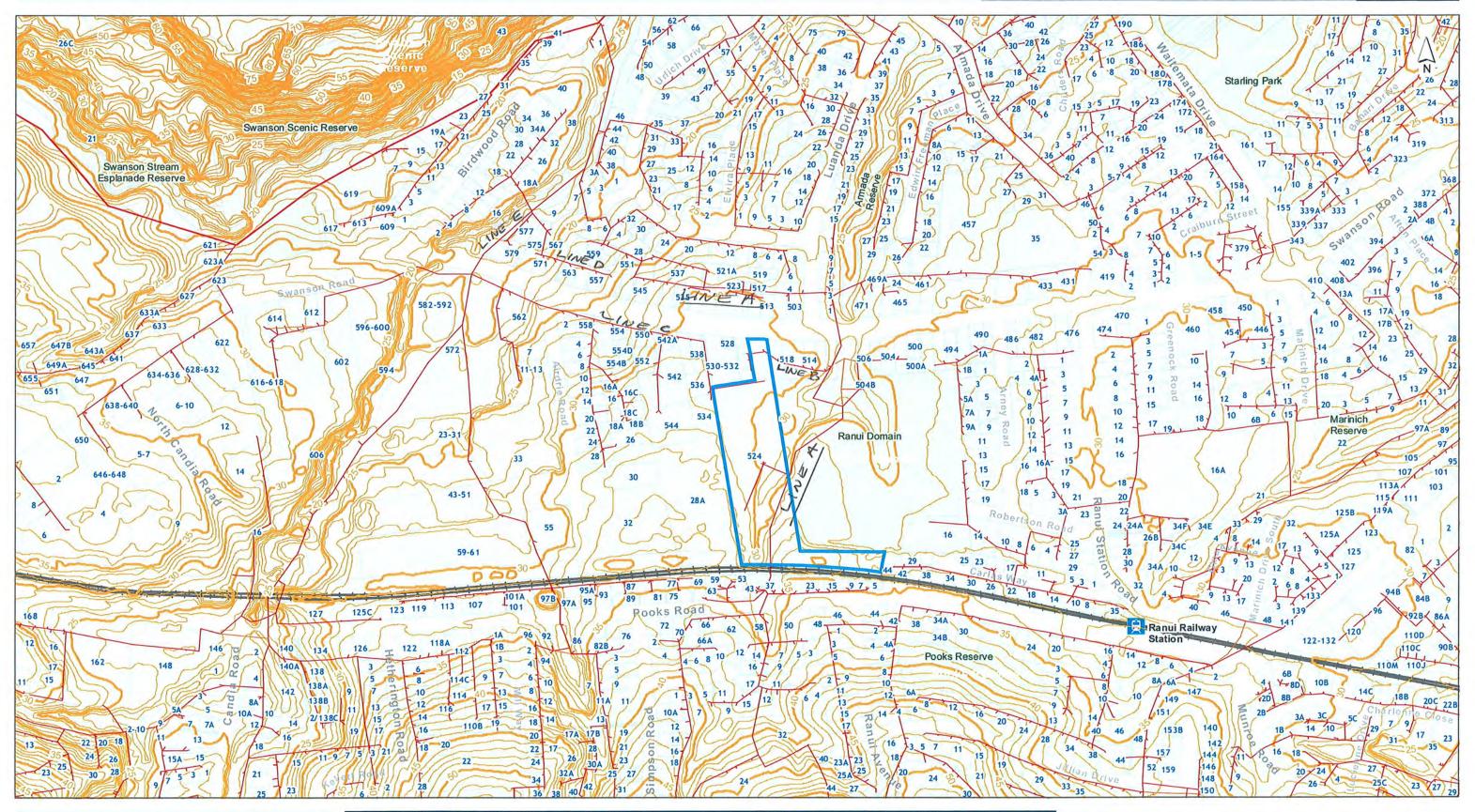
The conclusions and recommendations expressed herein should be read in conjunction with the remainder of this report and should not be referred to out of context with the remainder of this report.

Yours Sincerely
FRASER THOMAS LIMITED

#### **GREG MADDREN**

Director Encl.

- 23546 Wastewater Drawings
- Wastewater catchment analysis spreadsheets
- Watercare wastewater model existing wastewater capacity GIS plot
- Watercare assessment for water and wastewater capacity, 31/1/2019



#### DISCLAIMER:

This map/plan is illustrative only and all information should be independently verified on site before taking any action. Copyright Auckland Council. Land Parcel Boundary information from UNZ (Crown Copyright Reserved). Whilst due care has been taken, Auckland Council gives no warranty as to the accuracy and plan completeness of any information on this map/plan and accepts no liability for any error, omission or use of the information. Height datum: Auckland 1946.



## Map

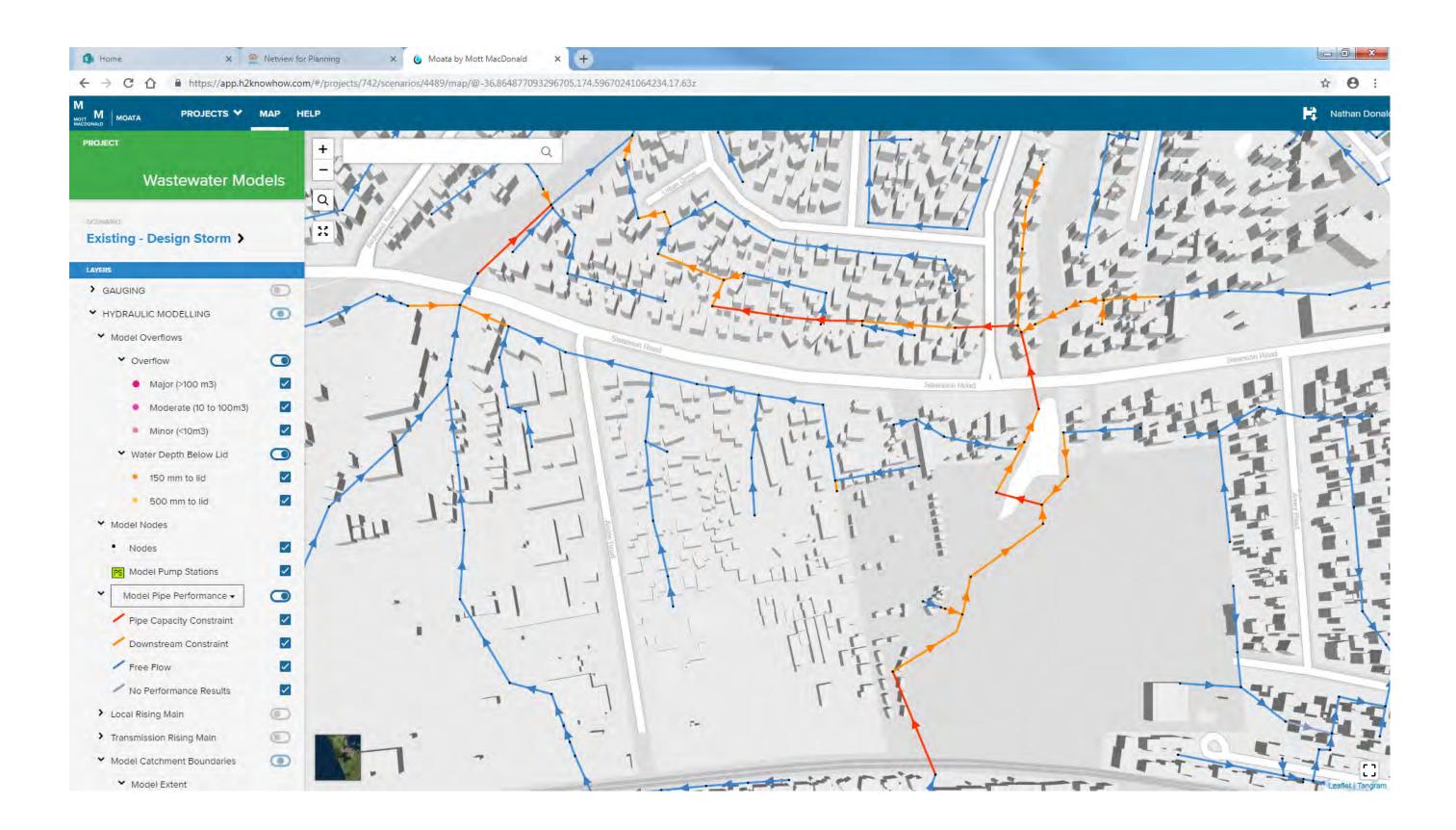
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Scale @ A3 = 1:5,000

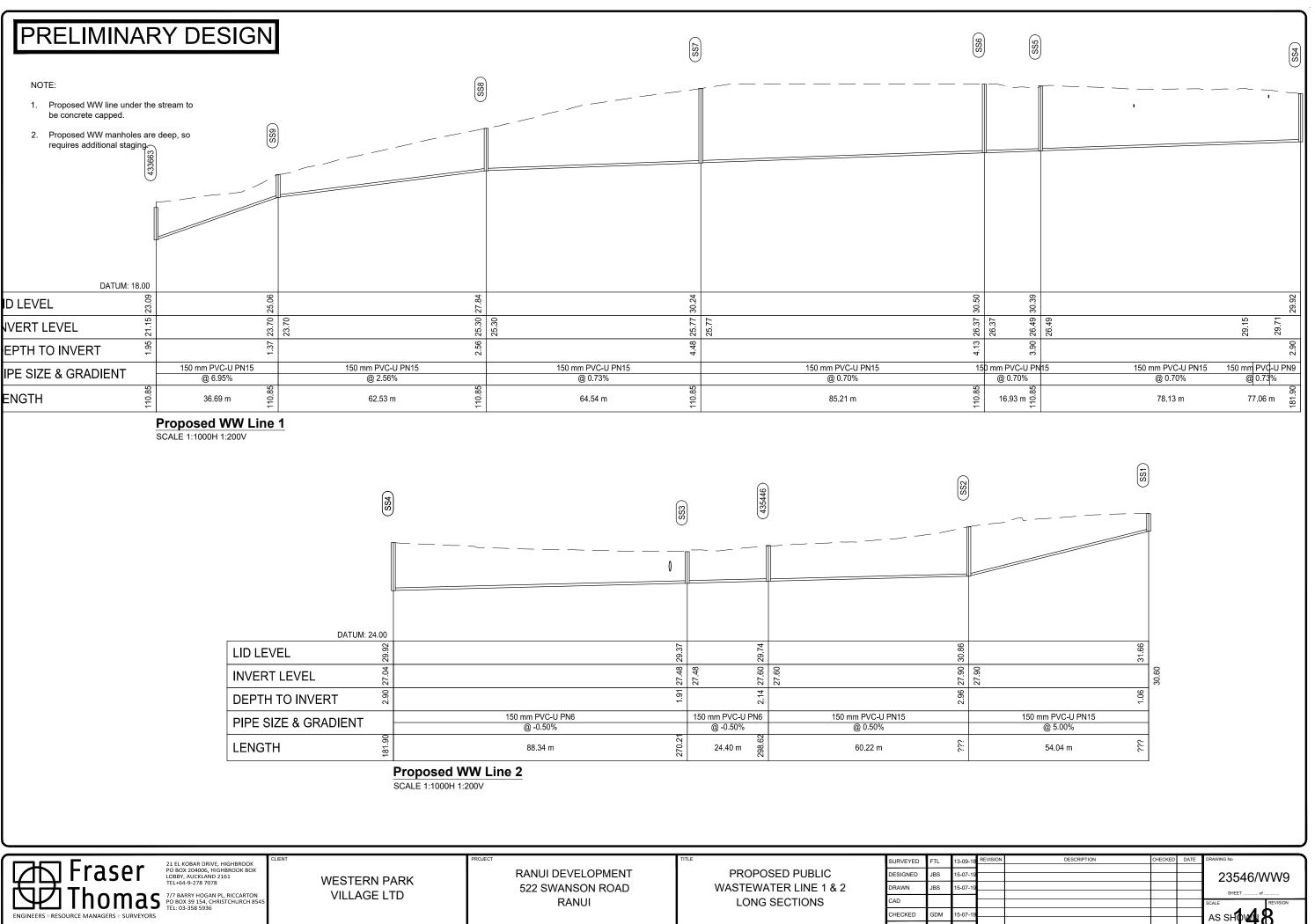
**Date Printed:** 20/06/2019



145







ENGINEERS 

RESOURCE MANAGERS 

SURVEYORS

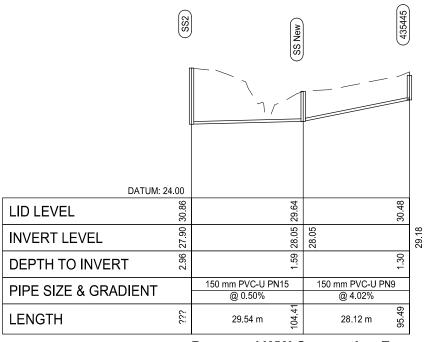
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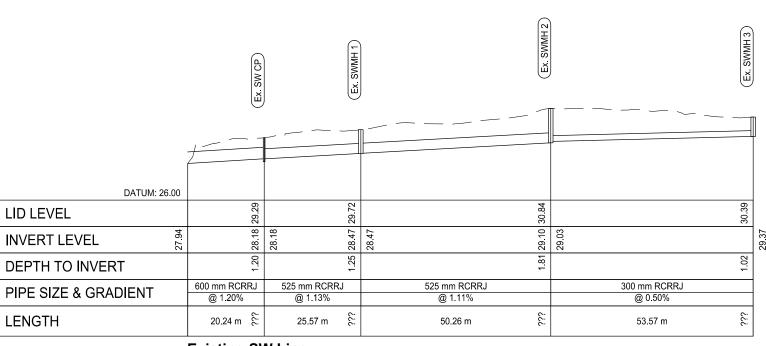
## PRELIMINARY DESIGN

#### NOTE:

- 1. Proposed WW line under the stream to be concrete capped.
- 2. Proposed WW manholes are deep, so requires additional staging.



**Proposed WW Connection From** Ex. WW Line (Line 3) SCALE 1:1000H 1:200V



## Existing SW Line



21 EL KOBAR DRIVE, HIGHBROOK PO BOX 204006, HIGHBROOK BOX LOBBY, AUCKLAND 2161 TEL+64-9-278 7078 7/7 BARRY HOGAN PL, RICCARTON PO BOX 39 154, CHRISTCHURCH 854 TEL: 03-358 5936

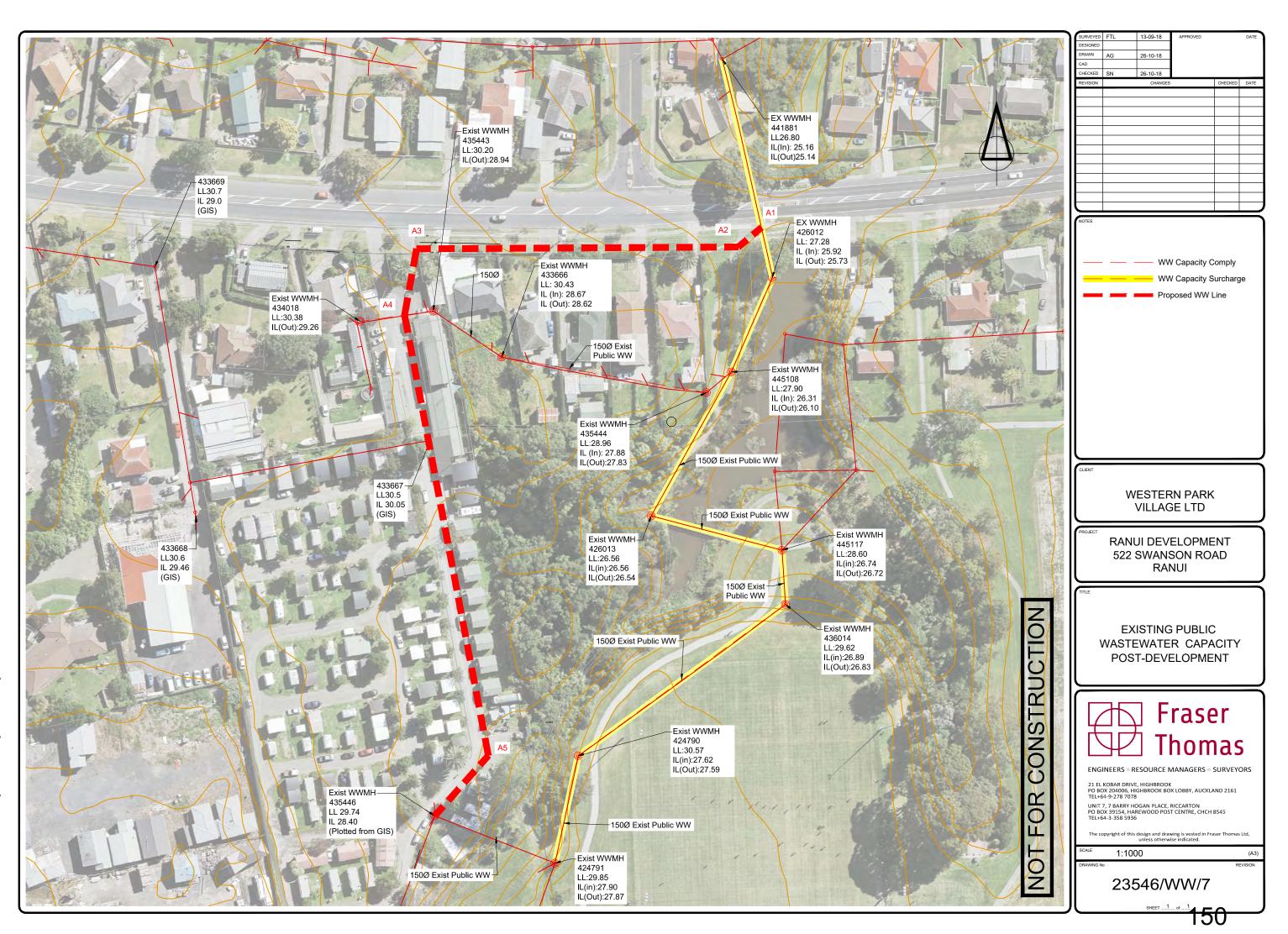
WESTERN PARK VILLAGE LTD

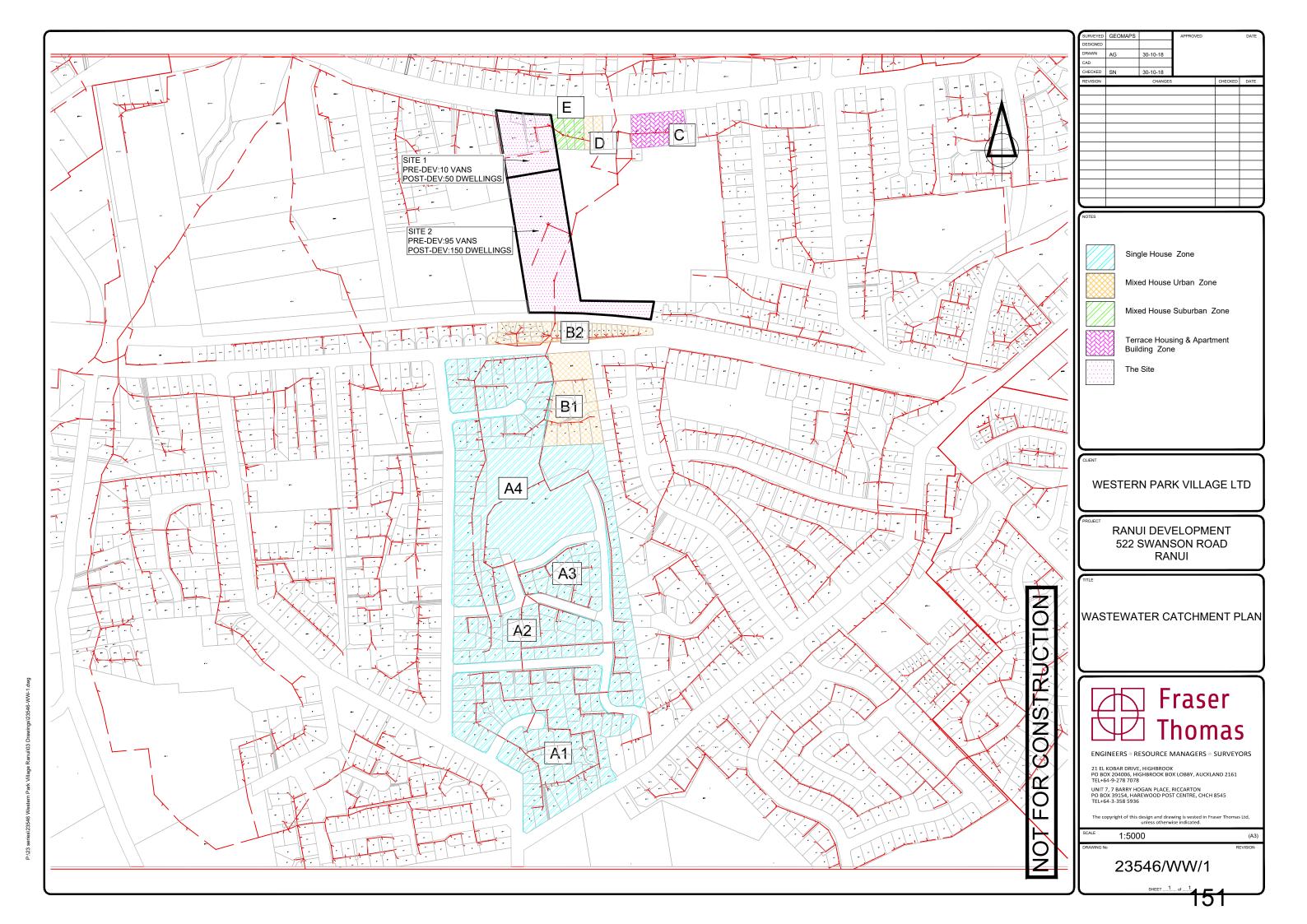
RANUI DEVELOPMENT 522 SWANSON ROAD RANUI

PROPOSED PUBLIC WASTEWATER LINE 3 & EXISTING STORMWATER LINE LONG SECTIONS

SURVEYED	FTL	13-09-18	REVISION	
DE OLONIED	10.0	45.07.40		
DESIGNED	JBS	15-07-19		
DRAWN	JBS	15-07-19		
CAD				
CHECKED	GDM	15-07-19		
APPROVED				

DRAWING No	DATE	CHECKED	DESCRIPTION
23546/WW10			
SHEET of			
SCALE REVISION			
AS SHOWAL			
(A3)			





## EXISTING WASTEWATER NETWORK CAPACITY - SOUTHERN PIPELINE

TITLE: 522 SWANSON ROAD, RANUI

CLIENT: WESTERN PARK VILLAGE

EXTENT: SOUTHERN PIPELINE (WWMH 445123-426012)

					PIPE	CUM.			
WWMH ID	ш	DEPTH	IL(OUT))	IL(IN)	LENGTH	LENGTH	DIA	GRADE%	NOTE
445123	33.51	2.66	30.85	30.90	68.9	68.9	150		Surveyed
435445	30.46	1.26	29.18	29.20	68.9	137.8	150	2.40%	Surveyed
424791	29.85	1.95	27.87	27.90	79.4	217.2	150	1.61%	Surveyed
424790	30.57	2.95	27.59	27.62	34.6	251.7	150	0.72%	Surveyed
436014	29.62	2.73	26.83	26.89	80.8	332.5	150	0.87%	Surveyed
445117	28.60	1.86	26.72	26.74	17.1	349.7	150	0.53%	Surveyed
426013	28.02	1.46	26.54	26.56	42.6	392.2	150	0.38%	Surveyed
445108	27.90	1.80	26.10	26.10	51.9	444.1	150	0.85%	Surveyed
426012	27.28	1.55	25.73	25.92	32.3	476.4	150	0.56%	Surveyed
441881	26.80	1.64	25.14	25.16	70.6	547.1	150	0.81%	Surveyed
					PIPE	CUM.			
WWMH ID	LL	DEPTH	IL(OUT))	IL(IN)	LENGTH	LENGTH	DIA	GRADE%	NOTE
SS1	31.66	1.06	30.60	30.65	0.0	0.0	150		Designed
SS2	30.86	2.96	27.90	27.90	54.0	54.0	150	5.00%	Designed
435446	30.86	2.96	27.60	27.60	60.2	114.3	150	0.50%	Designed
SS3	29.37	1.91	27.48	27.48	24.4	138.7	150	0.49%	Designed
SS4	29.92	2.90	27.04	27.04	88.3	227.0	150	0.50%	Designed
SS5	30.39	3.90	26.49	26.49	78.1	305.1	150	0.70%	Designed
SS6	30.50	4.13	26.37	26.37	16.9	322.1	150	0.71%	Designed
SS7	30.24	4.48	25.77	25.77	85.2	407.3	150	0.70%	Designed
SS8	27.84	2.56	25.30	25.30	64.5	471.8	150	0.73%	Designed
SS9	25.06	1.37	23.70	23.70	62.5	534.3	150	2.56%	Designed
433663	23.09	1.95	21.10	21.15	36.7	571.0	150	6.95%	From Gis

WWMH ID	LL	DEPTH	IL(OUT))	IL(IN)	LENGTH	LENGTH	DIA	GRADE%	NOTE
435445	30.48	1.30	29.18	28.05	0.0	0.0	150		Designed
SS New	29.64	1.59	28.05	28.05	28.1	28.1	150	4.02%	Designed
435446	29.74	2.14	27.90	27.90	29.5	57.7	150	0.51%	Designed

 Job no.
 23546

 Calcs by: JBS
 Job no.

 Date: 15/07/2019
 Checked by: GDM

 Page 1 / 1
 Version 3

#### PROPOSED

SECTION	OF PIPE	SUB- CATCHMENT	NO. DW	/ELLING	NO. OF	PEOPLE	CUM. NO	). PEOPLE	PD	WF L/s	PWV	VF L/s	POST	- PRE L/s	DIA	GRADE %	VEL m/s	CAP I/s		CAPACITY A	ASSESSMENT	ſ
US Node	DS Node		Pre-dev	Post- dev	Pre-dev	Post- dev	Pre-dev	Post- dev	Pre-dev	Post- dev	Pre-dev	Post- dev	PDWF	PWWF					Pre-dev	Pre-Dev Utilisation	Post- dev	Post Dev Utilisation
445123	435445	50% of (A & B)	109	109	327	327	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	2.40%	1.36	24.08	Comply	19%	Comply	19%
435445	424791	N/A	0	0	0	0	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	1.61%	1.12	19.76	Comply	23%	Comply	23%
424791	424790	N/A	0	0	0	0	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	0.72%	0.75	13.22	Comply	35%	Comply	35%
424790	436014	N/A	0	0	0	0	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	0.87%	0.82	14.48	Comply	32%	Comply	32%
436014	445117	N/A	0	0	0	0	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	0.53%	0.64	11.28	Comply	40%	Comply	40%
445117	426013	N/A	0	0	0	0	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	0.38%	0.54	9.53	Comply	48%	Comply	48%
426013	445108	N/A	0	0	0	0	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	0.85%	0.81	14.33	Comply	32%	Comply	32%
445108	426012	I F&D	8 houses (3 from Site 1)	8	24	24	351	351	2.2	2.2	4.9	4.9	0.0	0.0	150	0.56%	0.66	11.61	. Comply	42%	Comply	42%
426012	441881	1 house	1	1	3	3	354	354	2.2	2.2	4.9	4.9	0.0	0.0	150	0.81%	0.79	13.97	Comply	35%	Comply	35%

SECTION	OF PIPE	SUB- CATCHMENT	NO. DW	/ELLING	NO. OF	PEOPLE	CUM. NO	. PEOPLE	PD	WF L/s	PWV	VF L/s	POST	PRE L/s	DIA	GRADE %	VEL m/s	CAP I/s		CAPACITY A	SSESSMENT	
US Node	DS Node		Pre-dev	Post- dev	PDWF	PWWF					Pre-dev	Pre-Dev Utilisation	Post- dev	Post Dev Utilisation								
435445	SS New	50% of (A & B)	109	109	327	327	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	4.02%	1.77	31.19	Comply	15%	Comply	15%
SS New	SS2	N/A	0	0	0	0	327	327	2.0	2.0	4.6	4.6	0.0	0.0	150	0.51%	0.63	11.08	Comply	41%	Comply	41%
SS1	SS2	FROM SITE 2	6 vans	50	12	150	339	477	2.1	3.0	4.7	6.7	0.9	1.9	150	5.00%	1.97	34.78	Comply	14%	Comply	19%
SS2	435446	FROM SITE 2	10 vans	0	30	0	369	477	2.3	3.0	5.2	6.7	0.7	1.5	150	0.50%	0.62	10.98	Comply	47%	Comply	61%
435446	SS3	FROM SITE 2	29 vans	50	87	150	456	627	2.9	3.9	6.4	8.8	1.1	2.4	150	0.49%	0.62	10.91	Comply	58%	Comply	80%
SS3	SS4	FROM SITE 2	20 vans	50	60	150	516	777	3.2	4.9	7.2	10.8	1.6	3.6	150	0.50%	0.62	10.98	Comply	66%	Comply	99%
SS4	SS5	FROM SITE 1+2	40 vans	50	120	150	636	927	4.0	5.8	8.9	12.9	1.8	4.1	150	0.70%	0.74	13.05	Comply	68%	Comply	99%
SS5	SS6	N/A	0	0	0	0	636	927	4.0	5.8	8.9	12.9	1.8	4.1	150	0.71%	0.74	13.10	Comply	68%	Comply	99%
SS6	SS7	N/A	0	0	0	0	636	927	4.0	5.8	8.9	12.9	1.8	4.1	150	0.70%	0.74	13.05	Comply	68%	Comply	99%
SS7	SS8	N/A	0	0	0	0	636	927	4.0	5.8	8.9	12.9	1.8	4.1	150	0.73%	0.75	13.27	Comply	67%	Comply	97%
SS8	SS9	N/A	0	0	0	0	636	927	4.0	5.8	8.9	12.9	1.8	4.1	150	2.56%	1.41	24.89	Comply	36%	Comply	52%
SS9	433663	4 houses	4	4	12	12	648	939	4.1	5.9	9.0	13.1	1.8	4.1	150	6.95%	2.32	41.03	Comply	22%	Comply	32%

#### NOTE:

Based on WSL COP 27/07/2018

POST-DEV Assessment of the existing wastewater network based on the proposed development of the site only. No allowance for MPD of the local catchment.

SITE Assume 2 people per campervan for pre-dev

SITE Assume 200 x 3 bedroom for post-dev

WF 180L/p/d

PDWF 180 x 3 = 540L / p / d

PWWF 180 x 6.7 = 1206L / p / d

## 



Watercare Services Limited Private Bag 94010 Auckland 2241

www.watercare.co.nz

Customer service line Mon to Fri 7.30 to 6pm 09 442 2222

info@water.co.nz



31/01/2019

Greg Maddren Fraser Thomas Ltd Level 1, 21 El Kobar Drive, East Tamaki PO Box 204 006 Highbrook

Dear Greg,

## **Re: Initial high-level assessment for water and wastewater capacity** Watercare application number 84557

We have completed an assessment for the proposed 200 at 522-524 Swanson Road, Ranui - [1 Super Lot]. There are no capacity constraints identified in the current water and wastewater network as at today's date. However, the timing of development is critical and we will need to assess future upgrade requirements in more detail when you apply for resource consent. You will need to include the following information in the infrastructure report when you lodge your resource consent application:

- A completed water and wastewater planning assessment form (available on the Watercare website)
- A plan showing the proposed location and size of the water and wastewater connections along with type of pipe material Ductile Iron due to soil contamination.
- Design flows in accordance with the Watercare Code of Practice for Development
- Contributing catchment analysis showing calculations
- Hydrant flow test results

If applicable the following requirements may also need to be included in the infrastructure report:

- Confirmation of development scale and any changes
- Acknowledgement of additional development in the contributing catchment which may affect water and wastewater network capacity
- Acknowledgement of any catchment network changes as a result of upgrades or any additional information that was not taken into consideration as part of this assessment

Please note, as part of the water reticulation design, the infrastructure report should consider boost pumping to upper levels of buildings of more than two storeys. Once consented, it is the responsibility of the building owner to conduct a periodic review of sprinkler design flow and pressure against available pressure and flow from the Watercare network.

Yours faithfully,

Nita Dharmadhikari Connection Engineer Development Services

## **APPENDIX 3**

# INTEGRATED TRANSPORTATION ASSESSMENT



## 522-524 Swanson Road, Ranui Proposed Plan Change

Integrated Transportation Assessment Report

15 November 2019





Suite 16, 160 Broadway, Newmarket 1023 PO Box 128259, Remuera 1541, Auckland Ph. 09 869 2825 www.commute.kiwi

Project:	522-524 Swanson Road, Ranui
Report title:	Integrated Transportation Assessment Report
Document reference:	J001107 522-524 Swanson Road, Ranui ITA v2.docx
Date:	15 November 2019

Report Status	Prepared By	Reviewed By	Approved By
Final Report	Josh Brajkovic	Mike Nixon	Mike Nixon
	Anthon	Mittica	Millio

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## 1 INTRODUCTION

Commute Transportation Consultants (Commute) has been engaged by Western Park Village (WPV) to prepare an Integrated Transport Assessment (ITA) for a proposed Plan Change for the land at 522-524 Swanson Road, Ranui, Auckland (referred to as the 'site').

The site is zoned 'Residential – Mixed Housing Suburban Zone' and 'Business – Light Industry Zone' under the Auckland Unitary Plan – Operative in Part (Unitary Plan) and it is proposed to re-zone the land as 'Residential – Terrace Housing and Apartment Building Zone' (THAB Zone) and 'Residential – Mixed Housing Urban' (MHU Zone). It is noted that the plan change only covers the area on site currently zoned as Light Industry. There will be no change to the existing Mixed Housing Suburban Zone on the site.

The potential of the site has been assessed for the maximum development of up to 200 dwellings. This is a conservative estimate as no detailed development schemes have been prepared at this stage. Vehicles have been assessed to access the site via a new intersection on Swanson Road which will connect to an internal road network.

Key transportation considerations of the proposed Plan Change are:

- compatibility with neighbouring land uses
- the accessibility of the site to the various modes of transport; and
- the ability of the surrounding road network to safely and efficiently accommodate traffic generated by potential development.

These and other transportation issues will be addressed in this report.





## 2 EXISTING ENVIRONMENT

## 2.1 SITE LOCATION

Figure 1 shows the location of the site in relation to the surrounding road environment.

#### Figure 1: Site Location



The site is located in Ranui, Auckland. The site comprises land currently owned by WPV. The area is bounded by Swanson Road to the north, the western railway line to the south, and residential, business and open space zoned land to the east and west.

## 2.2 ROAD NETWORK

## 2.2.1 SWANSON ROAD

Swanson Road is classified as an Arterial Road in the Unitary Plan and is a major route that connects Swanson in the west with Henderson in the east.

Photograph 1 and Photograph 2 show Swanson Road near the proposed site access.



#### Photograph 1: Swanson Road (looking east)



Photograph 2: Swanson Road (looking west)



Swanson Road has a road reserve width of approximately 30.0 m with a sealed carriageway of approximately 11.6 m. Swanson Road near the site provides a single lane in each direction separated by a flush median with additional lanes on the approach to the Ranui Station Road / Swanson Road intersection.



Pedestrian footpaths are provided on both sides of Swanson Road. There is a signalised pedestrian crossing on Swanson Road some 440 m east of the site at the Swanson Road / Ranui Station Road intersection and bus stops are provided nearby. Intermittent on-street parking is permitted on both sides of Swanson Road.

Swanson Road has a posted speed limit of 50 km/hr.

## 2.3 ACCESSIBILITY

## 2.3.1 PRIVATE VEHICLES

The site is well located with regards to road connectivity to the wider Auckland Region. Swanson Road connects to Universal Drive and Lincoln Road to the east, providing a link to State Highway 16. The SH16 Lincoln Road interchange is located approximately 3.9 km east of the site. The site is some 15.0 km from the Auckland city centre and 18.0 km from Albany.

At peak times, travel times between the site and the City Centre approximately range from 30 minutes to 1 hour and are sensitive to SH16 motorway flows and the associated demands at the Lincoln Road interchange.

## 2.3.2 PUBLIC TRANSPORT

A pair of bus stops exist near the site along Swanson Road. Route 146 serves these bus stops with a frequency of at least every 60 minutes 7 days a week. Lower frequencies occur early morning and evenings. Route 146 serves Waitakere Village, Swanson, Universal Drive, Central Park Drive and Henderson.

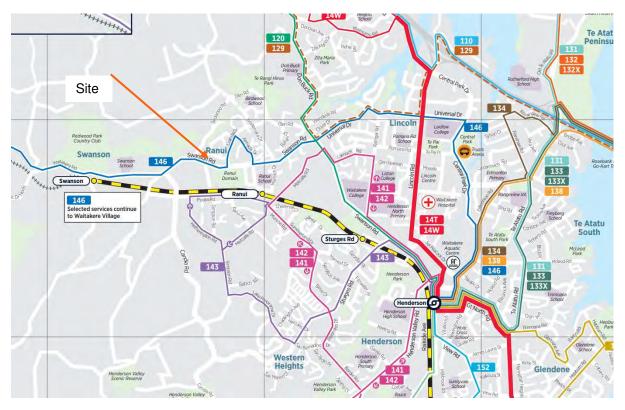
Route 146 provides a connection between Waitakere Village and the Henderson Interchange. The Henderson Interchange provides connectivity to several bus services as well as train services on the western line. In the future, when a Lincoln Road public transport interchange is established, the 146 route will connect to this and provide connectivity to RTN services along SH16 (buses initially and potentially light rail in the future.

Ranui Train Station is also located approximately 350m from the site, some 3 to 4 minutes' walk. Trains currently operate on 10 minute frequencies and following the completion of City Rail Link (CRL), while there will be greater capacity on the western line (greater frequencies closer to the city) and larger trains, the frequencies are likely to remain at 10 minutes (6 trains per hour).

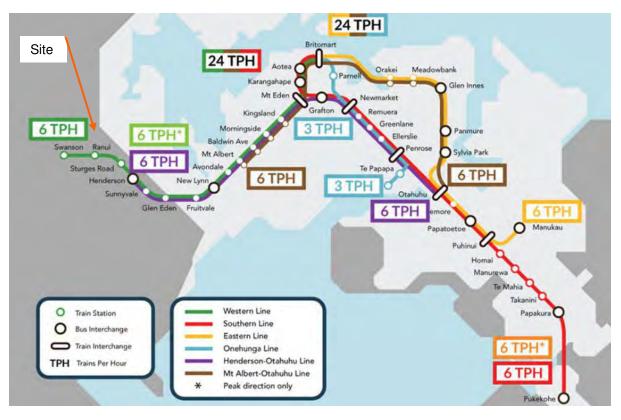
Figure 2 shows an extract of the bus routes currently operating near the site. Figure 3 shows the post-CRL train frequencies near the site.



#### Figure 2: Bus Routes









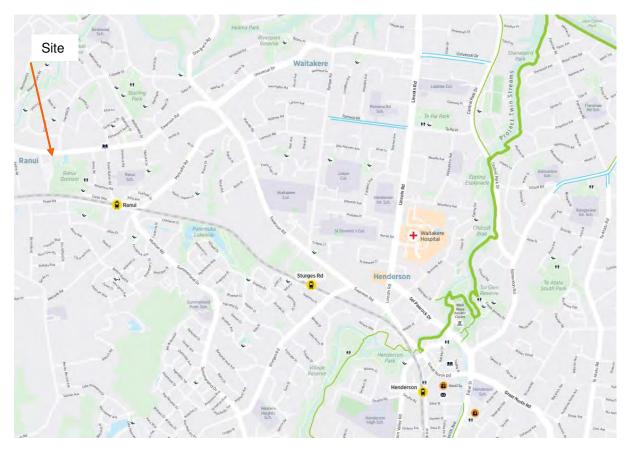
## 2.3.3 WALKING

The Austroads Guide to Traffic Engineering Practice Part 13 – Pedestrians indicates that the practical walking distance for non-recreational walking trips is in the order of 1.5 km. Using the practical walking distance of 1.5 km and the 15<sup>th</sup> percentile walking speed of a typical fit, healthy adult of 1.3 m/s, gives a journey time of some 20 minutes. This is in line with New Zealand data in the Pedestrian Planning and Design Guide, which states that for walking trips, half are more than 10 minutes and 18% are more than 20 minutes.

Attachment B1 details the anticipated walking catchment, and includes key destinations, the intersection crossing types, and the routes to these destinations. As shown in the attachment, several schools, parks, transport stations and retail activities are located within walking distance of the site, and can be accessed safely using signalised crossings, priority crossings and footpaths. Overall, the site is considered to be well connected to neighbouring activities, with pedestrian accessibility proposed to be improved as detailed in Section 7.3.

## 2.3.4 CYCLING

The Auckland Transport western area cycle map does not identify Swanson Road as featuring any specific cycle facilities. It is noted that Swanson Road features a wide carriageway sufficient to accommodate cyclists within the traffic lanes. The Auckland Transport western area cycle map is detailed in Figure 4 below.



#### Figure 4: Auckland Transport western area cycle map

Based on New Zealand Transport Agency Research Report 426, the average cycling trip length is approximately 3 km.



Attachment B2 details the anticipated cycling catchment, and includes key destinations, and the status of the surrounding roads. As shown in the attachment, several schools, parks, transport stations and retail activities are located within cycling distance of the site, and can be accessed safely by sharing the roads with vehicles. No specific cycling facilities currently exist in Swanson. Overall, the site is considered to be well connected to neighbouring activities, with pedestrian accessibility proposed to be improved as detailed in Section 7.3.

## 2.3.5 TRAFFIC VOLUMES

## 2.3.5.1 AUCKLAND TRANSPORT TRAFFIC VOLUMES

Table 1 outlines traffic volumes for Swanson Road near the site.

## Table 1: Auckland Transport Traffic Volumes

Road	Location	Date	7-Day ADT (veh/ day)		volume
Swanson	Between Ranui Station Road	February	12,478	906	1,037
Road	and Arney Road	2018		(AM)	(PM)

As shown above, Swanson Road carries traffic volumes typical of an arterial road in suburban Auckland.

## 2.3.5.2 SURVEYED TRAFFIC VOLUMES

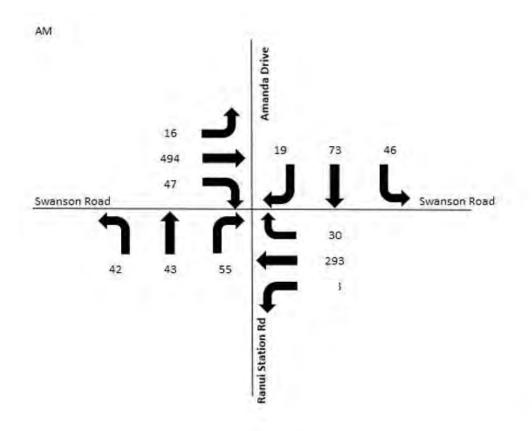
Tube count surveys were undertaken near the site on Swanson Road in the week beginning 10 June 2019. Table 2 outlines traffic volumes recorded for Swanson Road near the site.

## Table 2: Surveyed Traffic Volumes

Road	Location	Date	7-Day ADT (veh/ day)		volume
Swanson Road	Near 538 Swanson Road	June 2019	12,372	1,006 (AM)	1,060 (PM)

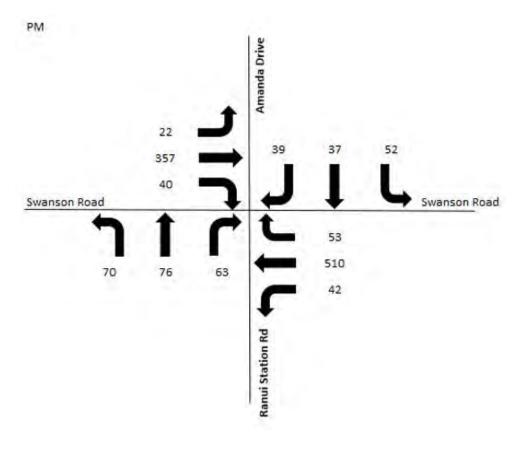
Turning count surveys were also undertaken at the Swanson Road / Ranui Station Road signalised intersection on Thursday 13 June 2019. The results of the surveys are summarised in Figures 5 and 6.





### Figure 5: Swanson Road / Ranui Station Road Traffic Volumes – Morning Peak Hour











## 2.4 CRASH HISTORY

A search of the road safety record using the New Zealand Transport Agency Crash Analysis System (CAS) has been carried out to identify all reported crashes near the site during the five-year period from 2014 to 2018 as well as all available data in 2019. The search focused on all reported crashes occurring on Swanson Road (between Birdwood Road and Ranui Station Road) and within 50 m of the following intersections:

- Swanson Road / Birdwood Road intersection.
- Swanson Road / Airdrie Road intersection.
- Swanson Road / Luanda Drive intersection.
- Swanson Road / Arney Road intersection.
- Swanson Road / Ranui Station Road intersection.

A total of 35 crashes were identified. The crashes are summarised in Table 3.

Location	Number of Crashes/ Predominant Crash Types	Injuries
Swanson Road / Birdwood Road intersection	2 crashes 100% loss of control crashes	1 serious injury and 1 non- injury crashes 1 crash involving pedestrians
Swanson Road midblock between Birdwood Road and Arney Road	4 crashes 25% turning movement crashes and 25% loss of control crashes	2 minor injury and 2 non-injury crashes 2 crashes involving pedestrians
Swanson Road / Airdrie Road intersection	1 crash 100% loss of control crashes	1 non-injury crash 0 crashes involving pedestrians
Swanson Road midblock between Airdrie Road and Luanda Road	7 crashes 57% collision with parked vehicle and 29% turning movement crashes	3 minor injury and 4 non-injury crashes 3 crashes involving pedestrians
Swanson Road / Luanda Drive intersection	3 crashes 66% turning movement crashes and 33% loss of control crashes	1 minor injury and 2 non-injury crashes 1 crash involving pedestrians



Location	Number of Crashes/ Predominant Crash Types	Injuries
Swanson Road midblock between Luanda Drive and Arney Road	5 crashes 40% opened door in path of another party crashes and 40% lane changing movement crashes	5 non-injury crashes 0 crashes involving pedestrians
Swanson Road / Arney Road intersection	1 crash 100% right angled collision	1 non-injury crash 0 crashes involving pedestrians
Swanson Road midblock between Arney Road and Ranui Station Road	2 crashes 50% U-turn manoeuvre crashes and 50% entering / exiting parking crashes	1 minor injury and 1 non-injury crashes 1 crash involving pedestrians
Swanson Road / Ranui Station Road intersection	10 crashes 40% stopped / slowing for signals and 20% turning movement crashes	<ol> <li>1 minor injury and 9 non-injury crashes</li> <li>1 crash involving pedestrians</li> </ol>

The predominant crash types were loss of control and turning moment crashes for midblock sections and stopped / slowing for signals near the signalised intersection within the crash study area. This is not unexpected on high volume roads with signalised intersections.

As will be described, the proposed development is considered to add relatively small additional traffic movements onto Swanson Road and is therefore not expected to significantly affect the operation and safety of the nearby intersections.

## 3 PROPOSED DEVELOPMENT

## 3.1 OVERVIEW

As noted, Commute has been engaged by WPV to prepare an ITA for a proposed Plan Change for the land at 522-524 Swanson Road, Ranui, Auckland.

The site is currently zoned 'Residential – Mixed Housing Suburban Zone' and 'Business – Light Industry Zone' in the Unitary Plan and it is proposed to re-zone the industrial land on-site as Residential – THAB Zone and Residential – MHU Zone.

The existing and proposed Unitary Plan zoning is detailed in Figures 7 and 8 below.





#### Figure 8: Proposed Unitary Plan Zoning







## 3.2 TRANSPORT CONNECTIVITY

The site is currently accessed via four vehicle crossings to Swanson Road. Given the scale of development, an upgraded connection to Swanson Road will be required. Based on the survey data, and the development scenario assessed, there is a need to safely accommodate right turn entry and exit movements to and from the site. This is best achieved via a new priority controlled intersection to Swanson Road. It is noted that access solutions may change depending on the configuration and intensity of any proposed development (which has not yet been confirmed). This design would be confirmed at the time of any development through the resource consent process.

Due to the neighbouring land to the south being predominantly developed as well as the location of the railway line, there is no potential for public road connectivity to Pooks Road for instance. As such, a cul-de-sac road or crescent road would likely be provided into the site. This would also be assessed at the time of any development through the resource consent process.

A priority-controlled intersection has been assessed to understand whether this connection to Swanson Road could be established. An indicative intersection is shown in Figure 9.



#### Figure 94: Indicative Priority controlled Intersection

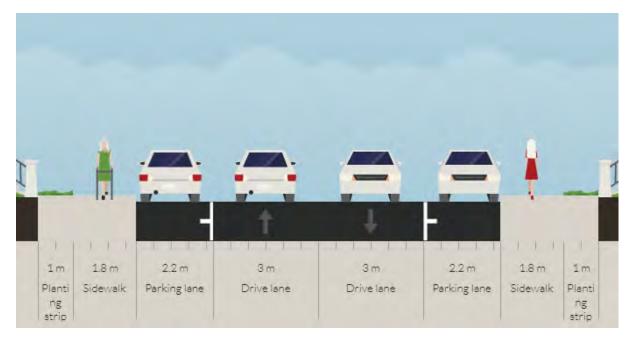
The intersection is located some 130 m from the Swanson Road / Luanda Drive intersection to the east and some 240 m from the Swanson Road / Airdrie Road intersection to the west. These separation distances are considered appropriate and typical of many town centre arterial road intersections.



## 3.3 INTERNAL ROAD DESIGN

As noted, the internal road is likely to be a crescent road or cul-de-sac however could change depending on the size of any proposed residential development. An indicative cross section width for the internal road would be 16 m. If a cul-de-sac was progressed, a cul-de-sac head could be provided at the end of the road to enable vehicles, particularly rubbish vehicles, to turn around at the end of the road. The cul-de-sac would likely be designed to meet ATCOP GD006 Type A specification. The proposed indicative cross-section is shown in Figure 10.

#### Figure 10: Proposed Internal Road Cross Section



The proposed cross-section can accommodate indented parking adjacent to the traffic lane. It is envisaged that kerb buildouts between parking bays would enable room for street trees and rain gardens and act as traffic calming to reduce vehicle speeds on the internal road.

## 4 TRIP GENERATION

## 4.1 EXISTING SITE TRIP GENERATION

## 4.1.1 SURVEYED TRIP GENERATION

The site driveways were surveyed on Tuesday 30<sup>th</sup> July 2019 in the morning and evening peak hours to ascertain the existing trip generation for the site. The site featured a peak hour trip generation of 14 vehicles in the evening peak hour. This level of traffic is considered negligible and for analysis purposes, the site is assumed to be a nil traffic generator.

## 4.1.2 PERMITTED DEVELOPMENT TRIP GENERATION

The site is permitted to develop the 2.65 ha of light industry zoned land. To ascertain an approximate level of permitted trip generation for the site, the following calculation and assumptions have been undertaken:

- The site provides approximately 2.65 ha of light industry zoned land;
- 0.53 ha (20%) of the land is assumed to be roading infrastructure;



- Of the remaining 2.12 ha (80%) of land, 1.2 ha (55% coverage) is assumed to be industrial buildings;
- Assuming a 50% / 50% split between warehousing and factory activities, results in 6,000 m<sup>2</sup> GFA of warehousing and 6,000 m<sup>2</sup> GFA of factory activities;
- The RTA guide details trip rates of 0.5 trips / 100sqm GFA and 1.0 trips / 100sqm GFA for warehouse and factory activities respectively;
- This results in a total industrial trip generation of 90 peak hour trips;
- The two existing residential dwellings (within the existing residential zoned area of the site) will approximately generate an additional 2 peak hour trips.

## 4.2 SITE TRIP GENERATION (WITH PLAN CHANGE)

As noted previously, the existing 'Business – Light Industry' zoning is proposed to be re-zoned to THAB zone and MHU zone. The effects of this change, for the purposes of the trip generation assessment, are summarised as follows:

- The proposed THAB and MHU zoned land would generate all vehicle traffic onto Swanson Road via a single new intersection connection.
- The number of vehicle movements generated by the site is likely to increase, however will be offset by the removal of the existing trips generated by the site via the four existing vehicle crossings.

The peak hour trip generation of dwelling houses is typically estimated using the predictive models within the RTA Guide<sup>1</sup>. An assessment has been undertaken using an indicative development potential of 200 dwellings. This housing potential is indicative of a mixed apartment and single house dwelling typology.

A trip rate of 0.5 trips per dwelling has been used for proposed THAB zoned dwellings (assessed as 50% of the residential yield each) and a trip rate of 0.65 trips per dwelling for the MHU zoned dwellings (assessed as 50% of the residential yield). The number of generated trips is summarised in Table 4.

Dwelling Type	Number of Dwellings	Trip Rate	Indicative Trips
THAB dwellings	100	0.5	50
MHU dwellings	100	0.65	65
TOTAL	200	-	115

## Table 4: RTA Guide Traffic Generation

Based on the above, the overall trip generation for the site is 115 traffic movements per hour. The overall trip rate is therefore 0.58 trips per dwelling. This is slightly more than industrial activity which could potentially be developed on the site given the current zoning (albeit with a different arrival / departure pattern).

<sup>&</sup>lt;sup>1</sup> Roads and Traffic Authority of NSW, Guide to Traffic Generating Developments, Version 2.2, October 2002



## 4.3 TRIP DISTRIBUTION / MODEL GENERATION

## 4.3.1 DISTRIBUTION ASSUMPTIONS

All trips associated with the 200 dwellings have been added to the existing road network traffic volumes summarised in Section 2.3.5.2. It is noted that the existing trips generated by the site have not been removed from the network. The analysis detailed in Section 5 is therefore considered to be a conservative assessment.

In terms of inbound/outbound percentages, the following has been assumed:

- Morning Peak Hour 80% outbound, 20% inbound
- Evening Peak Hour 20% outbound, 80% inbound.

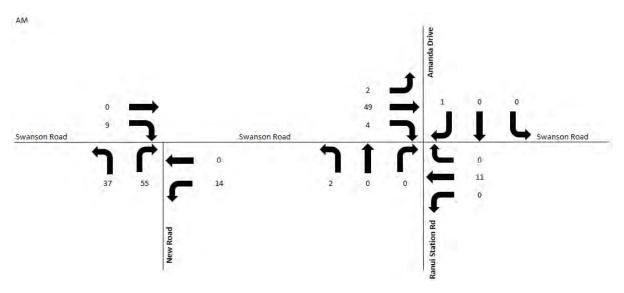
The directional split has been approximately based on the intersection surveys detailed previously. Therefore 60% of vehicles are assumed to travel to / from the east (i.e. Swanson Road / Ranui Station Road intersection) while 40% of vehicles are assumed to travel to / from the west (i.e. to / from Swanson).

The key intersections for assessment are the new intersection providing access to the site and the existing Swanson Road / Ranui Station Road signalised intersection. Additional vehicle movements at the signalised intersection have been assigned to the network based on existing turning movement patterns.

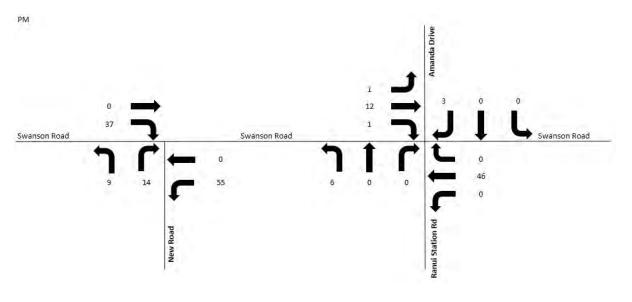
## 4.3.2 ADDITIONAL TRAFFIC MOVEMENTS

Figure 11 and Figure 12 show the estimated development traffic movements generated by the site.

#### Figure 11: Additional Traffic Movements – Weekday Morning Peak Hour





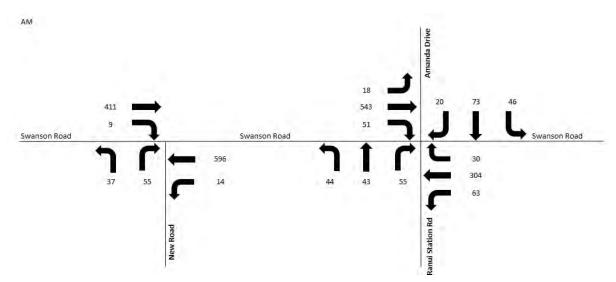


#### Figure 125: Additional Traffic Movements – Weekday Evening Peak Hour

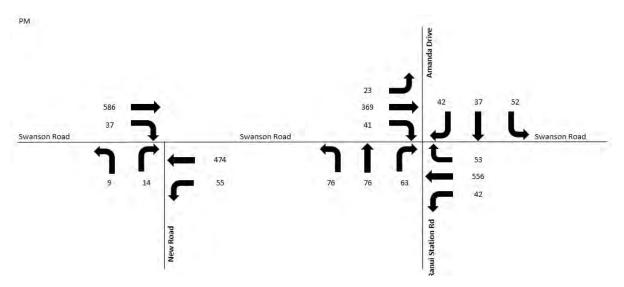
## 4.3.3 PROPOSED TRAFFIC MOVEMENTS

The proposed traffic movements including existing and additional traffic movements are summarised in Figure 13 and Figure 14.

#### Figure 13: Proposed Traffic Movements – Weekday Morning Peak Hour







#### Figure 146: Proposed Traffic Movements – Weekday Evening Peak Hour

## 5 ASSESSMENT OF EFFECTS

## 5.1 ASSESSMENT METHODOLOGY

The traffic effects of the indicative development potential of the site has been assessed using the traffic modelling software SIDRA.

The modelling does not remove the existing trips generated by the dwellings on site and is therefore conservative in terms of assessing traffic effects of the proposed Plan Change.

The results presented in this report include the Degree of Saturation, which is a measure of available capacity and the Level of Service ("LOS"), which is a generalised function of delay. For signal controlled intersections, a Degree of Saturation of less than 0.90 is considered to be acceptable. LOS A and B are very good and indicative of free-flow conditions; C is good; D is acceptable; and E and F are indicative of congestion and unstable conditions.

The assessment below identifies the effect of the additional vehicle trips.

## 5.2 ROAD NETWORK ASSESSMENT

## 5.2.1 SWANSON ROAD / RANUI STATION ROAD INTERSECTION

## 5.2.1.1 EXISTING INTERSECTION PERFORMANCE

The Swanson Road / Ranui Station Road intersection is a signal controlled four-leg intersection. The existing intersection performance is summarised in Table 5 and Table 6 below.



Mov	Turn	Dem	and Flows	d Flows Deg. Average Level of	Level of	95% Back of Queue			
ID		Total veh/h	HV %	Sain vic	Delay sec	Service	Vehicles veh	Distance	Prop. Queued
South: Ran	ui Staiton Road						- Colle		
1	L2	44	5.0	0.107	37.5	LOS D	1.7	12.5	0.82
2	T1	45	5.0	0.550	46.0	LOS D	4.9	35.7	0.98
3	R2'	58	5.0	0.550	50.6	LOS D	4.9	35.7	0.98
Approach		147	5.0	0.550	45.3	LOS D	4.9	35.7	0.93
East: Swan	ison Road								
4	1.2	66	5.0	0.378	19.3	LOS B	10.6	77.6	0.63
5	T1	308	5.0	0.378	14.7	LOS B	10.6	77.6	0.63
6	R2	32	5.0	0.294	56.5	LOSE	1.6	11.5	0.99
Approach		406	5.0	0,378	18.7	LOS B	10.6	77.6	0.66
North: Ama	nda Drive								
7	1.2	48	5.0	0.180	30.6	LOS C	1.6	11.7	0.91
8	T1	77	5.0	0.576	49.8	LOS D	4.8	35.1	1.00
9	R2	20	5.0	0.576	54.4	LOS D	4.8	35.1	1.00
Approach		145	5.0	0,576	44.0	LOS D	4.8	35.1	0,97
West: Swar	nson Road								
10	L2	17	5.0	0,573	21.1	LOS C	17.1	124.6	0.71
11	T1	520	5.0	0.573	16.5	LOS B	17.1	124.6	0.71
12	R2	49	5.0	0.460	57.4	LOS E	2.5	18.4	1.00
Approach		586	5.0	0.573	20.1	LOS C	17.1	124.6	0.73
All Vehicles		1285	5.0	0.576	25.2	LOSC	17.1	124.6	0.76

#### Table 5: Swanson Road / Ranui Station Road Existing Intersection Performance – Morning Peak Hour

#### Table 6: Swanson Road / Ranui Station Road Existing Intersection Performance - Evening Peak Hour

Mov	Tum	Dema	Demand Flows	Deg.		Level of	95% Back of Queue		Prop.
D		Total veh/h	HV %	Satn v/c	Delay sec	Service	Vehicles veh	Distance m	Quevec
South: Ran	ui Staiton Road								-
t	L2	74	5.0	0.158	35.5	LOS D	2,8	20.3	0.81
2	T.1	80	5.0	0.687	45.0	LOS D	7.0	50.9	0.97
3	R2	66	5.0	0.687	49.6	LOS D	7.0	50.9	0.97
Approach		220	5.0	0.687	43.2	LOS D	7.0	50.9	0.92
East Swan	son Road								
4	L2	44	5.0	0.659	24.0	LOS C.	20.4	148.8	0.78
5	TI	537	5.0	0.659	19.3	LOS B	20.4	148.8	0.78
6	R2	56	5.0	0.519	57.7	LOSE	2.9	20.9	1.00
Approach		637	5,0	0.659	23.0	LOS C	20.4	148,8	0.80
North: Amar	nda Drive								
7	L2	55	5.0	0.203	29.4	LOS C	1.7	12.7	0.91
8	T1	39	5,0	0.484	49.2	LOS D	3.9	28.6	0.99
9	R2	41	5.0	0.484	53.8	LOS D	3.9	28.6	0.99
Approach		135	5.0	0.484	42.6	LOS D	3.9	28.6	0.96
West: Swan	nson Road								
10	L2	23	5.0	0.424	21.5	LOS C.	12.2	89.4	0.68
11	T1	376	5.0	0.424	16.9	LOS B	12.2	89.4	0.68
12	R2	42	5.0	0.391	57.0	LOS E	2.1	15.5	1.00
Approach		441	5.0	0.424	21.0	LOS C	12.2	89.4	0.71
All Vehicles		1433	5.0	0.687	27.3	LOSC	20.4	148.8	0.80

As shown above, the morning peak hour shows similar patterns to the evening peak hour. The intersection operates with an overall LOS of C and the maximum degree of saturation is 69%. The queues are considered typical of a major arterial road intersection.

## 5.2.1.2 PROPOSED INTERSECTION PERFORMANCE

As noted, the proposed traffic volumes are summarised in Figure and Figure 146. The proposed Swanson Road / Ranui Station Road intersection performance is summarised in Table 7 and Table 8.



#### Table 7: Swanson Road / Ranui Station Road Proposed Intersection Performance - Morning Peak Hour

#### MOVEMENT SUMMARY

Site: 101 [AM Proposed] Swanson / Ranui Station Stre Category: (None) Site Category: (None) Signals - Fixed Time Isolated Cycle Time = 100 seconds (Site User-Given Cycle Time) Variable Sequence Analysis applied. The results are given for the selected output sequence.

Mov	Tum	Den	and Flows	Deg.	Average	Level of	95% Back of Qu	eue	Prop.
ID		Total veh/b	HV %	Satn v/c	Delay sec	Service	Vehicles veh	Distance m	Queued
South: Ranui 4	Staiton Road								
1	L2	46	5.0	0.117	38.5	LOS D	1.8	13.3	0.83
2	T1	45	5.0	0.606	47.7	LOS D	5.0	36.5	0.99
3	R2	58	5.0	0.606	52.3	LOS D	5.0	36.5	0.99
Approach		149	5.0	0.606	46.6	LOS D	5.0	36.5	0.94
East: Swansor	Road								
4	L2	66	5.0	0.383	18.8	LOS B	10.8	79.2	0.62
5	T1	321	5.0	0.383	14.2	LOS B	10.8	79.2	0.62
6	R2	32	5.0	0.294	56.5	LOS E	1.6	11.5	0.99
Approach		419	5.0	0.383	18.1	LOS B	10.8	79.2	0.65
North: Amand	a Drive								
7	L2	48	5.0	0.180	31.1	LOSC	1.6	11.9	0.91
8	T1	77	5.0	0.583	49.9	LOS D	4.9	35.5	1.00
9	R2	21	5.0	0.583	54.5	LOS D	4.9	35.5	1.00
Approach		146	5.0	0.583	44.3	LOS D	4.9	35.5	0.97
West: Swanso	n Road								
10	L2	18	5.0	0.617	21.0	LOS C	19.1	139.3	0.72
11	T1	572	5.0	0.617	16.4	LOS B	19.1	139.3	0.72
12	R2	54	5.0	0.499	57.6	LOS E	2.7	20.0	1.00
Approach		643	5.0	0.617	20.0	LOS B	19.1	139.3	0.74
All Vehicles		1358	5.0	0.617	25.0	LOS C	19.1	139.3	0.76

#### Table 8: Swanson Road / Ranui Station Road Proposed Intersection Performance - Evening Peak Hour

#### MOVEMENT SUMMARY

Site: 101 [PM Proposed]

Swanson / Ranui Station Site Category: (None) Signals - Fixed Time isolated Cycle Time = 100 seconds (Site User-Given Cycle Time) Variable Sequence Analysis applied. The results are given for the selected output sequence.

Mov	Tum	Den	and Flows	Deg.	Average	Level of	95% Back of Que	eue	Prop.
D		Totai	HV %	Satu	Delay	Service	Vehicles	Distance	Queued
South: Ranui	Decition Decid	veh/h	%	vic	Sec		veh	m	
South: Ranui	all and a subsect of			2.222		1000			
1	L2	80	5.0	0.191	35.6	LOS D	3.0	22.2	0.81
2	T1	80	5.0	0.701	45.3	LOS D	7.0	51.2	0.97
3	R2	66	5.0	0.701	49.9	LOS D	7.0	51.2	0.97
Approach		226	5.0	0.701	43.2	LOS D	7.0	51.2	0.91
East Swanso	n Road								
4	L2	44	5.0	0.711	24.7	LOSC	22.9	167.5	0.81
5	T1	585	5.0	0.711	20.1	LOS C	22.9	167.5	0.81
6	R2	56	5.0	0.519	57.7	LOS E	2.9	20.9	1.00
Approach		685	5.0	0.711	23.5	LOS C	22.9	167.5	0.83
North: Amand	a Drive								
7	L2	55	5.0	0.203	29.4	LOSIC	1.7	12.7	0.91
8	T1	39	5.0	0.503	49.3	LOS D	4.1	29.8	0.99
9	R2	44	5.0	0.503	53.9	LOS D	4.1	29.8	0.99
Approach		138	5.0	0.503	42.9	LOS D	4.1	29.8	0.96
West: Swanso	on Road								
10	L2	24	5.0	0.438	21.7	LOS C	12.8	93.3	0.69
11	T1	388	5.0	0.438	17.1	LOS B	12.8	93.3	0,69
12	R2	43	5.0	0.401	57.1	LOS E	2.2	15.9	1.00
Approach		456	5.0	0.438	21.1	LOSIC	12.8	93.3	0.72
All Vehicles		1505	5.0	0.711	27.5	LOSC	22.9	167.5	0.82

As shown above, the intersection continues to work acceptably. The intersection continues to operate at overall LOS C and the average delays decrease from 25.2 seconds to 25.0 seconds in the morning peak hour and increase from 27.3 seconds to 27.5 seconds in the evening peak hour. Overall, the effects of the potential development volumes on the existing intersection are considered negligible. As such, no mitigation works are considered to be required for the subject intersection.



#### INDICATIVE SITE ACCESS INTERSECTION 5.2.2

### 5.2.2.1 INDICATIVE INTERSECTION PERFORMANCE

The proposed Swanson Road / New Road intersection performance is summarised in

Table 9 and Table 10.

Table 9: Swanson Road / New Road Proposed Intersection Performance - Morning Peak Hour

#### MOVEMENT SUMMARY

♡ Site: 101 [Swanson Road/ Site Access Intersection AM Proposed] AM Peak Hour Site Category: (None) Giveway / Yield (Two-Way)

Mov	Performance - Vel Tum		and Flows	Deg.	Average	Level of	95% Back of Q	12(2)	Prop.
ID.	7 Mill	Total veh/h	HV W	Sain v/c	Delay sec	Service	Vehicles	Distance	Queued
South: Site A	Access	Ventiti	20	0.00	466		Ven		
1	L2	39 58	2.0	0.263	8.5	LOS A	1.0	6.9	0.75
3	R2	58	2.0	0.263	18.6	LOS C	1.0	6.9	0.75
Approach		97	2.0	0.263	14.5	LOS B	1.0	6.9	0.75
East: Swans	on Road								
4	L2	15	2.0	0.340	4.6	LOS A	0.0	0.0	0.00
5	TI	627	5.0	0.340	0.0	LOSA	0.0	0.0	0.00
Approach		642	4.9	0.340	0.1	NA	0.0	0.0	0.00
West: Swans	son Road								
11	T1	433	5.0	0.229	0.0	LOSA	0.0	0.0	0.00
12	R2	9	2.0	0.011	7.4	LOS A	0.0	0.3	0.56
Approach		442	4.9	0.229	0.2	NA	0.0	0.3	0.01
All Vehicles		1181	4.7	0.340	1.3	NA	1.0	6.9	0.07

Table 10: Swanson Road / New Road Proposed Intersection Performance – Evening Peak Hour

#### MOVEMENT SUMMARY

V Site: 101 [Swanson Road/ Site Access Intersection PM Proposed] PM Peak Hour

Site Category: (None) Giveway / Yield (Two-Way)

Movement P	erformance - Veh	icles							
Mov ID	Tum	Total	and Flows HV	Deg. Saln	Average Delay	Level of Service	95% Back of Q Vehicles	Distance	Prop. Queued
South: Site Acc	ess	vetvin	%	v/c	sec		Veh	m	
1	L2	9	2.0	0.074	6.6	LOSA	0.2	1.7	0.71
3	R2	15	2.0	0.074	19.0	LOS C	0.2	1.7	0.71
Approach		24	2.0	0.074	14.1	LOS B	0.2	1.7	0.71
East Swanson	Road								
4	L2	58	2.0	0.296	4.6	LOS A	0.0	0.0	0.00
5	T1	499	5.0	0.296	0.0	LOS A	0,0	0.0	0.00
Approach		557	4.7	0.296	0.5	NA	0.0	0.0	0.00
West: Swansor	n Road								
11	T1	617	5.0	0.329	0,0	LOS A	0.0	0.0	0.00
12	R2	39	2.0	0.040	6.9	LOS A	0.2	1.1	0.53
Approach		656	4.8	0.329	0.5	NA	0.2	1.1	0.03
All Vehicles		1237	4.7	0.329	0.7	NA	0.2	1.7	0.03

As shown above, the morning peak hour shows similar patterns to the evening peak hour. The intersection operates well overall with the worst movements being the outbound movements from the site access (LOS B and LOS C). These movements operate satisfactorily and the maximum queue length is 7 m.

#### 6 PARKING

#### PROPOSED AUCKLAND UNITARY PLAN REQUIREMENTS 6.1



The Unitary Plan outlines the relevant rules against which potential development should be assessed. Table 11 summarises the Unitary Plan parking requirements.

#### Table 11: Unitary Plan Minimum Parking Requirements

Acti	vity	Unitary Plan Parking Requirement
Residential – Terrace Housing and Apartment Building Zone	All dwellings in the Terrace Housing and Apartment Building Zone	No minimum No maximum
Residential – Mixed Housing Urban Zone	Dwellings - two or more bedrooms	1 per dwelling minimum No maximum

As noted, there are potentially 200 dwellings in total, approximately evenly split between the THAB and MHU zones.

On this basis, there is a minimum of 100 parking spaces required for the 200 dwellings, with no maximum parking requirement. It is noted that some dwellings may provide no parking while other dwellings may provide up to two parking spaces. It is unlikely any dwellings would provide more than two parking spaces. It is considered that the site can readily accommodate more than 100 spaces, and can therefore satisfy Unitary Plan requirements.

# 6.2 ON-STREET PARKING

On-street parking on the internal road can be determined at future resource consent stages however it is generally considered that a minimum of 1 space per 4 dwellings is an appropriate design standard. This would equate to some 50 parking spaces for the 200 dwellings. It is considered that this level of parking can be accommodated on-site.

# 6.3 CYCLE PARKING

Table 12 outlines the Unitary Plan bicycle parking requirements for the THAB and MHU zoned land.

### Table 12: Unitary Plan Bicycle Parking Requirements

Activity	Short Stay	Long Stay
Residential (Developments of 20 or more dwellings)	1 per 20 dwellings	1 per dwelling without a dedicated garage

All dwellings are assumed to be terraces or apartments. Terraces would likely provide internal garaging therefore there would be no need for cycle parking however apartments would likely have a shared at-grade or basement parking area (no dedicated garages). On this basis, bicycle parking spaces would be required for the apartment typologies.

The total cycle parking provisions can be determined at subsequent resource consent stages however the site is considered to be capable of accommodating the required number of cycle parking spaces.



# 6.4 ACCESSIBLE PARKING

The Unitary Plan requires that accessible parking be provided as per the requirements of the Building Code and NZS 4121<sup>2</sup>. The Building Act states that accessible parking is not required for residential dwellings.

There may be small scale ancillary café type activities provided on the ground floor of apartment buildings for example that may require accessible parking. This can be investigated at subsequent resource consent stages once development schemes are further investigated.

### 6.5 SERVICING

For all activities other than retail and industrial use, the site is likely to have a dwelling GFA of between 20,000 m<sup>2</sup> and 90,000 m<sup>2</sup> and therefore requires two loading spaces.

The internal road network would be designed to accommodate a 10.3 m rear steering waste truck as advised by Auckland Council's Waste Management team. The indicative site access intersection features compound kerbs to enable trucks to enter and exit the development without obstructing opposing light vehicles. Within the site, it is expected that trucks will be able to access each apartment building for the purposes of furniture delivery and rubbish collection.

The minimum headroom within each parking level is recommended to be a minimum of 3.8 m. Again, this can be investigated at subsequent resource consent stages.

# 7 ACCESS

# 7.1 SITE ACCESS

As noted, the site has been assessed to gain access to the road network via a new priority-controlled intersection on Swanson Road. The indicative intersection design is shown in Figure 94.

The indicative intersection would require land take within the site. As Swanson Road is an Arterial Road, any vehicle access onto Swanson Road, either as a result of the activities under the current zoning or for residential development under the proposed THAB and MHU zone, would require a 'Restricted Discretionary Resource Consent' under Rule E27.6.4.1. of the Unitary Plan. This will enable traffic effects to be assessed regardless of the underlying zoning of the site. The key point is that regardless of development under the existing zone, or development under the proposed THAB and MHU zone, there would still be subsequent resource consent applications to assess traffic effects of any activities seeking access onto Swanson Road.

The internal road is proposed to have a cross-section of 16 m which satisfies the minimum road width of 14 m for public roads and is proposed to have maximum gradients less (shallower) than the permitted maximum gradient of 1:8. While the design of the internal road will be finalised as part of later resource consent stages, a workable internal road solution can be provided.

### 7.2 ACCESS TO INDIVIDUAL SITES

Vehicle access for terraced housing and apartments would be expected to occur to individual garages, or basement or at-grade parking areas with multiple parking spaces, respectively. Where

<sup>&</sup>lt;sup>2</sup> NZS4121:2001, Design for Access and Mobility: Buildings and Associated Facilities



possible, the number of vehicle access points would be minimised. Vehicle accesses would meet Unitary Plan requirements including:

- Minimum 10 m separation from intersections;
- Minimum 6 m separation between vehicle accesses;
- 6.0 m maximum crossing widths;
- 1:20 gradient, 4 m long platforms on the approach to public roads;
- Maximum 1:8 gradients where service vehicles are expected.

Overall, the vehicle accesses can be accommodated.

# 7.3 PEDESTRIANS

Given the proposed rezoning, it is recommended to improve the existing connections to Ranui Train Station. Pedestrian connectivity to the neighbouring park to the east and potentially upgrading the lighting within this area is recommended to provide safe pedestrian connectivity to the station via Robertson Road or Carla's Way. The station will then be some 600 - 700m (6 - 7 minutes walk) from the centre of the site with a relatively direct travel path. A separate connection directly to Ranui Domain is also proposed. An indicative pedestrian connectivity plan is shown in Attachment B1.

It is also proposed to connect directly to the existing footpath network on Swanson Road, as well as implement a pedestrian refuge crossing to the west of the proposed intersection with Swanson Road. this is detailed in Attachment A1. The proposed pedestrian connections are considered to improve the local pedestrian network, and provide excellent connectivity for the subject site.

We also note that following the implementation of CRL, the travel times into the city from Ranui Train Station will be in the order of 40 – 50 minutes (similar to the current travel times of the sector of the Western line between Avondale and Fruitvale stations). The site is considered to offer good accessibility to the Rapid Transit Network which provides connectivity to a number of public transport services throughout the Auckland region. As such, the site is considered to be well connected from a pedestrian perspective, with the upgrades detailed above to further improve pedestrian amenity.

# 8 INTEGRATION WITH FUTURE TRANSPORT NETWORK

# 8.1 GENERAL

The following section provides a review of established policy and plans in relation to the proposed development. The documents reviewed comprise:

- Auckland Plan 2050;
- Auckland Regional Policy Statement;
- Auckland Regional Land Transport Plan;
- Auckland Regional Public Transport Plan 2013;
- Auckland Unitary Plan Operative in Part Version (referred to as the 'Unitary Plan' in this report);
- Auckland Transport Code of Practice; and
- Auckland Design Manual 2014.

### 8.2 AUCKLAND PLAN 2050

The Auckland Plan 2050 sets the direction for how Auckland will grow and develop over the next 30 years. It responds to the key challenges we face today – high population growth, sharing prosperity



among all Aucklanders, and reducing environmental damage. The key transport related outcome is detailed below:

"Aucklanders will be able to get where they want to go more easily, safely and sustainably".

The Auckland Plan 2050 details seven focus areas in order to achieve this outcome:

- Make better use of existing transport networks;
- Target new transport investment to the most significant challenges;
- Maximise the benefits from transport technology;
- Make walking, cycling and public transport preferred choices for many more Aucklanders;
- Better integrate land-use and transport;
- Move to a safe transport network, free from death and serious injury; and
- Develop a sustainable and resilient transport system.

It is considered that the proposed development and associated roading connection to Swanson Road aligns well with these focus areas.

# 8.3 AUCKLAND REGIONAL LAND TRANSPORT PLAN

The Auckland Regional Land Transport Plan ("RLTP") forms part of the National Land Transport Programme and represents the combined intentions of the NZ Transport Agency (the Transport Agency), Auckland Transport (AT), and KiwiRail to respond to growth and other challenges facing Auckland in the next 10 years.

Some of the specific projects noted are East West link, the New Network for South Auckland, and various rail and bus network improvements (ticketing, rail, signalling improvements and bus lanes). The proposed development is considered to be compatible with the surrounding transport environment and offers alternatives to the private vehicle.

# 8.4 AUCKLAND REGIONAL PUBLIC TRANSPORT PLAN

The Auckland Regional Public Transport Plan 2018 – 2028 ("RPTP") seeks to deliver an improved public transport network in Auckland by increasing public transport frequency along key transport corridors.

The vision of the RPTP is to deliver "*provide Auckland with seamless end-to-end customer journeys that are safe, accessible and reliable*". To achieve this vision, the RPTP features four focus areas:

- 1. Expanding and enhancing rapid and frequent networks;
- 2. Improving customer access to public transport;
- 3. Improving Māori responsiveness; and
- 4. Harnessing emerging technologies.

As noted, the New Network for West Auckland includes frequent bus services and the Rapid Transit Network (RTN) along the southern rail line. The proposed development is therefore considered to be supportive of the vision of the RPTP.

### 8.5 AUCKLAND UNITARY PLAN

The Auckland Unitary Plan Operative in part (the latest iteration of the Unitary Plan) has the following objectives with regard to the region's transport infrastructure under Chapter E27 (Transport):

- 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.
- An integrated public transport, including public transport, walking, cycling, private vehicles and freight, is provided for.
- Parking and loading support urban growth and the quality compact urban form.
- The provision of safe and efficient parking, loading and access is commensurate with the character, scale and intensity of the zone.
- Pedestrian safety and amenity along public footpaths is prioritised.
- Road/rail crossings operate safely with neighbouring land use and development.

Any residential development making use of existing and proposed transport mode alternatives on the site is therefore considered to align well with the transport objectives of the Unitary Plan. The proposed zoning aligns well with neighbouring zones.

### 8.6 AUCKLAND TRANSPORT CODE OF PRACTICE

Should the proposed development be approved, any road improvements will follow approved standards namely the Auckland Transport Code of Practice (ATCOP), Austroads and NZS4404. It is also noted that AT currently have a new design manual ('TDM'), currently in draft, which can inform any road or intersection designs as part of future resource consent applications.

### 8.7 AUCKLAND DESIGN MANUAL

The Auckland Design Manual 2014 is currently being developed to sit alongside the Unitary Plan and provides practical advice, best practice processes and detailed design guidance to enable informed choices, to help build houses and develop streets and neighbourhoods that not only look good but are built to last, sustainable and give the best return on investment. To date, it gives the following transport-based design outcomes:

- **Connections and connectivity** Subdivisions that provide movement choice and connectivity, while balancing costs, safety, and privacy;
- **Walkable neighbourhoods** Prioritisation of pedestrian convenience and access to destinations in the design of subdivisions;
- Legible hierarchies A clear and consistent road hierarchy to create accessible, legible and safe subdivisions and helps people understand how to get to, and when they are on, main routes;
- **Managing speed and modes** Subdivision design ensures the safety of pedestrians and cyclists by managing vehicle travel speed, and provides equally for the four major modes (walking, cycling, passenger transport, vehicles) in a way that will appeal to the users of each;
- Vehicle emissions and road layout Movement networks are designed to minimise the costs and environmental impacts of unnecessary travel; and
- **Public access** Streets provide public movement and access throughout a subdivision.

The proposed development intends to follow these design guidelines and the site promotes connectivity with the existing employment, retail, community and recreational activities in the local and wider area. Traffic calming is proposed to be investigated to promote pedestrian movement and slow traffic within the site.

# 9 CONSTRUCTION TRAFFIC

The development site is currently occupied, and demolition works followed by earth works would be required before any new development could be constructed. Again, this would be subject to subsequent resource consent processes.



To facilitate construction, a left in / left out access could be established on Swanson Road to accommodate truck movements to and from the site. The volume of earth works is unknown at this stage however can be undertaken over an extended period to minimise traffic effects of necessary.

As is typical with a development of this scale, it is recommended that as part of any later resource consent, a Construction Traffic Management Plan (CTMP) should be required as a condition. It is considered that this Construction Traffic Management Plan should include:

- Construction dates and hours of operation including any specific non-working hours for traffic congestion/noise etc, aligned with normally accepted construction hours in the Auckland Region;
- Truck route diagrams between the site and external road network.
- Temporary traffic management signage/details for both pedestrians and vehicles, to manage the interaction of these road users with heavy construction traffic; and
- Details of site access/egress over the entire construction period and any limitations on truck movements. All egress points should be positioned to achieve appropriate sight distances.

Based on experience of constructing similar projects, and bearing in mind capacity within the existing road network, with the appropriate Construction Traffic Management Plan in place and the above measures implemented, it is considered that construction activities can be managed to ensure any generated traffic effects are appropriately mitigated.

# **10 CONSULTATION**

The following consultation (attended by Commute) has been undertaken with Auckland Council and Auckland Transport on transport matters relating to the development:

• Pre-application meeting with Auckland Transport on 3 July 2019.

# **11 IMPLEMENTATION PLAN**

Table 13 summarises an indicative Implementation Plan. It sets out proposed works that are proposed to be addressed as part of development of this site.

#### Table 13: Implementation Plan

Trigger	Indicative Upgrade	Comments	Funder
Stage 1 Resource Consent	Construction of a new intersection on Swanson Road to provide access to the site. Includes upgrade of footpath fronting the site to 1.8 m minimum width. Land take on development site may be set aside at this time.	To be provided prior to first occupation of new development seeking access onto Swanson Road.	Developer
Stage 1 Resource Consent	Provision of new internal road network	To be provided prior to first occupation of new development seeking access onto Swanson Road.	Developer
Stage 1 Resource Consent	Pedestrian connection to Ranui Station including lighting upgrade.	To be provided prior to first occupation of new development seeking access onto Swanson Road.	Developer



The above works are indicatively only and are subject to change depending on the scale of development proposed. The detail of mitigation measures may be revisited at Resource Consent stage.

# 12 CONCLUSIONS

Based on the assessments undertaken in this report, it is concluded:

- The site, with the mitigation measures identified, has good accessibility to various transport modes: walking, cycling, bus and private vehicle;
- The effects of the proposed increase in vehicles are expected to be minimal with all existing roads and intersections capable of accommodating this additional traffic;
- Sufficient parking can be provided on-site. On street parking is recommended to be established with a parking rate of approximately 1 on-street parking space per 4 dwellings.
- To demonstrate that a safe and efficient vehicle access could be achieved to accommodate potential residential development in the THAB and MHU zoned land, an indicative priority-controlled intersection has been assessed. The intersection has been conservatively assessed as a worst-case scenario and can safely control right turn movements and minimise the number of vehicle crossings on Swanson Road (due to its replacement of several existing vehicle crossings). However, the design of the intersection is dependent on the size of the development which is not known at this stage. Further detail can be provided at subsequent resource consent stages should the Plan Change be approved;
- The southern side of Swanson Road in front of the site can be upgraded to provide a 1.8 m footpath. Again, this can be clarified at Resource Consent stage;
- The proposed development is consistent with, and encourages, key regional and district transport policies.

It is anticipated that any future residential development would provide the transport network upgrades described in Section 11 of this assessment. The traffic effects of the development potential that could be achieved under the THAB and MHU zone, with the implementation of the measures identified in Section 11, are considered acceptable and there is no reason, from a transport perspective, to preclude approval of the proposed Plan Change.

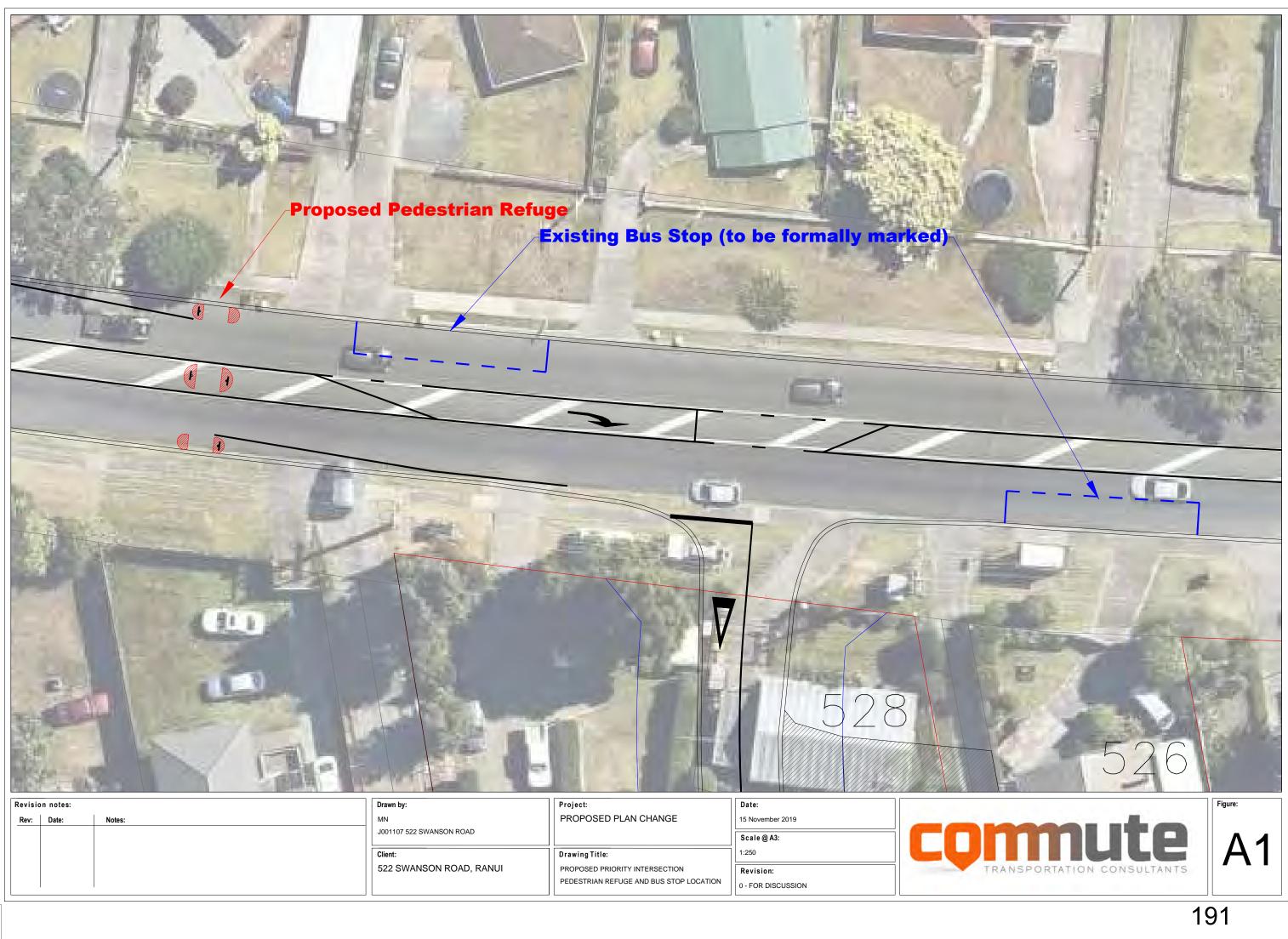


ATTACHMENT A – PROPOSED INDICATIVE INTERSECTION

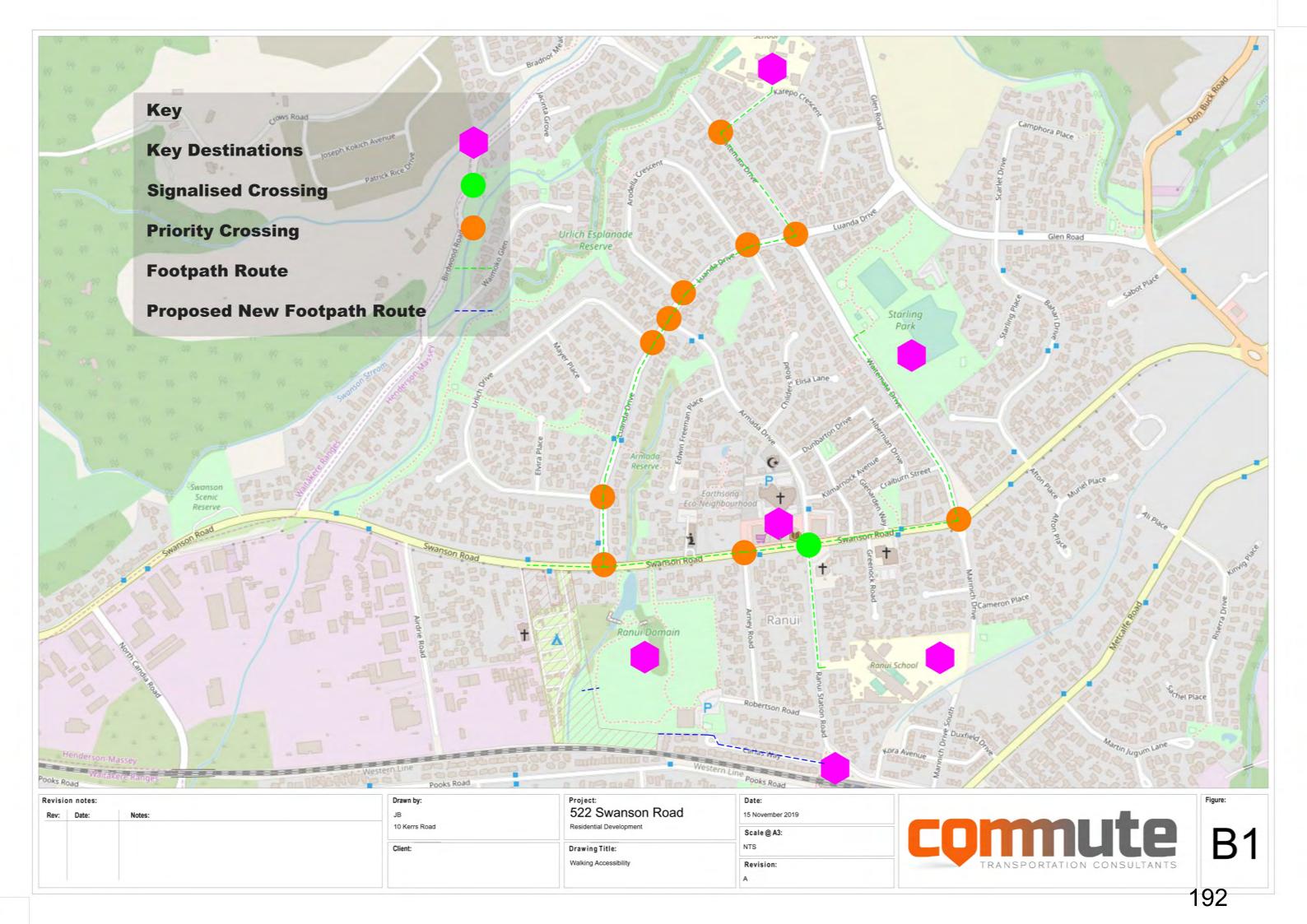


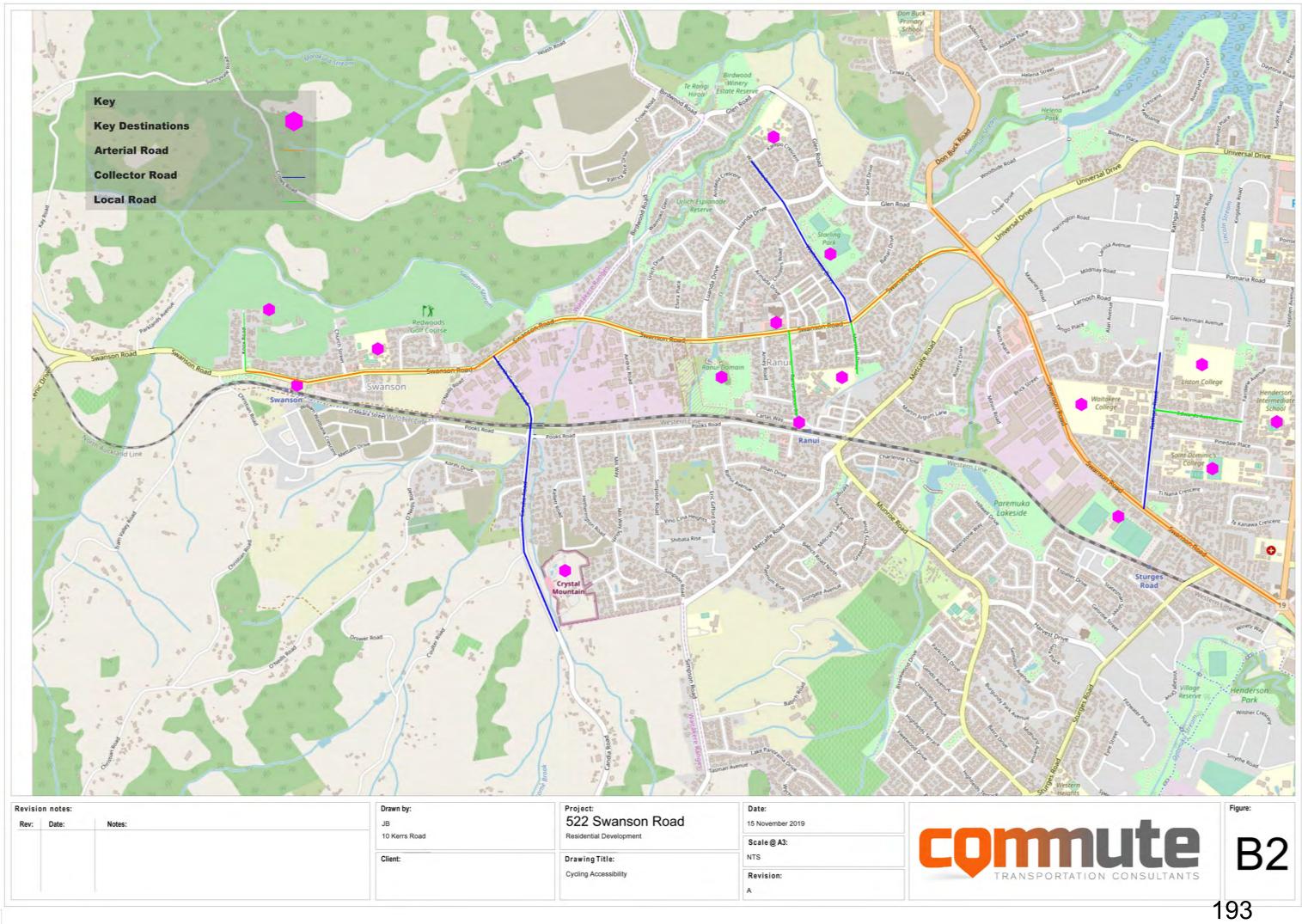
ATTACHMENT B – WALKING AND CYCLING CATCHMENTS





Revisio	on notes:		Drawn by:	Project:	Date:	
Rev:	Date:	Notes:	MN	PROPOSED PLAN CHANGE	15 November 2019	
			J001107 522 SWANSON ROAD		Scale@A3:	
			Client:	Drawing Title:	1:250	
			522 SWANSON ROAD, RANUI	PROPOSED PRIORITY INTERSECTION	Revision:	
				PEDESTRIAN REFUGE AND BUS STOP LOCATION	0 - FOR DISCUSSION	





Revisi	on notes:		Drawn by:	Project:	Date:	
Rev:	Date:	Notes:	JB	522 Swanson Road	15 November 2019	
			10 Kerrs Road	Residential Development	Scale @ A3:	
			Client:	Drawing Title:	NTS	
				Cycling Accessibility	Revision:	
					A	

# **APPENDIX 4**

# **ACOUSTIC ASSESSMENT**

# 522-524 SWANSON ROAD, RANUI

Proposed Plan Change Acoustic Assessment

**Prepared for:** 

Western Park Village Limited 3/30 Augustus Terrace Parnell Auckland 1052

# PREPARED BY

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# BASIS OF REPORT

This report has been prepared by SLR Consulting NZ Limited (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Western Park Village Limited (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

# DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
710.10180-R01-v1.0	22 August 2019	Peter Runcie	Matthew Bryce	Peter Runcie

1	INTRODUCTION	4
2	PROJECT DESCRIPTION AND SITE LOCATION	4
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5	CONCLUSION	8

# DOCUMENT REFERENCES

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Figure 2	Proposed Zoning	6

# APPENDICES

Appendix A Acoustic Terminology Appendix B Auckland Unitary Plan Rules E25.6.2, E25.6.5 and E25.6.19

# **1** Introduction

Western Park Village Limited (the Applicant) is seeking to rezone the land at 524 Swanson Road in Ranui. The rezoning will allow residential activities to be established on the rezoned land.

SLR Consulting NZ Ltd (SLR) has been commissioned to undertake an assessment of acoustic effects associated with the proposed private plan change.

This report contains a review of the relevant noise performance standards applicable to the existing site zoning; recommends appropriate noise performance standards related to the proposed new zoning and provides an assessment of potential reverse sensitivity noise effects on adjacent sites.

A description of acoustic terminology is provided in **Appendix A**.

# 2 **Project Description and Site Location**

The site comprises approximately 2.9 hectares of land with the majority being zoned *Business - Light Industry* and a smaller portion on the Swanson Road frontage zoned *Residential - Mixed Housing Suburban*.

The neighbouring land is zoned as follows:

- to the north Residential Mixed Housing Suburban;
- to the east Open Space Sport and Active Recreation;
- to the south (across the railway line) Residential Mixed Housing Urban; and
- to the west Business Light Industry.

Figure 1 shows the existing Auckland Unitary Plan (AUP) zoning for the site and surrounding area.

The proposed private plan change seeks to rezone the portion of the site currently zoned *Business - Light Industry* to *Residential - Mixed Housing Urban* and *Residential - Terrace Housing and Apartment Building*. The proposed new land zones have been illustrated in **Figure 2**. It is proposed that the rezoned land would be used for residential development, which would be consistent with the land uses of surrounding areas to the north, east and south. The application documentation as submitted to the Council contains a full description of the proposal.

The two neighbouring *Business - Light Industry* zoned sites to the west (534 Swanson Road and 28A Airdrie Road) are noted to have direct boundary interfaces with *Residential* zoned land on at least one boundary.

Site observations indicated that 534 Swanson Road is currently in use as a worship facility (Ranui Assembly of God). 28A Airdrie Road is currently used by a variety of businesses – the main activities being a house viewing/moving yard and a machinery/material storage facility.







## Figure 2 Proposed Zoning

# **3** Noise Performance Standards

# 3.1 Existing

The existing noise rules applicable to activity on the site are those applicable to land zoned *Business – Light Industry* (E25.6.5 - *Noise levels in the Business – Heavy Industry Zone or the Business – Light Industry Zone* and E25.6.19- *Business zones interface*) and *Residential* (E25.6.2 - *Maximum noise levels in residential zones*). See **Appendix B** for copies of the referenced rules.

The *Business zone interface* rules (E25.6.19) apply to the *Business – Light Industry* sites to the west which already have at least one boundary interface with *Residential* zoned land.

# 3.2 Proposed

The proposed plan change process affords the opportunity to prescribe new or modified rules, appropriate for the proposed new zoning and interaction with adjoining land.

For consistency with the AUP, it is proposed that the rezoned land would be subject to the Auckland Unitary Plan rules for land zoned *Residential - Mixed Housing Urban* and *Residential – Terrace Housing and Apartment Buildings* (that being the rules in Chapter E25 of the Auckland Unitary Plan).

These proposed noise standards (in terms of noise generated by activity on the site) would be consistent with the surrounding land uses which, as noted before, comprise a mixture of residential, open space, religious establishment and light industry.

Given a large portion of the site is currently zoned *Business – Light Industry*, the proposed plan change is likely to result in a potential improvement in the acoustic amenity of surrounding sites in terms of the reduction in permitted activity noise levels at neighbouring *Residential* zoned land by removing potentially noisy land uses as a result of the proposed rezoning.

Therefore, based on the above, it would be reasonable to conclude that the acoustic amenity of surrounding land would be maintained or even potentially improved by the adoption of the Auckland Unitary Plan limits for *Residential - Mixed Housing Urban* and *Residential - Terrace Housing and Apartment Building* zoned land as part of the proposed private plan change.

# 4 Reverse Sensitivity

Following the proposed rezoning, the introduction of the noise standards of the *Business zones interface* rules (E25.6.19) affords lower permitted activity noise levels **from** the adjoining sites **to** the new zoned land, i.e., the potential for reverse sensitivity is created. However, this is noted to be the current situation for both of the adjoining sites which already have boundary interfaces with *Residential* zoned land.

SLR understands that the activities undertaken on 28A Airdrie Road largely occur during the daytime (modification of houses in preparation for moving, loading of houses onto trucks, delivery of equipment for storage etc.). Night-time activity is understood to be limited to trucks moving off the site, as that period coincides with safer/easier road traffic conditions.

Whilst zoned *Business – Light Industry*, the current types of activities undertaken on both sites adjoining the western boundary, are not anticipated to exceed the more stringent *Business zone interface* rules – in part due to the constraints already imposed by the existing interfaces with *Residential* zoned land to the north.

Notwithstanding, it is expected that a number of noise mitigation measures can be implemented by the proponent that would further enhance the likelihood of the neighbouring sites achieving compliance with the new noise standards (following rezoning) without the requirement for either of the neighbouring sites to modify their current operations. These include:

 Construction of an acoustically effective screen along the common boundary with 534 Swanson Road and 28A Airdrie Road. This screening could be formed of fencing or bunding (or a combination of the two) and formed of a material with a surface mass of at least 10 kg/m<sup>2</sup> (e.g., 20 mm thick pine), with no gaps between or below component parts and panels. Based on modelling undertaken by SLR, such screening would need to be 3-4 m above ground level. • A setback for new multi-storey dwellings on the rezoned site of at least 4 m from the site boundary (consistent with the requirements of the AUP to provide a set back and minimum outdoor living space<sup>1</sup>).

Those mitigation measures have been determined following noise modelling based on previous experience and noise measurements of similar projects/activities assuming:

- Worship internal noise levels (including live/amplified music) and use of the car parking area during daytime hours on 534 Swanson Road; and
- 22 truck/machinery movements and use of hand-held power tools (e.g. electric drill or saw) during the daytime and one truck loaded with a house leaving from the rear of the site in a 'peak' 15-minute night-time period on 28A Airdrie Road.

On the basis of the above, it is considered that potential reverse sensitivity effects that may arise due to the proposed rezoning can be appropriately managed.

# 5 Conclusion

Western Park Village Limited seeks to rezone the land at 524 Swanson Road in Ranui.

SLR has assessed the relevant acoustical performance standards applicable to the existing site and recommended appropriate performance standards for the proposed rezoned land.

It is proposed that the newly *Residential* zoned land would be subject to the AUP noise rules applicable to that zone. The activities expected on the proposed rezoned land would be consistent with existing uses of the surrounding land and would be expected to be able to readily comply with the new noise limits.

With the recommended noise performance standards, the noise amenity (i.e., the received noise) of surrounding land would be maintained or improved.

The potential for reverse sensitivity effects on the two immediately neighbouring *Business – Light Industry* zoned sites has been assessed. The assessment found that with suitable mitigation measures provided by the proponent, reverse sensitivity effects due to the proposed change in zoning can be appropriately managed without impacting on the existing operations of the adjoining land uses.



Acoustic Terminology

#### 1. Sound Level or Noise Level

The terms 'sound' and 'noise' are almost interchangeable, except that 'noise' often refers to unwanted sound.

Sound (or noise) consists of minute fluctuations in atmospheric pressure. The human ear responds to changes in sound pressure over a very wide range with the loudest sound pressure to which the human ear can respond being ten million times greater than the softest. The decibel (abbreviated as dB) scale reduces this ratio to a more manageable size by the use of logarithms.

The symbols SPL, L or LP are commonly used to represent Sound Pressure Level. The symbol LA represents A-weighted Sound Pressure Level. The standard reference unit for Sound Pressure Levels expressed in decibels is  $2 \times 10^{-5}$  Pa.

#### 2. 'A' Weighted Sound Pressure Level

The overall level of a sound is usually expressed in terms of dBA, which is measured using a sound level meter with an 'A-weighting' filter. This is an electronic filter having a frequency response corresponding approximately to that of human hearing.

People's hearing is most sensitive to sounds at mid frequencies (500 Hz to 4,000 Hz), and less sensitive at lower and higher frequencies. Different sources having the same dBA level generally sound about equally loud.

A change of 1 dB or 2 dB in the level of a sound is difficult for most people to detect, whilst a 3 dB to 5 dB change corresponds to a small but noticeable change in loudness. A 10 dB change corresponds to an approximate doubling or halving in loudness. The table below lists examples of typical noise levels.

Sound Pressure Level (dBA)	Typical Source	Subjective Evaluation
130	Threshold of pain	Intolerable
120	Heavy rock concert	Extremely noisy
110	Grinding on steel	
100	Loud car horn at 3 m	Very noisy
90	Construction site with pneumatic hammering	
80	Kerbside of busy street	Loud
70	Loud radio or television	
60	Department store	Moderate to
50	General Office	quiet
40	Inside private office	Quiet to
30	Inside bedroom	very quiet
20	Recording studio	Almost silent

Other weightings (e.g. B, C and D) are less commonly used than A-weighting. Sound Levels measured without any weighting are referred to as 'linear', and the units are expressed as dB(lin) or dB.

#### 3. Sound Power Level

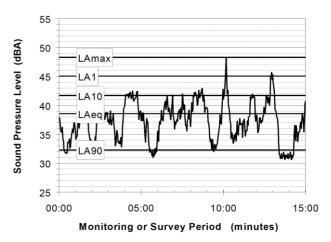
The Sound Power of a source is the rate at which it emits acoustic energy. As with Sound Pressure Levels, Sound Power Levels are expressed in decibel units (dB or dBA), but may be identified by the symbols SWL or LW, or by the reference unit  $10^{-12}$  W.

The relationship between Sound Power and Sound Pressure is similar to the effect of an electric radiator, which is characterised by a power rating but has an effect on the surrounding environment that can be measured in terms of a different parameter, temperature.

#### 4. Statistical Noise Levels

Sounds that vary in level over time, such as road traffic noise and most community noise, are commonly described in terms of the statistical exceedance levels LAN, where LAN is the A-weighted sound pressure level exceeded for N% of a given measurement period. For example, the LA1 is the noise level exceeded for 1% of the time, LA10 the noise exceeded for 10% of the time, and so on.

The following figure presents a hypothetical 15 minute noise survey, illustrating various common statistical indices of interest.



Of particular relevance, are:

- LA1 The noise level exceeded for 1% of the 15 minute interval.
- LA10 The noise level exceeded for 10% of the 15 minute interval. This is commonly referred to as the average maximum noise level.
- LA90 The noise level exceeded for 90% of the sample period. This noise level is described as the average minimum background sound level (in the absence of the source under consideration), or simply the background level.
- LAeq The A-weighted equivalent noise level (basically, the average noise level). It is defined as the steady sound level that contains the same amount of acoustical energy as the corresponding time-varying sound.

#### 5. Frequency Analysis

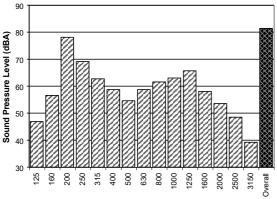
Frequency analysis is the process used to examine the tones (or frequency components) which make up the overall noise or vibration signal.

The units for frequency are Hertz (Hz), which represent the number of cycles per second.

Frequency analysis can be in:

- Octave bands (where the centre frequency and width of each band is double the previous band)
- 1/3 octave bands (three bands in each octave band)
- Narrow band (where the spectrum is divided into 400 or more bands of equal width)

The following figure shows a 1/3 octave band frequency analysis where the noise is dominated by the 200 Hz band. Note that the indicated level of each individual band is less than the overall level, which is the logarithmic sum of the bands.





#### 6. Annoying Noise (Special Audible Characteristics)

A louder noise will generally be more annoying to nearby receivers than a quieter one. However, noise is often also found to be more annoying and result in larger impacts where the following characteristics are apparent:

- Tonality tonal noise contains one or more prominent tones (i.e. differences in distinct frequency components between adjoining octave or 1/3 octave bands), and is normally regarded as more annoying than 'broad band' noise.
- Impulsiveness an impulsive noise is characterised by one or more short sharp peaks in the time domain, such as occurs during hammering.
- Intermittency intermittent noise varies in level with the change in level being clearly audible. An example would include mechanical plant cycling on and off.
- Low Frequency Noise low frequency noise contains significant energy in the lower frequency bands, which are typically taken to be in the 10 to 160 Hz region.

#### 7. Vibration

Vibration may be defined as cyclic or transient motion. This motion can be measured in terms of its displacement, velocity or acceleration. Most assessments of human response to vibration or the risk of damage to buildings use measurements of vibration velocity. These may be expressed in terms of 'peak' velocity or 'rms' velocity.

The former is the maximum instantaneous velocity, without any averaging, and is sometimes referred to as 'peak particle velocity', or PPV. The latter incorporates 'root mean squared' averaging over some defined time period.

Vibration measurements may be carried out in a single axis or alternatively as triaxial measurements (i.e. vertical, longitudinal and transverse). The common units for velocity are millimetres per second (mm/s). As with noise, decibel units can also be used, in which case the reference level should always be stated. A vibration level V, expressed in mm/s can be converted to decibels by the formula 20 log (V/Vo), where Vo is the reference level ( $10^{-9}$  m/s). Care is required in this regard, as other reference levels may be used.

#### 8. Human Perception of Vibration

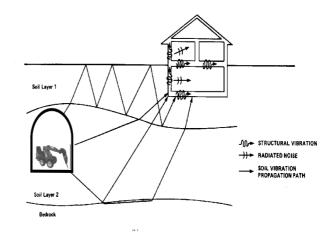
People are able to 'feel' vibration at levels lower than those required to cause even superficial damage to the most susceptible classes of building (even though they may not be disturbed by the motion). An individual's perception of motion or response to vibration depends very strongly on previous experience and expectations, and on other connotations associated with the perceived source of the vibration. For example, the vibration that a person responds to as 'normal' in a car, bus or train is considerably higher than what is perceived as 'normal' in a shop, office or dwelling.

# 9. Ground-borne Noise, Structure-borne Noise and Regenerated Noise

Noise that propagates through a structure as vibration and is radiated by vibrating wall and floor surfaces is termed 'structure-borne noise', 'ground-borne noise' or 'regenerated noise'. This noise originates as vibration and propagates between the source and receiver through the ground and/or building structural elements, rather than through the air.

Typical sources of ground-borne or structure-borne noise include tunnelling works, underground railways, excavation plant (e.g. rockbreakers), and building services plant (e.g. fans, compressors and generators).

The following figure presents an example of the various paths by which vibration and ground-borne noise may be transmitted between a source and receiver for construction activities occurring within a tunnel.



The term 'regenerated noise' is also used in other instances where energy is converted to noise away from the primary source. One example would be a fan blowing air through a discharge grill. The fan is the energy source and primary noise source. Additional noise may be created by the aerodynamic effect of the discharge grill in the airstream. This secondary noise is referred to as regenerated noise.

# **APPENDIX B**

Auckland Unitary Plan Rules E25.6.2, E25.6.5 and E25.6.19

(2) When deciding 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).

# E25.6. Standards

All activities must comply with the following relevant permitted activity standards.

# E25.6.1. General standards

- (1) Noise levels arising from activities must be measured and assessed in accordance with the New Zealand Standard NZS 6801:2008 Measurement of environmental sound and the New Zealand Standard NZS 6802:2008 Acoustics - Environmental noise except where more specific requirements apply.
- (2) The application of an adjustment for noise containing special audible characteristics in terms of Appendix B4 Special Audible Characteristics in New Zealand Standard NZS 6802:2008 Acoustics – Environmental noise may apply to the A weighted level for any measurement but an adjustment must not be applied to any level measured in the 63Hz and 125Hz octave bands.
- (3) The noise from any construction work activity must be measured and assessed in accordance with the requirements of New Zealand Standard NZS6803:1999 Acoustics – Construction noise. Construction work is defined in New Zealand Standard NZS6803:1999 Acoustics – Construction noise.
- (4) The noise limits of the Plan do not apply to emergency service sirens and callout sirens during emergency situations.
- (5) Where more than one standard applies that requires insulation of a noisesensitive space from an external noise source, the standards must be applied cumulatively.
- (6) Where standards are provided for specific activities, the zone interface standards and the zone standards do not apply to that activity.

Noise levels arising from activities within zones

# E25.6.2. Maximum noise levels in residential zones

(1) The noise (rating) levels and maximum noise level arising from any activity in the Residential – Large Lot Zone, Residential – Rural and Coastal Settlement Zone, Residential – Single House Zone, Residential – Mixed Housing Suburban Zone, Residential – Mixed Housing Urban Zone and the Residential – Terrace Housing and Apartment Buildings Zone measured within the boundary of an adjacent site in these residential zones must not exceed the levels in Table E25.6.2.1 Noise levels in residential zones below:

# Table E25.6.2.1 Noise levels in residential zones

Time	Noise level
Monday to Saturday 7am-10pm	50dB L <sub>Aeq</sub>
Sunday 9am-6pm	
All other times	40dB L <sub>Aeq</sub>
	75dB L <sub>AFmax</sub>

(2) The levels for the daytime hours in Table E25.6.2.1 Noise levels in residential zones may be exceeded by intermittent noise for reasonable periods where that noise is associated with normal household activities, such as lawn mowing or home handyman work.

# E25.6.3. Noise levels in rural and future urban zones

(1) The noise (rating) level from any activity in the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or the Future Urban Zone measured within the notional boundary on any site in any rural zone must not exceed the limits in Table E25.6.3.1 Noise levels in the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or the Future Urban Zone below:

# Table E25.6.3.1 Noise levels in the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or the Future Urban Zone

Time	Noise level
Monday to Saturday 7am-10pm	55dD I
Sunday 9am-6pm 55dB L <sub>Aeq</sub>	
All other times	45dB L <sub>Aeq</sub> 75dB L <sub>AFmax</sub>

(2) The noise (rating) level from any activity in the Rural – Rural Conservation Zone; Rural – Countryside Living Zone, Rural – Waitākere Foothills Zone; or the Rural – Waitākere Ranges Zone measured within the notional boundary on any site in any rural zone must not exceed the limits in Table E25.6.3.2 Noise levels in the Rural – Rural Conservation Zone, Rural – Countryside Living Zone, Rural – Waitākere Foothills Zone; or Rural – Waitākere Ranges Zone below: (2) Standard E25.6.4(1) above does not apply to bird scaring devices that generate a noise level less than 70 dB L<sub>Zpeak</sub> measured at the notional boundary on another site.

# E25.6.5. Noise levels in the Business – Heavy Industry Zone or the Business – Light Industry Zone

(1) The noise (rating) level arising from an activity in the Business – Heavy Industry Zone or the Business – Light Industry Zone measured within the boundary of any other site in those zones must not exceed the limits in Table E25.6.5.1 Noise levels in the Business – Heavy Industry Zone or the Business – Light Industry Zone below:

# Table E25.6.5.1 Noise levels in the Business – Heavy Industry Zone or the Business – Light Industry Zone

Time	Business – Heavy Industry Zone	Business – Light Industry Zone
All times	70dB L <sub>Aeq</sub>	65dB L <sub>Aeq</sub>

# E25.6.6. Noise levels in the Business – General Business Zone or the Business – Business Park Zone

(1) The noise (rating) level arising from an activity in the Business – General Business Zone or the Business – Business Park Zone measured within the boundary of any other site in those zones must not exceed the limits in Table E25.6.6.1 Noise levels in the Business – General Business Zone and the Business – Business Park Zone below:

Table E25.6.6.1 Noise levels in the Business – General Business Zone orthe Business – Business Park Zone

Time	Business – General Business Zone	Business – Business Park Zone
All times	65dB L <sub>Aeq</sub>	60dB L <sub>Aeq</sub>

# E25.6.7. Noise levels in the Business – Local Centre Zone or the Business – Neighbourhood Centre Zone

(1) The noise (rating) level and maximum noise level arising from any activity in the Business – Local Centre Zone or the Business – Neighbourhood Centre Zone measured or assessed as the incident level on the façade of any building on any other site in the Business – Local Centre Zone or the Business – Neighbourhood Centre Zone must not exceed the levels in Table E25.6.7.1 Noise levels in the Business – Local Centre Zone or the Business – Neighbourhood Centre Zone below:

# Table E25.6.18.1 Noise limits at the Open Space – Conservation Zone,Open Space – Informal Recreation Zone, Open Space – Civic SpacesZone or Open Space – Community Zone interface

Time	Noise level
Monday to Saturday	
7am-10pm	50dB L <sub>Aeq</sub>
Sunday 9am-6pm	
All other times	40dB L <sub>Aeq</sub>
All other times	75dB L <sub>AFmax</sub>

# E25.6.19. Business zones interface

(1) The noise (rating) and maximum noise level from any activity in the business zones must not exceed the levels in Table E25.6.19.1 Noise levels at the business zone interface when measured within the boundary of a site in a residential zone or within the notional boundary of property in a rural zone.

	Table E25.6.19.1	Noise levels at the	e business zone interface
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Time	Noise level
Monday to Saturday 7am-10pm	EE dD I
Sunday 9am-6pm	55dB L <sub>Aeq</sub>
All other times	45dB L <sub>Aeq</sub>
	60dB L <sub>eq</sub> at 63 Hz
	55dB L <sub>eq</sub> at 125 Hz
	75dB L <sub>AFmax</sub>

- (2) These noise limits in Standard E25.6.19(1) above do not apply to any of the following:
  - (a) the noise from vehicles moving on roads controlled by Auckland Council or Auckland Transport; or
  - (b) the noise affecting 11, 13, and 15 Harrison Road as generated on the Fulton Hogan sites at 7 Reliable Way (Lot 2, DP 114222, CT NA65A/209) and 4 Reliable Way Mt Wellington (Lot 3, DP 363738, CT 259289).
     Instead, the noise (rating) level arising from the Fulton Hogan sites must comply with a limit of 60dB L<sub>Aeq</sub> when measured within the boundary of 11, 13 or 15 Harrison Road; or
  - (c) the noise affecting the sites identified in Table E25.6.19.2 Affected sites and on Figure E25.6.19.1 Affected sites as generated on the DB Waitemata Breweries site and 3 Bairds Road, Ōtahuhu (being PT Lot 4 DP 22498, Lot 1, DP 29149, PT Lot 4 DP 15832, PT Lot 2 DP 31817, PT Lot 9 DP 26107, Lot 1 DP 31104, PT Lot 10 DP 7281 all on CT 443069). Instead, the noise (rating) level arising from the DB Waitemata Breweries site must comply with a limit of 65dB L<sub>Aeq</sub> with a maximum noise limit of

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# **APPENDIX 5**

# **ECONOMICS COST BENEFIT ANALYSIS**



12.02.2019 AUTHOR ADAM THOMPSON 51214.5.02

Economic Cost-Benefit Analysis: Proposed Plan Change of 522-524 Swanson Road, Ranui DRAFT ONLY

PREPARED FOR:

Western Park Village

# ABOUT US

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# OUR AREAS OF EXPERTISE

# Economic Analysis

Our work aims to bridge the gap between land-use planning and urban economics. Our focus is on the interaction between land markets, land-use regulations, and urban development. We have developed a range of methodologies using a quantitative approach to analyse urban spatial structure and audit land-use regulations.

# Property Research

We provide property and retail market research to assist with planning and marketing of new projects. This includes identification of new sites and market areas, assessments of market potential and positioning, and the evaluation of market-feasibility of specific projects.

# **Development Advisory**

We provide development planning and costing advisory services to support small and large-scale developments.

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### 1. Key Points

- Western Park Village is a caravan park in Swanson with 120 units. It has been operating as temporary housing facility for more than 30 years. It is the largest caravan park in Auckland.
- Western Park Village is not a Ministry of Social Development ("MSD") recognised temporary housing provider. Some tenants have their rent paid directly by Work and Income New Zealand ("WINZ").
- MSD presently has 700 temporary houses in Auckland and has plans to increase the number of units.
- The 'base case' for the property under the Light Industry zone is the continued operation of the temporary housing facility. This is because its current rental income (and land value) significantly exceeds an alternative industrial use. If the property is redeveloped for industrial use it is estimated that the owner would incur a commercial loss of \$9.7 million. The Light industry zone would therefore freeze the temporary housing facility in place indefinitely, as the highest and best use.
- There are two likely 'counterfactual' outcomes indicated under the proposed THAB and MHU zones. These include (1) redevelopment as a MSD approved temporary housing facility and (2) redevelopment as high intensity housing.
- In total there are 57 hectares of Light Industry zone land in Ranui, of which Western Park Village makes up 2.7 hectares (5%).
- Industrial land costs an average of \$470/m<sup>2</sup> across the wider Auckland market. In Ranui by contrast industrial land costs an average of \$290/m<sup>2</sup>. The low price reflects lower demand for locations that are some distance from the motorway.
- The Council Valuation of Western Park Village is \$4,150,000. If the property was redeveloped to industrial use, a valuation of \$7,700,000 is estimated based on the average land value for industrial land at Ranui of \$290/m<sup>2</sup>. Western Park Village has an estimated annual rental income of \$1,470,000 after costs. Applying a capitalization rate of 13% (being twice the normal rate to account for the nature of the property) results in an estimated market valuation of \$17,400,000.
- The implication of the values for future development is that there is a significant incentive to retain the current use rather than redevelop the property for industrial use. This is because under the redevelopment option, the property owner would incur a substantial commercial loss of \$9.7 million. The practical economic implication is that if the Light Industry zone is retained, the current use as temporary housing would be locked in place indefinitely as the 'highest and best use'.

- In Ranui, the higher density housing land, namely the THAB and Mixed Housing zones, in large part have residual land values that generally exceed \$1,000/m<sup>2</sup>. In general terms, intensive housing development in Ranui (e.g. terrace and town houses) would be feasible on properties with a residual land value of up to \$700-800/m<sup>2</sup>. Ranui therefore has very little potential for additional infill development.
- This is confirmed by a more detailed insight is provided by the Certificate of Code Compliance data for 2017-2018. This shows very few infill dwellings have been completed in Ranui since the AUP became operative in late 2016.
- Western Park Village has a residual land value of \$650/m<sup>2</sup> based on the property's current use. It therefore presents an opportunity for 120-180 infill houses in an existing urban area. It is worth noting that the majority of infill terrace housing, in the order of 83%, has been on large masterplanned sites, such as this property, since the AUP became operative.
- Since the AUP became operative, there have been 390 dwelling competitions in Ranui, and most of these, 340 or 87%, have been stand alone houses.
- The site is located adjacent to a park. International studies have found that dwellings near to a park have a 10% price premium, indicating a significant economic benefit for this site being used for residential rather than industrial.
- A central economic consideration is that government provided temporary housing is less expensive and of better quality than private sector temporary housing, and MSD appear to be expanding the total number of temporary housing units in Auckland to meet growing demand. For these reasons, it is concluded that a shift from private and government temporary housing, towards only government temporary housing, would, over time, provide a superior social and economic outcome. This supports that conclusions that, although Western Park Village makes a valuable contribution to the temporary housing sector, that its replacement with government temporary housing, over time, would on balance, provide a superior outcome.
- In conclusion, both of the likely counterfactual outcomes are considered to provide a greater economic net benefit than the base case. The proposal is recommended for approval in respect of economic costs and benefits.

### 2. Introduction

The proposal is to rezone a 2.7 hectare site to Terrace Housing and Apartment Building zone (THAB) and Mixed Housing Urban (MHU). The property is located at 522-524 Swanson Road in Ranui. It has a 30 year history operating as a large temporary housing facility. It presently accommodates up to 300 people within 120 units.

### 3. Western Park Village

The Western Park Village website provides a concise description of the village:

"Western Park Village houses up to 300 people on a substantial site in the heart of the West Auckland suburb of Swanson.

Western Park Village is located in West Auckland. It is walking distance to the Ranui railway station, the local primary school and the Swanson shopping village which includes a new supermarket, library and medical hub.

The Village caters for those needing temporary housing, although some residents have made the property their permanent home.

The Village offers a wide range of accommodation options with 60 units (including cabins, small units, trailer homes and powered sites) and 60 caravans.

The current owners have transformed the Village since taking over in the late 1990s. New purpose-built self-contained units are being added all the time to replace aging caravans and extensive landscaping has taken place. As a result, many 'short-stay' tenants end up staying, with some having lived here for well over two decades! The current owners still live on-site too." (Source: <u>https://westernparkvillage.com/about-us/</u>).

Western Park Village (the "village") could be broadly described as a 'trailer park'. It offers residents 'temporary housing' or 'transitional housing', and in some cases rent payments are received directly from WINZ. The village is however not a recognised 'temporary housing by MSD, although it offers a similar service.

The MSD is aware of the Western Park Village, and in December 2016 stated:

"...it was aware the park was not the most suitable accommodation for children, and said it encouraged clients to seek alternative accommodation.

<sup>1</sup> The MSD defines transitional housing as follows: "Transitional housing provides warm, dry and safe short-term accommodation for people in need, along with tailored social support while they're there."

#### <u>https://www.radionz.co.nz/national/programmes/checkpoint/audio/201827713/auckland-</u> caravan-park-gets-472k-in-winz-payments-in-two-years)

The MSD also noted that they monitor all residents in the village.

Monte Cecilia Housing Trust chief executive Bernie Smith, which operates across Auckland, described the accommodation as "substandard", but acknowledged it was filling a gap:

"My preference is that it be shut down tomorrow, but where do you place 300 people when there's a lot of housing stress right across Auckland, where people are sleeping in cars?" (source; Radio NZ,

<u>https://www.radionz.co.nz/national/programmes/checkpoint/audio/201827713/auckland-</u> caravan-park-gets-472k-in-winz-payments-in-two-years)

Te Whānau O Waipareira Trust chief executive John Tamihere was also familiar with Western Park Village.

"It's been a place of great difficulty," he said. "Apart from sleeping on the street, it's the next step up."

Mr Tamihere said the park's owners had stumbled upon a gap in the market with a steady clientele, and unless something drastically changed, there would be more Western Parks in the future.

"It's a private bizzo, it's focus is solely or significantly on that particular type of person that's fallen into significant disrepair, and unlikely to recover anytime soon," (source; Radio NZ, <u>https://www.radionz.co.nz/national/programmes/checkpoint/audio/201827713/auckland-caravan-park-gets-472k-in-winz-payments-in-two-years</u>)

These comments reflect the difficult and contentious nature of temporary housing. In this instance, while there has been some negative public commentary on the village, from an economic perspective it is providing a housing service to residents that have independently decided it is their best option. It should also be noted that the village has a high level of occupancy and that there is a waiting list for additional residents. Perhaps the most important point to make is that for many of the village residents, this is the only housing option practically available to them, and they would otherwise not have housing.

Figure 1 shows the extent of the village. It utilises in the order of two thirds of a large 2.7 hectare property. It is bounded by light industry activities to the west, a public park to the east, and a rail line to the south.

The village includes a range of communal facilities, such as kitchens and an internet access room. The village employees 12 staff to manage the facility. Figure 1: Western Park Village Site



### 4. Base Case & Counterfactual

The THAB and MHU zones permits a diverse range of activities. In order to undertake a cost-benefit analysis it is first necessary to identify the likely outcomes under the existing and proposed zones. Having considered provisions of the zone, the site characteristics and market demand, it is considered reasonable to expect the following outcomes. These form the 'base case' and 'counterfactuals' as required for a s32 analysis.

#### A) Light Industry zone – Western Park Village continues to operate under Resource Consent

Western Park Village has consent to operate as a caravan park. If the Light Industry zone is retained the most likely outcome is that the <u>Western Park Village would continue indefinitely</u>, as the 'highest and best use'. Redeveloping the property for a Light Industry use would result in a significant commercial loss to the land owner, estimated to be \$9.7 million (Section 10).

#### B) THAB and MHU zones - site redeveloped into MSD approved temporary housing

The historic operation of the village, and the size and location of the site, support the <u>development</u> <u>of MSD approved temporary housing</u>. This could for example enable 150-300 small units, of 20-40m<sup>2</sup>. It could also involve a component of MSD approved temporary housing, e.g. half of the 150-300 units, however this scenario is not evaluated. The likely configuration would be two storey 'walk-up' units, most with views over the park.

#### C) THAB and MHU zones - site redeveloped for intensive housing

A site of this size (2.7 hectares) would enable an <u>intensive housing development</u> of 120-180 small - mid size dwellings. The most likely configuration is two storey 'zero lot' or terrace houses, with 2-3 bedrooms, on lots of 100-150m<sup>2</sup>. These would have a price range of \$550,000 - \$650,000.

### 5. Temporary Housing in Auckland

This section provides a brief overview of the temporary housing sector in Auckland.

The MSD has contracts with emergency housing providers around the country to provide places for clients to stay for up to 12 weeks while they look for more stable longer-term accommodation. As at August 2018, in Auckland there are 700 temporary housing units. The MSD plans to increase supply of temporary housing units.

Recently the government has built several new temporary housing facilities around Auckland. These have tended to adopt a more conventional housing format, with the following examples:

• Brown's Road, Manurewa. This contains six, two storey blocks with nine studio units in each. The complex will house approximately 350 individuals from the housing register per year.

- Luke Street, Otahuhu. This contains a number of two, three and four-bedroom homes, fully insulated, double glazed and furnished. It is next to schools and has an on-site playground. The complex houses around 210 people per year.
- Maungarua Lane, Manurewa. This contains 19 new homes and will house up to 76 households per year.

Figure 2: Current Transitional Housing Facility



Source: Stuff

There are a number of social benefits of temporary housing, as follows:

- As Auckland house prices have continued to rise over the past decade, there has been a corresponding lack of affordable housing. This has had negative flow-on effects, for example on health, education and employment prospects. Temporary housing provides accommodation to households that would otherwise not have any accommodation.
- Evidence suggests temporary housing can provide social benefits for ex-offenders and persons with mental illness. Miller & Ngugi conducted two meta-analyses in the United States on the impact of housing support, one for persons with mental illness and the other for ex-offenders. They found significant reductions in homelessness, hospital services use

and crime for persons with mental illness and a significant reduction in crime for serious violent ex-offenders.

Figure 3: Effects of Transitional Housing

Treatment Type	Outcome Measure	Number of estimates	Effect of Treatment
Persons with mental illness	Homelessness	3	34%
	Hospital Services Use	4	12%
	Crime	2	5%
Serious violent ex-offenders	Crime	4	12%

Source: Miller & Ngugi (2009), Urban Economics

### 6. Other Similar Caravan Parks in Auckland

This section provides a brief description of the other caravan parks in Auckland.

Otahuhu Caravan Park residence has 42 units and provides accommodation for up to 100 residents at a time. A quarter of Otahuhu's residents are over the age of 65. Otahuhu Caravan park is zoned Business - Mixed Use ("Mixed Use"). The age restriction is likely to provide a relatively stable social environment.

Property details:

- RV \$2,050,000
- Land Value \$1,900,000
- Improvements Value \$150,000
- Land Area 4,510m<sup>2</sup>
- Land Value = \$420/m<sup>2</sup>

Figure 4: Otahuhu Caravan Park Residence



Source: Google Earth

Riverhead Motorhome park provides a mix of accommodation services, including temporary accommodation services as well as catering to longer term tenants and recreational purposes. This is small park and does not have any known social issues.

Property details:

- RV \$2,635,000
- Land Value \$1,400,000
- Improvements Value \$1,235,000
- Land Area 64,060m<sup>2</sup>
- Land Value = \$20/m<sup>2</sup>

Figure 5: Riverhead Motorhome Park



Source: Google Earth

Avondale Motor Park provides accommodation services for recreational as well as medium to long term tenants. This is a small park and does not have any known social issues.

Property details:

- RV \$10,000,000
- Land Value \$9,500,000
- Improvements Value \$500,000
- Land Area 17,410m<sup>2</sup>
- Land Value =  $550/m^2$

Figure 6: Avondale Motor Park



Source: Google Earth, Urban Economics

## 7. Private Sector versus Government Temporary Housing

A central economic question to consider for the proposal, is whether temporary housing should optimally be provided by the private and public sectors, or only the public sector. This is because, if the proposed Plan Change is approved, it is likely that the existing private sector temporary housing would be replaced with either government temporary housing (or high density residential). The existing tenants that currently have accommodation at Western Park Village would need to find alternative accommodation under this scenario.

It is commonly accepted that there are social and economic benefits of the government providing subsidised housing for households that cannot afford market rents. MSD provides this housing through approved providers and in Auckland there are presently (as at December 2017) 700 temporary houses (with the current examples previously provided). This housing is rented to occupants at a rate which equates to no more than 25% of their income, to ensure they have sufficient money remaining for food, power, transport, etc.

By contrast, Western Park Village provides temporary housing at a fixed price, of \$200-\$270 per week<sup>2</sup>. This would significantly exceed 25% of weekly income for the majority of residents in Western Park Village.

It is therefore evident that government temporary housing is provided to the market at a significantly lower rate than at Western Village Park.

<sup>2</sup> This has been adjusted to account for power, water, etc., which is included in a single weekly payment.

It is also evident that the quality of the government temporary housing is superior to that at Western Park Village, and in general appears to be configured as a normal house comprising many units, within an existing suburb. This avoids the concentration of a large number of temporary housing units in one location. By contrast, Western Park Village has 120 units on one site.

A final consideration is whether government temporary housing has the current or future capacity to accommodate the Western Park Village residents, if it is redeveloped for intensive housing.

MSD are aiming to increase its stock of temporary housing from 700 units to 915 units, an increase of 215 units. This indicates that there is currently demand for additional temporary housing. There is no information available on whether MSD have financial resources to further increase temporary housing supply, however it may be reasonable to assume that MSD would have the objective of meeting all demand for temporary housing.

In summary, government provided temporary housing is less expensive and of better quality than private sector temporary housing, and MSD appear to be expanding the total number of temporary housing units in Auckland to meet growing demand. For these reasons, it is concluded that a shift from private and government temporary housing, towards only government temporary housing, would, over time, provide a superior social and economic outcome.

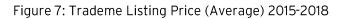
### 8. Auckland Housing Market Under the AUP

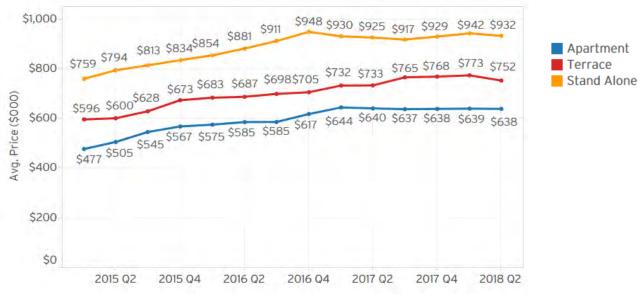
The Auckland Unitary Plan ("AUP") has been operative for around two years. This has been enough time for the market to respond to the new provisions for more intensive and affordable housing. Our analyses have found the following key trends.

### 8.1. House Prices Have Remained High and Unaffordable

The following figure shows Trademe dwelling listing prices by type. This includes both the existing housing stock and new dwellings. The key points to note are:

- Asking prices rose rapidly up until the end of 2016 and have plateaued during 2017 and 2018, with the exception of terrace houses which increased marginally over the 2017 and 2018 period.
- Over 40% of all dwellings for sale on Trademe are currently priced over \$1,000,000, while only 14% are priced less than \$600,000.
- 76% of all listings are currently stand alone, 9% are terrace and 15% are apartment. This is approximately consistent with the sales data.





Source: Trademe

The Auckland Council has recently completed a report on the commercial feasibility of new housing under the AUP, as part of the requirements of the National Policy Statement on Urban Development Capacity ("NPS-UDC"). The report concludes:

"The enabled feasible capacity for dwelling supply, as modelled for the 2016 draft Unitary Plan recommended by the Independent Hearings Panel, was for approximately 422,000 - being 270,000 (modelled) in brownfield existing urban areas and 130,000 (assumed feasible) in future urban areas, with the remainder being potential Housing NZ developments and future dwelling growth in rural-zoned areas. **The new modelling shows, principally due to rising construction costs and flat to declining sales prices, that the brownfield enabled feasible capacity of 270,000 has since reduced to 140,000**; and that the future urban feasible enabled capacity has changed slightly as it is now modelled, from 130,000 to 146,000 dwellings."

(Planning Committee, 28 November 2017, National Policy Statement on Urban Development Capacity initial assessment results, Item 14, National Policy Statement on Urban Development Capacity initial assessment results, page 5, emphasis added).

The most notable conclusion is that average price of a new dwelling under the AUP is estimated to be \$1.5 million<sup>3</sup>. This is reflected in the actual average sale price of a new stand alone dwelling over the past year, which exceeds \$1.0 million. Based on the Auckland Council estimates this average price is expected to continue to increase, towards \$1.5 million. This highlights the critical need for additional low-mid priced housing, particularly in the short term (1-5 years).

<sup>&</sup>lt;sup>3</sup> (Planning Committee, 28 November 2017, National Policy Statement on Urban Development Capacity initial assessment results, Item 14, National Policy Statement on Urban Development Capacity initial assessment results, page 10).

### 8.2. Terrace Housing Has Occurred Mostly in Masterplanned Peripheral Greenfield Developments

The following table shows the location of New Dwelling Competitions by type for 2015 (prior to the Auckland Unitary Plan) and for 2017 (when the AUP was operative).

The main points to note are:

- Dwelling completions increased from 5,150 in 2015 to 7,040 in 2017, an increase of (1,900). This was attributed mostly to an increase in terrace houses (760) and apartments (510).
- Rodney performed strongly in the stand alone house sector, with 1,280 completions in 2017. This was followed closely by Manukau with 930 stand alone completions. Together these Rodney and Manukau accounted for nearly half of all new stand alone completions.
- The majority of terrace house competitions in 2017, 600 of the 1,230, were in Waitakere. A large proportion of these were in Hobsonville Point.
- Auckland Central dominated in apartment completions, mostly in the CBD and surrounds, and Stonefields.
- The majority of small-medium scale infill development has been stand-alone rather than terrace houses. It is likely that developers are opting to retain the existing dwelling and build 1-2 houses on the rear of the property, rather than demolish the existing house and undertake a more intensive terrace house development.

		2	015			2	017	
Area	Stand Alone	Terrace	Apartment	Total	Stand Alone	Terrace	Apartment	Total
Rodney	1,000	120	50	1,170	1,280	120	130	1,530
North Shore	490	70	40	600	480	150	90	720
Waitakere	420	170	30	620	490	600	140	1,230
Auckland Central	570	170	220	960	540	270	600	1,410
Manukau	880	70	110	1,060	930	150	40	1,120
Papakura	460	20	0	480	550	70	0	620
Franklin	220	0	40	260	390	20	0	410
Total	4,040	620	490	5,150	4,660	1,380	1,000	7,040
Area	Stand Alone	Terrace	Apartment	Total	Stand Alone	Terrace	Apartment	Total
Rodney	65%	8%	3%	76%	84%	8%	8%	100%
North Shore	68%	10%	6%	83%	67%	21%	13%	100%
Waitakere	34%	14%	2%	50%	40%	49%	11%	100%
Auckland Central	40%	12%	16%	68%	38%	19%	43%	100%
Manukau	79%	6%	10%	95%	83%	13%	4%	100%
Papakura	74%	3%	0%	77%	89%	11%	0%	100%
Franklin	54%	0%	10%	63%	95%	5%	0%	100%
Total	57%	9%	7%	73%	66%	20%	14%	100%

Figure 8: Dwelling Completions for 2015 and 2017 by Sub-region

Source: Auckland Council, Urban Economics

		2015			2017	
Typology	Greenfield	Infill	Total	Greenfield	Infill	Total
Stand Alone	2,740	1,380	4,120	3,150	1,510	4,660
Terrace	580	60	640	1,150	240	1,390
Apartment	170	340	510	340	650	990
Total	3,490	1,780	5,270	4,640	2,400	7,040
Stand Alone	52%	26%	78%	45%	21%	66%
Terrace	11%	1%	12%	16%	3%	20%
Apartment	3%	6%	10%	5%	9%	14%
Total	66%	34%	100%	66%	34%	100%

Figure 9: Dwelling Completions for 2015-2017 by Infill and Greenfield

Source: Auckland Council, Urban Economics

### 9. Industrial Land Market

This section evaluates the impact of the proposal on the supply of industrial land within the region.

It is first important to note that the property has a long history operating as temporary housing. It has therefore has not contributed to the industrial land market or industrial sector for 30 years.

It is similarly unlikely that the property would be redeveloped for industrial use, as this would result in a significant commercial loss for the owner, of \$9.6 million (see section 10). For these reasons, the proposal would have no material impact on the supply of industrial land or the industrial sector more generally. Nevertheless, this section provides a brief overview of the local and regional industrial land market as general context.

### 9.1. Local Industrial Land Market

Figure 10 shows the location and price of Light industry zone land in Ranui. In total there are 57 hectares of Light Industry zone land in Ranui, of which Western Park Village makes up 2.7 hectares (5%).

Of all Light Industry zoned land in Ranui, 5.7 hectares (10%) is vacant. This land is sometimes used for parking or storage overflow.

A significant portion of Ranui's Light Industry land is currently underutilized. When vacant land is excluded, 16% of the remaining industrial properties have improvements making up less than 40% of their total capital value.



Figure 10: Sub Regional Light Industrial Improvement Value per sqm

Improvement V.. 0 1,000

Source: Corelogic, Urban Economics

Figure 11 shows the prices of Light Industry land in West Auckland. It is worth noting that Ranui has the lowest price, of around \$290/m<sup>2</sup>, and this is likely to reflect the preference for industrial firms to be near the motor way to enable access to markets and employees.

Source: Corelogic, Urban Economics

Figure 11: Sub-Regional Light Industrial Land Prices



This figure is currently in here twice (in section 7 as well) and unsure where it goes better

### 9.2. Regional Industrial Land Market

Urban Economics has undertaken a survey of all business zone land under the legacy and operative plans<sup>4</sup>. The purpose was to determine the extent to which industrial zone land has changed between the legacy and operative plans.

The following figures and tables show the distribution of commercial, mixed use and industrial zone land under the legacy and operative plans. These broad categories have been applied to enable a comparison between the plans, and are defined as follows:

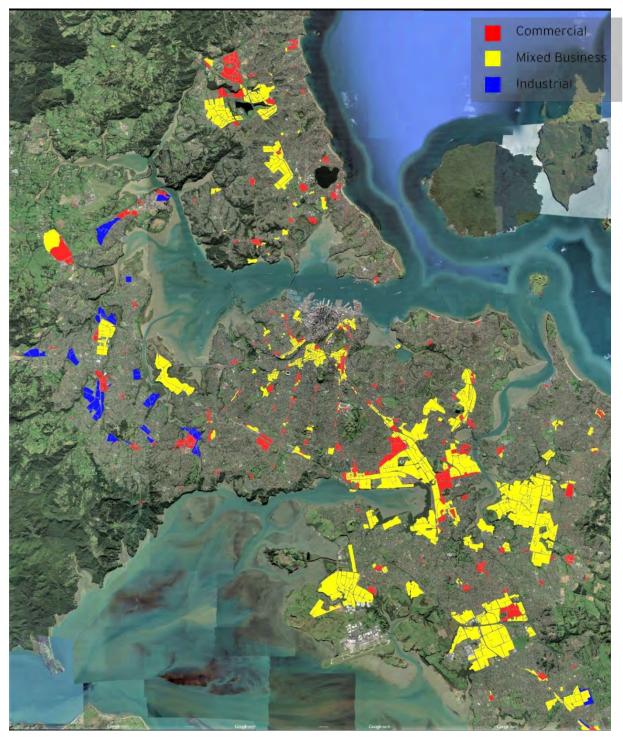
**Commercial:** Centres and/or on main roads, permitted activities include retail, office, entertainment and other centre-type activities.

**Mixed Business:** Normally on the periphery of centres or along main roads/in accessible locations. Permitted activities include bulk/non-centre type retail, allowing a range of industrial activities, offices, professional services.

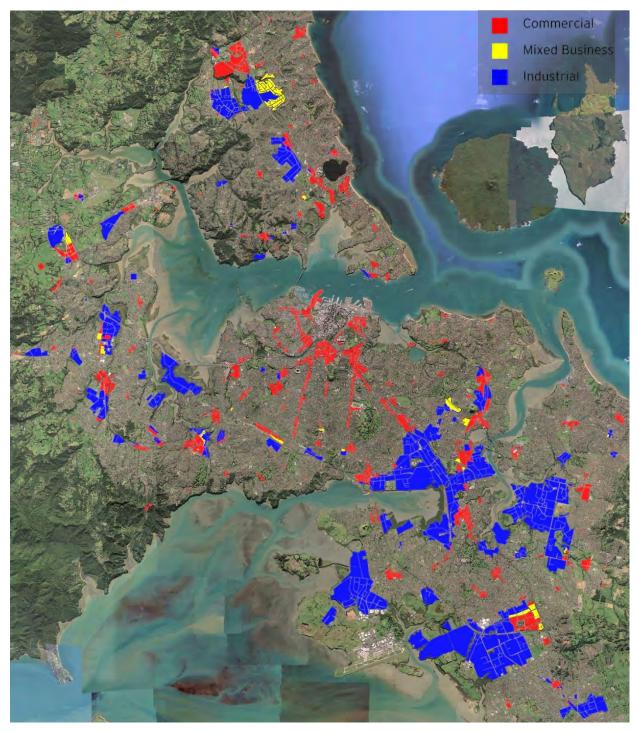
**Industrial:** Also in accessible locations. Permitted activities include industrial activities and very limited commercial, such as office/retail.

<sup>4</sup> This was a detailed assessment that took approximately 250 hours.

Figure 12: Business Land for Legacy Plans







#### Figure 14: Business Land for Legacy and Operative Plans

Local Authority	Commercial	Mixed Business	Subtotal Mixed Business and Commercial	Industrial	Total
Rodney Legacy	120	320	440	260	710
Rodney Operative	200	30	230	400	620
Change	80	-290	-210	140	-90
% Change	67%	-91%	-48%	54%	-13%
North Shore Legacy	280	490	770	0	770
North Shore Operative	390	100	490	460	950
Change	110	-390	-280	460	180
% Change	39%	-80%	-36%	-	23%
Waitakere Legacy	230	90	320	510	830
Waitakere Operative	250	30	280	530	810
Change	20	-60	-40	20	-20
% Change	9%	-67%	-13%	4%	-2%
Auckland Isthmus Legacy	300	770	1,070	840	1,920
Auckland Isthmus Operative	850	50	900	1,210	2,110
Change	550	-720	-170	370	190
% Change	183%	-94%	-16%	44%	10%
Manukau Legacy	210	1,540	1,750	600	2,340
Manukau Operative	340	40	380	2,540	2,920
Change	130	-1,500	-1,370	1,940	580
% Change	62%	-97%	-78%	323%	25%
Papakura Legacy	50	30	80	550	630
Papakura Operative	80	0	80	550	630
Change	30	-30	0	0	0
% Change	60%	-100%	0%	0%	0%
Franklin Legacy	10	210	220	510	730
Franklin Operative	110	30	140	580	720
Change	100	-180	-80	70	-10
% Change	1,000%	-86%	-36%	14%	-1%
Auckland Region Legacy	1,200	3,450	4,650	3,270	7,930
Auckland Region Operative	2,220	280	2,500	6,270	8,760
Change	1,020	-3,170	-2,150	3,000	830
% Change	85%	-92%	-46%	92%	10%

Source: Urban Economics

The main findings of the survey are:

- There has been a significant increase in the quantity of Industrial land between the legacy and operative plans. Under the legacy plans there were 3,270 hectares of Industrial land, and this has increased substantially to 6,270 hectares under the operative plan. This equates to an overall increase of Industrial land of 92% or 3,000 hectares.
- The amount of Mixed Business land has decreased substantially, from 3,450 hectares under the legacy plan, to 280 hectares under the operative plan. For the same reasons outlined above, this substantially reduces the opportunity for commercial businesses to find suitable locations within the City.
- The amount of Commercial zone land has increased, from 1,200 hectares under the legacy plans to 2,220 hectares under the operative plan.

• The combined Mixed Business and Commercial land decreased from 4,650 hectares under the legacy plans to 2,500 hectares under the operative plan. As commercial activity can occur on both Mixed Business and Commercial land, there has been an overall reduction in land that enables commercial activity, of 46% or 2,150 hectares.

#### Local Industrial Supply

The Waitakere area has 530 hectares of Industrial land, which equates to 8.5% of the total regional supply. This increased slightly from the legacy plans, which had 510 hectares.

It is also worth noting that the Whenuapai Plan Change (5) has provision for a substantial quantity of industrial land. This approach is supported by the Auckland Plan which identifies that 1,400 hectares of new business land is needed with the FUZ over the next 30 years.

#### "Business land in future urban areas

Approximately 1,400 hectares of business land is needed in greenfield areas. The Development Strategy identifies indicative locations for the provision of business land and centres." (page 230, The Auckland Plan).

#### **AUP Provisions**

The AUP provisions require that there is a perpetual supply of industrial land that is equivalent to 7 years' demand:

"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." (Urban growth and form B2.2.2.(1) Policies, Page 2)

The AUP identified the FUZ as having potential for additional industrial land inherently relies on this future potential to meet the needs of industry over the life of the AUP (approximately ten years). On the basis that industrial firms are much less location dependent than commercial firms, there are no practical barriers to a significant proportion of future industrial firms needs being met in the FUZ. It is in fact a typical development pattern for a city's industrial firms to migrate to the urban periphery over time in a growing city, as commercial firms compete business land in central and middle localities to meet the needs of these localized markets.

In summary, Auckland has seen a significant regional increase in the availability inf industrial land, increasing from 3,270 hectares under the legacy plans to 6,270 hectares under the operative plan. Over the next several decades, the Auckland Plan will enable 1,400 hectares of additional industrial land in FUZ areas, such as Whenuapai.

### 10. Property Value Implications for Future Redevelopment

Figure 16 outlines the Council Valuation of the property, its value for industrial use and its value from its current use<sup>5</sup>. These values are summarised as follows:

- The Council Valuation of Western Park Village is \$4,150,000
- If the property was redeveloped to industrial use, a valuation of **\$7,700,000** is estimated based on the average land value for industrial land at Ranui of \$290/m<sup>2</sup> (refer section XX).
- Western Park Village has an estimated annual rental income of \$1,470,000 after costs. Applying a capitalization rate of 13% (being twice the normal rate to account for the nature of the property) results in an estimated market valuation of \$17,400,000.

The implication of this for future development is that there is a significant incentive to retain the current use rather than redevelop the property for industrial use. This is because under the redevelopment option, the property owner would incur a substantial commercial loss of \$9,660,000 (i.e. the property would reduce in value from \$17,400,000 to \$4,150,000). The practical economic implication is that if the Light Industry zone is retained, the current use as temporary housing would be locked in place indefinitely as the 'highest and best use'. This would be the 'base case' for the s32 analysis, rather than the redevelopment of the site for industrial use.

<sup>5</sup> This is based on 105 cabin/units at \$270 per week rent after expenses, and 15 caravans at \$200 per week after expenses, and an annual occupancy rate of 90%.

Figure 15: Property Valuations

Council Valuation	
Land Value	\$2,650,000
Improvement Value	\$1,500,000
Estimated Market Valuation	\$4,150,000
Value Estimated from Sub-regional Ind	ustrial Land Values
Ranui Industrial Land Value per sqm	\$290
Site Area	26565
Estimated Market Valuation	\$7,700,000
Value Estimated From Current Capitali	sed Rent
Annual Rent	\$1,470,000
Normal Market Capitalisation	6.5%
Adopted Capitalisation Rate	13.0%
Current Site Utilisation	65%
Estimated Market Valuation	\$17,360,000
Source: Auckland Council, Corelogic, Urb	an Economics

Figure 16: Property Valuation Differentials

Value
\$4,150,000
\$7,700,000
\$17,360,000
\$13,210,000
318%
\$9,660,000
125%

Source: Auckland Council, Corelogic, Urban Economics

## 11. Potential for High Density Housing in Ranui

The following figure shows the 'residual land value' of all properties in Ranui. The residual land value is the total property value, including capital improvements, divided by the land area. This is a useful metric because it is the effective price a developer would pay for the land, per sqm, if the site is purchased for redevelopment.

Western Park Village has a residual land value of \$650/m<sup>2</sup> based on the property's current use. Note that this is not shown in Figure 17, which is the significantly lower residual land value based on the Council Valuation.

The higher density housing land, namely the THAB and Mixed Housing zones, have residual land values that generally exceed \$1,000/m<sup>2</sup>. In general terms, intensive housing development in Ranui (e.g. terrace and town houses) would be feasible on properties with a residual land value of up to \$700-800/m<sup>2</sup>. It is evident, by the predominance of properties coloured yellow-red, that there are very few sites that are suitable for redevelopment for higher density residential in Ranui. It is therefore unlikely that there will be any significant additional of smaller terrace and town houses in Ranui over the next decade. This has been born out across the region more generally, with for example, 85% of all terrace housing being within new large masterplanned developments, most of which are on the urban periphery, rather than on smaller infill sites. The proposal site, at 2.7 hectares, could feasibly contribute 100-200 addition units to the market.

A more detailed insight is provided by the Certificate of Code Compliance data for 2017-2018, as illustrated in Figure 17. This shows very few infill dwellings have been completed in Ranui since the AUP became operative in late 2016.

It is evident that the majority of new dwellings in Ranui were in the larger subdivisions, and that there was very little small-medium scale infill development. This is commonly the case, as larger developments have economies of scale. The proposal would enable 100-200 new smaller high density dwellings. By comparison, since the AUP became operative, there have been 390 dwelling competitions in Ranui, and most of these, 340 or 87%, have been stand alone houses.



Figure 17: Sub-Regional Residual Land Value Map

Figure 18: Certificate of Code Compliance 2017-2018



Source: Auckland Council

## 12. Site Context & Proximity

The site is located in close proximity to a small shopping centre and public transport. This is well suited to both temporary housing and terrace/town housing.

### 13. Benefits of Proximity to the Ranui Domain

The proposal site is immediately adjacent to the Ranui Domain. The economic evidence suggests that residential properties receive increased amenity benefits from being located near a park, and this is reflected in property prices (i.e. hedonic analysis). In other words, a household will pay a premium price for a house that is near to a park, or for a house that has views over a park, and this premium price provides a monetary quantification of the economic benefit.

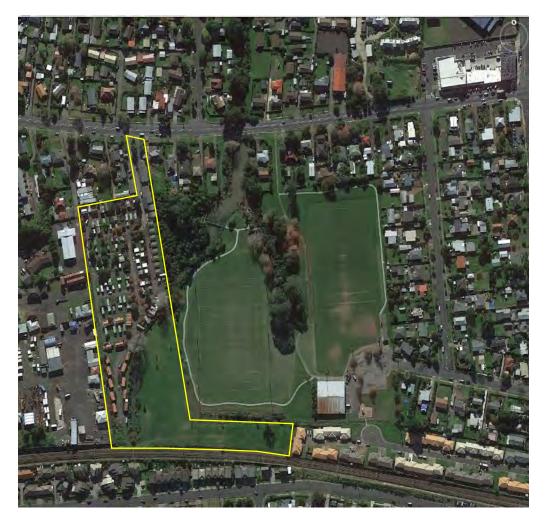
A summary of several studies of the economic benefits of housing in close proximity to parks finds the following:

- 1. There is a positive impact of bordering parks. A study of ten parks in Dallas found properties within 150 metres of parks experience property values on average 11% higher than properties further than 150 metres from the park.
- 2. This is consistent with an earlier study in Spokane, Washington that found properties bordering 'active recreation areas' had 10% higher values than the average in the surrounding area, and those in the residential blocks surrounding the park had 7% higher values.

Overall these studies indicate a 10% premium price to be adjacent to or near a park. This is a significant economic benefit for a large housing development. For example, a 10% premium price on 150 dwellings located near a park, would have an economic benefit of \$9 million. In practical terms, the proximity of housing to the Ranui Park would provide significant additional amenities to the property when used for residential purposes. This is particularly the case with higher density housing, which tends to have small rear yards and therefore relies more on public open space.

There is no evidence to suggest a similar proximity benefits exist for industrial properties.

### Figure 19: Ranui Domain



Source: Google Earth, Urban Economics

## 14. Economic Costs & Benefits

The proposal requires the base case (Western Park Village) to be weighed up against the two counterfactual outcomes (redeveloped for MSD approved temporary housing or intensive private housing). Weighing these alternate potential outcomes is not straight forward, as discussed below.

The Western Park Village currently provides a valuable and significant contribution to the temporary housing market.

A central economic consideration is that government provided temporary housing is less expensive and of better quality than private sector temporary housing, and MSD appear to be expanding the total number of temporary housing units in Auckland to meet growing demand. For these reasons, it is concluded that a shift from private and government temporary housing, towards only government temporary housing, would, over time, provide a superior social and economic outcome. This supports that conclusions that, although Western Park Village makes a valuable contribution to the temporary housing sector, that its replacement with government temporary housing, over time, would on balance, provide a superior outcome.

The development of intensive housing would make a significant addition to the Ranui housing market, particularly in terms of smaller more affordable homes. Based on recent trends, this would make a notable contribution to the range of new housing that is offered to the market, which is mostly (87%) stand alone at present.

### 15. Conclusions & Recommendations

In conclusion, both of the likely counterfactual outcomes are considered to provide a greater economic net benefit than the base case. The proposal is recommended for approval in respect of economic costs and benefits.

# **APPENDIX 6**

# **SECTION 32 ANALYSIS**

	Option One Status Quo ('do nothing') Zoned Business Light Industry	Option Two Rezone to Business Mixed Use	Option Three Rezone to Mixed Housing Suburban	Optio Rezor Housi
Zone description and purpose	The current zone on the site anticipates industrial activities that do not generate objectionable odour, dust or noise. This includes manufacturing, production, logistics, storage, transport and distribution activities. The anticipated level of amenity is lower than the centre zones, General Business and Mixed Use zones. Due to the industrial nature of the zone, activities sensitive to air discharges are generally not provided for. Resource consent is not required for new buildings or industrial activities within this zone.	This zone provides for residential activity as well as predominantly smaller scale commercial activity that do not cumulatively affect the function, role and amenity centres and acts as a transition area, in terms of scale and activity, between residential zones and other business zones. The height of new buildings within this zone is generally 18m, with some zoned land close to centres allowed greater height. All new development within the zone requires resource consent in order to ensure that it is designed to a high standard which enhances the quality of the streetscape and public open spaces.	This zone is the most widespread residential zone in Auckland and covers many established suburbs. The zone enables intensification, while retaining a suburban built character. The objectives of the zone seek quality on-site residential amenity, while increasing the housing capacity, intensity and choice.	The N enabl reside zone choice as pro The T heigh reside store arour transp The re design asses qualit scale
Effectiveness and efficiency	This option has been considered as it is the existing zoning of the site. This current zoning would enable light industrial uses (manufacturing, production, logistics, storage and warehousing) which typify the sites to the west. The provisions of this zone do require development to consider the character and amenity of adjoining zones, however, it is not considered to positively contribute to the planned development outcomes of the area or the overall quality of place. Development under this zone is less likely to achieve amenity levels that are commensurate with the existing use of the site and the existing character of the	This option has been considered as it provides for both residential and commercial growth along transport corridors and the site is located adjacent to both commercial (industrial) and residential zones as well as the train network. The policies of the zone encourage a mixture of both residential and non-residential activities, achieving a high level of amenity and visual interest for streets and public open spaces. However, the zone, while providing for a mixture of uses, does not require developments to be mixed use, so residential development does not have to be a necessity for development.	This option has been considered as the immediately adjacent properties to the north of the subject site are zoned as Mixed Housing Suburban. By seeking a zoning that is similar to the surrounding properties, there is greater certainty in achieving the planned environmental outcomes for the area. The zone seeks to achieve high quality on-site living environments while managing the effects of visual amenity, privacy and access to daylight, resulting in a suburban character.	This of of the MHU is sim greate enviro comb one zo intens use lo the lo Road.
	<ul> <li>In a dition, potential</li> <li>development under this zone is more demanding</li> <li>on the natural environment, with no control on</li> <li>impervious or building coverage.</li> <li>Residential development within the zone is</li> <li>generally not provided for (non-complying</li> <li>activity status) apart from 'workers</li> <li>accommodation'. However, this must be</li> </ul>	This zone allows for the development of new residential housing at a much greater intensity than adjoining properties but at a lower height limit than the existing industrial zoning of the site. However, much like the existing business zoning on the site, there are no development controls within the mixed use zone for impervious area or building coverage. While a high level of amenity is sought under the zone, the emphasis is placed on streets,	This zone does not anticipate as high an intensity of development of many other residential zones and development under this zone is generally restricted to two storeys. However, building bulk and location on site is more controlled than the Business Light Industry and Mixed Use zones, with impervious area and building coverage restrictions, in addition to landscaping minimums. The resulting	Much this o amen provis buildi and so develo and p

#### tion Four cone to Mixed Housing Urban and Terrace using and Apartment Zone

e MHU zone is a reasonably high-intensity zone abling a variety of the sizes and forms of idential development. The objectives of the support the increase in the capacity and bice of housing within neighbourhoods as well promoting walkable communities.

e THAB zone provides for the greatest density, ght and scale of development of all the idential zones. Buildings can be enabled up to 7 reys and the zone is predominately located und town and local centres as well as the public nsport network.

e resource consent requirements enable the ign and layout of the development to be essed, recognising that the need to achieve a ality design is increasingly important as the le of development increases.

is option has been considered given the zoning the surrounding residential sites are THAB, IU or MHS (Suburban). By seeking a zoning that imilar to the surrounding properties, there is ater certainty in achieving the planned vironmental outcomes for the area. The mbination of residential zones, rather than just e zone, enables a transition on site in the ensity of development, with the higher intensity e located nearest to the Ranui Train Station and e lower intensity zone located closer to Swanson ad.

ch like Option 3, the zones considered under s option have provisions that emphasis on-site enity as well as maintaining a high level of enity between neighbouring properties. The visions of the zone include a higher degree of lding control which ensures that the bulk, form I scale of any proposed residential relopment is able to integrate with the existing

I planned residential built character of the area.

	Option One Status Quo ('do nothing') Zoned Business Light Industry	Option Two Rezone to Business Mixed Use	Option Three Rezone to Mixed Housing Suburban	Optio Rezo Hous
	<ul> <li>ancillary to the primary industrial function of the site and therefore, does not support a compact, urban and residential form of development. Given the need to provide for greater housing capacity and choice in Auckland in location close to public transport and outdoor space, this current zone has very limited ability to achieve this desired outcome.</li> <li>An Economic Analysis undertaken for the site has outlined that the price of the land for industrial activities is less when compared to other more desirable locations. As such, industrial activities are unlikely to establish on site, meaning the existing temporary accommodation will continue to operate on site.</li> </ul>	rather than within a site. The site does not have a wide street frontage. While a range of residential uses are permitted within the zone, the emphasis of the zone on mixed use and the potential for developments not including residential use is considered to mean the zone will be less likely to achieve the amenity to the standard of the surrounding neighbourhood character. Mixed Use zones act as transition zones between residential and centre zones and given the distance of the site to the nearest centre zone, overall, this option is not considered to be the most efficient use of the site.	development form will result in a notably higher quality interface with the Ranui Domain and surrounding residential zones than option 1 and 2. The height limit on site, being only two storeys, is not considered to be the most efficient means of intensifying land use on the site, given the site's location close to the Ranui Train Station and the Ranui Domain. The outcomes sought by the AUP(OP) is higher density housing close to open space zones and transport corridors so the MHS would not efficiently meet this outcome.	The c deve intro that a of the provi close highe than The p consi use a zonin The c the b resid appro amer
Cost	Light industrial development of the site is much more land intensive and would require a greater extent of development to ensure that the site is able to accommodate light industrial activities such as retaining structures and greater land disturbance.	Short term costs associated with making the land liveable and usable, such as installing new infrastructure. Economic gain is lower with a mixture of uses rather than straight residential.	Residential development is considered to be less land intensive and would require a lesser degree of intervention to the site, such as fewer retaining structures or less land disturbance.	Resid land of int struc There
	There are greater long-term financial costs associated with future development of the site beyond industrial activities, including the site	A mixture of uses is not required under the zone so there is no guarantee that residential development would occur.	There are larger costs associated with housing development in the short term in order to get the site in a position to be able to redevelop.	devel site in Neigh
	being less adaptable to provide for new land uses in the future. Distance to transport routes to enable movement of commercial goods to and from the	Given the proximity of the site to the Ranui local centre, enabling retail (possibly at a significant scale)on site may adversely affect the viability and economic wellbeing of the shops in the nearby local	This zone would not provide as much housing as more intensive residential zones.	devel with.
	site	centre.	Neighbouring industrial sites would have new development standards and noise limits to comply with.	
Benefit	Allows for immediate development of the site, albeit for industrial purposes.	Increases housing capacity, choice and intensity.	Increases housing capacity, choice and intensity.	Incre
	Locates industrial activity close to other industrially zoned land.	Increased land available for housing adjacent to an established residential area, open space and transport options.		Increa estab living

#### tion Four zone to Mixed Housing Urban and Terrace using and Apartment Zone

e combination of these zones allows for the velopment of new residential housing that helps roduce a wider variety of housing typologies at are consistent with the residential character the wider area. These zones are effective in oviding high density housing, of a high quality, in se proximity to the Ranui Domain by enabling her height limits and more building coverage on the Mixed Housing Suburban Zone.

e proposed residential zoning of the site is nsidered most appropriate and sensitive to the e and function of the adjacent open space ning of the site.

e development controls of the zone which guide e bulk, form and scale of any proposed idential development are considered the most propriate achieving the level of character and lenity anticipated for the wider neighbourhood.

sidential development is considered to be less d intensive and would require a lesser degree ntervention to the site, such as fewer retaining uctures or less land disturbance.

ere are larger costs associated with housing velopment in the short term in order to get the e in a position to be able to redevelop.

ighbouring industrial sites would have new velopment standards and noise limits to comply h.

reases housing capacity, choice and intensity.

reased land available for housing adjacent to an ablished residential area. . Higher density ng close to public transport encourages

	Option One Status Quo ('do nothing') Zoned Business Light Industry	Option Two Rezone to Business Mixed Use	Option Three Rezone to Mixed Housing Suburban	Optic Rezo Hous
		Consideration given to on-site amenity and quality of the built form.	Increased land available for housing adjacent to an established residential area, open space and transport options.	alteri existi quick
			Consideration given to on-site amenity and quality of the built form.	More key p provi
			More intensive residential land use adjacent to a key public open space. Greater consideration given to on-site amenity and quality of the built form.	that p would devel
			amenity and quality of the built form.	Great qualit
Summary	The current zoning on the site does not reflect the existing and well established residential use of the site. Given the site's location, the use of the land for industrial purposes would result in	This option has the potential to achieve the outcomes of the AUP(OP), however, it is not considered the most effective or efficient.	In summary, this option, while providing for residential housing that expects on site amenity, would not provide for the intensity of housing sought under the	Overa Resid Housi most
an economic cost, rather than a benefit, as the is little demand for industrial land in the area.	While the provisions of the zone and the relevant chapters and Auckland wide provision of the plan would ensure a reasonable level of amenity within the site, the overall cumulative effects of a mixed- use development is not considered to be the most	AUP(OP), particularly when considering the site's proximity to public transport, public open space and a town centre.	polici qualit trans The re Auckl	
		effective and efficient response to providing increased housing within the area.		enviro propo more

#### tion Four zone to Mixed Housing Urban and Terrace using and Apartment Zone

ernative forms of transportation and utilises an sting facility which is set to expand, with cker services to Britomart more often.

ore intensive residential land use adjacent to a v public open space. The Ranui Domain ovides a large scale, high quality public location it provides significantly high amenity values and uld benefit a high density residential velopment.

eater consideration given to on-site amenity and ality of the built form.

erall, the requested rezoning of the site to sidential Mixed Housing Urban and Terrace using and Apartment Zone is considered to be est appropriate in achieving the objectives and icies of the Auckland Unitary Plan, being high ality and high density residential use along nsport corridors and close to open space. The respective zone provisions, together with the ckland-wide rules of the AUP, will ensure vironmental effects of future development oposal are avoided, minimised or mitigated in a ore effective and efficient manner.

# 

### **APPENDIX 7**

## CORRESPONDENCE WITH TE KAWERAU A MAKI



2/3 Airpark Dr Airport Oaks Auckland 2022 PO Box 59-243 Mangere Bridge Auckland 2151

25 July 2019

Tenā koutou katoa

#### RE: Private Plan Change Request – 522-524 Swanson Road, Ranui - Western Park Village

I can confirm that 522-524 Swanson Rd, Ranui, sits within the Statutory Acknowledgement Area of Te Kawerau a Maki and therefore we have an interest in this plan change. The plan change seeks to rezone the land from its existing Business - Light Industry zoning to a mix of Residential Terraced Housing and Apartment Buildings and Residential -Mixed Housing Urban.

After meeting with the owners of the property and Mt Hobson Group - Resource Management Consultants, I can confirm that Te Kawerau a Maki Iwi Tribal Authority have no objections to this plan change.

Please note that this letter of support concerns the plan change only and does not relate to any future resource consent applications associated with any future building developments on the site. Specific consultation and feedback will be required when building is proposed.

I trust that the above is of assistance in preparing your consent and with the proposed rezoning.

mauri ora

Par la



Robin Taua-Gordon Heritage and Environment Officer Te Kawerau Iwi Tribal Authority & Settlement Trust 2/3 Airpark Drive, Airport Oaks, Auckland | PO Box 59-243, Mangere Bridge, Auckland Email: robin.taua-gordon@tekawerau.iwi.nz

## **APPENDIX 8**

## DETAILED SITE INVESTIGATION SUMMARY



### MEMORANDUM

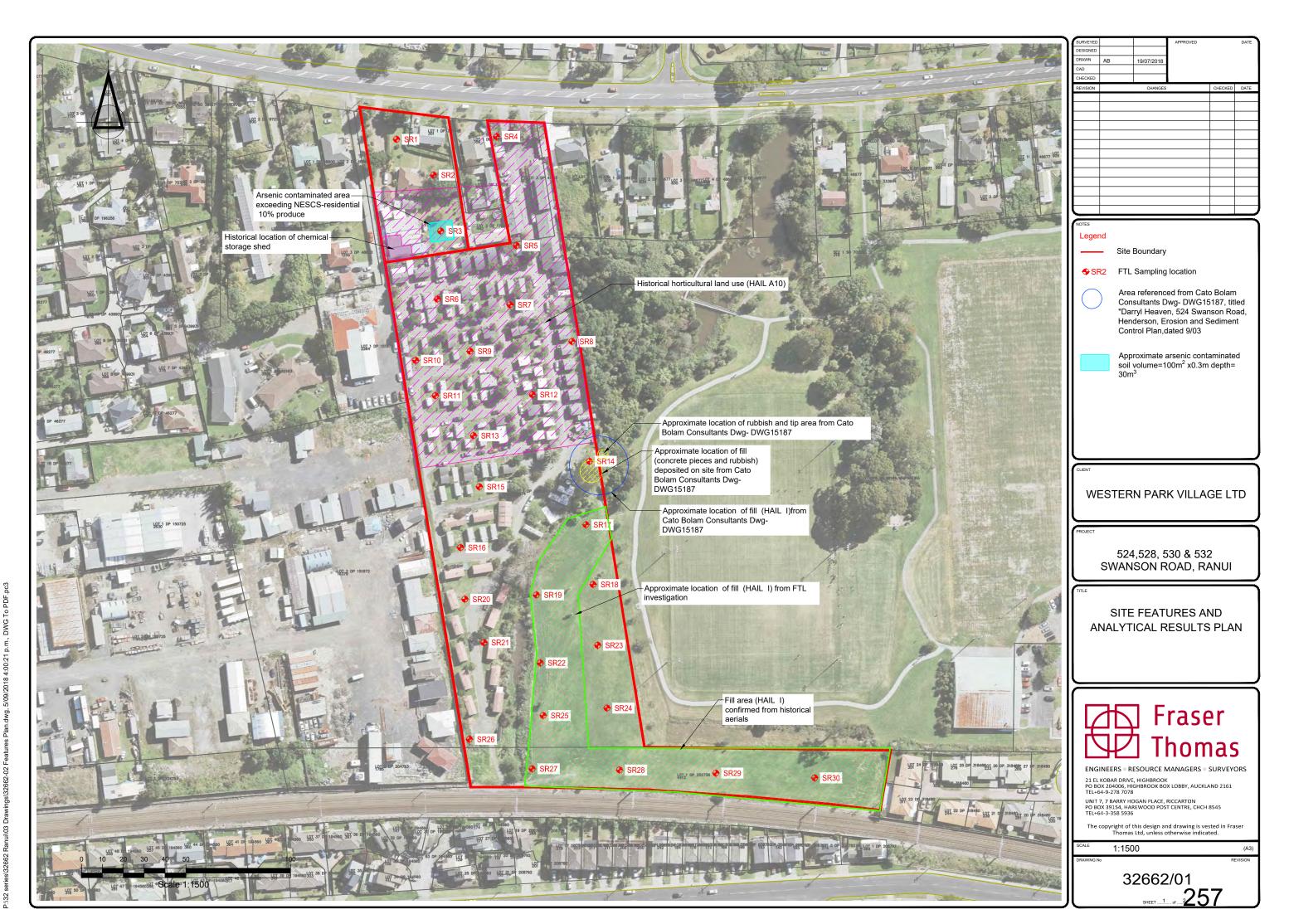
Date:	13 September 2018	Job No 32662
То:	Brad Heaven	
Subject:	524, 528, 530 & 532 SWANSON ROAD, RANUI – DETAILED SITE INVESTIGATION SU	MMARY
From:	Sean Finnigan	

This memo provides a brief summary of the key findings of the Detailed Site Investigation (DSI) undertaken by Fraser Thomas Ltd for Lot 1 DP 206224, Lot 1 DP 202726, PT LOT 3 DP 412212, LOT 2 DP 396542, & LOT 1 DP 396542 located at 524, 528, 530 & 532 Swanson Road, Ranui ('site'):

- Our investigation involved a desktop study, site walkover, soil sampling (60 samples) and reporting.
- This investigation has confirmed that the site has been subject to HAIL activities:
  - A10: "Persistent pesticide bulk storage or use including sport turfs, market gardens, orchards, glass houses or spray sheds", and
  - I: "Any other land that has been subject to the intentional or accidental release of a hazardous substance in sufficient quantity that it could be a risk to human health or the environment." (i.e. fill material).

Drawing 32662/01 shows the location of these HAIL activities.

- The NESCS (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) regulations apply to the proposed development, due to arsenic, copper and lead being present above background levels in a number of locations (lead at SR3 & SR4 and arsenic and copper at SR3). These sampling locations are shown on drawing 32662/01, while results are shown on sheet 2 of the same drawing.
- Organochlorine pesticides (OCPs) were generally found at concentrations lower than the laboratory limit of reporting in all samples, except for sample location SR3 where low levels of DDT were detected.
- Arsenic exceeded the NESCS Residential 10% produce consumption soil contaminant standard (SCS) at one sampling location (SR3) but not the high density residential SCS. Further sampling in this area is required to confirm the horizontal and vertical extent of arsenic contamination in this area, if the residential 10% SCS is adopted. A preliminary estimate of the contaminated soil volume is 100m<sup>2</sup> area x 0.3m depth, equivalent to 30m<sup>3</sup> (assuming a remediation target depth of 300mm), as shown on drawing 32662/01.
- All samples readily complied with applicable NESCS high density residential land use standards and Auckland Unitary Plan (AUP) permitted activity discharge criteria.
- Fill was found in a number of deeper samples (SR17A, SR19A, SR22A, SR27A & SR30A) collected from the southeastern portion of the site along the stream channel as shown on dwg 32662/01. The location of this fill is consistent with historical reports of rubbish/tipping having been undertaken along parts of the stream bank. Only shallow fill material has been tested to date, as it is considered more practical to test the deeper fill during the subsequent geotechnical investigation.
- Testing of the deeper fill material is needed to confirm the consent status of the proposed development in relation to the NESCS and contaminated land provisions of the Unitary Plan.



Contaminants		1.1	Guidelines			-				Soil Sar	nples ID			
	Background <sup>(1)</sup>	NES Res <sup>(2)</sup>	NES High Density Res <sup>(3)</sup>	AUP <sup>(4)</sup>	Cleanfill <sup>(5)</sup>	SR1	SR2	SR3	SR4	SR5	SR6	SR7	SR8	SR9
Heavy Metals														
Arsenic	0.4 - 12	20	45	100	12	11	3	34	6	4	5	7	<2	3
Copper	20 - 90	>10,000	>10,000	325	90	29	35	159	53	27	31	50	19	20
Lead	<1.5 - 65	210	500	250	140	40	22	91	75	26	30	34	11.2	21
Organochlorine pesticides				10							1.00			
Total DDT iosmers		70	240		0.08	<lor< td=""><td><lor< td=""><td>0.11</td><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""></lor<></td></lor<></td></lor<></td></lor<></td></lor<></td></lor<></td></lor<></td></lor<>	<lor< td=""><td>0.11</td><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""></lor<></td></lor<></td></lor<></td></lor<></td></lor<></td></lor<></td></lor<>	0.11	<lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""></lor<></td></lor<></td></lor<></td></lor<></td></lor<></td></lor<>	<lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""></lor<></td></lor<></td></lor<></td></lor<></td></lor<>	<lor< td=""><td><lor< td=""><td><lor< td=""><td><lor< td=""></lor<></td></lor<></td></lor<></td></lor<>	<lor< td=""><td><lor< td=""><td><lor< td=""></lor<></td></lor<></td></lor<>	<lor< td=""><td><lor< td=""></lor<></td></lor<>	<lor< td=""></lor<>
	Background <sup>(1)</sup>	NES Res <sup>(2)</sup>	NES High Density Res <sup>(3)</sup>	AUP <sup>(4)</sup>	Cleanfill <sup>(5)</sup>	SR11	SR12	SR13	SR14	SR15	SR16	SR17	SR18	SR19
Heavy Metals				1					4.1					
Arsenic	0.4 - 12	20	45	100	12	6	2	4	3	4	7	2	3	4
Copper	20 - 90	>10,000	>10,000	325	90	74	18	23	13	27	39	16	7	22
Lead	<1.5 - 65	210	500	250	140	27	18.9	22	14.1	22	25	32	18.1	19.9
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	Background <sup>(1)</sup>	NES Res (2)	NES High Density Res <sup>(3)</sup>	AUP <sup>(4)</sup>	Cleanfill <sup>(5)</sup>	SR21	SR22	SR23	SR24	SR25	SR26	SR27	SR28	SR29
Heavy Metals				1.00									1000	
Arsenic	0.4 - 12	20	45	100	12	5	4	4	3	<2	4	2	3	3
Copper	20 - 90	>10,000	>10,000	325	90	26	18	19	9	6	14	8	11	9
Lead	<1.5 - 65	210	500	250	140	23	46	41	13.3	11.6	20	14.7	18.6	12.5
Organochlorine pesticides									1 4		1			
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Notes: Concentrations expressed	in mg/kg													
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3. National Environmental Standa				nts in Soil	to Protect Hur	man Health	Table B2 So	oil contamir	nant standar	rds - SCSs(h	ealth) - High	Density Res	sidential	
. Auckland Unitary Plan (AUP) - F	Permitted Activity S	oil Criteria (	Discharge)											
. Disposal site Acceptance criter	ia in the Auckland	region - (e.g.	Envirofill No	orth)										
old-Exceeds background														
Exceeds NESCS- Residential 10%	produce													
LOR - Lower than limit of reporti	ng													

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### **APPENDIX 9**

# FLOODING ASSESSMENT AND STREAM MODELLING



# TP108 Stormwater Runoff & HEC RAS Stream Model

FOR:

MHG Planning

Western Park Village

AT:

522-524 Swanson Road

Ranui

Jun-2015 Our Ref: 150010



22 June 2015 Our Ref: 150010



MHG Planning Attnetion: Mark Benjamin PO Box 37964 Parnell AUCKLAND 1151

Dear Mark,

#### FLOOD RISK ASSESSMENT & HEC-RAS MODEL RESULTS

#### 522-524 SWANSON ROAD, RANUI

#### INTRODUCTION

ACH Consulting Ltd has been engaged to complete an assessment of the unnamed stream entering the property at 522-524 Swanson Road as part of a redevelopment assessment for Western Park Village. The assessment is required to establish finished floor levels and determine if there is a requirement for an esplanade reserve area to be vested to Council as part of any redevelopment.

#### COUNCIL REQUIREMENTS

Where there is an overland flow path and / or flooding shown within a proposed development site on the Auckland GIS Council requires a report that addresses the following operative rules:

- · Overland flow is not obstructed by the proposed development.
- Downstream and upstream neighbours are not adversely affected by any development.
- Habitable floor levels be a minimum of 500 mm above the predicted 1% AEP flood level.
- Non-habitable floor levels be a minimum of 200 mm above the predicted 1% AEP flood level.

Additionally, esplanade reserves are to be vested to Council when land next to a stream at least 3 metres wide (at mean (average) fullest annual flow) is subdivided.

#### DESCRIPTION

Western Village Park is currently a mix of one-bedroom units and caravans, and has a capacity of approximately 300 residents. The irregular shaped site, located south of the Swanson Road carriageway, has an area of 2.65 ha. The property abuts Ranui Domain Park along the eastern boundary and the Western Line railway tracks on the southern boundary. The area to the west of the property is industrial with a mixture of industries.

The property is relatively flat and has a small unnamed stream which crosses into the property from across the Western Line railway tracks via a 1650 mm diameter culvert. The unnamed stream travels northeast cutting off the southeast 1 ha corner of the property, which is undeveloped. An Auckland Council GIS Plan has been included in Appendix A.

#### CATCHMENT

The unnamed stream drains approximately 26 ha of land which is comprised of residential land at the foot of the Waitakere Ranges. The unnamed stream is a tributary to the Swanson Stream which it enters via the Waiomoko Stream approximately 1 km north of the subject site. The stream crosses several under several roadways via culverts and bridges prior to entering the Waimoko. Further to this, the stream passes through a pond located within the Ranui Domain. A catchment map has been included in Appendix B.

P.O Box 104-201, Lincoln North, Auckland 0654 Level 1, 87 Central Park Drive, Henderson, Auckland



The contributing catchment to the unnamed stream is assumed to be 65% impermeable at maximum probable development. The calculated time to concentration considering the catchment is 1.3 km in length and an average gradient of 5% is 28 minutes. A rainfall depth of 207 mm over 24 hours (NIWA HIRDS) for the 1 in 100 year (1% AEP) rainfall event results in a calculated peak flow rate for the catchment of 6.089 m<sup>3</sup>/sec for the 1% AEP rainfall event. A rainfall depth of 25 mm over 24 hours Auckland Council Technical Report 2013/035 for the 1 year (100% AEP) rainfall event results in a calculated peak flow rate for the catchment of 0.364 m<sup>3</sup>/sec for the 100% AEP rainfall event. Calculations have been included in Appendix C.

#### ANALYSIS

The current channel alignment and 13 cross sections of the 255 m reach of the unnamed stream which passes through the subject property to the pond located within the Ranui domain were surveyed. Using the steady peak flow rate for both the 1 % AEP and 100% AEP rainfall events the unnamed stream was then analysed using HEC-RAS.

Steady state flow analysis was used, using a mixed flow (sub-critical & supercritical) analysis. The steady flow analysis considered the Manning's co-efficient to be 0.04 for the banks and the stream channel. The average slope of this reach of the unnamed stream adopted for the model was 0.05 m/m. For the model of the 1% AEP rainfall event the water level of the pond located in the Ranui Domain was considered to be RL 28.63 m based on the Swanson and Paremuka Streams Floodplain Mapping (Opus 2010). The level of the pond was entered into the downstream boundary conditions so as to analyse any backwater effects caused by the pond. For the 1 year full flow model the elevation was considered to be RL 27 m based on the survey data.

#### **RESULTS AND DISCUSSION**

The steady flow analysis for the 1 % AEP rainfall event showed that during this event water is contained completely within the stream channel. Finished floor levels (FFL) should be set at each cross section a minimum of 500 mm above the 1% AEP flood levels as modelled. The following are the recommended finished floor levels at between each cross section:

Chainage	Minimum FFL	Chainage	Minimum FFL	Chainage	Minimum FFL
225.55 -207.93	30.91	207.93-191.08	30.18	191.08-171.49	30.06
171.49-155.79	29.93	155.79-139.22	29.8	139.22-120.72	29.37
120.72-108.64	29.34	108.64-78.2	29.3	78.2-72.67	29.26
72.67-57.94	29.25	57.94-34.69	29.25	37.69-0	29.19

Table 1. Minimum FFL based on HEC RAS model results (Chainage and predicted water surface elevation have been included in Appendix D).

The western banks of the unnamed channel are higher in elevation than the predicted flood level. Every effort should be made during development to avoid lowering ground levels around the stream.

With respect to the esplanade reserve to be vested to the Council, the average width of the stream channel as it passes through the property is 2.74 m during mean fullest annual flow. As such no esplanade reserve is required to be vested to Council. Results for the HEC RAS model have been included in Appendix E.

#### CONCLUSIONS

With respect to any future development of the Western Park Village it is our professional opinion that residential properties are at little risk from flooding provided ground levels on the site are not lowered. No esplanade reserve should be required by the Council as the average width is less than 3 m during full yearly flows.

We trust that the above is satisfactory for your needs. Should you have any queries or require further information please do not hesitate to contact the undersigned at this office.

Yours faithfully ACH Consulting Ltd

Linda Norman BS MSc. Engineer

Reviewed by Brett Chick CPEng MIPENZ BE Senior Engineer

Appendix A Auckland Council GIS Plan



This map/plan is illustrative only and all information should be independently verified on site before taking any action.Copyright Auckland Council. Boundary information from LINZ (Crown Copyright Reserved). Whilst due care has been taken, Auckland Council gives no warranty as to the accuracy and completeness of any information on this map/plan and accepts no liability for any error, omission or use of the information. Height datum: Auckland 1946.

### Western Park Village

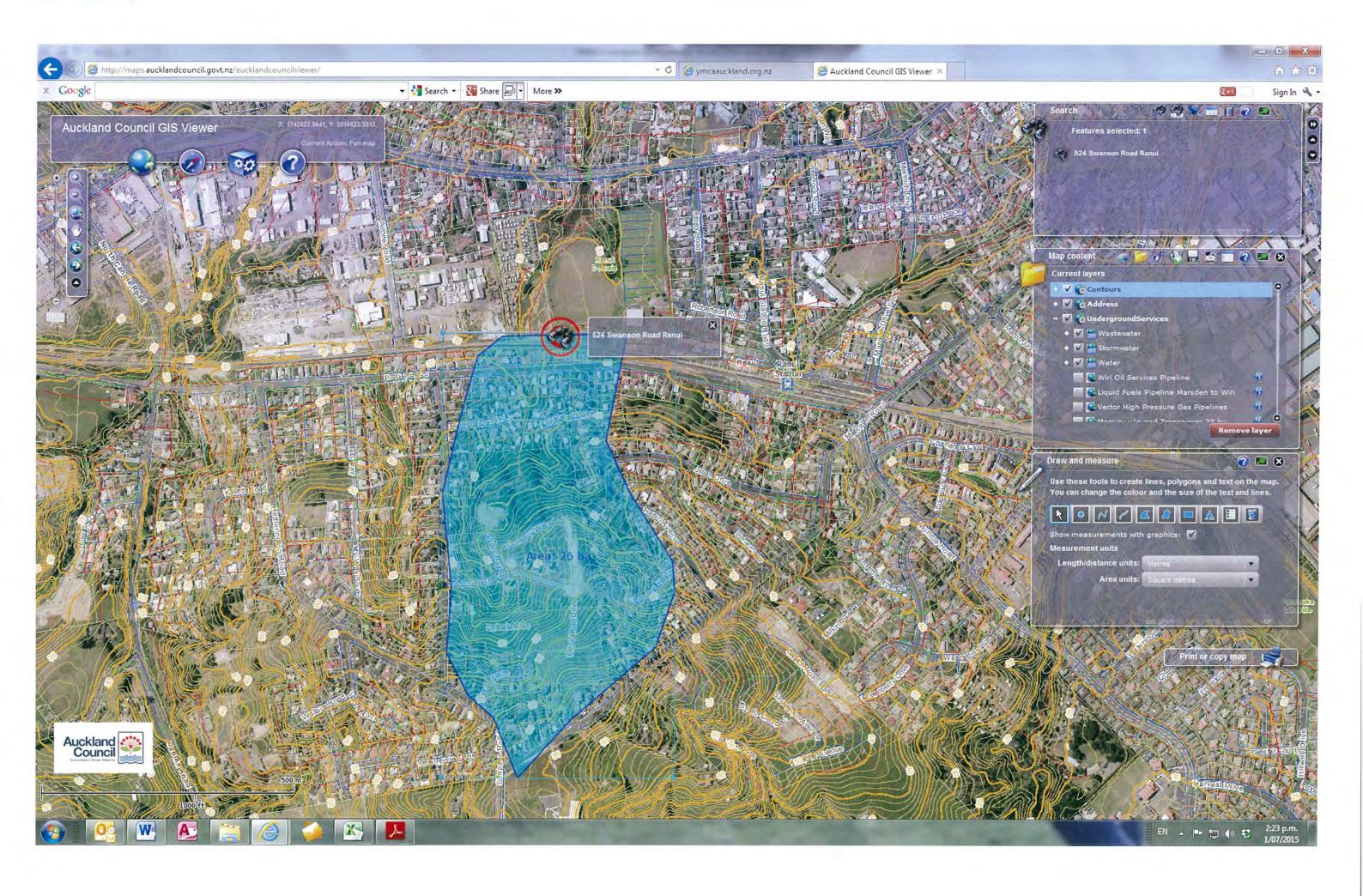


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Appendix B Catchment Map



Appendix C Calculations



#### Stormwater Runoff Calculation Worksheet - (Based on ARC TP 108)

Section 1 - Runoff Curve Number (CN) & Initial Abstraction (Ia)

Soil Name & Classification	Cover Type, treatment & Hydrologic Condition	Curve No. (CN)	Area (ha)	Product of CN x Area
Pervious	Grass	74	9.2750	686.35
Impervious	Existing Hardstand	98	17.2250	1688.05
			0.0000	0.00
			0.0000	0.00
		Total:	26.5000	2374.40

CN <sub>(Weighted)</sub> = Total Product/ Total Area	89.60
Initial Abstraction $I_{a(Weighted)} = 5(Pervious Area/Total Area)$	1.75

Time of Concentration (tc)				
Channelisation Factor (C)	1.0			
Catchment Length (km)	1.300			
Catchment Slope (S <sub>c</sub> ) (m/m)	0.05			
Runoff Factor = CN/(200-CN)	0.81			
t <sub>c</sub> = 0.14 x C x L <sup>0.66</sup> (CN/200-CN) <sup>-0.55</sup> x S <sub>c</sub> (hrs)	0.465			
Time to Peak $(t_p) = 2/3 t_c$ (hrs)	0.310			

#### Section 2 - Graphical Peak Flow Rate

Catchment Data	2
Catchment Area (A) (km2)	0.265000
Runoff Curve Number (CN)	89.60
Initial Abstraction I <sub>a(Weighted)</sub>	1.75
Time of Concentration $(t_c)$ (hrs)	0.465
Depression Storage (S) = (1000/CN - 10) x 25.4 (mm)	29.48

Average Recurrence Interval (ARI) (yrs)	1 Year
24 hour Rainfall Depth (P <sub>24</sub> ) (mm)	25
Runoff Index (c*) = $P_{24}-2I_a/P_{24}-2I_a+2S$	0.27
Estimate Specific Flow Rate q*	0.055
Peak Flow Rate $(q_p) = q^* x A x P_{24} (m^3/sec)$	0.364
Runoff Depth $D_{24} = (P_{24}-I_a)^2/(P_{24}-I_a)+S (mm)$	10
Runoff Volume $V_{24} = 1000 \times D_{24} \times A (m^3)$	2716.54

Enter values in yellow cells only Result cells



#### Stormwater Runoff Calculation Worksheet - (Based on ARC TP 108)

Section 1 - Runoff Curve Number (CN) & Initial Abstraction (I<sub>a</sub>)

Soil Name & Classification	Cover Type, treatment & Hydrologic Condition	Curve No. (CN)	Area (ha)	Product of CN x Area
Pervious	Grass	74	9.2750	686.35
Impervious	Existing Hardstand	98	17.2250	1688.05
			0.0000	0.00
			0.0000	0.00
		Total:	26.5000	2374.40

CN <sub>(Weighted)</sub> = Total Product/ Total Area	89.60
Initial Abstraction I <sub>a(Weighted)</sub> = 5(Pervious Area/ Total Area)	1.75

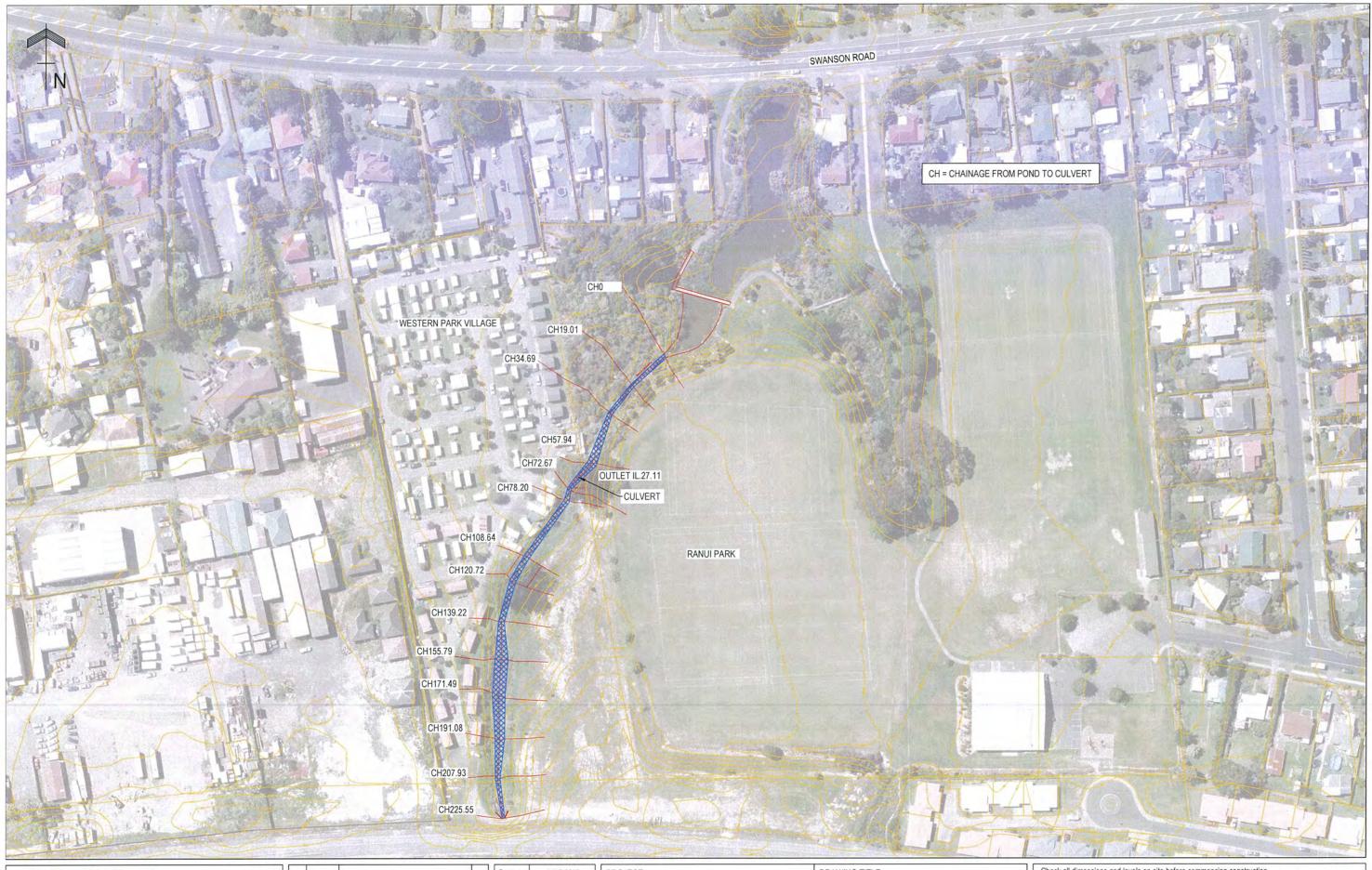
Time of Concentration (tc)						
Channelisation Factor (C)	1.0					
Catchment Length (km)	1.300					
Catchment Slope (S <sub>c</sub> ) (m/m)	0.05					
Runoff Factor = CN/(200-CN)	0.81					
t <sub>c</sub> = 0.14 x C x L <sup>0.66</sup> (CN/200-CN) <sup>-0.55</sup> x S <sub>c</sub> (hrs)	0.465					
Time to Peak $(t_p) = 2/3 t_c$ (hrs)	0.310					

#### Section 2 - Graphical Peak Flow Rate

Catchment Data	
Catchment Area (A) (km2)	0.265000
Runoff Curve Number (CN)	89.60
Initial Abstraction I <sub>a(Weighted)</sub>	1.75
Time of Concentration (t <sub>c</sub> ) (hrs)	0.465
Depression Storage (S) = (1000/CN - 10) x 25.4 (mm)	29.48

Storm No.	Storm No.4
Average Recurrence Interval (ARI) (yrs)	100 Yr
Situation	Undev
24 hour Rainfall Depth (P <sub>24</sub> ) (mm)	207
Runoff Index (c*) = $P_{24}-2I_a/P_{24}-2I_a+2S$	0.78
Estimate Specific Flow Rate q*	0.111
Peak Flow Rate $(q_p) = q^* x A x P_{24} (m^3/sec)$	6.089
Runoff Depth $D_{24} = (P_{24}-I_a)^2/(P_{24}-I_a)+S (mm)$	179
Runoff Volume $V_{24}$ = 1000 x D <sub>24</sub> x A (m <sup>3</sup> )	47559.76

Enter values in yellow cells only Result cells Appendix D Chainage & Predicted Water Surface Elevations



	87 Central Park Drive				Date:	JUNE-2015	PROJECT	DRAWING TITLE	Check all dimensions an				produced
	Henderson 0610	$\vdash$			Cad Ref:	150010-C01.dwg		1 YEAR	This drawing and design without the written perm			to and may not be rep	Jiouuceu
	PO Box 104 201 Lincoln North 0654, Waitakere				Designed	LN	WESTERN PARK VILLAGE	FULL FLOW			100.11	DWON	
		 		Drawn	GG	524 SWANSON ROAD, RANUI	FULL FLOW	ORIGINAL SIZE	A3	JOB No.	DWG No.	RE	
CONSULTING ENGINEERS	Ph: 09 839 7050 Fax: 09 838 6530 Email: info@achconsulting.co.nz	Rev	 Amendment	- By	Checked	Ar			ORIGINAL SCALE	1:1500m	150010	C01	-
												27	1.3



	87 Central Park Drive					Date:	JUNE-2015	PROJECT	DRAWING TITLE
	Henderson 0610	-				Cad Ref:	150010-C01.dwg		100 YEAR
	PO Box 104 201 Lincoln North 0654, Waitakere					Designed	LN	WESTERN PARK VILLAGE	FULL FLOW
	Ph: 09 839 7050 Fax: 09 838 6530	-				Drawn	GG	524 SWANSON ROAD, RANUI	FULL FLOW
CONSULTING ENGINEERS	Email: info@achconsulting.co.nz	Rev	Date	Amendment	Ву	Checked	Ar		

ORIGINAL SIZE	A3	JOB No.	DWG No.	REV
ORIGINAL SCALE	1:1500m	150010	C02	-
			27	Δ

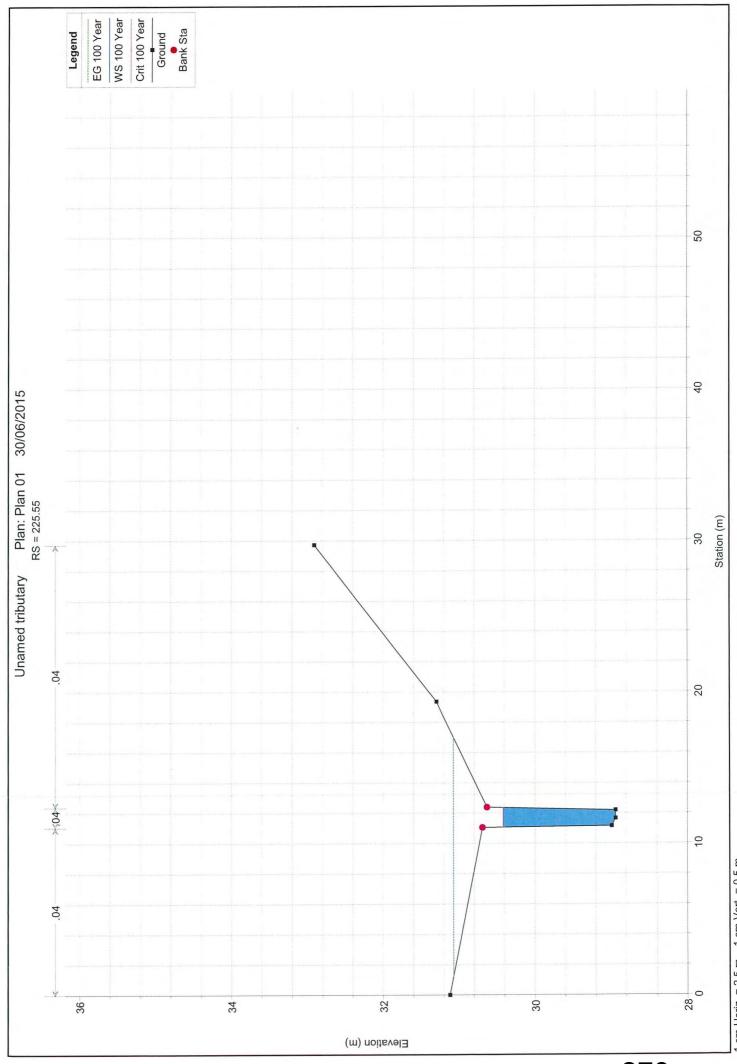
Appendix E HEC RAS Model Results

HEC-RAS Plan: UnNameed River: un named Reach: mid Profile: 1 Year

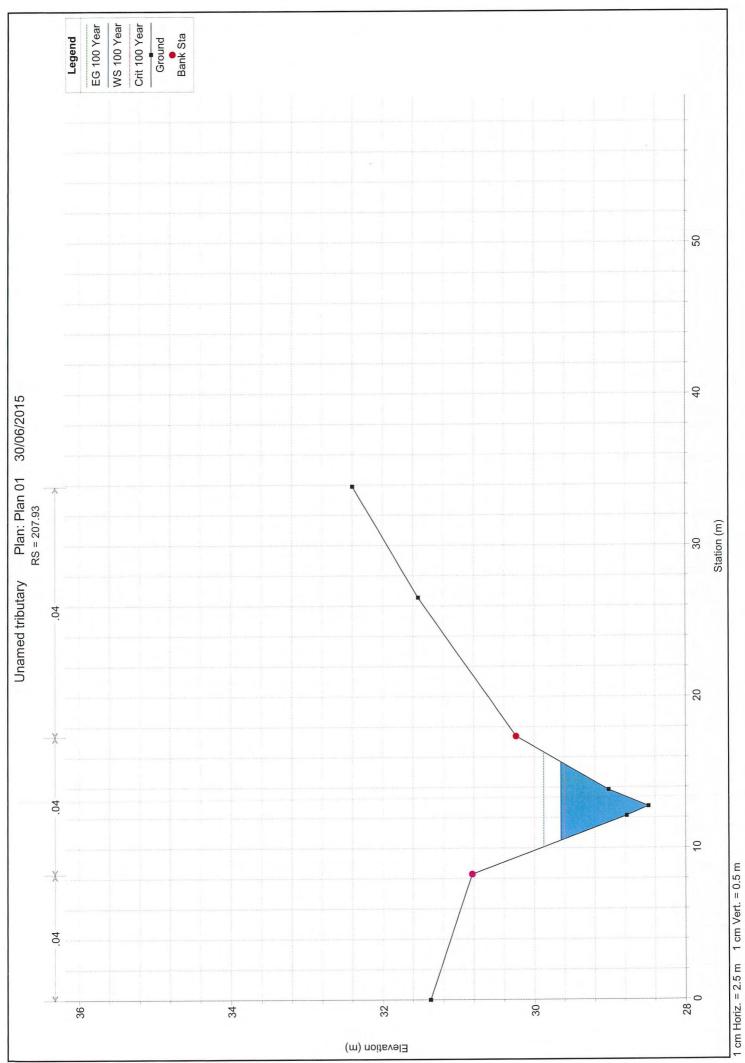
Reach	Plan: UnName River Sta	Profile	amed Reach Q Total	Min Ch El	1 Year W.S. Elev	Top Width
. coun			(m3/s)	(m)	(m)	(m)
mid	225.55	1 Year	0.36	28.94	29.25	1.08
mid	221.145*	1 Year	0.36	28.83	29.16	1.47
mid	216.74*	1 Year	0.36	28.71	29.07	1.48
mid	212.335*	1 Year	0.36	28.60	29.02	1.40
mid	207.93	1 Year	0.36	28.49	29.02	2.10
mid	207.30	1 Year	0.36	28.43	29.00	2.10
mid	199.505*	1 Year	0.36	28.38	28.99	2.92
mid	195.292*	1 Year	0.36	28.32	28.99	3.39
mid	191.08	1 Year	0.36	28.26	28.99	4.00
mid	186.668*	1 Year	0.36	28.32	28.98	4.00
mid	182.257*	1 Year	0.36	28.32	28.97	4.20
mid	177.846*	1 Year	0.36	28.43	28.97	4.81
mid	173.435*	1 Year	0.36	28.49	28.96	5.15
			f			
mid	169.023*	1 Year	0.36	28.54	28.95	5.54
mid	164.612*	1 Year	0.36	28.60	28.93	5.94
mid	160.201*	1 Year	0.36	28.65	28.92	6.34
mid	155.79	1 Year	0.36	28.71	28.85	5.73
mid	151.647*	1 Year	0.36	28.54	28.73	4.13
mid	147.505*	1 Year	0.36	28.36	28.58	3.15
mid	143.362*	1 Year	0.36	28.18	28.43	2.63
mid	139.22	1 Year	0.36	28.01	28.30	2.46
mid	134.595*	1 Year	0.36	27.87	28.17	2.39
mid	129.97*	1 Year	0.36	27.73	28.01	2.09
mid	125.345*	1 Year	0.36	27.59	27.89	2.36
mid	120.72	1 Year	0.36	27.45	27.90	2.72
mid	116.693*	1 Year	0.36	27.44	27.88	2.65
mid	112.666*	1 Year	0.36	27.44	27.87	2.50
mid	108.64	1 Year	0.36	27.43	27.85	2.34
mid	104.291*	1 Year	0.36	27.42	27.83	2.38
mid	99.9428*	1 Year	0.36	27.42	27.81	2.41
mid	95.5942*	1 Year	0.36	27.41	27.79	2.53
mid	91.2457*	1 Year	0.36	27.41	27.77	2.61
mid	86.8971*	1 Year	0.36	27.40	27.74	2.65
mid	82.5485*	1 Year	0.36	27.40	27.71	2.62
nid	78.2	1 Year	0.36	27.39	27.64	2.36
mid	75.435*	1 Year	0.36	27.28	27.53	1.78
nid	72.67	1 Year	0.36	27.16	27.42	1.56
mid	67.7599*	1 Year	0.36	27.06	27.42	2.52
nid	62.85*	1 Year	0.36	26.95	27.42	3.39
nid	57.94	1 Year	0.36	26.85	27.42	4.12
nid	53.29*	1 Year	0.36	26.84	27.41	3.95
nid	48.64*	1 Year	0.36	26.83	27.37	1.69
nid	43.99*	1 Year	0.36	26.82	27.35	1.65
nid	39.34*	1 Year	0.36	26.81	27.33	1.76
nid	34.69	1 Year	0.36	26.80	27.32	1.95
nid	30.7725*	1 Year	0.36	26.77	27.30	1.69
nid	26.855*	1 Year	0.36	26.73	27.24	1.39
nid	22.9375*	1 Year	0.36	26.69	27.11	1.51
nid	19.02	1 Year	0.36	26.66	27.01	1.63
nid	14.515*	1 Year	0.36	26.51	27.00	1.70
nid	10.01*	1 Year	0.36	26.36	27.00	1.80
nid	5.505*	1 Year	0.36	26.21	27.00	1.90
nid	1	1 Year	0.36	26.06	27.00	2.03

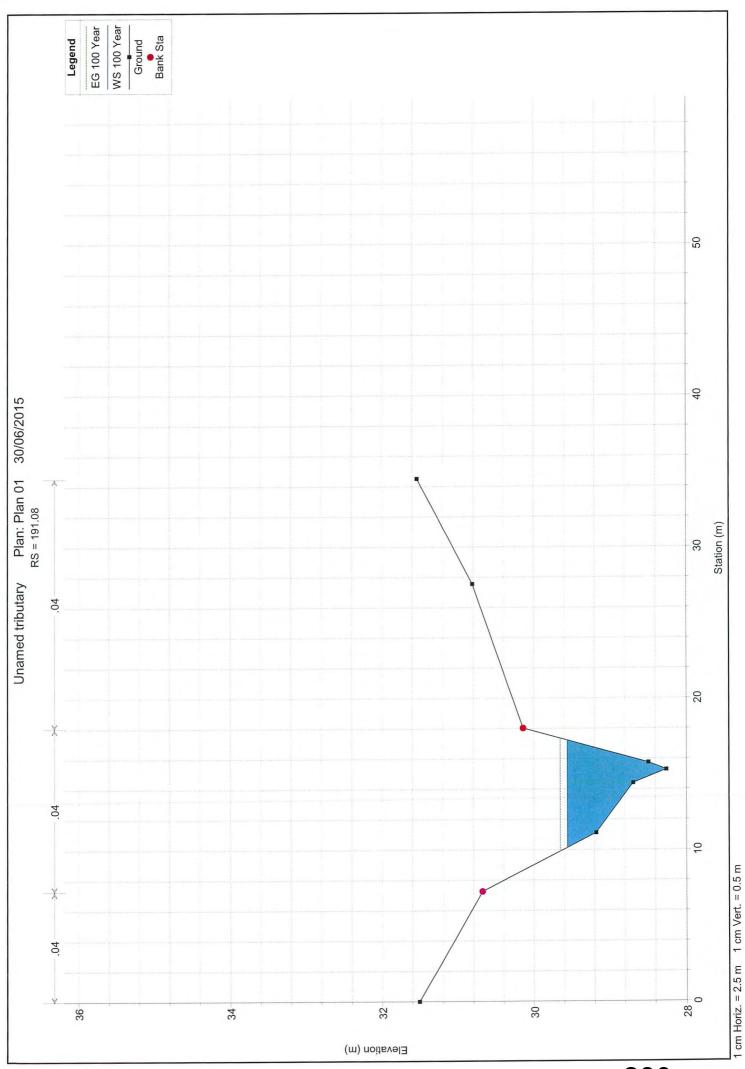
HEC-RAS Plan: UnNameed River: un named Reach: mid Profile: 100 Year

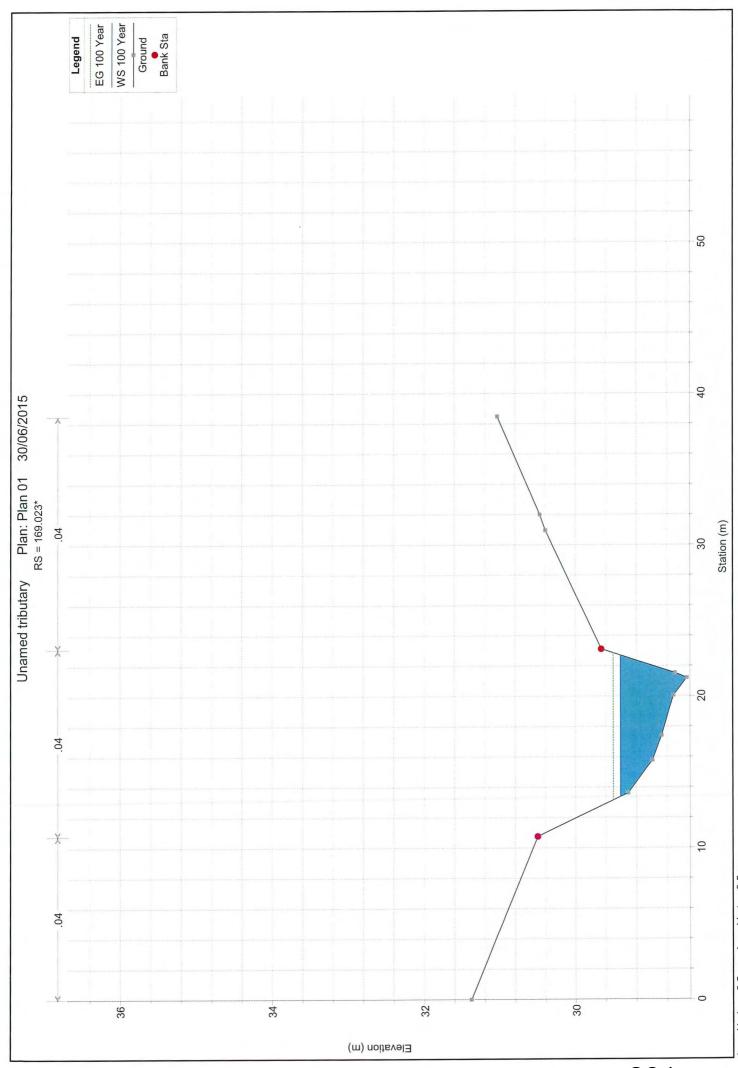
	Plan: UnNamee	· · · · · · · · · · · · · · · · · · ·	named Reach		100 Year	
Reach	River Sta	Profile	Q Total	Min Ch El	W.S. Elev	Top Width
			(m3/s)	(m)	(m)	(m)
mid	225.55	100 Year	6.09	28.94	30.41	1.29
mid	221.145*	100 Year	6.09	28.83	29.98	2.70
mid	216.74*	100 Year	6.09	28.71	29.83	3.95
mid	212.335*	100 Year	6.09	28.60	29.72	4.55
mid	207.93	100 Year	6.09	28.49	29.65	5.18
mid	203.717*	100 Year	6.09	28.43	29.61	5.57
mid	199.505*	100 Year	6.09	28.38	29.59	6.05
mid	195.292*	100 Year	6.09	28.32	29.57	6.56
mid	191.08	100 Year	6.09	28.26	29.56	7.09
mid	186.668*	100 Year	6.09	28.32	29.53	7.46
mid	182.257*	100 Year	6.09	28.37	29.51	7.89
mid	177.846*	100 Year	6.09	28.43	29.47	8.38
mid	173.435*	100 Year	6.09	28.49	29.44	8.89
mid	169.023*	100 Year	6.09	28.54	29.41	9.32
mid	164.612*	100 Year	6.09	28.60	29.37	9.74
mid	160.201*	100 Year	6.09	28.65	29.33	10.15
mid	155.79	100 Year	6.09	28.71	29.28	10.53
mid	151.647*	100 Year	6.09	28.54	29.21	9.58
mid	147.505*	100 Year	6.09	28.36	29.12	8.43
mid	143.362*	100 Year	6.09	28.18	29.00	6.89
mid	139.22	100 Year	6.09	28.01	28.87	5.91
mid	134.595*	100 Year	6.09	27.87	28.85	7.59
mid	129.97*	100 Year	6.09	27.73	28.85	8.92
mid	125.345*	100 Year	6.09	27.59	28.84	9.84
mid	120.72	100 Year	6.09	27.45	28.84	10.45
mid	116.693*	100 Year	6.09	27.44	28.82	10.55
mid	112.666*	100 Year	6.09	27.44	28.81	10.56
mid	108.64	100 Year	6.09	27.43	28.80	10.48
mid	104.291*	100 Year	6.09	27.40	28.79	10.93
mid	99.9428*	100 Year	6.09	27.42	28.78	11.56
mid	95.5942*	100 Year	6.09	27.42	28.77	11.30
mid	91.2457*	100 Year	6.09	27.41	28.77	12.19
mid	86.8971*	100 Year	6.09	27.41	28.76	12.33
mid			6.09	27.40	28.76	12.04
	82.5485*	100 Year	6.09	27.40	28.76	13.31
mid	78.2	100 Year			28.70	13.00
mid mid	75.435*	100 Year 100 Year	6.09 6.09	27.28 27.16		13.00
mid	72.67				28.75	
mid	67.7599*	100 Year	6.09	27.06	28.75	13.00
mid	62.85*	100 Year	6.09	26.95	28.75	12.71
mid	57.94	100 Year	6.09	26.85	28.74	12.46
mid	53.29*	100 Year	6.09	26.84	28.73	13.27
mid	48.64*	100 Year	6.09	26.83	28.72	9.98
mid	43.99*	100 Year	6.09	26.82	28.71	9.82
mid	39.34*	100 Year	6.09	26.81	28.69	9.25
mid	34.69	100 Year	6.09	26.80	28.68	8.56
mid	30.7725*	100 Year	6.09	26.77	28.67	8.32
mid	26.855*	100 Year	6.09	26.73	28.66	7.97
mid	22.9375*	100 Year	6.09	26.69	28.65	7.06
mid	19.02	100 Year	6.09	26.66	28.63	5.73
mid	14.515*	100 Year	6.09	26.51	28.62	6.81
mid	10.01*	100 Year	6.09	26.36	28.63	8.22
mid	5.505*	100 Year	6.09	26.21	28.63	9.62
mid	1	100 Year	6.09	26.06	28.63	10.91



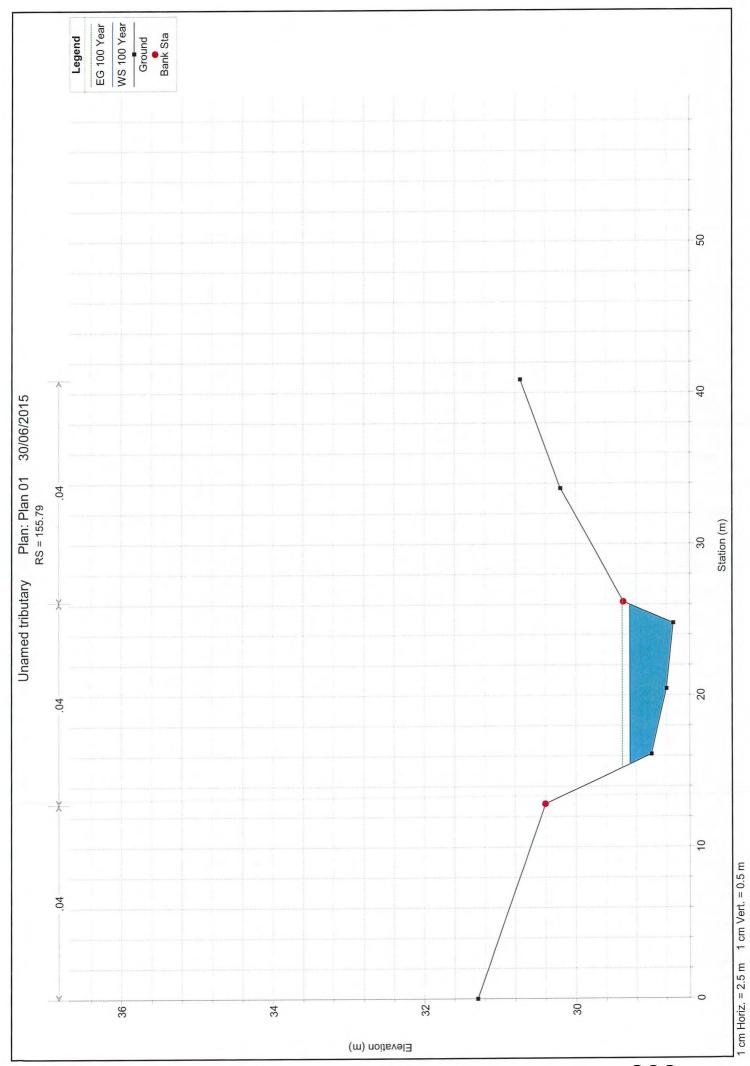
1 cm Horiz. = 2.5 m 1 cm Vert. = 0.5 m

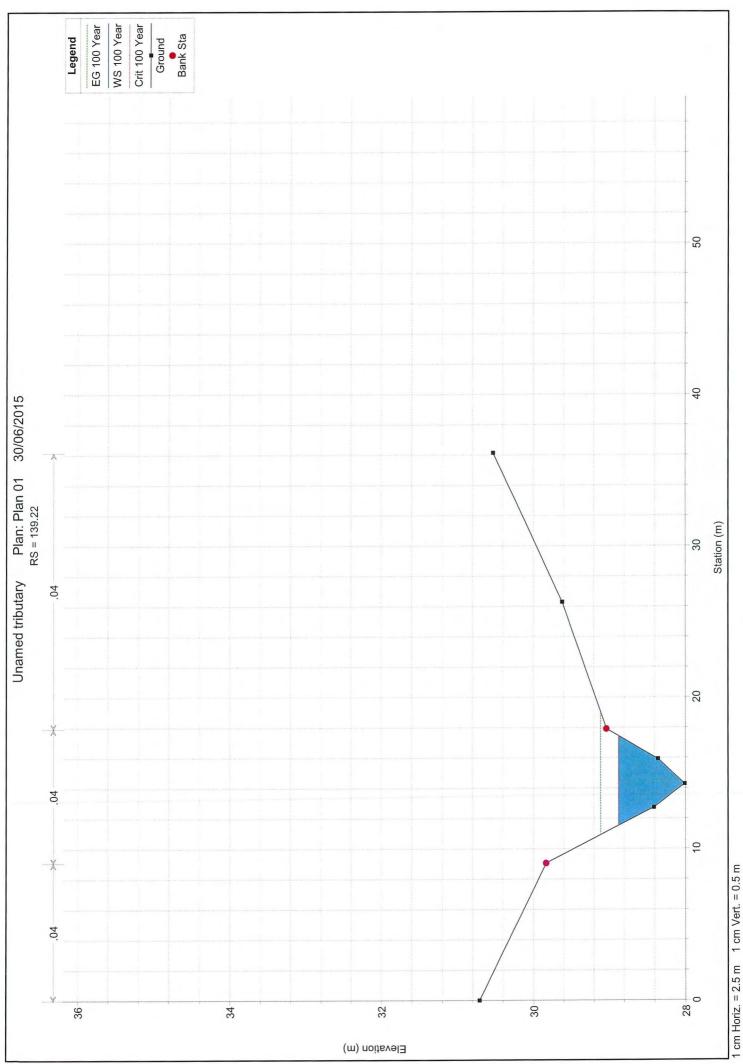


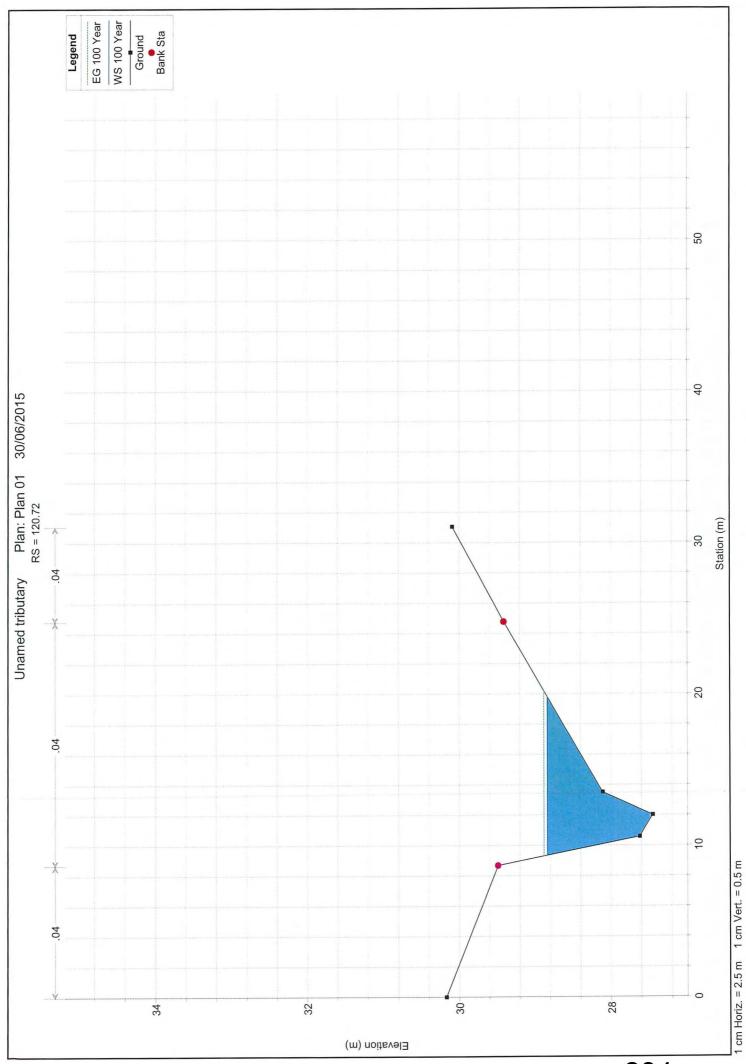


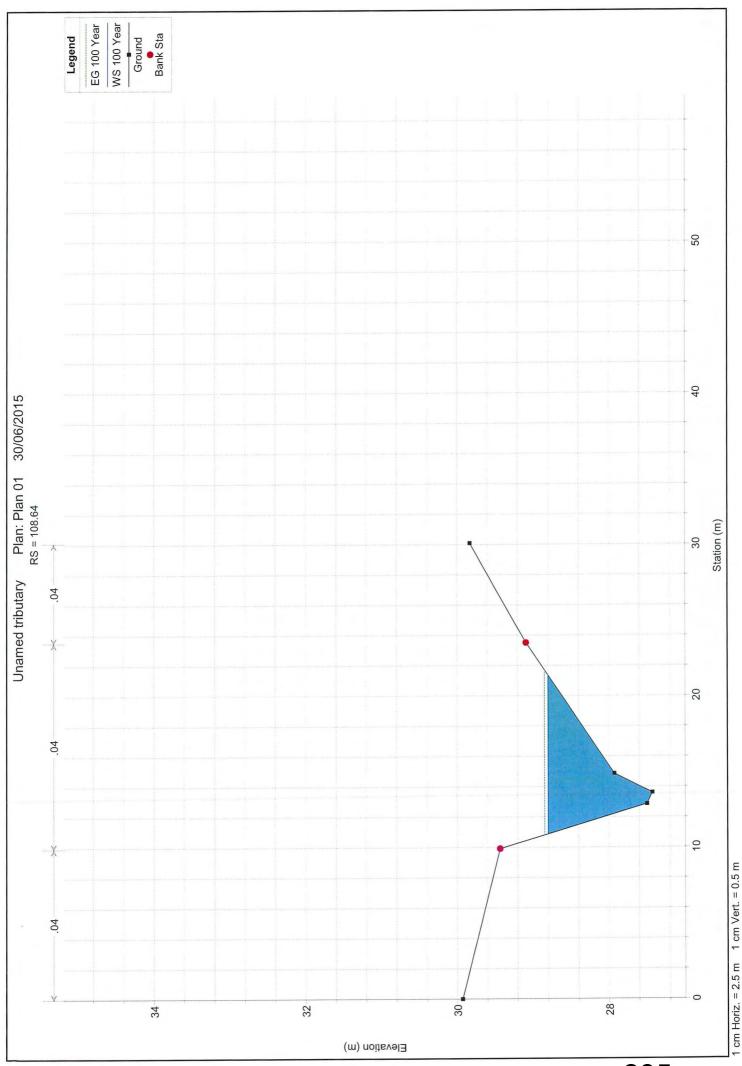


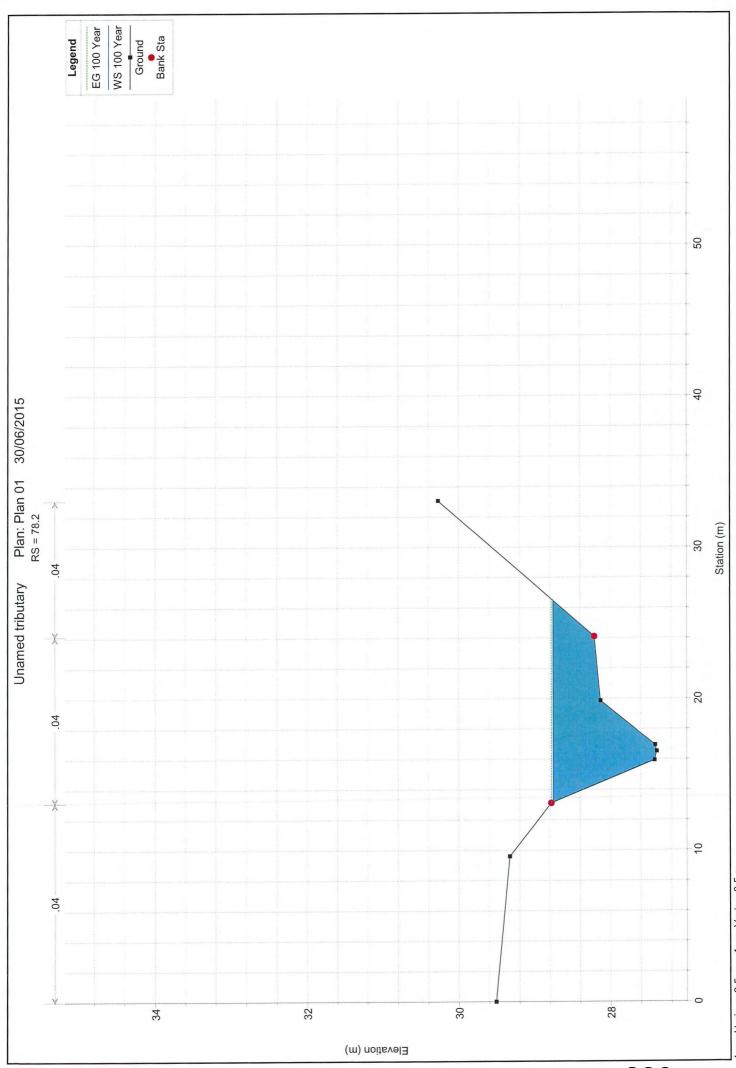
1 cm Horiz. = 2.5 m 1 cm Vert. = 0.5 m



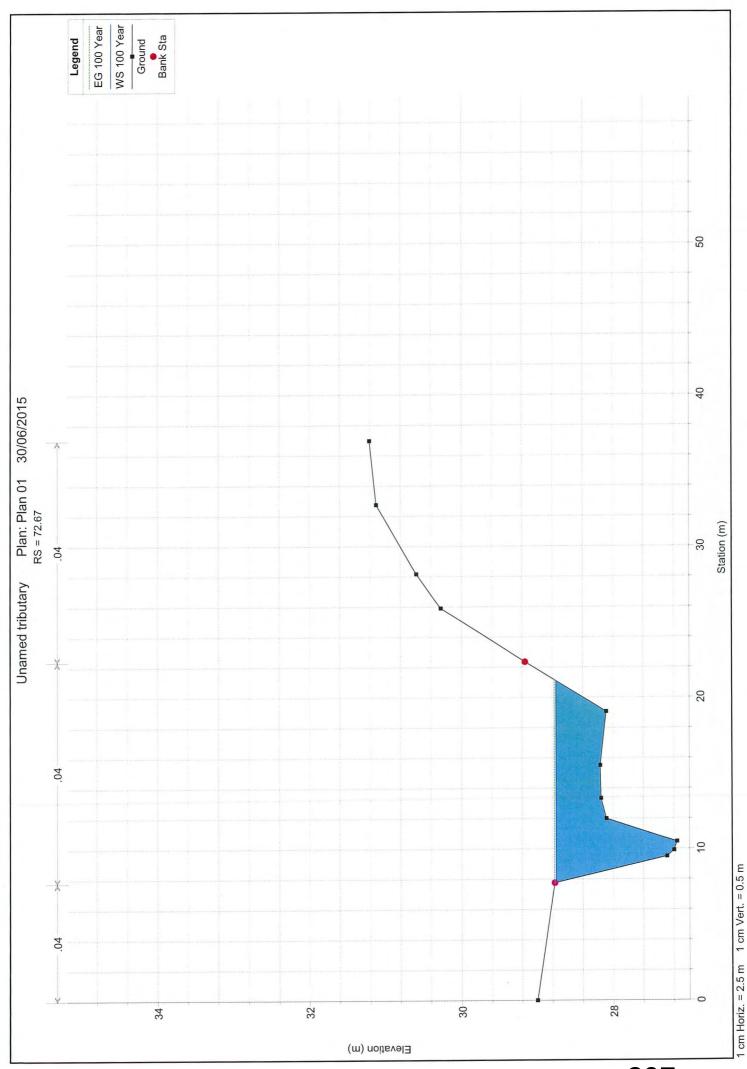


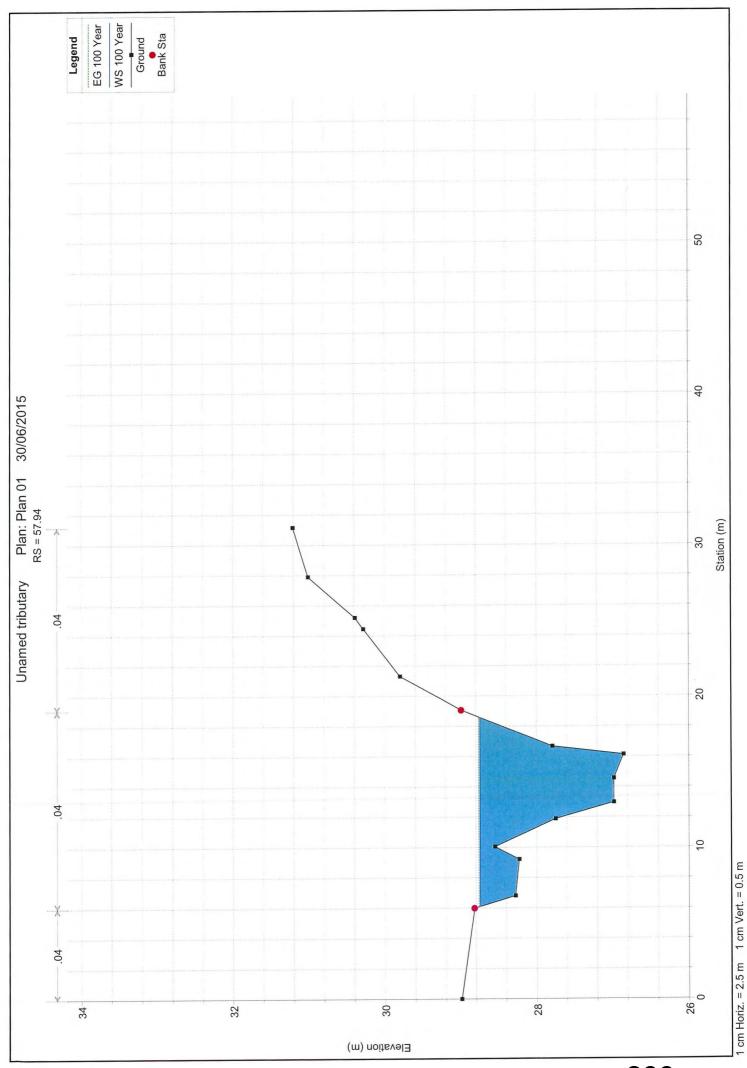


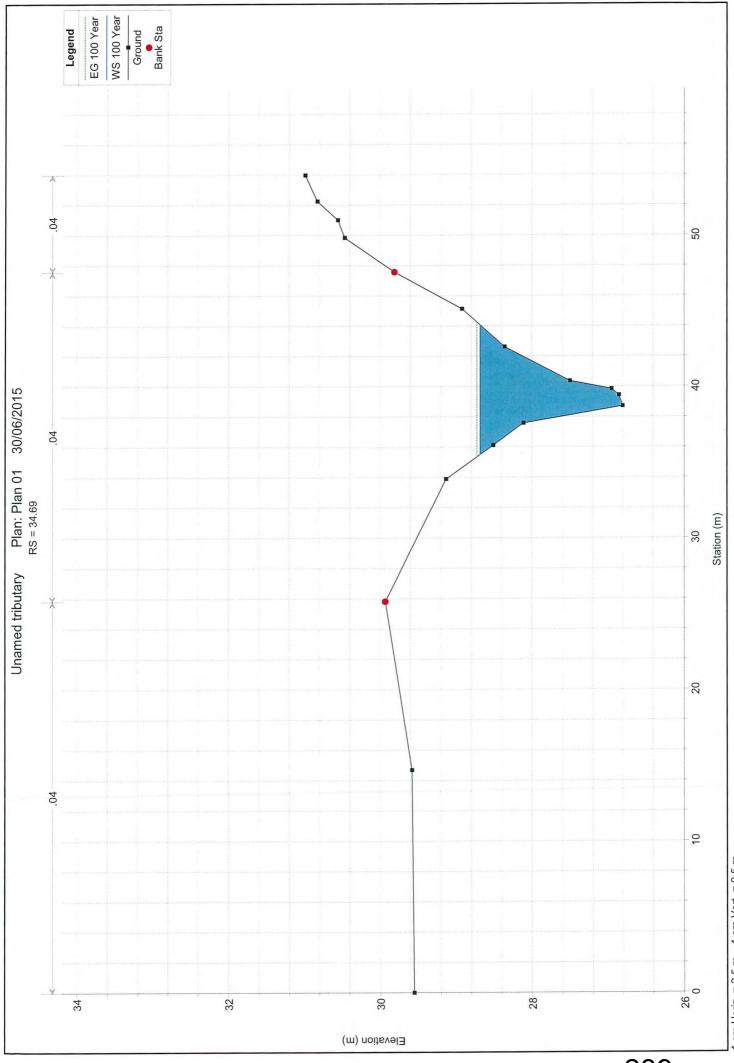




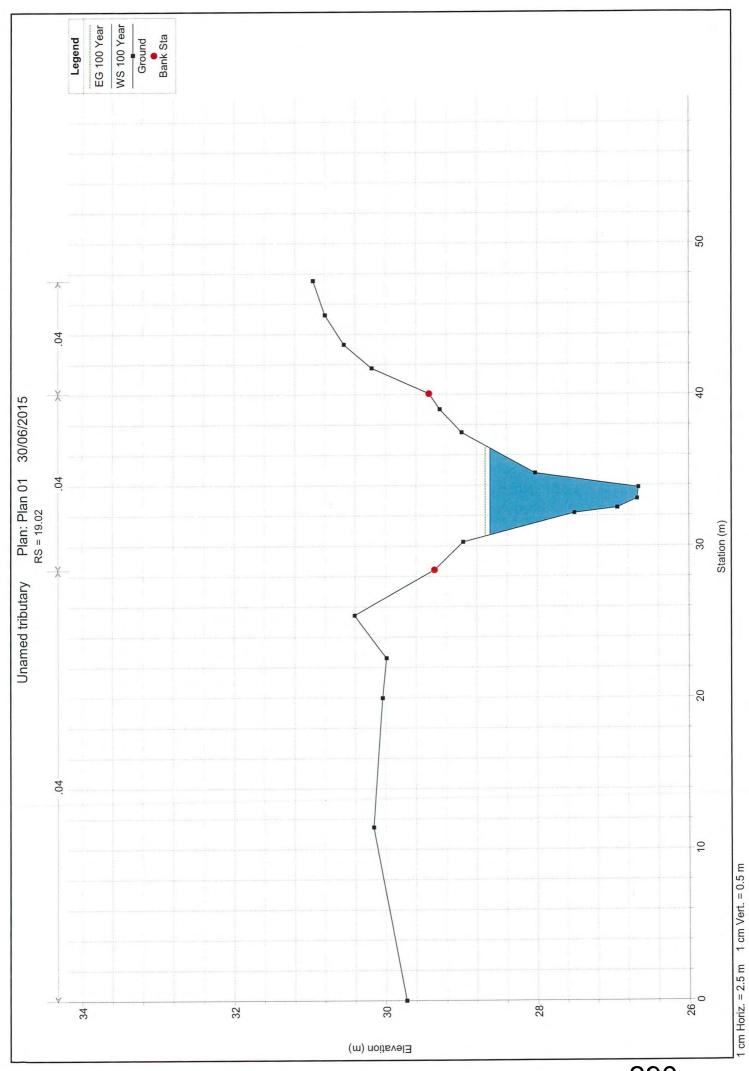
1 cm Horiz. = 2.5 m 1 cm Vert. = 0.5 m

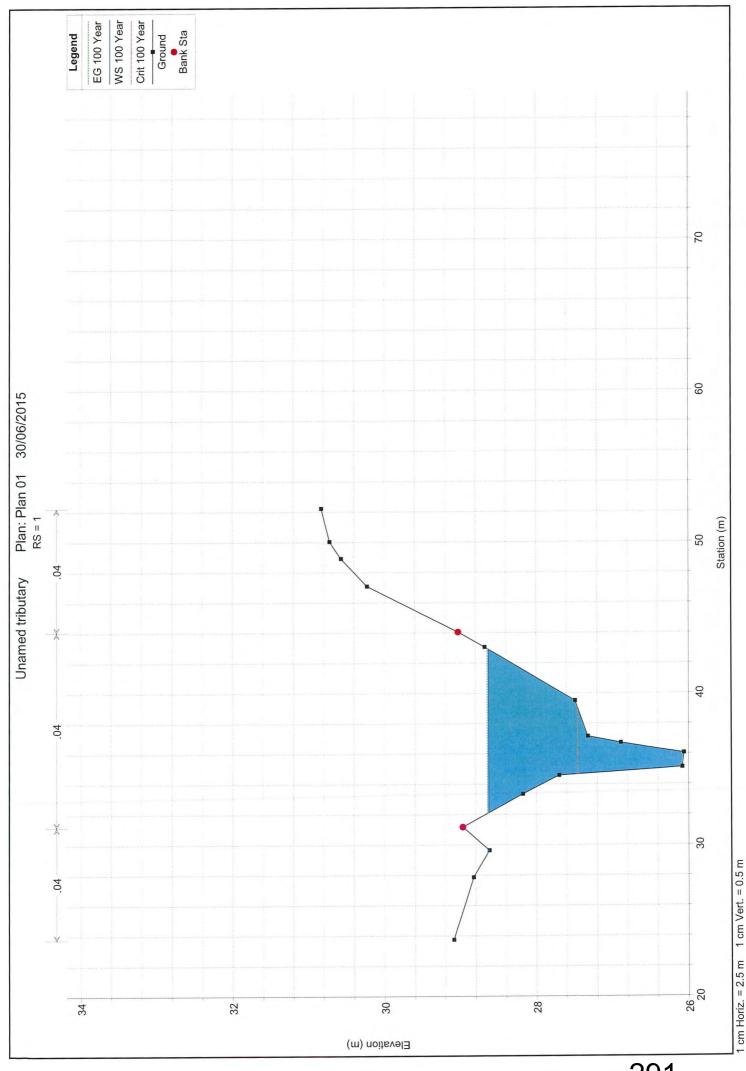






1 cm Horiz. = 2.5 m 1 cm Vert. = 0.5 m





# **APPENDIX 10**

# **CERTIFICATE OF TITLE**



## COMPUTER FREEHOLD REGISTER UNDER LAND TRANSFER ACT 1952

**Search Copy** 



IdentifierNA131C/251Land Registration DistrictNorth AucklandDate Issued14 December 2000

 Prior References
 PROC 6206
 PROC 706

 NA17A/856
 PROC 6206
 PROC 706

 Estate
 Fee Simple

 Area
 2.5287 hectares more or less

 Legal Description
 Lot 1 Deposited Plan 202726 and Lot 1 Deposited Plan 206224

 Proprietors
 Darryll Lawrence Heaven, Anne Evelyn Heaven and Trustee Management Limited

#### Interests

K48394 Building Line Restriction (Affects part)

Fencing Agreement in Transfer 418755 (Affects part)

Subject to Part IV A Conservation Act 1987

Subject to Section 11 Crown Minerals Act 1991

Subject to Subsection (6) and (10) of Section 25A of the New Zealand Railways Corporation Restructuring Act 1990

C081605.1 CERTIFICATE PURSUANT TO SECTION 643 LOCAL GOVERNMENT ACT 1974 (AFFECTS CT NA17A/855) - 14.12.1989 AT 2.47 PM (AFFECTS PART)

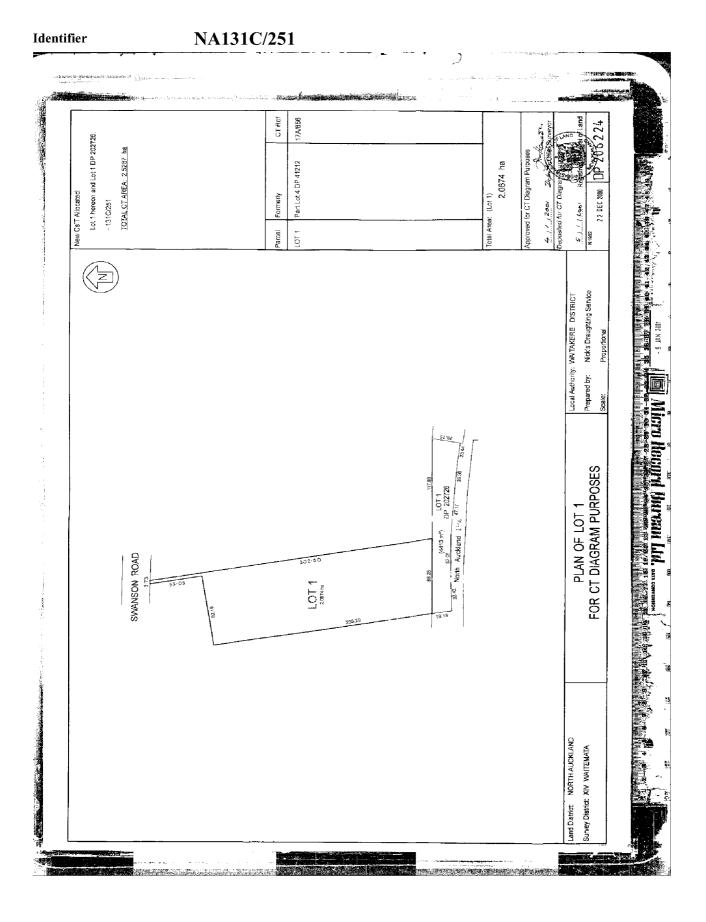
C643521.3 CERTIFICATE PURSUANT TO SECTION 37 (2) BUILDING ACT 1991 (ALSO AFFECTS CT NA17A/855) - 18.8.1994 AT 1.50 PM (AFFECTS PART)

C920379.2 Lease of Lot 1 DP 206224 to Strung up Racket Sports Wholesale Limited Term 19 years and 11 months commencing on the 10 June 1994 - 14.11.1995 at 1:52 pm

5994020.4 Mortgage to Bank of New Zealand - 6.5.2004 at 9:00 am

7770001.1 Variation of Mortgage 5994020.4 - 3.4.2008 at 9:00 am

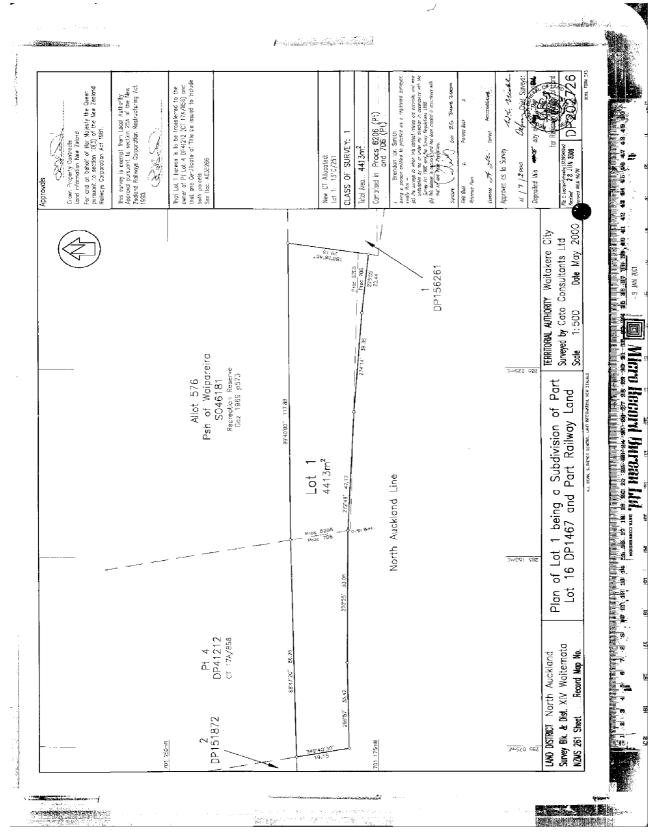
8407452.1 CAVEAT BY TRUSTEES EXECUTORS LIMITED - 4.2.2010 at 11:01 am





Identifier





## **Mark Benjamin**

From: Sent:	Tame TeRangi <tame.terangi@ngatiwhatua.iwi.nz> Monday, 10 June 2019 5:00 PM</tame.terangi@ngatiwhatua.iwi.nz>
То:	Mark Benjamin
Cc:	Pania Sofa; Office of the Chairman
Subject:	190610 Reply 522 Swanson Road, Ranui - Western Park Village - residential
	rezoning

Tēnā koe e Mark – thanks for your email. Our review of the information provided for consideration confirms the following:

- The Mana Whenua interests of Ngāti Whātua in the area of the proposed development;
- Defer those interests to Kaipara in anticipation of their provision of an appropriate response accordingly;
- We also anticipate that our future involvement will be determined following due consideration by Kaipara as well; and,
- We provide this response pro bono in our quest to support public good through managed growth and development.

We wish you all well in your endeavours. Tame Te Rangi [For and on behalf of Te Rūnanga o Ngāti Whātua].

From: Mark Benjamin <MarkB@mhg.co.nz>
Sent: Monday, 10 June 2019 4:48 p.m.
To: Tame TeRangi <Tame.TeRangi@ngatiwhatua.iwi.nz>
Subject: 522 Swanson Road, Ranui - Western Park Village - residential rezoning

Hello,

Mt Hobson Group have been engaged by Western Park Village Limited, the owner of Western Park Village at 522-524 Swanson Road, Ranui, in regard to resource management matters.

We have met with Auckland Council to begin the private plan change process to rezone the land from its current Light Industrial zoning to Residential (a mix of Terraced Housing and Apartment Buildings and Mixed Housing Urban as per the zoning of surrounding land).

Western Park Village Limited considers a zone change, and redevelopment of the land for housing, as the most sustainable outcome for the site.

As part of this process we wish to engage with, and understand the views of, mana whenua.

Please see attached letter for more details.

Regards,

Mark Benjamin



## **Mark Benjamin**

From:	Tame TeRangi <tame.terangi@ngatiwhatua.iwi.nz></tame.terangi@ngatiwhatua.iwi.nz>
Sent:	Monday, 10 June 2019 5:00 PM
То:	Mark Benjamin
Cc:	Pania Sofa; Office of the Chairman
Subject:	190610 Reply 522 Swanson Road, Ranui - Western Park Village - residential rezoning

Tēnā koe e Mark – thanks for your email. Our review of the information provided for consideration confirms the following:

- The Mana Whenua interests of Ngāti Whātua in the area of the proposed development;
- Defer those interests to Kaipara in anticipation of their provision of an appropriate response accordingly;
- We also anticipate that our future involvement will be determined following due consideration by Kaipara as well; and,
- We provide this response pro bono in our quest to support public good through managed growth and development.

We wish you all well in your endeavours. Tame Te Rangi [For and on behalf of Te Rūnanga o Ngāti Whātua].

From: Mark Benjamin <MarkB@mhg.co.nz>
Sent: Monday, 10 June 2019 4:48 p.m.
To: Tame TeRangi <Tame.TeRangi@ngatiwhatua.iwi.nz>
Subject: 522 Swanson Road, Ranui - Western Park Village - residential rezoning

Hello,

Mt Hobson Group have been engaged by Western Park Village Limited, the owner of Western Park Village at 522-524 Swanson Road, Ranui, in regard to resource management matters.

We have met with Auckland Council to begin the private plan change process to rezone the land from its current Light Industrial zoning to Residential (a mix of Terraced Housing and Apartment Buildings and Mixed Housing Urban as per the zoning of surrounding land).

Western Park Village Limited considers a zone change, and redevelopment of the land for housing, as the most sustainable outcome for the site.

As part of this process we wish to engage with, and understand the views of, mana whenua.

Please see attached letter for more details.

Regards,

Mark Benjamin



## ATTACHMENT B

## SUBMISSION AND FURTHER SUBMISSION

22 January 2020

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

Attention: Planning Technician

By email to: unitaryplan@aucklandcouncil.govt.nz

## SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PLAN, CHANGE OR VARIATION (FORM 5) Plan Change 38

NAME OF SUBMITTER: KiwiRail Holdings Limited (KiwiRail)

#### ADDRESS FOR SERVICE:

Level 1 Wellington Railway Station Bunny Street PO Box 593 WELLINGTON 6140 Attention: Pam Butler

Ph: 04 498 2127 Fax: 04 473 1460 Email: <u>Pam.butler@kiwirail.co.nz</u>

#### KiwiRail Submission on Auckland Unitary Plan Operative in Part Plan Change 38 522-524 Swanson Road, Ranui

KiwiRail Holdings Limited (KiwiRail) is the State-Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail Holdings Limited is also the Requiring Authority for land designated "Railway Purposes" (or similar) in District Plans throughout New Zealand. The subject site is adjacent to the North Auckland Line which carries rail freight traffic and Metro passenger services can be obtained via Ranui Railway station.

The Plan Change seeks to rezone the site from Business Light Industry to a combination of both Residential Mixed Housing Urban and Residential Terrace Housing and Apartment.

KiwiRail's submission relates to the following main issues;

• The current zoning of the site is appropriate given the proximity to the rail corridor. Rezoning the site to enable residential development will result in an increase in sensitive activities that may give rise to safety and reverse sensitivity effects.

• While the proximity of the site to good rail transport links is acknowledged, the plan change fails to consider the issues associated with rail noise and vibration that arise when incompatible activities are established nearby (in terms of both adverse effects on sensitive users and potential reverse sensitivity effects on the rail corridor)

• the AEE includes a summary of the consultation undertaken with KiwiRail, at which time KiwiRail recommended provision for setbacks and acoustic treatment for sensitive dwellings. The acoustic assessment provided with Plan Change 38 does not refer to rail noise and vibration. The plan change

does not provide for these matters and there is a lack of certainty that these issues will be addressed in the future.

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

KiwiRail wishes to speak to our submission and will consider presenting a joint case at the hearing with other parties who have a similar submission.

KiwiRail's detailed submissions on Plan Change 38 are set out in the attached table.

Regards

Pam Butler Senior RMA Advisor KiwiRail

22 January 2020

AUP OP Plan Change 38 522-524 Swanson Road, Ranui	Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons	Relief Sought (as stated or similar to achieve the requested relief)	
Plan Change 38	Setbacks from the rail corridor boundary	Seek amendment	A key concern for KiwiRail is to ensure the safe and efficient operation of the rail network, in particular where neighbouring activities may come into conflict with adjacent land uses. Providing a physical setback for buildings adjoining the railway corridor boundary is a safety control which manages the interface between operations within the railway corridor and activities near the railway corridor i.e. it ensures that site occupants are able to carry out normal residential activities, including building maintenance with a reduced risk of coming into contact with the operational railway. A building setback is appropriate to reduce the potential conflict between the safe enjoyment and maintenance of buildings on adjacent properties and activities within the operational rail corridor. The urban design report shows an access way aligned east-west along the rail corridor boundary in the Concept Plan Design Test. This sets most building sites back from the boundary; which will act to protect	Add a concept plan to the Plan Change which any development on the site is required to comply with providing that building development along the southern boundary and in the southeast east part of the site will be set back from the boundary by 5m.	1.1
			the safety and amenity of future inhabitants. This access way is listed as a key reason in the Urban Design Report for support of the proposal as " (allowing units to have outdoor amenity spaces away from the noise of the rail corridor), and sufficient space also for outdoor living spaces, also north-facing and separated from the rail corridor. This gives me confidence that the re-zoning would be appropriate." KiwiRail's submission is that the outline 'structure plan' should be formalised in the Plan Change as it provides an efficient method to address this key concern, or alternatively that provision made in the PC38 for a 5metre (m) setback from the KiwiRail boundary. If this is not provided for then a key reason behind support for the proposal detailed in Urban Design Report will be undermined.		
Plan Change 38	Assess reverse sensitivity effects from the railway corridor adequately, including mitigation measures and alter PC accordingly	Seek assessment of reverse sensitivity effects and provide adequate mitigation measures in the plan change	Another key part of ensuring the safe and efficient operation of the railway network is ensuring that reverse sensitivity effects on the railway corridor are appropriately mitigated. These effects arise from the impact of noise and vibration arising from railway operations on nearby residents. It is widely accepted nationally and internationally that sound and vibration from road and rail networks have the potential to cause adverse health and amenity effects on people living nearby. This has been documented by authoritative bodies such as the World Health Organisation ("WHO"). With respect to sound from road and rail networks, WHO guidelines note the following adverse effects: ischaemic heart disease, hypertension, high annoyance and sleep disturbance. Where adverse noise effects are not adequately managed, consequential reverse sensitivity effects on the railway corridor are likely to arise in addition to health effects on residents. Railways are generally an accepted part of the urban environment, but many people do not appreciate the actual effects of living with rail sound when they choose to build new houses near existing railway designations. Even when a site has been visited during the day, prospective residents might not have envisaged the continuing sound into the evening when they could be relaxing outside in the summer, or at night when trying to sleep with windows open. Railway operations occur 24/7 either and include maintenance activities.	<ul> <li>Amend the Plan Change by;</li> <li>a. Providing an adequate assessment of rail noise and vibration effects and mitigation measures, as is done with the industrial zone</li> <li>And</li> <li>b. Insert noise and vibration requirements into the plan change to apply to any development within 100m of the rail corridor boundary.</li> </ul>	1.2
			For new buildings being constructed near railway networks it is relatively straight-forward to control internal sound and vibration through the building location, design and systems (like mechanical ventilation). In most cases it is practical to achieve acceptable intern al sound and vibration levels. Likewise, screening can be used to achieve reasonable external sound levels. Thus, with careful design, future occupants can be protected from the most significant adverse effects associated with railway noise. The plan change seeks to provide for medium residential density next to a railway line however the plan change has not adequately assessed noise and vibration effects from the railway corridor. The application		

AUP OP Plan Change 38	Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons
522-524 Swanson Road, Ranui			
			has not included any assessment of rail noise and vibration effects but takes a view that this is adequately addressed under current plan controls.
			There is also inadequate assessment of the potential reverse sensitivity effects on the railway line. Effect on the railway line are not referenced at all in s7.44 – Reverse Sensitivity Effects of the AEE. The only consideration of such effects in the plan change documents is a brief reference in the Urban Design Report but is not based on any robust assessment. The Acoustic Assessment only assesses reverse sensitivity effects on the surrounding industrial zoning (s4) and provides suggested noise mitigation measures. An assessment and recommendations for mitigation measures (if any) should also be undertaken for reverse sensitivity effects on the railway.
			Rail noise effects will extend approximately 100m from the railway designation and reverse sensitivity controls should apply over this entire area. KiwiRail is aware that there are no railway noise and vibration requirements in the AUP OP zones sought to apply to the site's future development. However, the Plan Change process permits a proper assessment of noise and vibration effects, and given existing and future potential investment in the North Auckland Line within the region and beyond, it is reasonable that effects on this critical transport link be evaluated in both the s32 report and addressed under the plan change process in terms of effects and mitigation. Regional Policy Statement (RPS) objectives and policies seek to protect infrastructure by setting out issues of regional significance which include urban growth and form and infrastructure, transport and energy. For example, RPS objectives in B2.3.1 relating to 'quality built environment' and 'infrastructure' and policies in B3.2.2 addressing 'reverse sensitivity' are relevant to any plan change.
			The Infrastructure and Subdivision chapters in the AUP OP build on the RPS with additional objectives;
			E26.2.1. Objectives
			(6) Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.
			E26.2.2. Policies
			(2) Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.
			E38.2. Objectives
			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.
			(6) Subdivision has a layout which is safe, efficient, convenient and accessible.
			10 (b) avoids, where possible, and otherwise mitigates, adverse effects associated with subdivision for infrastructure or existing urban land uses;
			The inadequate assessment of reverse sensitivity effects and mitigation of its impact on railway infrastructure is inconsistent with the relevant objectives and policies.
			While consents will be required for future development providing key mitigation in the Plan Change phase better promotes sustainable development at this site and provides certainty, consistency and clarity for future resource consents.

	Relief Sought (as stated or similar to achieve the requested relief)
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## FURTHER SUBMISSION BY KĀINGA ORA HOMES AND COMMUNITIES ON PLAN CHANGE 38 (PRIVATE) 522-524 SWANSON ROAD, RANUI, TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART)

- TO: Auckland Council Plans and Places Attn: Planning Technician <u>unitaryplan@aucklandcouncil.govt.nz</u>
- KĀINGA ORA HOMES AND COMMUNITIES ("Kāinga Ora") at the address for service set out below makes the following further submission on Plan Change 37 (Private) 522-524 Swanson Rd, Ranui ("PC38") to the Auckland Unitary Plan Operative in Part ("AUP") in support of / in opposition to original submissions to PC38.
- Kāinga Ora was established in October 2019 and consolidates Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. It is the Government's delivery agency for housing and urban development and its two key roles are being a world class public housing landlord, and leading and co-ordinating urban development projects.
- 3. In recent times, the focus of Kāinga Ora (in its former capacity as Housing New Zealand Corporation) has been to provide public housing that matches the requirements of those most in need. To achieve this, it has largely focused on redeveloping its existing landholdings. Kāinga Ora will continue this approach of redeveloping existing sites to provide housing by using them more efficiently and effectively. In addition, Kāinga Ora now has a legislative mandate with respect to the initiation and facilitation of urban development more generally, and now has a role that extends beyond its own land and interests, and beyond the development of housing, to encompass the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.<sup>1</sup>
- 4. Kāinga Ora is a person who has an interest in the proposal that is greater than the interest the general public has, as a Crown agency responsible for the provision of public housing and the facilitation of urban development, and as a major landowner in the Auckland Region. The housing portfolio managed by Kāinga Ora comprises approximately 28,758<sup>2</sup> dwellings and these housing assets form a major part of the Auckland Region's social infrastructure (particularly its affordable housing infrastructure). In that regard, the Auckland Region is identified as a key area for Kāinga Ora to reconfigure and grow its housing stock to provide housing that is aligned with current and future residential demand in the area, and the country as a whole. The provisions of the AUP have the potential to directly affect the sustainable

<sup>&</sup>lt;sup>1</sup> Section 12(f) of the Kāinga Ora Act.

<sup>&</sup>lt;sup>2</sup> As at 31 December 2019. This number excludes Community Group and Transitional Housing.

management of these housing assets, as well as the development and renewal of urban environments more generally, and are therefore of considerable interest to Kāinga Ora.

- 5. Kāinga Ora also represents a relevant aspect of the public interest for a number of reasons, including (without limitation) the fact that Kāinga Ora has a statutory objective which requires it to contribute to sustainable, inclusive, and thriving communities<sup>3</sup> and statutory functions which relate to urban development generally, including key roles of:<sup>4</sup>
  - (a) Initiating, facilitating and/or undertaking development not just for itself, but in partnership of, or on behalf of others;
  - (b) Providing a leadership or coordination role more generally; and
  - (c) To understand, support, and enable the aspirations of communities and of Māori in relation to urban development.

The Further Submission is:

- 6. Kāinga Ora makes this further submission in respect of the submission by KiwiRail Holdings Limited (Submission No. 1) ("**the Submission**").
- 7. The reasons for this further submission are:
  - (a) The Submission does not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 ("**RMA**");
  - (b) The relief sought in the Submission is not the most appropriate in terms of section 32 of the RMA;
  - (c) Rejecting the relief sought in the Submission opposed would more fully serve the statutory purpose than would implementing that relief; and
  - (d) Those reasons set out in the **attached** Schedule.

### Relief Sought

- 8. The specific relief in respect of each submission point that is supported or opposed is set out in the **attached** Schedule.
- 9. Kāinga Ora wishes to be heard in support of this further submission.

<sup>&</sup>lt;sup>3</sup> Section 12, Kāinga Ora-Homes and Communities Act 2019.

<sup>&</sup>lt;sup>4</sup> Sections 12(f)-(g) of the Kāinga Ora Act.

10. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at hearing.

**Dated** this 12<sup>th</sup> day of March 2020

KĀINGAORAHOMESANDCOMMUNITIESby itssolicitorsanddulyauthorised agentsEllisGould

C E Kirman / A Devine

### ADDRESSES FOR SERVICE:

The offices of Ellis Gould Lawyers Level 17, Vero Centre 48 Shortland Street PO Box 1509, Auckland 1140 DX CP22003, Auckland Telephone: (09) 307-2172

Attention: Alex Devine Email: adevine@ellisgould.co.nz. Kāinga Ora – Homes and Communities PO Box 74598 Greenlane, Auckland

Attention: Claire Kirman / Gurv Singh Email: claire.kirmanmartin@kaingaora.govt.nz; gurv.singh@kaingaora.govt.nz

Propos	sed Plan Change	Proposed Plan Change 38 – Auckland Unitary Plar	an -Operative in Part	ve in Part		
522-52	522-524 Swanson Road (Private)	d (Private)				
Summ	Summary of Submissions Requested	ons Requested			Kāinga Ora	Kāinga Ora (Formerly Housing New Zealand) response
No.	Submitter Name	Email	Point No.	Submission Summary	Support/ Oppose/ Amend	Kāinga Ora response
-	Kiwi Rail Holdings Ltd	Pam.butler@kiwirail.co.nz	۲. ۲.	Seek amendment to add a concept plan that development is required to comply with a setback of 5m along the southern boundary and southeast part of the site.	Oppose	The relief sought is opposed on the basis that it: • Places an overly restrictive burden on landowners – without a corresponding burden on infrastructure providers to manage effects to adjacent land uses generated by the operation of infrastructure.
						Unnecessarily constrains the future use of private land to achieve an intensive and compact urban form
						<ul> <li>Places additional restrictions on private property and constitutes a de-facto extension of the infrastructure provider designation, without corresponding restrictions on KiwiRail.</li> </ul>
<del>.</del>	Kiwi Rail Holdings Ltd	Pam.butler@kiwirail.co.nz	1.2	plan modifi new prov ptential hum om rail no where	Oppose	<ul> <li>The relief sought is opposed on the basis that it:</li> <li>It: Is significant in its geographic extent and applies to alterations to existing buildings as well as new buildings.</li> </ul>
				containing noise sensitive activities are located adjacent to the railway corridor.		<ul> <li>Creates potential administrative and cost burdens for the community and Consenting Authorities and is inconsistent with the planning rules that currently govern other residential sites abutting the same railway corridor and which are</li> </ul>

<ul> <li>Places the onus and cost of managing effects generated by the requiring authority and their operations on landowners.</li> </ul>	
<ul> <li>Is unbalanced in its scope and content.</li> </ul>	
<ul> <li>Lacks clarity or explanation as to how the rules will be implemented and monitored in practice.</li> </ul>	
already Zoned Mixed Housing Urban or Terrace and Apartment Zones.	

## ATTACHMENT C

## SPECIALIST ASSESSMENTS

Jo Hart Principal Planner Planning North/West and Islands Plans and Places Auckland Council

By email: jo.hart@aucklandcouncil.govt.nz

20 June 2020

Dear Jo

#### Re: Urban design assessment of Proposed Private Plan Change at 522-524 Swanson Road, Ranui

#### **Report scope**

- This report provides an urban design assessment of a Private Plan Change at 522-524 Swanson Road, Ranui. My assessment is based on the following:
  - o Urban design assessment and neighbourhood design statement, Ian Munro, August 2019;
  - Assessment of environmental effects and s32 analysis, Mt Hobson Group, November 2019; and
  - A visit to the site in June 2020.
- Although not central to my assessment, I have also read the Economic Analysis (Urban Economics) and Integrated Transport Assessment (Commute) that formed part of the lodgement package.

#### **Qualifications and experience**

4. I am a Senior Associate/Urban designer at Barker & Associates Ltd ('B&A'), an independent specialist planning and urban design consultancy. I have worked for the past 15 years as an urban designer, with the last 6 years at B&A, and 9 years at Auckland Council and its predecessor Auckland City Council. Prior to that I worked for 5 years as an urban planner at an Auckland consultancy. I have the qualifications and experience set out at Appendix 1 to this report.

#### **Report structure**

- 5. My report is structured as follows:
  - The proposal;
  - Comments on the lodgement urban design report;
  - Summary of the site and its context;
  - Urban design assessment; and
  - o Conclusions.

#### The proposal

6. The Private Plan Change requests rezoning of approximately 2.65ha of Business- Light Industry ('LI') zoned land to Residential-Mixed Housing Urban ('MHU') zoning and Residential-Terrace Housing and Apartment Buildings ('THAB') zoning. Existing Residential-Mixed Housing Suburban ('MHS') zoning is retained at the northern end of the site.

#### Comment on urban design report

- 7. The urban design report by Ian Munro provides an analysis of the site and its context and an urban design assessment. The report assesses the urban design merits of the Plan Change under a number of headings which are synthesised from key provisions in the Auckland Unitary Plan: Operative in Part ('AUP: OP'). These provisions are from the Structure Plan guidelines in Appendix 1 of the AUP: OP, the Regional Policy Statement Urban Growth and Form chapter, the subdivision chapter and a number of zone chapters.
- I consider this methodology of assessment to be robust, enabling a filtering of good urban design practice and principles to those matters relevant to a Resource Management Act based assessment process.
- 9. In my opinion, Mr Munro has correctly identified the key characteristics of the site and its opportunities and constraints. His assessment, under the headings that he has selected, enables a clear understanding of the merits of the requested rezoning, with a logical flow from wider strategic and spatial concerns, through to connectivity, and integration with and effects on adjoining sites.

- 10. A 'concept plan design test' is attached to the report, showing how the site might be laid out if development was undertaken under the requested zoning. In my view, while the concept is only one way in which the site might be laid out, it represents a conceivable development form consistent with the requested MHU and THAB zonings.
- 11. I note that the concept includes 528 and 530-532 Swanson Road. These lots are not included within the Plan Change boundaries. The concept shows a road through these lots connecting with Swanson Road. This layout is also shown in the Integrated Transport Assessment ('ITA'). It is somewhat unusual to test a development concept in part on lots that are outside a Plan Change area, given that typically there would be no certainty that access could be secured across these lots. While the layout shown in the concept test may well occur, if access through 528 and 53—532 Swanson Road cannot be secured, access to the main part of the site can be gained from the north-eastern part of it. This could be achieved, in my view, in a manner which as I discuss later in this report would produce acceptable urban design outcomes.

#### The site and context

- 12. As described in the AEE, the Plan Change area has a loose 'L' shape. The main body of the site has a north-south orientation, with a width of approximately 87m. At its northern end it narrows to approximately 27m. The base of the 'L', which has an east-west orientation, is relatively narrow, with measurements ranging from approximately 20m to 29m.
- 13. The site is largely flat, rising slightly at its southern end. A walking route from the approximate centre of the site north to Swanson Road and then east to Ranui Local Centre is a distance of roughly 400m west. A walking route east from the site's centre to Ranui Railway Station, via Ranui Domain and Carlas Way is a distance of approximately 600m.
- 14. The site wraps around the western side and part of the southern side of Ranui Domain, adjoining the Domain's wetland and one of its playing fields. To the south of the site are the tracks of the western line of the Auckland railway network. Adjoining the site to the west is LI zoned land, currently used in part by a house removal company. A stream runs south-west to north-east across the site connecting through to the wetland.

- 15. That part of the site north of the stream is currently used by Western Park Village for residential accommodation in the form of a number of largely pre-fabricated small-scale buildings. The remainder of the site is clear of development and is in grass. This part of the site appears largely visually contiguous with Ranui Domain, although there is a line of shrubs and trees along the southern side of the Domain. These provide some visual separation between it and the southern 'arm' of the site. Otherwise, there are no clear boundary markings between the Domain and the site.
- 16. Ranui Domain is a large area of public open space, predominantly used as playing fields, with an area of wetland at it northern end. A path network extends in a loose fashion around the perimeter of the Domain. This comes close to but does not directly adjoin the site. The paths connect north to Swanson Road and east to Robertson Road and Carlas Way, in the latter case being via a carpark adjoining the clubrooms of a rugby league club.

#### Urban design assessment

17. As I note earlier, I consider Mr Munro's assessment methodology, via the headings he has selected under which to analyse the Plan Change proposal, to be sound and robust. In my assessment below, I use the same headings of contribution to a quality compact form and connectivity. Other headings I have selected, however, differ from Mr Munro's, where I have chosen to filter my assessment through the lens of wider spatial arrangements, both in the wider area and to adjoining sites. This different approach is chosen to add hopefully helpful comments to the observations already made by Mr Munro.

#### Contribution to a quality compact form

18. The site is within a short walking distance to a Local Centre and a railway station. It directly adjoins a large area of public open space. In my view, these locational characteristics are highly supportive of the requested change in zoning to medium to higher density residential land uses. Such zonings would allow potential residents easy access to the services of the Centre, convenient public transport access and recreational opportunities offered by the open space.

#### Spatial arrangement of proposed zones

- 19. In my view, the proposed location and extent of MHU zoning and THAB zoning is a logical and appropriate response to the characteristics of the site and the surrounding area. The placement of MHU zoned land at the northern end of the site, and retention of MHS zoning on that part directly adjoining Swanson Road, allows for a graduation in building scale and height from the MHS zoned sites in this area.
- 20. There is an argument that the northern end of the site could be zoned THAB, allowing for increased dwelling density close to Ranui Local Centre. While I would not be opposed to that, limiting THAB zoning to the southern end of the site places it where it can be easily visually absorbed clear of the existing low-scale nature of Swanson Road.

#### Relationship with Ranui Domain

- 21. I agree with the assessment of Mr Munro in his report on the merits of the proposed change in zoning of the site from LI to residential zones in terms of its relationship to Ranui Domain.I summarise key points as follows:
  - I agree that the proposed change in zoning would likely result in a higher quality built edge to Ranui Domain. Buildings in the LI zone are permitted, subject only to compliance with bulk and location standards. No assessment of their design quality, appearance or aesthetics as seen from the Domain is therefore possible.
  - In comparison, most forms of residential use, including dwellings and integrated residential developments, require restricted discretionary activation consent in the THAB zone, as do new buildings associated with those uses. Discretion to approve or decline a resource consent application is given to Council over a range of design based matters, including neighbourhood character and safety. In my view, when comparing the LI and THAB zones, development adjoining the Domain in a THAB zoned scenario is therefore much more likely to produce an attractive edge to the Domain with a likely greater variation in building mass and form than would be seen under an LI zone scenario, and with increased building articulation and 'fine grain' use of materials.
  - THAB zoning would also result in improved safety outcomes for the Domain, with both the inherent nature of likely multi-unit residential development and the manner in which

it would be assessed through the AUP:OP resulting in a high degree of glazing (and probable balconies) overlooking the reserve – and therefore providing passive surveillance of it. This contrasts with development under an LI zone scenario, where there would likely be a limited number of windows overlooking the Domain, and a low level of occupation, also generally limited to daylight hours, resulting in an overall poor level of passive surveillance.

- THAB zoning also has a lower permitted building height (16m) than in the LI zone (20m).
   While Ranui Domain is of a size that could visually accommodate adjoining buildings of 20m height, the THAB zone's lower permitted height, combined with the assessment process for new buildings, likely resulting in varied building mass, is more likely to result in building forms that are less bulky as seen from the Domain, and therefore less visually dominant.
- o The THAB zone is of higher relevance to the quality of interface outcomes with the Domain than the MHU zoning requested for the northern part of the site. This is because the proposed THAB zoned area adjoins part of the Domain which it is largely visually contiguous with. In contrast, the proposed MHU zoned part of the site is either set back from the Domain behind proposed THAB zoning or, where it adjoins the Domain, it would be unable to be seen clearly from public footpaths within it, due to intervening dense planting within the wetland area.
- Nonetheless, turning my mind to the MHU zone, I note that development of four or more dwellings in the zone requires resource consent. Council discretion to approve or decline applications for four or more dwellings, as with the THAB zone, includes matters such as neighbourhood character and safety. Given the single ownership and large site area of the Plan Change land, it is likely that any development in the proposed MHU zoned part of the site would be in a comprehensive, larger-scale manner for four or more dwellings. This would allow assessment of the design and appearance of the proposed buildings, with the opportunity for similar positive outcomes as I describe for the THAB zone above.
- 22. In summary, I consider that the requested THAB and MHU zones would produce higher quality visual and safety outcomes as seen from and relative to Ranui Domain.

#### Relationship with adjoining Light Industry zoned land

- 23. I agree with Mr Munro's assessment that, when looking at the wider Auckland region zoning pattern, having adjoining LI and residential zoned sites is not unusual.<sup>1</sup> I also agree that:
  - amenity and spatial relationships between the adjoining LI zoned lots and potential residential development on the site can be adequately managed by the bulk and location controls in the LI, MHU and THAB zones; and
  - a certain degree of confidence is warranted that residential development on the site would naturally respond to the site's evident opportunities and constraints, tending to orientate outlook and living areas of dwellings towards the Domain rather than towards adjoining LI zoned lots.
- 24. In terms of reverse sensitivity effects, I agree with Mr Munro's view that the proposal will be less successful than the LI zone at producing a compatible business amenity along the site's western boundary with adjoining LI zoned lots.<sup>2</sup> In terms of a holistic assessment, however, I consider this must be seen within the context of the significant overall built form and land use benefits of the requested change in zonings.

#### Relationship with railway line

- 25. The southern arm of the site directly adjoins the western line of the Auckland commuter railway system. This raises the question of whether the proposed THAB zoning, which is the AUP:OP's highest density residential zoning, is appropriate in this location. On this matter, I agree with the view of Mr Munro that there is established precedent for this in the locality, with THAB zoning applying to lots directly to the east on both sides of the railway track.<sup>3</sup> A review of the AUP:OP zoning maps shows this is a common zoning throughout the Auckland region for lots adjoining railway tracks where they are also close to railway stations.
- 26. I also agree with Mr Munro that a logical layout of multi-unit residential development on this part of the site would be to place the more regularly occupied part of dwellings, such as

<sup>&</sup>lt;sup>1</sup> Para 6.5, page 12 of the Urban design assessment.

<sup>&</sup>lt;sup>2</sup> Ibid, para 6.17, page 17.

<sup>&</sup>lt;sup>3</sup> Ibid, para 6.2(g), page 11.

principal living areas and outdoor living spaces, on the north side of this area, away from the railway line. Furthermore, as Mr Munro identifies, it would be logical to place a vehicle access lane on the south side of this area, creating a separation between dwellings and the railway line.

#### <u>Connectivity</u>

- 27. It is desirable for medium to higher density residentially zoned areas to be well connected and integrated into the surrounding area, enabling convenient, direct and safe movement to nearby services and public transport stops.
- 28. The nature of the site means that it would not be possible to get a road through it which connects at both its northern (Swanson Road) end and also at its south-eastern end. This is because the site is 'landlocked' at its south-eastern end by adjoining lots accessed off the end of Carlas Way. This means, at best, that a long 'cul—de-sac' road could be developed. The layout shown in the concept design at Appendix 1 to Mr Munro's report accurately reflects that sort of development scenario.
- 29. As I note earlier, however, this layout may not be possible unless access can be secured across 528 and 530-532 Swanson Road, lots which are outside the Plan Change area. It would be possible, however, to swing a road of similar width to the east connecting to Swanson Road through the narrower north-eastern part of the Plan Change area. The narrow width of this part of the site may make accommodating both a road and residential units challenging. I am satisfied, however, that an appropriate built form result could be achieved through the resource consenting process.
- 30. In regard to the inevitable cul-de-sac nature of any road coming into the site from Swanson Road, I consider that this does not undermine the overall connectivity of the site. Within this location, close to a centre and railway station, the emphasis is rightly on pedestrian connectivity. In my view, through subsequent subdivision and resource consent processes, good quality pedestrian movement routes can be secured through the site, connecting both to Swanson Road and to the railway station via pathways linking with those in Ranui Domain.

- 31. I note that the concept design shows a road adjoining Ranui Domain towards its southern end. In urban design terms, adjoining a public open space with a road edge is typically considered to be good practice, as a road can contribute to the activation of the open space and facilitate public use of it. This sort of layout is again one which might be secured through future subdivision and resource consent processes.
- 32. Regardless of a road eventually being in this location or not, the subdivision and resource consent processes will ensure that good pedestrian connectivity is achieved between the Domain and through to residential development within the site. In addition to this, I would add that it is highly likely that park edge dwellings would have individual pedestrian entries through to the reserve, adding to both overall connectivity and also to safety and activation of the Domain.
- 33. The ITA refers, at section 7.3, to recommended improvements to the pedestrian network outside the Plan Change area. I do not see the recommended improvements to be pivotal to the central question of whether the requested zonings are appropriate or not. In my view, having visited the site, while there is room for improvement, existing pedestrian connections to the east are adequate. Over time, I agree that it would be appropriate to look at improvements to path and street lighting.
- 34. Figure B1 of the ITA shows a potential future pedestrian route connecting east from the site through to the cul-de-sac head of Carlas Way. I consider the particular route shown to not be appropriate from a safety perspective, as it passes through a relatively narrow and unobserved space on the south side of the rugby league buildings.
- 35. In summary, I consider the site could be developed under its requested MHU and THAB zonings through subdivision and resource consent processes in a manner that provides good connectivity, with an emphasis on pedestrian connectivity, to the surrounding area.

#### Submissions

36. You have advised that there are no submissions that raise issues directly relevant to an urban design assessment. You have asked, however, that I provide comment on the KiwiRail

submission in regard to the concern expressed in that submission regarding residential development adjoining the railway line.

- 37. The submission refers to the concept design shown in Mr Munro's urban design assessment, which shows a vehicle access along the southern arm of the Plan Change area adjoining the railway corridor. It requests that this layout be secured through the Plan Change process.
- 38. I consider that such a layout would be a positive result in this part of the site, increasing the physical distance between dwellings and the railway line, and thereby reducing actual and perceived adverse amenity effects. I also consider that this form of development ie: placing the vehicle access on the south side of this area, directly adjoining the railway line is a logical and very probable form of development. However, securing this particular layout requiring a deep separation between the railway line and residential developments that would in effect be provided via the width of the vehicle access is not central to my own support for THAB zoning in this area.
- 39. It is my understanding that the AUP:OP does not require such specific access arrangements or separation distances on other residentially zoned sites that adjoin the railway network. In my view, there are no unique characteristics of the subject site which would necessitate such an approach being applied here. I consider that the standard subdivision and resource consenting processes are sufficient to ensure appropriate amenity outcomes are achieved along this interface without the need for bespoke requirements.

#### Conclusions

40. In my view, the characteristics of the site and its location make it well-suited to a change in zoning to MHU and THAB. I consider that any potential adverse built form, amenity or interface issues are either able to be adequately addressed through subsequent subdivision and resource consent processes or are overall outweighed by the positive urban design aspects of the requested zoning change.

### Appendix 1 – Matt Riley Curriculum Vitae

#### **Qualifications and memberships**

Master of Architecture (Urban Design) (1st class honours 1st Division). University of Auckland, 2003 - 2005. Master of Planning Practice (1st class honours). University of Auckland, 1999 - 2000. Bachelor of Law / Bachelor of Arts. University of Auckland, 1990 - 1994. Member of the NZ Urban Design Forum.

Member of the Auckland Urban Design Panel. Independent Commissioner for Auckland Council.

#### **Employment history**

2014 – Present	Senior Associate / Urban Designer, Barker & Associates Limited.
2005 – 2014	Urban designer / Principal Specialist Urban Designer, Auckland Council
2001 - 2005	Planner / Senior Planner, Barry Rae Transurban.

#### **Professional skills**

Urban design assessments of development projects Site master planning (greenfield, brownfield and subdivision) and structure planning Site and context analysis Project feasibility against urban design principles, including lot and built form testing Urban design input to plan changes and district plan reviews Council hearing and Environment Court evidence and presentations.

#### Key experience

#### Design review and urban design analysis

- 2014-present: RMA based urban design review and analysis of large scale mixed use, residential, educational and office resource consent applications on behalf of developer and local authority clients.
- 2014: Seconded to Auckland Council's Special Housing Area Office as lead consents urban designer. Responsible for urban design review of apartments, terrace housing and subdivision proposals.
- 2017: Urban design review, on behalf of Auckland Council, of the AMETI 2a multi-modal transport project.

Strategic / masterplanning

- 2020: Urban design lead for George Street, Parnell Plan Change a large scale, mixed used development at the northern edge of Newmarket.
- 2016: Led urban design input into masterplan process for Crown Lynn site, New Lynn an 11ha urban regeneration project and future residential community of 10,000 people.
- 2009: Seconded to the Tamaki Transformation Programme as Senior Urban Designer to provide design input to Government's regeneration of, and masterplanning for Glen Innes, Panmure and Point England.
- 2006: Co-ordinated input to Auckland City Council's urban design strategy: The Urban Design Framework.

Policy design input

• 2013-present: Presentation of evidence to Proposed Auckland Unitary Plan Hearings Panel on Unitary Plan urban design provisions; Seconded to Auckland Unitary Plan team to co-ordinate urban design input to the Plan, with an emphasis on the residential zones and Regional Policy Statement.

## Memo

To:	Jo Hart, Principal Planner, Planning North/West and Islands, Plans and Places
From:	Derek Foy, Associate Director
Date:	22 June 2020
Re:	Swanson Road Ranui, Private Plan Change Economic Review

#### Introduction

The purpose of this memo is to review the economic merits of Private Plan Change ("PPC38"), and to review any submissions and further submissions on the application that raise economic issues. The review is intended to assist the Council to identify any outstanding economics issues and provide an opinion on them, contributing to Council's overall assessment of the merits of the application.

#### Documents reviewed

The application contained the following economic assessment lodged with the application:

• "Economic Cost-Benefit Analysis: Proposed Plan Change of 522-524 Swanson Road, Ranui" (Draft), 12 February 2019, Urban Economics Ltd ("the UE report").

I have also reviewed other relevant application material, the only submission received, and the Mt Hobson Group planning report.<sup>1</sup>

#### Structure

This memo first provides a brief overview of PPC38, then reviews the UE report, discussing the key economic issues raised, any issues not identified that I consider require consideration, and other relevant discussion and conclusions as to matters identified.

### Private Plan Change 38 overview

The application seeks to rezone the land at 522 and 524 Swanson Road ("the Site"), an area of some 2.6ha, Business - Light Industry zone ("BLIZ") to a mixture of Residential Mixed Housing Urban ("MHU") and Residential Terrace Housing and Apartment Zone ("THAB").

The site currently provides short term residential accommodation for those members of the community who cannot find housing elsewhere, and is known as the Western Park Village. From the

<sup>&</sup>lt;sup>1</sup> "Private Plan Change Request 522-524 Swanson Road, Ranui. Assessment of Environmental Effects and Statutory Analysis", Mt Hobson Group, November 2019 ("the AEE")

AEE, the current owners wish to formalise the use of the site for residential housing and provide more permanent options for accommodation for the occupants, and has been in discussions with Kiwibuild and community housing providers about incorporating social housing into the Site. The AEE states that although the site is zoned BLIZ, it has never been used for industrial purposes.<sup>2</sup>



#### Figure 1: PPC38 location

#### Description of the Site

The UE report summarises the nature of the current activity on the Site, which has been in place for many years. Key points from that summary include that the residential activity on the Site is temporary in nature and generally of substandard quality, however it is providing a necessary service for a vulnerable segment of the Auckland population.

#### Counterfactual

In section 4 the UE report summarises the main land uses which might apply to the Site, and states that the obvious and most appropriate alternative to the operative BLIZ zoning is residential activity. Ultimately, I agree with that assessment, although disagree with some of the justification UE use to reach that conclusion. My primary disagreement is that the UE report states that redeveloping the Site for industrial use would result in a significant commercial loss to the landowner, compared to use

for existing residential activities. The cost to the landowner is not a relevant consideration in RMA terms, and should not be factored in when deciding the most appropriate use of the Site.

#### Social housing

The UE report provides some examples of social and temporary housing in Auckland, and describes the benefits of providing state-subsidised social housing. The report then speculates that the Ministry of Social Development might provide social housing on the Site if PPC38 is approved. There appears to be nothing definite in the application to indicate that state-provided or other subsidised social housing might be provided on the Site, however the AEE notes that the owner has been in discussion with Kiwibuild and Auckland community housing providers (paragraph 2.2).

The inference is that PPC38 might smooth the way for the development of high quality social housing on the Site, although there appear to be no guarantees that any form of social housing would result, and it could be that all residential development on the Site becomes privately owned dwellings. That may be a concern if the merits of the proposal hinged on the provision of social housing, but in my opinion they do not, and any residential dwellings on the Site would represent an appropriate and efficient use of the Site.

#### Industrial land supply

The key points provided in the UE report that are relevant to assessing the potential loss of industrial land under the proposed plan change are that:

- 10% of BLIZ land in Ranui is vacant. That may overstate the true vacant area given the note that some of that is used for storage and parking overflow, which are valid industrial uses, however, it does indicate an adequate local industrial land supply in an area of relatively low demand (as indicated by the land prices UE refers to on p20) and growth.
- There are large new areas of industrial land proposed in west Auckland, such as at Whenuapai.
- The Site has never been used for industrial activities, so changing the operative zoning for a non-industrial use will not in practice reduce the amount of industrial land available for occupation in west Auckland, given the Site's existing use rights.

UE devotes some effort in the report to comparing business land under the legacy and operative Plans. There are some fundamental errors in that assessment, and the conclusions reached are inaccurate and misleading.<sup>3</sup> Nevertheless, in my opinion the merits of the proposal are not reliant on this

<sup>&</sup>lt;sup>3</sup> The comparison of legacy plans with the Unitary Plan zoning is inherently difficult, as in the legacy plans there were many different business zones in which "industrial" activity was enabled, to a greater or lesser degree. A large proportion of these appear to be inaccurately or misleadingly classified as "Mixed Business" in the UE report.

For example, the former Special Zone 3 transport corridor in Penrose, which is now zoned Heavy Industry, is

assessment, and the very small loss of zoned BLIZ land would have no material impact on the supply of industrial land (UE report, p18).

#### Demand for higher density housing

The UE report provides some justification for the need for THAB zone on the Site (sections 11-13). Further discussion of the Site's attributes that will support THAB is provided in the s32 analysis,<sup>4</sup> including proximity to public open space (Ranui Domain) and public transport. I agree with that assessment, and that the mix of residential zones proposed is the most appropriate zoning for the Site, and preferable to lower density residential zoning.

#### Costs and benefits

I agree with the costs and benefits assessment in the UE report, and the conclusion that they indicate that PPC38 is appropriate from an economics perspective.

However, I do note that as far as I am aware there is no certainty that government temporary housing would result on the Site if the application is successful, and as lodged, PPC38 would mean any residential activity would be possible. Similarly, there is no guarantee that smaller, affordable dwellings would be provided as UE indicates in the benefits assessment, although given UE's description of the residential land market in the area (section 11), and the position adjacent to an industrial zone, I agree that dwellings would likely be priced towards the lower end of the market, providing an economic (and social) benefit.

#### Submissions

There were only two submission received, and one was subsequently withdrawn. The only remaining submission (Kiwirail), does not contain any matters that relate to economics. No further submissions were received.

classified by UE as "Mixed Business". Under that classification that is "new" industrial land, which it clearly is not.

A second example is the former Business 5 zone from the Auckland City Plan, which is now a mixture of Light and Heavy Industry zone. That zone was described in the legacy plan as being "applied to existing areas, dispersed throughout the City, characterised by low to medium intensity industrial activity. These are generally the older purpose built industrial areas of the Isthmus". Under that classification that also is consider by UE to be "new" industrial land, which it clearly is not. There are many other examples throughout Auckland of similarly misleading categorisation which support UE's conclusion that the Unitary Plan significantly increased the quantum of industrial land in Auckland.

<sup>4</sup> "Section 32 analysis: Swanson Road, Ranui Plan Change", Appendix 6, Mt Hobson Group

#### Conclusions

In my opinion there is one key economic issue arising from the PPC38 application, and the very small loss of industrial land is highly unlikely to result in anything more than minor adverse economic effects, and a number of positive economic effects would be expected as a result of PPC38.

In my opinion, from an economics perspective the residential zoning proposed in PPC38 is the most appropriate zoning for the Site, and I support PPC38 on economics grounds.

# Memo

23/06/2020

То:	Jo Hart	
cc:	Frank Havel, Engineering & Technical Services	
From:	Charlie Brightman, Engineering & Technical Services	
Subject:	Geotechnical Review of Private Plan Change Application at 522-524 Swanson Road, Ranui	
Status:	For Information	Version: 0

# 1 Introduction

We have been requested by Jo Hart from Auckland Council Regulatory Services to review geotechnical aspects of a private plan change application for land at 522-524 Swanson Road, Ranui. It is understood that the developer is seeking to alter the existing zoning on the site from Business Light Industry to a combination of Residential Mixed Housing Urban Zone (MHU) and Residential Terrace Housing and Apartment Zone (THAB). Our geotechnical review includes queries/comments/recommendations pertaining to geotechnical matters. It excludes assessment of contamination which will be reviewed in a separate report.

The following reports have been attached to the application and reviewed by us:

- Mt Hobson Group report "PRIVATE PLAN CHANGE REQUEST, 522-524 SWANSON ROAD, RANUI, ASSESSMENT OF ENVIRONMENTAL EFFECTS AND STATUTORY ANALYSIS", unreferenced and dated November 2019
- Fraser Thomas Ltd memorandum: "524, 528, 530 & 532 SWANSON ROAD, RANUI DETAILED SITE INVESTIGATION SUMMARY" reference 32662 and dated 13 September 2018
- Ian Munro "Urban design assessment and neighbourhood design statement 524 SWANSON ROAD" unreferenced and dated August 2019

We understand that the above documents have been prepared to support the private plan change application. Our findings and recommended conditions are summarised below.

### 2 Proposed Plan Change

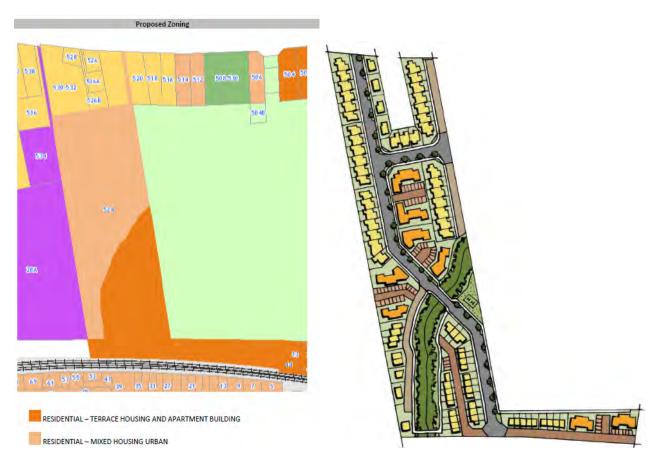
#### Existing Site

The Assessment of Environmental Effects (AEE) describes the site topography as "relatively flat from the road frontage towards the south before falling to a stream which traverses the site from the south western corner to exit approximately halfway up the eastern boundary. The site then rises from the stream towards the east. The highest part of the site is the narrow corridor which runs between the Ranui Domain and the railway line located to the south of the site. The existing buildings on the site are located to the north/west of the stream with the area of land to the east being vacant and grassed". The report also describes the existing site use: "the site contains a substantial number of temporary and permanent buildings providing

residential accommodation, toilet and cooking facilities and an administration type block in the north eastern corner of the site".

#### Proposed Development

The proposed zoning for the site shown in the AEE indicates that the south-eastern part of the site is to be zoned as "terrace housing and apartment building" and the remaining site area to the north and west as "mixed housing urban" as shown below.



#### Figure 1: Proposed Zoning and Site Layout

No detail has been submitted on anticipated earthworks extent. However, we expect earthworks to be minor based on the predominantly level ground on the site. Further details of any earthworks proposals will be required for resource consent application.

### 3 Assessment of Geotechnical Effects

#### 3.1 Site Ground Conditions

The published geological map (Edbrooke, 2001) indicates the site is underlain by Puketoka Formation alluvium of variable poorly consolidated beds of pumiceous mud, sand, and gravel with horizons of muddy peat and lignite. The underlying the Puketoka Formation is sandstone and mudstone of the East Coast Bays

Formation (ECBF) bedrock. The New Zealand Geotechnical database was checked for previous investigation records on the site, however no previous geotechnical information was available.

No specific geotechnical ground investigation has been undertaken for the Mt Hobson Group AEE report; however, the Fraser Thomas site investigation summary refers to a shallow intrusive investigation commissioned to sample site soils for contamination. This Fraser Thomas memorandum identifies areas of fill located on the eastern side of the stream crossing the south eastern part of the site, but does not contain detail of the overall site ground conditions to be able to review geotechnical risks that may influence determination of the plan change application.

#### 3.2 Anticipated Geotechnical Constraints for Site Re-Zoning

In the absence of detailed site-specific ground investigation, the typical anticipated geotechnical constraints based on the available site information are:

• Unsuitable earthworks materials on site: Areas of possible non-engineered fill are present on the south-eastern part of the site to the east of the stream. These materials are of unknown strength and composition, which may require excavation and removal off site if unsuitable for proposed infrastructure/building foundations or reuse in site earthworks.

• Groundwater drawdown: in the case of any deep excavations near the watercourse (e.g. apartment building basement excavations) groundwater is likely to be encountered and associated dewatering will result in groundwater drawdown and possible settlement effects on surrounding land.

• Slope stability: While most of the site is relatively flat, slope instability can occur in areas of land over steepened by streams and creeks or steep cut or fill gradients.

• Watercourse erosion: There is a risk that watercourse bank erosion may occur due to high water flows during flooding leading to slope instability. Erosion protection measures may be required.

• Building Foundations: Multi-storey buildings such as apartment buildings proposed for the southeastern part of the site are likely to require deep foundations (piles) to found within competent ground conditions below the fill understood to be present on that area of the site.

• Soil Expansivity: Shrink/swell ground movements are expected in the Puketoka Formation Alluvium soils. Assessment of ground shrinkage/swelling potential based on an interpretation of site-specific laboratory results will be required for resource consent application.

• Stability of excavations near railway: deep excavations (e.g. apartment building basement excavations) will need side support. A comprehensive assessment will be required for resource consent application including (but not to be limited to) wall deflection, associated settlement, effects on the existing neighbouring land and infrastructure (e.g. railway) and remedial solutions (if needed) to be submitted for review at the time of future resource consent

# 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 suitable to support the proposed private land change, provided that detailed assessments, specific engineering designs of earthworks, associated remedial measures, structures, infrastructure and appropriate construction methodologies are submitted. 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 Havel, Principal Geotechnical Specialist, 23/06/2020					
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	Charlie Brightman, Principal Geotechnical Specialist, 23/06/2020					
File location	https://aklcouncil.sharepoint.com/sites/EXT/ETS/Shared Documents/Memo template ETS.docx					
Date printed	23/06/2020 3:55 PM					

# Memo

vienio		26/06/2020
То:	Jo Hart, Principal Planner North, West and Islands Planning, Plans and Places	
cc:	Ross Roberts, Geotechnical and Geological Practice Lead	
From:	James Corbett, Principal Contaminated Land Specialist, ETS	
Subject:	522 524 Swanson Road, Ranui PPC	
Project:		
Status:	Final	Version: 0
Document ID:	AKLCCON-1472420225-501.docx	

### 1 Introduction

Jo Hart, Principal Planner from North, West and Islands Planning, Plans and Places, CPO has requested review of land contamination aspects of a private plan change application from Western Park Village Limited for land at 522-524 Swanson Road, Ranui (Refer Email 10 June 2020 JHart to R Roberts attached Appendix A). It is understood that the applicant is seeking to change the existing zoning on the site, the majority being Business Light Industry plus a smaller section of the northern part of the site currently zoned Residential Mixed Housing Suburban to a combination of Residential Mixed Housing Urban Zone (MHU) and Residential Terrace Housing and Apartment Zone (THAB) under the Auckland Unitary Plan (Operative in Part).

#### 1.1 Purpose and limitations

This memo is provided expressly for advising Plans and Places. It is not intended to be used or copied in whole or part for other audiences or purposes without the prior approval of Engineering & Technical Services.

The requested scope of this memo is to:

- Advise of any obvious information gaps for contaminated land specialist area required to better understand the effects on the environment, mitigation measures, benefits and costs, possible alternatives, and/or consultation undertaken.
- Advise of any issues that you consider will be of concern to council giving the applicant the opportunity to address these if they wish prior to formal lodgement.

Comment is restricted to contaminated land advice relating to the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESCS) and where relevant the Auckland Unitary Plan (Operative in Part) where relevant. This does not provide a regulatory services viewpoint.

20/00/2020

This memo excludes assessment of geotechnical or other aspects which will be reviewed in separate reports by others.

### 2 Bibliography and references

The following reports have been attached to the application and reviewed:

- Final Plan Change Request 14 November 2019 Mt Hobson Group report "Private Plan Change Request, 522-524 Swanson Road, Ranui, "Assessment of Environmental Effects and Statutory Analysis", unreferenced, dated November 2019.
- Draft Private Plan Change Request Planning Report Mt Hobson Group 522-524 Swanson Road Ranui, Private Plan Change Request by Western Park Village Limited, Planning Report Rezoning Land at 522-524 Swanson Road, Ranui. "Plan Change Submission: Western Park Village, Swanson Road, Ranui August 2019"
- Appendix 8 Ranui PPC Contamination DSI Summary Fraser Thomas Ltd memorandum: "524, 528, 530 & 532 Swanson Road, Ranui Detailed Site Investigation Summary" reference 32662 and dated 13 September 2018.
- Private Plan Change Request, 522-524 Swanson Road, Ranui , Assessment Of Environmental effects and Statutory Analysis by Mt Hobson Group for Western Park Village Ltd Nov 2019

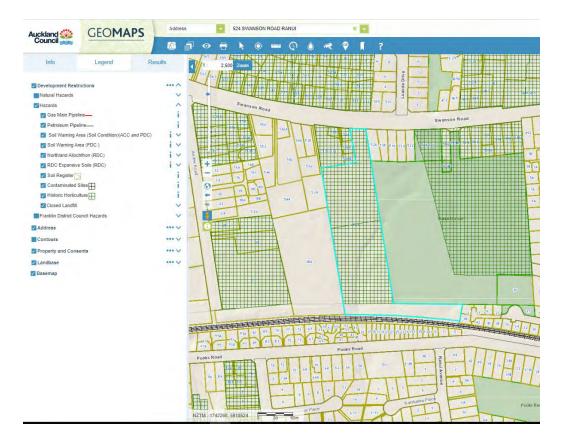
It is understood that the above documents have been prepared to support the private plan change application. Our findings and recommended conditions are summarised below.

### 3 Observations

This report is desktop only and no site visit has been undertaken.

Review of Council's GIS hazard layers and historical aerial photographs was limited, however sufficient to indicate that historical intensive horticulture HAIL category A10 activities had taken place at least on the northern half of the site as discussed below. Features such as fill areas identified in the Detailed Site Investigation (DSI) Summary were not able to be clearly seen on historical aerials.

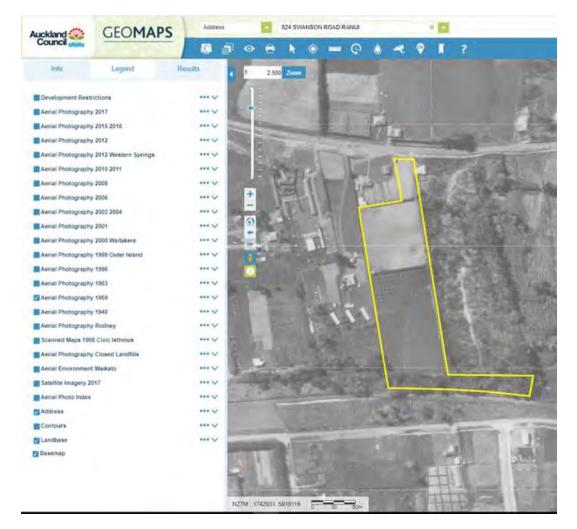
A snapshot of the Auckland Council GIS-Development Restrictions/Hazards layer below shows there is a Historic Horticulture tag denoted by cross-hatching on most of the site.



A snapshot of an Auckland Council GIS-Test Layer SAP Contamination Notes below shows "Horticultural-General" characteristic relating to the whole site.



A snapshot of the Auckland Council GIS 1959 Aerial below shows horticultural support buildings on 530-532 Swanson Road to the north/northeast of the site, and intensive horticultural activities on the upper half of the site which comprises soil disturbance on the top 2/3 and a small shed in the south western corner, with the lower 1/3 showing possible fruit tree or similar orcharding activity.



### 4 Information gaps and issues

The full Detailed Site Investigation (DSI) was not available to review. Review was therefore unable to determine if the Detailed Site Investigation meets investigation and reporting standards required under the NESCS or the Unitary Plan.

It was noted that the date of the DSI Summary was undertaken nearly two years ago and should be updated to reflect any changed or new activities and HAIL that may have occurred on or adjacent to the site in the interim period.

The sampling methodology as depicted in the Site Features and Analytical Results Plan No. 3266/01 does not appear to have targeted likely point source contamination locations. These include the chemical storage shed on the north-western boundary with 530-532 Swanson Road, and others such as historical chemical mixing/preparation areas, pump sheds, glasshouses or sites for refuelling, particularly around the periphery

of buildings adjacent the northern boundary of the site where possible cross-boundary discharges into the site may have occurred.

Geotechnical testing recommended in the last two bullet points in the summary document does not appear to have been undertaken, which would provide some information on soil contamination at fill areas and rubbish deposits along the south-eastern boundary and other areas shown on the plan.

### 5 Discussion

#### 5.1 Assessment of requirements for investigations and reporting

A combined Preliminary Site Investigation (desktop study) and Detailed Site Investigation is understood to have been undertaken, however only a "Detailed Site Investigation Summary" has been provided with the application documents for review. This restricts the ability to review the report contents and its findings against required standards for investigations and reporting as required by the NESCS and Unitary Plan (Operative in Part).

The required standards are for a Detailed Site Investigation to be conducted in accordance with the current version of the Contaminated Land Management Guidelines No. 5–Site Investigation and Analysis of Soils, Wellington, Ministry for the Environment, and the accompanying report to be undertaken in accordance with the current version of the Contaminated Land Management Guidelines No. 1–Reporting on Contaminated Sites in New Zealand, Wellington, Ministry for the Environment. The absence of a full report means that these standards likely cannot be achieved.

Elements of the investigation that were missing for review include the depth of source information for previous site activity history, the assumptions based on this and the sampling strategies for location sample depths, the full suite of chemical contaminants analysed and results (not all priority contaminants appear in the sampling results table), the risk assessment, concluding statements, and report certification by the practitioner.

A significant query raised in this review is that there is no explanation of the sampling strategy. Sampling appears from the plan to have been based on a grid pattern which is commonly applied where it is assumed uniform contamination of heterogeneous soils across cultivated or sprayed orchard areas. It is not known whether potential hot spot contamination from activities in/outside buildings adjacent the northern boundary of the site was considered, where targeted sampling would be undertaken. A single hot spot exceedance of arsenic was identified on the adjacent site, however there is no discussion whether this was related to an activity or specific location. The apparent sample spacing on the plan suggests a large hot spot diameter being able to be detected, and it is noted that there are few samples in the area of the buildings where more samples would be expected. The basis for preliminary assessment of an impacted 100m2 area is also not known. It is noted that the contamination hot spot has not yet been fully investigated to delineate the boundary. The sample plan and results do not provide confidence that the area around the support buildings and including the northern portion of the site under the proposed plan change, has been adequately investigated to demonstrate compliance with the relevant soil contaminant standard. The small shed identified in the 1959 aerial should also be considered as a potential hot spot if used as a pump shed.

Furthermore, the exceedance at the sampling location SR3 for arsenic against the Residential 10% produce ingestion land use scenario is then compared against the High-density residential scenario which is more commonly applied to high rise buildings with no land available for food growing. The development is medium density and the result is closer to the more relaxed standard than the more stringent Residential 10% scenario which should apply in the absence of a derived standard.

The Detailed Site Investigation Summary acknowledges it was limited in scope by only sampling shallow soils and did not investigate areas of fill and rubbish deposits, which it then recommended be investigated during subsequent geotechnical investigations but do not appear to have been undertaken.

The last bullet point of the Detailed Site Investigation Summary is as below:

"Testing of the deeper fill material is needed to confirm the consent status of the proposed development in relation to the NESCS and contaminated land provisions of the Unitary Plan."

This confirms that the investigation is incomplete.

#### 5.2 Assessment of Application of NESCS and Unitary Plan Chapter E30

The NESCS regulations apply when a person wants to do an activity including changing the use of a piece of land, where that land that is reasonably likely to harm human health because an activity or industry in the HAIL (the current edition of the Hazardous Activities and Industries List, Wellington, Ministry for the Environment) is, or has been, or more likely than not is or has been undertaken on it. The DSI Summary and other reports support the conclusions that the land is HAIL, and that the activity triggers the controls under the NESCS. In addition, they support the conclusion that the Unitary Plan E30 Contaminated Land controls also apply.

The document Private Plan Change Request, 522-524 Swanson Road, Ranui, Assessment of Environmental Effects and Statutory Analysis by Mt Hobson Group for Western Park Village Ltd Nov 2019 concludes that all samples comply with NESCS standards and AUP(OP) criteria and that while incomplete "confirms that the proposal to rezone the land for residential development is unlikely to give rise to any concerns in terms of effects on human health." The matters raised above do not allow this conclusion to be reached for those areas not investigated and those where there is doubt about the adequacy of investigations conducted.

The requirements of the NESCS is that in the absence of a Detailed Site Investigation conducted in accordance with the current version of the Contaminated Land Management Guidelines No. 5–Site Investigation and Analysis of Soils, Wellington, Ministry for the Environment, and similarly the accompanying report in accordance with the current version of the Contaminated Land Management Guidelines No. 1– Reporting on Contaminated Sites in New Zealand, Wellington, Ministry for the Environment, and understood in that sense to be a sufficiently complete study and compliant report on all areas of the site proposed under the activity, then the status of an application is Discretionary.

The Unitary Plan Chapter E30 requires investigations to the standards mentioned above to determine the application status. The absence of a complete investigation report does not appear to permit assessment to conclude it either meets the permitted activity criteria or as a controlled activity which also requires a site management and remedial action plan amongst other elements.

# 6 Conclusions

Detailed site investigations have not been carried out across the entire area of the proposed private plan change as several areas have been identified for further investigation to determine potential risk to human health and to the environment. The review has raised several queries around the sampling strategy and the sufficiency of sampling to demonstrate compliance with the relevant soil contaminant standards and criteria.

It is not possible to determine that the site is suitable for the proposed land use based on the information at hand.

The NESCS allows for discretionary consent where the activity on a piece of land identified as HAIL and the information provided does not meet the requirements for permitted, controlled or restricted discretionary activity, and in particular the absence of a complete Detailed Site Investigation. Matters of discretion include the adequacy of the DSI, the suitability of the land for the proposed activity given the amount and kind of soil contamination, the approach to remediation or ongoing management and the adequacy of the site management plan or site validation report.

In relation to the Unitary Plan E30 the Detailed Site Investigation is incomplete and does not meet the criteria for a controlled activity, and requirements for a site management plan (contaminated land) and a remedial action plan (contaminated land), relevant to the site and the proposed disturbance or remediation to be prepared and submitted to Council for consideration among other criteria.

# 7 Recommendations

It is recommended that you ask the applicant to undertake the additional investigations raised in the DSI Summary recommendation, consider information gaps and issues, update the detailed site investigation report and submit the full report for assessment. The applicant should also consider all information requirements of the NESCS and Unitary Plan Chapter E30 in relation to soil contamination for assessing the proposed plan change.

# 8 Quality assurance

Reviewed and approved for release by						
Reviewer	Jointly reviewed by Ross Roberts & James Corbett. Approved for issue on 23.08.2019 16:33					
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	James Corbett					
File location	https://aklcouncil.sharepoint.com/sites/ets-con/ETS Documents/AKLCCON-1472420225- 501.docx					
Date printed	25/06/2020 8:32 PM					

# Appendix A Request for service

#### 01/11/2019

# Memo

То:	Jo Hart, Principal Planner, Plans and Places
From:	Iresh Jayawardena, Healthy Waters Specialist, Resource
	Management Team
Subject:	Healthy Waters Initial Review of Private Plan Change (PPC)
	proposal – 522-524 Swanson Road, Ranui

#### **Healthy Waters Initial Review**

Healthy Waters Department has taken an initial assessment of the application material, provided by the applicant. In particular, the following documents have been reviewed:

• Draft Planning report for Private Plan Change request, prepared by Mt Hobson Group, dated August 2019.

This memo provides an initial review and assessment of the available information supplied from a perspective of stormwater management, streams and flooding provision of the AUP: OP. Particular attention is paid to the adequacy of the supplied information for initial assessment and further clarification and area of concern for evaluation purposes.

With regard to the stormwater management effects and the provisions of the Auckland Unitary Plan (Operative in Part) (AUP: OP), no significant information gaps have identified. Provided that the zone change proposed is to accommodate medium to high-density residential facilities, the effects on stormwater management is considered less significant compared to the exiting Light Industry Zoning.

The site features the following Auckland Unitary Plan (Operative in Part) Overlays:

- Controls: Macroinvertebrate Community Index Urban
- Controls: Stormwater Management Area Control SWANSON 5, Flow 2

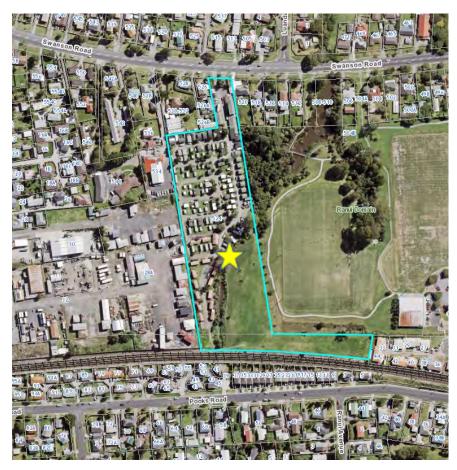


Figure 1: An aerial view of the proposed private plan change site at 522-524 Swanson Road ( $\widecheck{
u}$  )

#### Stormwater mitigation

The draft planning report states, the site will remain subject to the existing controls identified on the AUP(OP) planning maps, being the Macroinvertebrate Community (Urban) and the Stormwater Management Area (Swanson 5, Flow 2). All Auckland-Wide and zone provisions of the AUP(OP) will apply to the rezoned land and no additional provisions (e.g. precincts) are proposed as part of this plan change. While this is accepted; the effective mitigation of stormwater from the development and how this will be achieved can be assessed at the detailed site design and development stage. Considering the stream traverse across the site, the provision of SMAF 2 of the proposed development will need to comply with the requirements under Table E10.6.3.1.1 Hydrology mitigation requirements.

#### Streams restoration and protection

 According to Council's Geomaps, a permanent river traverse across the site. The private plan change proposal does not adequately asses actual and potential effects on the stream and how the proposed development meets the relevant policy directives with regards to stream restoration and enhancements opportunities as provided under AUP OP.

Policy B7.3.2 (6) that states,

(6) Restore and enhance freshwater systems where practicable when development, change of land use, and subdivision occur

Policy E1.3 (9) states;

(9) Minimise or mitigate new adverse effects of stormwater runoff, and where practicable progressively reduce existing adverse effects of stormwater runoff, on freshwater systems, freshwater and coastal waters during intensification and redevelopment of existing urban areas by all of the following:

. . .

(d) taking an integrated stormwater management approach for large-scale and comprehensive redevelopment and intensification (refer to Policy E1.3.10 below) and encourage the restoration of freshwater systems where practicable; and

(e) ensuring intensification is supported by appropriate stormwater infrastructure, including natural assets that are utilised for stormwater conveyance and overland flow paths

Given the proposed re-development within the plan change area will discharge into the stream; in order to achieve the outcomes of policy directives above, it is not clear if any precautionary approach has been taken into account or any assessment has been undertaken on the stream restoration and protection as part of the proposed plan change. Please also provide an assessment of effects in terms of sedimentation, erosion and water quality of the stream and how this will be mitigated.

- The proposed plan change does not include any discussions around policy E38.3 (22), in particular
   (b) and how this outcome will be achieved.
- The planning report indicates a map of proposed zoning. Provided that the area adjacent to the stream is proposed to be comprehensively developed as Residential Terrace housing and Apartments, it is considered this development will have potential effects on the subject watercourse. Therefore, it is not clear what enhancement opportunities and protection for the stream will entail by the proposed development. Please clarify the anticipated stream restoration and enhancement within the proposed plan change area.

#### Advice note:

Considering the watercourse traverse across the site towards the adjacent open space zoned reserve area, it is recommended that the proposed plan change will make provision to include an open space area along the stream. This open space area will enable land for the continuation of stream corridor, maintain natural stream flows and connectivity to the reserve

#### Flooding

 Noting the comprehensive medium to high-density residential re-development and existing flood plain presence on the site, it is recommended that the private plan change considers providing a riparian buffer to accommodate development within the plan change. It is significant to consider attributes, such as, predicted meander alignment of the stream, parallel stormwater management and treatment opportunities, stream habitat diversity and geotechnical stability of adjacent land etc. Please provide indications on how these attributes will be assessed and benefits will be realised within the proposed plan change. The site is located in a flood plain. The plan change proposes the use of land from less vulnerable activities to more vulnerable activities as residential development is considered a more vulnerable activity to flooding under AUP OP. The applicant needs to demonstrate that residents can gain safe access and egress during a flood to managed risk, and that finished floor levels will be above the flood plain. Please advise of the flood risk assessment is completed if so, Healthy Waters would be required to review the flood risk assessment report. In addition, the most recent flood hazard information should be assessed at the time of development.

#### Advice note:

The plan change would allow for residential development, habitable floors in the flood plain are considered a vulnerable and therefore the risks around flood hazard are higher than say a commercial floor.

#### Auckland-wide network discharge consent

Given the Auckland Council's Stormwater Network Discharge Consent (NDC) is commenced, this
will take effect immediately for resource consent decisions. The site size is 2.5Ha and falls under
Brownfield Large Category under NDC. A Stormwater Management Plan detailing the stormwater
management approach is required to be submitted to have the discharge authorised by the NDC for
Healthy Waters review and approval. A standalone discharge consent will need to meet the
information requirements of Chapter E8 of the AUP.

#### Advice note:

Please note that Healthy Waters is not intending to approve connections to the public network or accept assets for vesting if the network built for a development that does not meet the performance requirements as noted in the Stormwater Bylaw 2015.

It is strongly recommended that the applicant refers to relevant connection requirements in Schedule 4 of NDC to recognise how these requirements will be met from the proposed development.



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6 August 2020

Jo Hart Auckland Council Private Bag 92300 Victoria Street West Auckland 1142

Dear Jo

#### **SWANSON ROAD - REVIEW**

Thank you for a copy of the response prepared by Mt Hobson Group (MHG) to my Request for Further Information (RFI) for the private plan change proposed for 522 – 524 Swanson Road in Ranui. With all the available information, I have completed my review below.

#### Objective E25.2 (3)

As part of my RFI, I queried whether the proposal to establish a residential development next to the North Auckland Line (NAL) would result in reverse sensitivity to the NAL. The MHG response was that based on the large amount of residential use that already borders the NAL, the proposal will not materially change the land use in the area and would not therefore affect the operation of the rail.

I note that a proportion of the existing residential dwellings that face the NAL would have been consented under the Legacy District Plan and would therefore have been required to be designed to control internal levels of rail noise in accordance with Rule 1.2 of that Plan. Nonetheless, I generally agree with MHG's comments and my view is that there would be negligible effects on the operation of the rail corridor as a result of the proposal.

#### Policy E25.3 (6)

Based on the current Light Industrial zoning, the neighbours to the west are permitted to generate a level of 65dB  $L_{Aeq}$  at all times within the boundary of 522 – 524 Swanson Road (E25.6.5). By rezoning the proposal to Residential, this level could reduce to 55dB  $L_{Aeq}$  daytime and 45dB  $L_{Aeq}$  night time (with the addition of low frequency criteria) in accordance with E25.6.19. My concern was that this reduction in noise levels could result in limitations on what could occur on the neighbouring Light Industrial zone to the west, constituting an adverse effect.

In their response, MHG notes that Policy E25.3(6) does not apply to the proposal, as it relates to the establishment of a noise sensitive activity in an Industrial zone, which the proposal would no longer be as a result of the Plan Change. This is a valid point in terms of the wording of the AUP and the way in which I phrased my question. However, my issue remains that the effects



of the Plan Change on the neighbouring Light Industrial sites (through a reduction in the permitted noise levels) does not appear to be fully described by the application.

In simple terms, the proposal would result in a 10dB reduction the daytime noise that the western Light Industrial sites could generate within the boundaries of 522 – 524 Swanson Road and a 20dB reduction at night time. As a guide, a 10dB reduction is an apparent halving in level. Based on this, I do not agree with the MHG response that this is a slight reduction in limits.

In the original SLR assessment, one of the mitigation measures offered was the addition of a 3 – 4m high wall on the common boundary with the comment that it would "...*further enhance the likelihood of the neighbouring sites achieving compliance with the new noise standards (following rezoning) without the requirement for either of the neighbouring sites to modify their current operations*". The MHG response to my RFI on this issue notes that there is already a 2 – 3m high fence on this boundary, with no comment on its efficacy. Given that the fence suggested by SRL as a mitigation measure appears to already exist (at least in part), it cannot be relied upon a second time for mitigating the effects of the proposal. I therefore remain unclear as to how the fence should be considered in the application and would like this clarified before, or at, the hearing.

I also note that the AUP noise limits apply on the receiving side of the boundary wall. As such, any reduction in the receiving level equates to a corresponding reduction in the source level.

My view is that the reduction in boundary noise levels that would result from the Plan Change would result in a limitation on the activities that could be undertaken within the Light Industrial zone. If this were not the case, the AUP limits at the residential interface would also apply between all Light Industrial sites across the city. The fact that they do not indicates that it is preferable to have higher levels. That the AUP does provide interface rules with the residential zone recognises the reality that at some point, zones must meet. However, it stands to reason that a Light Industrial site with more relaxed noise limits would be preferable to one without. As such, it is my view that, in general terms, the proposal will have an adverse effect.

The SLR report looks at some specific Light Industry uses noting that activities such as amplified music (from church services) or 22 truck movements could occur during the day time. Under the present zoning, these activities could also occur at night<sup>1</sup> whereas SLR state that with the reduced interface limits, activities would be reduced to one night time truck movement. This provides an example of the reduction in intensity that the proposal would impose on the activities of the neighbouring Light Industrial zone.

I have also considered the specific effects on the existing Light Industrial activities, which the SLR assessment notes as a house relocation company. It has been my experience that such activities could comply with the residential interface rules but that doing so typically requires some form of mitigation/ site management. I am not familiar with the activities currently undertaken to comment further but note SLR's opinion that the current activities would comply with the interface rules.

MHG note that it is not possible to second guess future industrial uses of the site. I agree with this noting that a reduction in noise limits would be a likely factor in those future uses.

Given the potential for reverse sensitivity effects, I queried whether there was scope within the Plan Change to leave the boundary noise limits unchanged and place the onus on the new

<sup>1</sup> The intensity of activities may be decreased at night due to the removal of the averaging provision during the night time.

residential units to control the expected high levels of external noise to internal levels that are appropriate for residential amenity, as is currently the case should any residential accommodation be constructed within the Light Industrial zone (E25.6.10). The MHG response to this issue noted that doing so would be complex for a "*slight reduction in permitted noise levels*" and the fact that "*the owner of the adjacent land did not respond to letter send by the applicant or make a submission of the plant change request, which can be taken to indicate no opposition to the plan change*".

I cannot comment on whether such an approach is too difficult under the AUP but repeat my comment above that the reduction in permitted levels is significant rather than slight. As to the lack of response from the neighbour to the proposal, this could be viewed in several ways, including a lack of understanding of the process, noise levels and their effects.

Overall, it is my view that in principal, the proposal will have an adverse effect on the western Light Industrial sites due to the constraints placed upon them through the lowering of noise limits. This situation currently occurs at any Residential zone interface with a Business or Industrial zone and is therefore neither unexpected by the AUP nor unmanageable. It does, however, result in a significant change to this particular site.

My conclusion with respect to the effects that the proposed zone interface rules will have on the current activities of the Light Industrial zone, is that they will likely range from negligible to manageable.

#### Policy E25.3 (11)

While the eastern sports fields operate without a noise limit to the current Light Industrial zone of the proposal, the proposed rezoning would introduce the limits of E25.6.17. My query related to an assessment of any reverse sensitivity effects that may arise from the proposed noise limits.

The MHG response notes that SLR anticipate levels of up to 60dB  $L_{Aeq}$  when measured at 20m from sporting activities. Given that the 20m distance matches that between the sports fields and common boundary of the proposal (which is the assessment location), it can be seen that the noise from sporting activities would be up to 60dB  $L_{Aeq}$ . This matches the daytime limit of E25.6.17, noting that this limit only applies for three hours on weekdays and six hours on Saturdays.

There remains a potential issue with night time compliance, such as sports practices. However, in general, I agree with the MHG assessment that there is "...limited potential for reverse sensitivity effects".

Should you have any questions regarding the above please do not hesitate to contact me.

Yours sincerely Hegley Acoustic Consultants

**Rhys Hegley** 

#### 3 August 2020

Auckland Council

Planning North/West and Islands

#### ATTN: JO HART

Dear Jo,

# PRIVATE PLAN CHANGE REQUEST 522-524 SWANSON ROAD, RANUI – RESPONSE TO HEGLEY ACOUSTICS REQUEST FOR INFORMATION

Please find below a response to the information requested by Hegley Acoustics in their letter of 30<sup>th</sup> October 2019.

#### HEGLEY REQUEST

#### Objective E25.2 (4)

Objective E25.2(4) offers protection to infrastructure that, by its nature, produces high levels of noise from reverse sensitivity effects. Can SLR please consider the potential reverse sensitivity effects that the proposal may have on the rail operator adjacent to the southern boundary.

#### RESPONSE

I understand that the reference above is an error, with the correct objective being E25.4.2(3) which states:

Existing and authorised activities and infrastructure, which by their nature produce high levels of noise, are appropriately protected from reverse sensitivity effects where it is reasonable to do so.

In considering potential reverse sensitivity effects it is important to establish what is meant by the term. Reverse sensitivity has been described by the Environment Court<sup>1</sup> as:

... the legal vulnerability of an established activity to complaint from a new land use. It arises when an established land use is causing adverse environmental impact on nearby land, and the new, benign

<sup>1</sup> Affco New Zealand Ltd v Napier City Council NZ Env C Wellington W082/2004, 4 November 2004 at [29]

activity is proposed for the land. The sensitivity is this: if the new use is permitted the established use may be required to restrict its operation or mitigate its effects so as not to adversely affect the new activity.

In the context of this proposed plan change, there are considered to be no reverse sensitivity impacts on the rail operator, as the land alongside the NAL throughout Auckland is extensively developed with existing residential properties; including the land directly south of the site, on Pooks Road, and on the same side of the NAL, on Carlas Way.

The majority of the land uses directly adjoining the NAL in the vicinity of the plan change site are already zoned Residential. The proposed plan change would therefore not introduce a new type of sensitive land use to the area; it would reflect the existing land use. The proportional increase in potential dwellings alongside the NAL in Auckland would be negligible.

On this basis, the proposed plan change would not materially change the existing land use within the locality of the site or land adjacent to the NAL railway corridor such that the operation of the rail corridor could in some way be restricted by the rezoning and future development of residential activities on this land.

#### HEGLEY REQUEST

#### Policy E25.3 (6)

This policy seeks to protect the Business – Light Industrial site to the west of the proposal from the activities sensitive to noise of the proposal. The SLR report identifies that while the activities of the western Light Industrial site can currently generate levels of up to 65dB L<sub>Aeq</sub> at the proposal at all times (E25.6.5), this would reduce to 55dB L<sub>Aeq</sub> day time and 45dB L<sub>Aeq</sub> night time (with the addition of low frequency criteria) (E25.6.19) as a result of the proposed rezoning. The SLR report then states "... *it is expected that a number of noise mitigation measures can be implemented by the proponent that would further enhance the likelihood of the neighbouring sites achieving compliance with the new noise standards (following rezoning) without the requirement for either of the neighbouring sites to modify their current operations".* 

With respect to this statement, my queries are:

1. Is there currently any form of boundary fence between the two sites that acts to provide noise mitigation?

#### RESPONSE

Yes, there is currently a 2-3m high fence along the western boundary of the site.

It is noted however that the full wording of the Policy referred to is:

(6) Avoid activities sensitive to noise from establishing in industrial zones where adverse effects (including reverse sensitivity effects) arise that cannot be otherwise appropriately remedied or mitigated.

This policy is directed at noise sensitive activities<sup>2</sup> establishing within Industrial zones and is in essence met by Standard E25.6.10 which requires any noise sensitive spaces<sup>3</sup> to be designed to meet internal noise standards. This is how the plan deals with "appropriately remedied or mitigated" part of the policy. The policy is not considered to be relevant to the plan change.

#### HEGLEY REQUEST

2. Why has the onus of providing a suitable internal noise level within the proposed residential units been placed upon the existing Light Industrial neighbour (through the proposed rezoning) as opposed to the developer through the adoption of an internal noise limit within the proposed dwellings through E25.6.10;

#### RESPONSE

In the interests of simplicity, the Plan Change does not seek to introduce any non-standard plan rules such as internal noise limits but rather to change the zoning of the land only. The only way to include this type of rule would be to either seek to change Chapter E27 (e.g. by making specific reference to the plan change land within Rule E25.6.10), or to introduce a site-specific overlay (precinct) with specific standards. This was not considered to be appropriate in light of the way that the AUP currently deals with interface issues (by a slight reduction in the permitted noise levels on the industrial zone land. It is noted that the owner of the adjacent land did not respond to letters sent by the applicant or make a submission on the plan change request, which can be taken to indicate no opposition to the plan change .

#### HEGLEY REQUEST

3. The assessment appears limited to the current activity on the neighbouring Light Industrial site. Please clearly define the limitations on the generation of noise that the proposal would place upon the western Light Industrial zone as a result of the proposal (with the proposed mitigation);

<sup>2</sup> Any dwelling, visitor accommodation, boarding house, marae, papakāinga, integrated residential development, retirement village, supported residential care, care centres, lecture theatres in tertiary education facilities, classrooms in education facilities and healthcare facilities with an overnight stay facility

<sup>3</sup> Any indoor space within an activity sensitive to noise excluding any bathroom, water closet, laundry, pantry, walk in wardrobe, corridor, hallway, lobby, stairwell, clothes drying area, kitchens not part of a dwelling, garage or other space of a specialised nature occupied neither frequently nor for extended periods

#### RESPONSE

It is not possible to second guess future industrial uses on the site and so the assessment has been made based on what currently exists, and with acknowledgement of the fact that this may change. The limitations on the generation of noise are those that result from the AUP requirements between Industrial and Residential land as discussed in our assessment (and already applicable to the north and south of the industrial land).

#### HEGLEY REQUEST

4. One of the mitigation measures described by SLR is a 3 – 4m high boundary fence on the common boundary between the proposal and the western Light Industrial site. Is such a fence appropriate for the proposed residential zone given the suggested 4m boundary setback for residences?

#### RESPONSE

The introduction of a 3-4m high wall along the shared boundary is not considered to result in unacceptable amenity impacts for future residents. It is noted that the residential Mixed Housing and THAB zones allow fences up to 2.5m high set 1m back from the boundary without consent so this form of mitigation is considered to be acceptable from a design and appearance point of view.

It is also noted that any future building on the Light Industry zoned land would need to be set back 5m from the boundary, with 3m of this set back planted.

#### **HEGLEY REQUEST**

#### Policy E25.3 (11)

Policy E25.3.11 recognises that activities occurring in the Open Space – Sport and Active Recreation Zone (the proposal's eastern neighbour) may generate high levels of noise and requires that adverse effects are avoided, remedied or mitigated having regard to the sensitivity of the receiving environment.

Within the AUP, the neighbouring Open Space – Sport and Active Recreation zone has no noise rules to comply with at the site of the proposal. The result of rezoning the site residential would be the imposition of E25.6.17 on the activities of the Open Space zone. Could the potential reverse sensitivity effects of doing so be addressed?

#### RESPONSE

As noted by Hegley Acoustics, the AUP contains clearly defined noise limits for recreational activities in the open space zone within Standard E25.6.17. This standard and noise limit enable relatively high levels of noise to reflect the higher level of noise generated by such activities and the positive impacts of sports and recreation in the community balanced with the noise they generate.

The closest site boundary is approximately 20-25m to the existing sports field with future housing likely to be at least 4m back from this boundary. Based on SLR's experience, sports fields generate levels of approximately 60dB LAeq 20m from the side of the pitch during the busiest/noisiest scenarios (match play) – this would indicate compliance with the AUP limits for such activities and therefore limited potential for reverse sensitivity effects.

The fact that the future dwellings would be establishing adjacent to an existing sports field would also assist in minimising the likelihood of reverse sensitivity issues as owners/occupiers would be well aware of the sports field ahead of time.

It is noted that Council Parks did not raise any concerns in terms of the proposed plan change, which perhaps indicates that they also have no concerns and likely regard residential as a better neighbour / adjacent amenity than a possible industrial development, even with the potential creation of additional noise controls.

We trust that the above suitably addresses the point raised.

Yours faithfully,

Mark Benjamin Principal Planner MNZPI

CC: Western Park Village Limited (via email)



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30 October 2019

Jo Hart Auckland Council Private Bag 92300 Victoria Street West Auckland 1142

Dear Jo

#### SWANSON ROAD - RFI

Thank you for the acoustic assessment prepared by SLR for the private plan change proposed for 522 – 524 Swanson Road in Ranui and the request that I review it. I understand that, prior to undertaking the review, I can request clarification from SLR, and take this opportunity to do so through the following questions.

#### Objective E25.2 (4)

Objective E25.2(4) offers protection to infrastructure that, by its nature, produces high levels of noise from reverse sensitivity effects. Can SLR please consider the potential reverse sensitivity effects that the proposal may have on the rail operator adjacent to the southern boundary.

#### Policy E25.3 (6)

This policy seeks to protect the Business – Light Industrial site to the west of the proposal from the activities sensitive to noise of the proposal. The SLR report identifies that while the activities of the western Light Industrial site can currently generate levels of up to 65dB  $L_{Aeq}$  at the proposal at all times (E25.6.5), this would reduce to 55dB  $L_{Aeq}$  day time and 45dB  $L_{Aeq}$  night time (with the addition of low frequency criteria) (E25.6.19) as a result of the proposed rezoning. The SLR report then states "... *it is expected that a number of noise mitigation measures can be implemented by the proponent that would further enhance the likelihood of the neighbouring sites achieving compliance with the new noise standards (following rezoning) without the requirement for either of the neighbouring sites to modify their current operations".* 

With respect to this statement, my queries are:

- 1. Is there currently any form of boundary fence between the two sites that acts to provide noise mitigation?
- 2. Why has the onus of providing a suitable internal noise level within the proposed residential units been placed upon the existing Light Industrial neighbour (through the proposed rezoning) as opposed to the developer through the adoption of an internal noise limit within the proposed dwellings through E25.6.10;

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- 3. The assessment appears limited to the current activity on the neighbouring Light Industrial site. Please clearly define the limitations on the generation of noise that the proposal would place upon the western Light Industrial zone as a result of the proposal (with the proposed mitigation);
- 4. One of the mitigation measures described by SLR is a 3 4m high boundary fence on the common boundary between the proposal and the western Light Industrial site. Is such a fence appropriate for the proposed residential zone given the suggested 4m boundary setback for residences?

#### Policy E25.3 (11)

Policy E25.3.11 recognises that activities occurring in the Open Space – Sport and Active Recreation Zone (the proposal's eastern neighbour) may generate high levels of noise and requires that adverse effects are avoided, remedied or mitigated having regard to the sensitivity of the receiving environment.

Within the AUP, the neighbouring Open Space – Sport and Active Recreation zone has no noise rules to comply with at the site of the proposal. The result of rezoning the site residential would be the imposition of E25.6.17 on the activities of the Open Space zone. Could the potential reverse sensitivity effects of doing so be addressed?

Should you have any questions regarding the above please do not hesitate to contact me.

Yours sincerely Hegley Acoustic Consultants

**Rhys Hegley** 

# ATTACHMENT D

# AUP(OP) SECTION E25 NOISE AND VIBRATION PROVISIONS

#### E25. Noise and vibration

#### E25.1. Background

Noise and vibration may cause adverse effects on amenity depending on:

- when and where it occurs;
- its duration;
- physical characteristics, including the sound pressure level (loudness) and frequency (pitch);
- its steadiness;
- variations of these properties; and
- whether special audible characteristics are present.

Within urban areas, the background noise environment is most often dominated by traffic. Generally, the higher the traffic volumes nearby, the higher the background noise level. In low traffic areas, background noise may occur naturally from waves, high winds, animals or insects. The Plan cannot control either traffic noise or natural noise.

The objectives and policies for noise and vibration seek to control the levels of noise and vibration created by activities to limit the adverse effects of noise and vibration on amenity values, human health and to protect existing noisy activities from reverse sensitivity effects.

#### E25.2. Objectives [rcp/dp]

- (1) People are protected from unreasonable levels of noise and vibration.
- (2) The amenity values of residential zones are protected from unreasonable noise and vibration, particularly at night.
- (3) Existing and authorised activities and infrastructure, which by their nature produce high levels of noise, are appropriately protected from reverse sensitivity effects where it is reasonable to do so.
- (4) Construction activities that cannot meet noise and vibration standards are enabled while controlling duration, frequency and timing to manage adverse effects.

#### E25.3. Policies [rcp/dp]

- (1) Set appropriate noise and vibration standards to reflect each zone's function and permitted activities, while ensuring that the potential adverse effects of noise and vibration are avoided, remedied or mitigated.
- (2) Minimise, where practicable, noise and vibration at its source or on the site from which it is generated to mitigate adverse effects on adjacent sites.

- (3) Encourage activities to locate in zones where the noise generated is compatible with other activities and, where practicable, adjacent zones.
- (4) Use area or activity specific rules where the particular functional or operational needs of the area or activity make such rules appropriate.
- (5) Prevent significant noise-generating activities other than roads and railway lines from establishing in or immediately adjoining residential zones.
- (6) Avoid activities sensitive to noise from establishing in industrial zones where adverse effects (including reverse sensitivity effects) arise that cannot be otherwise appropriately remedied or mitigated.
- (7) Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on:
  - (a) existing or authorised infrastructure;
  - (b) adjacent Business Light Industry Zone and Business Heavy Industry Zone;
  - (c) existing lawfully established rural production activities;
  - (d) major recreation facilities;
  - (e) existing lawfully established commercial activities within Business City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone, Business – Mixed Use Zone; or
  - (f) regionally significant mineral extraction activities.

Noise arising from lakes, rivers and the coastal marine area

(8) Require activities to be insulated or protected, from unreasonable manmade noise and vibration emitted from the use and development of neighbouring lakes, rivers or the coastal marine area.

#### Noise arising from or affecting rural zones

(9) Avoid, remedy or mitigate the adverse effects of noise in the rural environment, having regard to the working nature of this environment.

#### Construction, demolition and maintenance activities

- (10) Avoid, remedy or mitigate the adverse effects of noise and vibration from construction, maintenance and demolition activities while having regard to:
  - (a) the sensitivity of the receiving environment; and
  - (b) the proposed duration and hours of operation of the activity; and

(c) the practicability of complying with permitted noise and vibration standards.

### Events and activities

(11) Recognise that activities occurring in the Open Space – Sport and Active Recreation Zone may generate high levels of noise and ensure that adverse effects are avoided, remedied or mitigated having regard to the sensitivity of the receiving environment.

### E25.4. Activity table

Table E25.4.1 Activity table specifies the activity status of land use and development activities pursuant to section 9(3) of the Resource Management Act 1991 and the activity status of coastal use, occupation and activity pursuant to sections 12(1); 12(2) and 12(3) of the Resource Management Act 1991.

If any activity listed in rules (including standards) E25.4.1 to E25.6.33 is regulated by the Resource Management (National Environmental Standard for Plantation Forestry) Regulations 2017 ("NESPF") then the NESPF applies and prevails.

However, the NESPF allows the plan to include more restrictive rules in relation to one or more of the following:

- Significant Ecological Areas Overlay;
- Water Supply Management Areas Overlay;
- Outstanding Natural Character Overlay;
- High Natural Character Overlay;
- Outstanding Natural Landscapes Overlay;
- Outstanding Natural Features Overlay; or
- activities generating sediment that impact the coastal environment.

Where there is a rule in the plan that relates to any of the matters listed above then the plan rule will apply. In the event that there is any conflict between the rules in the plan and the NESPF in relation to any of the above, the most restrictive rule will prevail.

If the NESPF does not regulate an activity then the plan rules apply.

### Table E25.4.1 Activity table [rcp/dp]

Activity		Activity status
(A1)	Activities that comply with all the relevant permitted activity standards	Р
(A2)	Activities that do not comply with a permitted activity standard	RD

### E25.5. Notification

(1) Any application for resource consent for an activity listed in Table E25.4.1 Activity table will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.

(2) When deciding 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 <u>C1.13(4)</u>.

### E25.6. Standards

All activities must comply with the following relevant permitted activity standards.

### E25.6.1. General standards

- (1) Noise levels arising from activities must be measured and assessed in accordance with the New Zealand Standard NZS 6801:2008 Measurement of environmental sound and the New Zealand Standard NZS 6802:2008 Acoustics - Environmental noise except where more specific requirements apply.
- (2) The application of an adjustment for noise containing special audible characteristics in terms of Appendix B4 Special Audible Characteristics in New Zealand Standard NZS 6802:2008 Acoustics – Environmental noise may apply to the A weighted level for any measurement but an adjustment must not be applied to any level measured in the 63Hz and 125Hz octave bands.
- (3) The noise from any construction work activity must be measured and assessed in accordance with the requirements of New Zealand Standard NZS6803:1999 Acoustics – Construction noise. Construction work is defined in New Zealand Standard NZS6803:1999 Acoustics – Construction noise.
- (4) The noise limits of the Plan do not apply to emergency service sirens and callout sirens during emergency situations.
- (5) Where more than one standard applies that requires insulation of a noisesensitive space from an external noise source, the standards must be applied cumulatively.
- (6) Where standards are provided for specific activities, the zone interface standards and the zone standards do not apply to that activity.

Noise levels arising from activities within zones

### E25.6.2. Maximum noise levels in residential zones

(1) The noise (rating) levels and maximum noise level arising from any activity in the Residential – Large Lot Zone, Residential – Rural and Coastal Settlement Zone, Residential – Single House Zone, Residential – Mixed Housing Suburban Zone, Residential – Mixed Housing Urban Zone and the Residential – Terrace Housing and Apartment Buildings Zone measured within the boundary of an adjacent site in these residential zones must not exceed the levels in Table E25.6.2.1 Noise levels in residential zones below:

### Table E25.6.2.1 Noise levels in residential zones

Time	Noise level
Monday to Saturday 7am-10pm	50dB L <sub>Aeq</sub>
Sunday 9am-6pm	
All other times	40dB L <sub>Aeq</sub>
	75dB L <sub>AFmax</sub>

(2) The levels for the daytime hours in Table E25.6.2.1 Noise levels in residential zones may be exceeded by intermittent noise for reasonable periods where that noise is associated with normal household activities, such as lawn mowing or home handyman work.

### E25.6.3. Noise levels in rural and future urban zones

(1) The noise (rating) level from any activity in the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or the Future Urban Zone measured within the notional boundary on any site in any rural zone must not exceed the limits in Table E25.6.3.1 Noise levels in the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or the Future Urban Zone below:

### Table E25.6.3.1 Noise levels in the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or the Future Urban Zone

Time	Noise level	
Monday to Saturday 7am-10pm	55dD I	
Sunday 9am-6pm	55dB L <sub>Aeq</sub>	
All other times	45dB L <sub>Aeq</sub> 75dB L <sub>AFmax</sub>	

(2) The noise (rating) level from any activity in the Rural – Rural Conservation Zone; Rural – Countryside Living Zone, Rural – Waitākere Foothills Zone; or the Rural – Waitākere Ranges Zone measured within the notional boundary on any site in any rural zone must not exceed the limits in Table E25.6.3.2 Noise levels in the Rural – Rural Conservation Zone, Rural – Countryside Living Zone, Rural – Waitākere Foothills Zone; or Rural – Waitākere Ranges Zone below:

### Table E25.6.3.2 Noise levels in the Rural – Rural Conservation Zone Countryside Living Zone, Rural – Waitākere Foothills Zone; or the Rural – Waitākere Ranges Zone

Time	Noise level	
Monday to Saturday 7am-10pm		
Sunday 9am-6pm	50 dB L <sub>Aeq</sub>	
All other times	40 dB L <sub>Aeq</sub> 75 dB L <sub>AFmax</sub>	

- (3) Standards E25.6.3(1) and E25.6.3(2) above do not apply to any of the following:
  - (a) animal noise on farms unless they are confined within a building or enclosure on a permanent or semi-permanent basis;
  - (b) the use of mobile agricultural horticultural or forestry vehicles or machinery, or other mobile or portable agricultural, horticultural or forestry equipment; and

Note 1

The operator of such vehicles or machinery is required by the Resource Management Act 1991 to adopt the best practicable option to ensure that noise emissions do not exceed a reasonable level, which will depend on the time they are used, how loud they are, how long it is used for and how often it is used near rural dwellings.

(c) the use of post-harvest facilities including vehicle access ways and milking sheds set back at least 100m from a notional boundary.

### E25.6.4. Bird scaring devices in the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone and the Future Urban Zone

- (1) Bird scaring or bird repelling devices in the in the Rural Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone and the Future Urban Zone must not operate:
  - (a) between the hours of sunset and sunrise; and
  - (b) at a frequency of more than six times in any 60-minute period with no more than three shots in rapid succession; and
  - (c) where the noise level measured within the notional boundary on any other site exceeds 85dB  $L_{\mbox{\scriptsize Zpeak}}.$

(2) Standard E25.6.4(1) above does not apply to bird scaring devices that generate a noise level less than 70 dB L<sub>Zpeak</sub> measured at the notional boundary on another site.

### E25.6.5. Noise levels in the Business – Heavy Industry Zone or the Business – Light Industry Zone

(1) The noise (rating) level arising from an activity in the Business – Heavy Industry Zone or the Business – Light Industry Zone measured within the boundary of any other site in those zones must not exceed the limits in Table E25.6.5.1 Noise levels in the Business – Heavy Industry Zone or the Business – Light Industry Zone below:

Table E25.6.5.1 Noise levels in the Business – Heavy Industry Zone or the Business – Light Industry Zone

Time	Business – Heavy Industry Zone	Business – Light Industry Zone	
All times	70dB L <sub>Aeq</sub>	65dB L <sub>Aeq</sub>	

## E25.6.6. Noise levels in the Business – General Business Zone or the Business – Business Park Zone

(1) The noise (rating) level arising from an activity in the Business – General Business Zone or the Business – Business Park Zone measured within the boundary of any other site in those zones must not exceed the limits in Table E25.6.6.1 Noise levels in the Business – General Business Zone and the Business – Business Park Zone below:

Table E25.6.6.1 Noise levels in the Business – General Business Zone orthe Business – Business Park Zone

Time Business – General		Business – Business Park	
Business Zone		Zone	
All times	65dB L <sub>Aeq</sub>	60dB L <sub>Aeq</sub>	

### E25.6.7. Noise levels in the Business – Local Centre Zone or the Business – Neighbourhood Centre Zone

(1) The noise (rating) level and maximum noise level arising from any activity in the Business – Local Centre Zone or the Business – Neighbourhood Centre Zone measured or assessed as the incident level on the façade of any building on any other site in the Business – Local Centre Zone or the Business – Neighbourhood Centre Zone must not exceed the levels in Table E25.6.7.1 Noise levels in the Business – Local Centre Zone or the Business – Neighbourhood Centre Zone below:

Time	Business – Local Centre Zone	Business – Neighbourhood Centre Zone
7am - 10pm	60dB L <sub>Aeq</sub>	60dB L <sub>Aeq</sub>
40mm 7mm	50dB L <sub>Aeq</sub> 60dB at 63 Hz L <sub>eq</sub>	50dB L <sub>Aeq</sub> 60dB at 63 Hz L <sub>eq</sub>
10pm - 7am	55dB at 125 Hz L <sub>eq</sub>	55dB at 125 Hz L <sub>eq</sub>
	75dB L <sub>AFmax</sub>	75dB L <sub>AFmax</sub>

## Table E25.6.7.1 Noise levels in the Business – Local Centre Zone or theBusiness – Neighbourhood Centre Zone

### E25.6.8. Noise levels in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone or the Business – Mixed Use Zone

The noise (rating) level and maximum noise level arising from any activity in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone or the Business – Mixed Use Zone measured or assessed as the incident level on the façade of any building on any other site in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone or the Business – Metropolitan Centre Zone, Business – Town Centre Zone or the Business – Mixed Use Zone must not exceed the limits in Table E25.6.8.1 Noise levels in the Business – City Centre Zone, Business – Metropolitan Centre Zone or the Business – Town Centre Zone or the Business – Town Centre Zone or the Business – Town Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone or the Business – Mixed Use Zone below:

# Table E25.6.8.1 Noise levels in the Business – City Centre Zone,Business – Metropolitan Centre Zone, Business – Town Centre Zone orthe Business – Mixed Use Zone

Time	Business – City Centre Zone	Business – Metropolitan Centre Zone	Business – Town Centre Zone	Business – Mixed Use Zone
7am - 11pm	65 dB L <sub>Aeq</sub>	65 dB L <sub>Aeq</sub>	65dB L <sub>Aeq</sub>	65dB L <sub>Aeq</sub>
11pm – 7am	60dB L <sub>Aeq</sub> 65dB at 63 Hz L <sub>Aeq</sub> 60dB at 125 Hz L <sub>Aeq</sub> 75dB L <sub>AFmax</sub>	60dB L <sub>Aeq</sub> 65dB at 63 Hz L <sub>Aeq</sub> 60dB at 125 Hz L <sub>Aeq</sub> 75dB L <sub>AFmax</sub>	55dB L <sub>Aeq</sub> 65dB at 63 Hz L <sub>eq</sub> 60dB at 125 Hz L <sub>eq</sub> 75dB L <sub>AFmax</sub>	55dB L <sub>Aeq</sub> 65dB at 63 Hz L <sub>eq</sub> 60dB at 125 Hz L <sub>eq</sub> 75dB L <sub>AFmax</sub>

(2) The 63Hz and 125Hz octave band limits do not apply to fixed mechanical plant.

- E25.6.9. Noise levels between units in the Business City Centre Zone,
  Business Metropolitan Centre Zone, Business Town Centre Zone,
  Business Local Centre Zone, Business Neighbourhood Centre Zone or
  the Business Mixed Use Zone
  - (1) In situations where common building elements such as floors and walls connect two units in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone or the Business – Mixed Use Zone the noise (rating) level arising from any activity measured in any unit must not exceed the levels in Table E25.6.9.1 Noise levels between units in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone or the Business – Mixed Use Zone. below:

### Table E25.6.9.1 Noise levels between units in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone or the Business – Mixed Use Zone

Unit affected	Time	Noise level
In all units except those containing activities sensitive to noise	At all times	50dB L <sub>Aeq</sub>
In bedrooms and sleeping areas within units containing	Between 10pm and 7am in Business – Local Centre Zone and Business – Neighbourhood Centre Zone and Between 11pm and 7am in Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and the Business – Mixed Use Zone	35dB L <sub>Aeq</sub> 45dB at 63 Hz L <sub>eq</sub> 40dB at 125 Hz L <sub>eq</sub>
activities sensitive to noise	Between 7am and 10pm in Business – Local Centre Zone and Business – Neighbourhood Centre Zone and Between 7am and 11pm in Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and the Business – Mixed Use Zone	40dB L <sub>Aeq</sub>
Other noise sensitive spaces	At all other times	40 dB L <sub>Aeq</sub>
<b>Note:</b> Adjustments for noise containing Special Audible Characteristics will only apply to A weighted levels		

(2) The 63Hz and 125Hz octave band limits do not apply to fixed mechanical plant.

- E25.6.10. Noise levels for noise sensitive spaces in the Business City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone, Business – Mixed Use Zone, Business – Heavy Industry Zone or the Business – Light Industry Zone
  - (1) Noise sensitive spaces must be designed and/or insulated so that the internal noise levels do not exceed the levels in Table E25.6.10.1 Noise levels for noise sensitive spaces in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone, Business – Mixed Use Zone, Business – Heavy Industry Zone or the Business – Light Industry Zone below:

Table E25.6.10.1 Noise levels for noise sensitive spaces in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone, Business – Mixed Use Zone, Business – Heavy Industry Zone or the Business – Light Industry Zone

Unit affected	Time	Level
Bedrooms and sleeping areas in the Business – Local Centre Zone and in the Business – Neighbourhood Centre Zone	Between 10pm and 7am	35dB LAeq 45dB at 63 Hz Leq; and 40dB at 125 Hz Leq
Bedrooms and sleeping areas in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Mixed Use Zone, Business – Heavy Industry Zone or the Business – Light Industry Zone	Between 11pm and 7am	35dB LAeq 45dB at 63 Hz Leq and 40dB at 125 Hz Leq
Other noise sensitive spaces	At all other times	40 dBA LAeq

- (2) The levels in Table E25.6.10.1 Noise levels for noise sensitive spaces in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone, Business – Mixed Use Zone, Business – Heavy Industry Zone or the Business – Light Industry Zone above must be met based on the maximum level of noise permitted by the zone or precinct standards or any adjacent zone or precinct standards.
- (3) Where a new room is constructed that is subject to Standard E25.6.10(1) (internal acoustic insulation requirement) and the noise levels in Table E25.6.10.1 Noise levels for noise sensitive spaces in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre

Zone or the Business – Mixed Use Zone, Business – Heavy Industry Zone or the Business – Light Industry Zone (internal design noise level) can only be complied with when doors or windows to those rooms are closed, those rooms must, as a minimum:

- (a) be constructed to ensure compliance with the noise limits in Table E25.6.10.1 Noise levels for noise sensitive spaces in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone, Business – Mixed Use Zone, Business – Heavy Industry Zone or the Business – Light Industry Zone; and
- (b) for residential dwellings be mechanically ventilated and/or cooled to achieve either:
  - (i) an internal temperature no greater than 25 degrees celsius based on external design conditions of dry bulb 25.1 degrees celsius and wet bulb 20.1 degrees celsius; or

Note 1

Mechanical cooling must be provided for all habitable rooms (excluding bedrooms) provided that at least one mechanical cooling system must service every level of a dwelling that contains a habitable room (including bedrooms).

- (ii) a high volume of outdoor air supply to all habitable rooms with an outdoor air supply rate of no less than:
  - six air changes per hour (ACH) for rooms with less than 30 per cent of the façade area glazed; or
  - 15 air changes per hour (ACH) for rooms with greater than 30 per cent of the façade area glazed; or
  - three air changes per hour for rooms with facades only facing south (between 120 degrees and 240 degrees) or where the glazing in the façade is not subject to any direct sunlight.
- (c) for all other noise sensitive spaces provide mechanical cooling to achieve an internal temperature no greater than 25 degrees celsius based on external design conditions of dry bulb 25.1 degrees celsius and wet bulb 20.1 degrees celsius; and
- (d) provide relief for equivalent volumes of spill air; and
- (e) be individually controllable across the range of airflows and temperatures by the building occupants in the case of each system; and
- (f) have a mechanical ventilation and/or a cooling system that generates a noise level no greater than  $L_{\text{Aeq}}$  35 dB when measured 1m from the

diffuser at the minimum air flows required to achieve the design temperatures and air flows in Standard E25.6.10(3)(b)(i) and (ii) above.

### E25.6.11. Noise levels in the Coastal – Marina Zone [rcp/dp]

(1) The noise (rating) level arising from an activity in the Coastal – Marina Zone measured within the boundary of any other site in this zone must not exceed the levels in Table E25.6.7.1 Noise levels in the Coastal – Marina Zone.

### Table E25.6.7.1 Noise levels in the Coastal – Marina Zone

Time	Coastal – Marina Zone
All times	60dB L <sub>Aeq</sub>

### E25.6.12. Noise levels in the Special Purpose – Cemetery Zone or the Special Purpose – Māori Purpose Zone

(1) The noise (rating) level and maximum noise level from any activity measured within the boundary of any site in the Special Purpose – Cemetery Zone or the Special Purpose – Māori Purpose Zone must not exceed the levels in Table E25.6.12.1 Noise levels in the Special Purpose – Cemetery Zone or the Special Purpose – Māori Purpose Zone.

## Table E25.6.12.1 Noise levels in the Special Purpose – Cemetery Zone orthe Special Purpose – Māori Purpose Zone

Time	Special Purpose – Cemetery Zone or Special Purpose – Māori Purpose Zone
Monday to Saturday 7am-10pm	50 dP I
Sunday 9am-6pm	50 dB L <sub>Aeq</sub>
All other times	40 dB L <sub>Aeq</sub> 75 dB L <sub>AFmax</sub>

## E25.6.13. Noise levels in the Special Purpose – Healthcare Facility and Hospital Zone

(1) The noise (rating) level from any activity measured within the boundary of any site in the Special Purpose – Healthcare Facility and Hospital Zone must not exceed the levels in Table E25.6.13.1 Noise levels in the Special Purpose – Healthcare Facility and Hospital Zone below:

## Table E25.6.13.1 Noise levels in the Special Purpose – Healthcare Facility and Hospital Zone

Time	Special Purpose – Health Care Facility and Hospital Zone
Monday to Saturday	55 dB L <sub>Aeq</sub>

7am-10pm	
Sunday	
9am-6pm	
All other times	45 dB L <sub>Aeq</sub>
	75 dB L <sub>AFmax</sub>

Noise levels for activities between zones

### E25.6.14. Noise levels at the coastal interface [rcp/dp]

(1) The noise (rating) level generated by any activity in the coastal marine area or on a lake or river must not exceed the levels in Table E25.6.14.1 Noise levels at the coastal interface when measured within the boundary of a site in a residential zone or notional boundary of any site in the Rural – Rural Production Zone, Rural – Mixed Rural Zone, Rural – Rural Coastal Zone; Rural – Rural Conservation Zone, Rural – Countryside Living Zone, Rural – Waitākere Foothills Zone and Rural – Waitākere Ranges Zone.

### Table E25.6.14.1 Noise levels at the coastal interface

Time	Noise level
7am-10pm	50dB L <sub>Aeq</sub>
10pm-7am	40dB L <sub>Aeq</sub>
	75dB L <sub>AFmax</sub>

- (2) The noise levels in Standard E25.6.14(1) above do not apply to:
  - (a) the operational requirements of vessels (including cargo vessels, tugs, passenger liners, naval vessels and commercial fishing vessels); and
  - (b) temporary activities in E40 Temporary activities.

### E25.6.15. Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or Future Urban Zone interface

(1) The noise (rating) level and maximum noise level from any activity in the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or Future Urban Zone measured within the boundary of any site in a residential zone must not exceed the levels in Table E25.6.15.1 Noise levels at the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or Future Urban Zone interface below:

Table E25.6.15.1 Noise levels at the Rural – Mixed Rural Zone, Rural – Rural Production Zone, Rural – Rural Coastal Zone or Future Urban Zone interface

Time	Noise level
Monday to Saturday	55dB L <sub>Aeq</sub>

7am-10pm	
Sunday 9am-6pm	
All other times	45dB L <sub>Aeq</sub>
	75dB L <sub>AFmax</sub>

- (2) Standard E25.6.15(1) above does not apply to:
  - (a) animal noise on farms unless they are confined within a building or enclosure on a permanent or semi-permanent basis; or
  - (b) the use of mobile agricultural horticultural or forestry vehicles or machinery, or other mobile or portable agricultural, horticultural or forestry equipment; or

The operator of such vehicles or machinery is required by the Resource Management Act 1991 to adopt the best practicable option to ensure that noise emissions do not exceed a reasonable level, which will depend on the time they are used, how loud they are, how long it is used for and how often it is used near dwellings.

(c) the use of post-harvest facilities including vehicle access ways and milking sheds set back at least 100m from any residential zone.

### E25.6.16. Rural – Rural Conservation Zone, Rural – Countryside Living Zone Rural – Waitākere Foothills Zone or Rural – Waitākere Ranges Zone interface

(1) The noise (rating) level and maximum noise level from any activity in the Rural – Rural Conservation Zone, Rural – Countryside Living Zone, Rural – Waitākere Foothills Zone or the Rural – Waitākere Ranges Zone measured within the boundary of any site in a residential zone must not exceed the levels in Table E25.6.16.1 Noise levels at the Rural – Rural Conservation Zone, Rural – Countryside Living Zone, Rural – Waitākere Foothills Zone or the Rural – Waitākere Ranges Zone.

Table E25.6.16.1 Noise levels at the Rural – Rural Conservation Zone, Rural – Countryside Living Zone, Rural – Waitākere Foothills Zone or the Rural – Waitākere Ranges Zone

Time	Noise level
Monday to Saturday	
7am-10pm	50dB L <sub>Aeq</sub>
Sunday 9am-6pm	
All other times	40dB L <sub>Aeq</sub>
All other times	75dB L <sub>AFmax</sub>

(2) Standard E25.6.16(1) above does not apply to:

- (a) animal noise on farms unless they are confined within a building or enclosure on a permanent or semi-permanent basis; or
- (b) the use of mobile agricultural horticultural or forestry vehicles or machinery, or other mobile or portable agricultural, horticultural or forestry equipment; or

The operator of such vehicles or machinery is required by the Resource Management Act 1991 to adopt the best practicable option to ensure that noise emissions do not exceed a reasonable level, which will depend on the time they are used, how loud they are, how long it is used for and how often it is used near dwellings.

(c) the use of post-harvest facilities including vehicle access ways and milking sheds set back at least 100m from any residential zone.

### E25.6.17. Open Space – Sport and Active Recreation Zone interface

(1) The noise (rating) level and maximum noise level arising from any recreational activity in the Open Space – Sport and Active Recreation Zone measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface below:

## Table E25.6.17.1 Noise levels at the Open Space – Sport and ActiveRecreation Zone interface

Time	Noise level
	55dB L <sub>Aeq</sub>
	Except that for a cumulative period of:
Monday to Saturday	(i) 3 hours per day between 7am and 9.30pm
7am-10pm	Monday to Friday; and
	(ii)6 hours between 7am and 10pm on Saturdays.
	the noise level must not exceed 60dB $L_{Aeq}$
Sundays and Public	55dB L <sub>Aeq</sub>
Holidays 9am to 6pm	Except that for a cumulative period of 3 hours
outside the daylight	between 10am and 3pm on Sundays the noise level
saving period	must not exceed 60dB L <sub>Aeq</sub>
Sundays and Public	55dB L <sub>Aeq</sub>
Holidays 8am to 7pm	Except that for a cumulative period of 3 hours
during the daylight	between 10am and 3pm Sundays the noise level
saving period	must not exceed 60dB L <sub>Aeq</sub>
	40dB L <sub>Aeq</sub>
All other times	55dB L <sub>eq</sub> at 63 Hz
	50dB L <sub>eq</sub> at 125 Hz
	75dB L <sub>AFmax</sub>

Compliance with the lower noise limit of 40dB  $L_{Aeq}$  applying at all other times in Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface may preclude intense, noisy activities or activities involving teams or groups from being undertaken where the receivers of noise are close to boundaries.

(2) The noise (rating) level and maximum noise level from the use of any voice or music amplification system associated with recreational activity in the Open Space – Sport and Active Recreation Zone measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.17.2 Noise levels from any voice or music amplification system associated with recreational activity on land zoned Open Space – Sport and Active Recreation Zone below:

Table E25.6.17.2 Noise levels from any voice or music amplification system associated with recreational activity on land zoned Open Space – Sport and Active Recreation Zone

Time	Noise level
Monday to Saturday	
7am-10pm	50dB L <sub>Aeg(5min)</sub>
Sunday and Public Holidays	
9am-6pm	
All other times	40dB L <sub>Aeq(5min)</sub>
	55dB L <sub>eq(5min</sub> ) at 63 Hz
	50dB L <sub>eq(5min)</sub> at 125 Hz
	75dB L <sub>AFmax</sub>

(a) No five minute measurement may exceed the stated limit.

### E25.6.18. Open Space – Conservation Zone, Open Space – Informal Recreation Zone, Open Space – Civic Spaces Zone or Open Space – Community Zone interface

(1) The noise (rating) level and maximum noise level from any activity in the Open Space – Conservation Zone, Open Space – Informal Recreation Zone, Open Space – Civic Spaces Zone or Open Space – Community Zone when measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.18.1 Noise levels at the Open Space – Conservation Zone, Open Space – Informal Recreation Zone, Open Space – Civic Spaces Zone or Open Space – Community Zone interface below:

# Table E25.6.18.1 Noise limits at the Open Space – Conservation Zone,Open Space – Informal Recreation Zone, Open Space – Civic SpacesZone or Open Space – Community Zone interface

Time	Noise level
Monday to Saturday 7am-10pm	50dB L <sub>Aeg</sub>
Sunday 9am-6pm	
All other times	40dB L <sub>Aeq</sub> 75dB L <sub>AFmax</sub>

### E25.6.19. Business zones interface

(1) The noise (rating) and maximum noise level from any activity in the business zones must not exceed the levels in Table E25.6.19.1 Noise levels at the business zone interface when measured within the boundary of a site in a residential zone or within the notional boundary of property in a rural zone.

Table E25.6.19.1 Noise levels at the busine	ness zone interface
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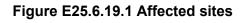
Time	Noise level
Monday to Saturday 7am-10pm	EE AD I
Sunday 9am-6pm	55dB L <sub>Aeq</sub>
All other times	45dB L <sub>Aeq</sub>
	60dB L <sub>eq</sub> at 63 Hz
	55dB L <sub>eq</sub> at 125 Hz
	75dB L <sub>AFmax</sub>

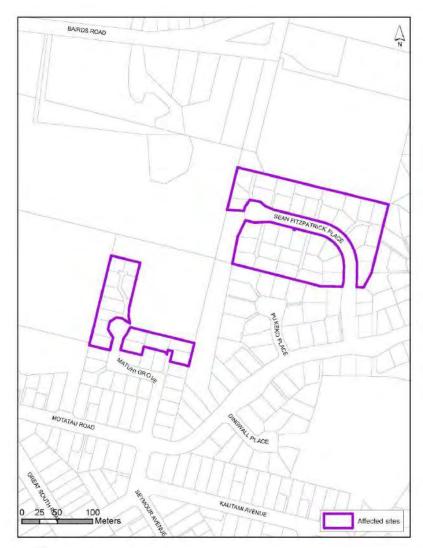
- (2) These noise limits in Standard E25.6.19(1) above do not apply to any of the following:
  - (a) the noise from vehicles moving on roads controlled by Auckland Council or Auckland Transport; or
  - (b) the noise affecting 11, 13, and 15 Harrison Road as generated on the Fulton Hogan sites at 7 Reliable Way (Lot 2, DP 114222, CT NA65A/209) and 4 Reliable Way Mt Wellington (Lot 3, DP 363738, CT 259289).
    Instead, the noise (rating) level arising from the Fulton Hogan sites must comply with a limit of 60dB L<sub>Aeq</sub> when measured within the boundary of 11, 13 or 15 Harrison Road; or
  - (c) the noise affecting the sites identified in Table E25.6.19.2 Affected sites and on Figure E25.6.19.1 Affected sites as generated on the DB Waitemata Breweries site and 3 Bairds Road, Ōtahuhu (being PT Lot 4 DP 22498, Lot 1, DP 29149, PT Lot 4 DP 15832, PT Lot 2 DP 31817, PT Lot 9 DP 26107, Lot 1 DP 31104, PT Lot 10 DP 7281 all on CT 443069). Instead, the noise (rating) level arising from the DB Waitemata Breweries site must comply with a limit of 65dB L<sub>Aeq</sub> with a maximum noise limit of

90dB  $L_{AFmax}$  applying only between the hours of 10pm and 7am when measured within the boundary of the sites identified in Table E25.6.19.2 Affected sites and shown on Figure E25.6.19.1 Affected sites below:

### Table E25.6.19.2 Affected sites

Lot 10 DP 205759
Lot 2 DP 205759
Lot 4 DP 205759
Lot 8 DP 205759
Lot 17 DP 205759
Lot 12 DP 205759
Lot 11 DP 205759
Lot 15 DP 205759
Lot 300 DP 205759
Lot 24 DP 205759
Lot 28 DP 205759
Lot 34 DP 205759
Lot 35 DP 205759
Lot 14 DP 335896
Lot 18 DP 335896
Lot 7 DP 335896
Lot 8 DP 335896
Lot 9 DP 335896
Lot 13 DP 335896
Lot 15 DP 335896
Lot 16 DP 335896
Lot 17 DP 335896
Lot 31 DP 341162
Lot 28 DP 341162
Lot 29 DP 341162
Lot 30 DP 341162
Lot 100 DP 341162
Lot 27 DP 341162





### E25.6.20. Noise levels at the Coastal – Marina Zone interface

(1) The noise (rating) levels and maximum noise level from any activity on land in the Coastal – Marina Zone must not exceed the levels in Table E25.6.20.1 Noise levels at the Coastal Marina Zone interface when measured within the boundary of a site in a residential zone or within the notional boundary of property in a rural zone.

Time	Noise level
Monday to Saturday 7am-10pm	EEAD I
Sunday 9am-6pm	55dB L <sub>Aeq</sub>
All other times	45dB L <sub>Aeq</sub>
	60dB L <sub>eq</sub> at 63 Hz
	55dB L <sub>eq</sub> at 125 Hz
	75dB L <sub>AFmax</sub>

Table E25.6.20.1 Noise levels at the Coastal – Marina Zone interface

(2) The noise levels in Standard E25.6.20(1) above do not apply to the noise from vehicles moving on roads controlled by Council or Auckland Transport.

### E25.6.21. Schools interface

(1) The noise (rating) level and maximum noise level from any neighbouring activity measured within the boundary of any school not located in the Special Purpose – School Zone must not exceed the levels in Table E25.6.21.1 Noise levels from any neighbouring activity measured within the boundary of any school not located in a Special Purpose – School Zone.

# Table E25.6.21.1 Noise levels from any neighbouring activity measured within the boundary of any school not located in a Special Purpose – School Zone:

Time	Noise level
Monday to Saturday 7am-10pm	EEAD I
Sunday 9am-6pm	55dB L <sub>Aeq</sub>
All other times	45dB L <sub>Aeq</sub>
All other times	75dB L <sub>AFmax</sub>

### E25.6.22. All other zone interfaces

(1) Except as provided for in Standards E25.6.14 to E25.6.21 above, where noise generated by any activity on a site in one zone is received by any activity on a site in a different zone, the activity generating the noise must comply with the noise limits and standards of the zone at the receiving site.

### Noise arising from specific activities

### E25.6.23. Noise levels for care centres for a childcare centre, creche, kindergarten, kohanga reo, play centre, play group, early childhood learning service or an after school care centre

(1) The noise (rating) level arising from any care centres for a childcare centre, creche, kindergarten, kohanga reo, play centre, play group, early childhood learning service or an after school care centre in any zone when measured within the boundary of any site in a residential zone must not exceed the levels in Table E25.6.23.1 Noise levels for care centres for a childcare centre, creche, kindergarten, kohanga reo, play centre, play group, early childhood learning service or an after school care centre unless the relevant zone in which the care centres for a childcare centre, creche, kindergarten, play group, early childhood learning service or an after school care centre unless the relevant zone in which the care centres for a childcare centre, creche, kindergarten, kohanga reo, play centre, play group, early childhood learning service or an after school care centre unless the relevant zone in which the care centres for a childcare centre, creche, kindergarten, kohanga reo, play centre, play group, early childhood learning service or an after school care centre unless the relevant zone in which the care centres for a childcare centre, creche, kindergarten, kohanga reo, play centre, play group, early childhood learning service or an after school care centre unless the relevant zone in which the care centre is located provides for higher levels.

# Table E25.6.23.1 Noise levels for care centres for a childcare centre, creche, kindergarten, kohanga reo, play centre, play group, early childhood learning service or an after school care centre

Time	Noise level
Monday to Friday 7am-6pm	55dB L <sub>Aeq</sub>
All other times	40dB L <sub>Aeq</sub> 75dB L <sub>AFmax</sub>

## E25.6.24. Noise levels for a primary school, intermediate school, secondary school or tertiary education facility

(1) The noise (rating) level arising from the operation of a primary, intermediate school, secondary school or tertiary education facility must comply with the noise levels in Table E25.6.24.1 Noise levels for a primary school, intermediate school, secondary school or tertiary education facility when measured within the boundary of any residentially zoned site.

Table E25.6.24.1 Noise levels for a primary school, intermediate school,secondary school or tertiary education facility

Time	Noise level
Monday to Saturday 7am to 10pm	EE AR L
Sunday 9am to 6pm	55dB L <sub>Aeq</sub>
All other times	45dB L <sub>Aeq</sub>
All other times	75dB L <sub>AFmax</sub>

Compliance with the noise levels of 45dB L<sub>Aeq</sub> and 75dB L<sub>AFmax</sub> applying at all other times in Table E25.6.24.1 Noise levels for a primary school, intermediate school, secondary school or tertiary education facility may mean that functions, events, and other activities utilising buildings, car parks, accessways and open space proximate to any activity sensitive to noise may need to be restricted in terms of finishing time or noise level.

(2) These noise limits do not apply to noise from school sports and school recreational activities occurring between 8am and 6pm Monday to Saturday.

### E25.6.25. Noise levels for wind turbines or wind farms

- (1) At any wind speed, the L<sub>A90 (10min)</sub> sound level from a wind turbine generator or wind farm must not exceed the background sound level by more than 5dB, or a level of 40dB L<sub>A90 (10min)</sub> whichever is the greater when measured within the notional boundary on any property which is a noise sensitive location as defined in New Zealand Standard 6808: 2010 Acoustics – Wind farm noise.
- (2) The noise level generated by wind farms must be measured and assessed in accordance with New Zealand Standard 6808:2010 Acoustics Wind farm noise.

### E25.6.26. Noise levels for electricity generators

(1) The noise (rating) level and maximum noise level arising from the use of any electricity generator in a rural zone or a residential zone powered by an internal combustion engine measured within the boundary of any site in a residential zone or the notional boundary of any site in a rural zone must not exceed the levels in Table E25.6.26.1 Noise levels for electricity generators.

### Table E25.6.26.1 Noise levels for electricity generators

Time	Noise level
7am to 10pm	40dB L <sub>Aeq</sub>
10pm to 7am	30dB L <sub>Aeq</sub> 75dB L <sub>AFmax</sub>

(2) Standard E25.6.26(1) does not apply to generators in use prior to the 30 September 2013. For generators established on or before 30 September 2013 the noise limits for the relevant zone or zone interface apply.

### Construction noise

### E25.6.27. Construction noise levels in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone

(1) Noise from construction activities in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone must not exceed the levels in Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone when measured 1m from the façade of any building that contains an activity sensitive to noise that is occupied during the works.

Time of	Time Period	Maximum noise	e level (dBA)
week	Time Period	L <sub>eq</sub>	L <sub>max</sub>
	6:30am - 7:30am	60	75
Maakdaya	7:30am - 6:00pm	75	90
Weekdays	6:00pm - 8:00pm	70	85
	8:00pm - 6:30am	45	75
Saturdays	6:30am - 7:30am	45	75
	7:30am - 6:00pm	75	90
	6:00pm - 8:00pm	45	75
	8:00pm - 6:30am	45	75
	6:30am - 7:30am	45	75
Sundays	7:30am - 6:00pm	55	85
and public holidays	6:00pm - 8:00pm	45	75
	8:00pm - 6:30am	45	75

# Table E25.6.27.1 Construction noise levels for activities sensitive tonoise in all zones except the Business – City Centre Zone and theBusiness – Metropolitan Centre Zone

(2) Noise from construction activities in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone must not exceed the levels in Table E25.6.27.2 Construction noise levels for noise affecting any other activity when measured 1m from the façade of any other building that is occupied during the works.

## Table E25.6.27.2 Construction noise levels for noise affecting any other activity

Time Period	Maximum noise levels Leq dBA
7:30am – 6:00pm	75
6:00pm – 7:30am	80

- (3) For a project involving a total duration of construction work that is less than 15 calendar days, the noise levels in Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business City Centre Zone and the Business Metropolitan Centre Zone and Table E25.6.27.2 Construction noise levels for noise affecting any other activity above shall be increased by 5dB in all cases.
- (4) For a project involving a total duration of construction work that is more than 20 weeks the noise limits in Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone and Table E25.6.27.2 Construction noise levels for noise affecting any other activity above shall be decreased by 5dB in all cases.

## E25.6.28. Construction noise levels in the Business – City Centre Zone and the Business – Metropolitan Centre Zone

(1) Construction activities in the Business – City Centre Zone and the Business – Metropolitan Centre Zone must comply with Standard E25.6.27(1) above for any receiver not in a Business – City Centre Zone or a Business – Metropolitan Centre Zone and must not exceed the levels in Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone and Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone when measured for any 30 minute period 1m from the façade of any building in the Business – City Centre Zone or the Business – Metropolitan Centre Zone that is occupied during the work.

Table E25.6.28.1 Construction noise levels for construction less than 15consecutive calendar days duration in the Business – City Centre Zoneand the Business – Metropolitan Centre Zone

Construction of less than 15 consecutive calendar days duration (total duration of works)			
Time	L <sub>Aeq(30 min)</sub>	L <sub>AFmax</sub>	
Monday to Friday 6.30am - 10.30pm	80 dB	90 dB	
Saturday 7am - 11pm	85 dB	90 dB	
Sunday 9am - 7pm	80 dB	90 dB	
All other times (night time)	60 dB	75 dB	
All other times in the City Centre Residential Precinct and the Learning Precinct	55 dB	75 dB	

Table E25.6.28.2 Construction noise levels for construction of 15
consecutive calendar days or more duration in the Business – City
Centre Zone and the Business – Metropolitan Centre Zone

Construction of 15 consecutive calendar days or more (total duration of works)			
Time	L <sub>Aeq(30 min)</sub>	L <sub>AFmax</sub>	
Monday to Friday 6.30am-10.30pm	75 dB	90 dB	
Saturday 7am-11pm	80 dB	90 dB	
Sunday 9am-7pm	65 dB	85 dB	
All other times (night time)	60 dB	75 dB	
All other times in the City Centre Residential Precinct and the Learning Precinct	55 dB	75dB	

Where external measurement of construction noise is impractical or inappropriate, the upper limits for the noise measured inside the building will be 20dB less than the relevant levels in Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone and Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Netropolitan Centre Zone and the Business – City Centre Zone and the Business – City Centre Zone and the Business – City Centre Zone and the Business – Netropolitan Centre Zone and the Business – City Centre Zone and the Business – Netropolitan Centre Zone and the Business – City Centre Zone and the Business – Netropolitan Centre Zone and the Business – City Centre Zone and the Business – Netropolitan Centre Zone and the Business – City Centre Zone and the Business – Netropolitan Centre Zone above.

### E25.6.29. Construction noise and vibration levels for work within the road

- (1) Noise from any construction, maintenance and demolition activities in the road must comply with the relevant noise levels in the following relevant table:
  - (a) Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
  - (b) Table E25.6.27.2 Construction noise levels for noise affecting any other activity; or
  - (c) Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
  - (d) Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone.

- (1A) Vibration from any construction, maintenance and demolition activities in the road must comply with the relevant vibration levels in the following relevant table or standard:
  - (a) the limits set out in E25.6.30(1)(a) German Industrial Standard DIN 4150-3 (1999): Structural vibration Part 3 Effects of vibration on structures; and
  - (b) Table E25.6.30.1 Vibration limits in buildings.
- (2) The noise levels specified in Standard E25.6.29(1) above do not apply to unplanned repair or maintenance works or planned works in the road between the hours of 10pm and 7am where:
  - (a) the number of nights where the noise generated by the works exceeds the relevant noise levels in the following tables:
    - (i) Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
    - (ii) Table E25.6.27.2 Construction noise levels for noise affecting any other activity; or
    - (iii) Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
    - (iv) Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone;

at any one receiver is 3 nights or less; and

- (b) the works cannot practicably be carried out during the day or because the road controlling authority requires this work to be done at night time; or
- (c) because of the nature of the works the noise produced cannot be practicably be made to comply with the relevant noise levels of the following tables:
  - (i) Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
  - (ii) Table E25.6.27.2 Construction noise levels for noise affecting any other activity; or
  - (iii) Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or

- (iv) Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
- (d) for planned works, a copy of the works access permit issued by Auckland Transport or approval from the New Zealand Transport Agency is provided to the Council five days prior to work commencing; or
- (e) for minor planned works a construction noise and vibration management plan is provided to the Council no less than five days prior to the works commencing in accordance with the applicable provisions of Standard E25.6.29(5) below.
- (3) The noise levels specified in Standard E25.6.29(1) above do not apply to unplanned repair or maintenance works or planned works in the road between the hours of 7am and 10pm where:
  - (a) the number of days where the noise generated by the works exceeds the relevant noise levels in the following tables:
    - (i) Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
    - (ii) Table E25.6.27.2 Construction noise levels for noise affecting any other activity; or
    - (iii) Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
    - (iv) Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone;

at any one receiver is 10 days or less; or

- (b) because of the nature of the works and the proximity of receivers the noise generated cannot practicably made to comply with the relevant noise levels of the following tables:
  - (i) Table E25.6.27.1 Construction noise limits for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
  - (ii) Table E25.6.27.2 Construction noise limits for noise affecting any other activity; or
  - (iii) Table E25.6.28.1 Construction noise limits for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or

- (iv) Table E25.6.28.2 Construction noise limits for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
- (c) for planned works, a copy of the works access permit issued by Auckland Transport or approval from the New Zealand Transport Agency is provided to the Council five days prior to work commencing; or
- (d) for planned works where the works will take more than 8 hours to complete a construction noise and vibration management plan is provided to the Council no less than five days prior to the works commencing in accordance with the applicable provisions of Standard E25.6.29(5) below.
- (4) The noise levels specified in Standard E25.6.29(1) do not apply to road rehabilitation works that comprise the substantial removal and replacement of the road structural base and pavement in the road where:
  - (a) the number of nights where the noise generated by the works exceeds the relevant noise levels in the following tables:
    - (i) Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
    - (ii) Table E25.6.27.2 Construction noise levels for noise affecting any other activity; or
    - (iii) Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
    - (iv) Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone;

at any one receiver is 20 days or less; and

- (b) milling, concrete cutting, percussive demolition are completed by 10.30pm; and
- (c) the works cannot practicably be carried out during the day or because the road controlling authority requires this work to be done at night time; and
- (d) because of the nature of the works the noise produced cannot be practicably be made to comply with the relevant noise levels of the following tables:
  - (i) Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or

- (ii) Table E25.6.27.2 Construction noise levels for noise affecting any other activity; or
- (iii) Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
- (iv) Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; and
- (e) a copy of the works access permit issued by Auckland Transport or approval from the New Zealand Transport Agency is provided to the Council five days prior to work commencing; and
- (f) a construction noise and vibration management plan is provided to the Council no less than five days prior to the works commencing in accordance with the applicable provisions of Standard E25.6.29(5) below.
- (4A) The vibration levels specified in Standard E25.6.29(1A)(b) do not apply to works within the road where:
  - (a) for planned works, a copy of the works access permit issued by Auckland Transport or approval from the New Zealand Transport Agency is provided to the Council five days prior to work commencing; and
  - (b) a construction noise and vibration management plan is provided to the Council no less than five days prior to the works commencing in accordance with the applicable provisions of Standard E25.6.29(5) below.
  - (5) A construction noise and vibration management plan must be prepared by a suitably qualified and experienced person and include the following:
    - (a) details of the community consultation to be undertaken to advise the occupiers of properties located within 100m of the proposed works of all of the following:
      - (i) the area affected by the work;
      - (ii) why the work is required to be undertaken at night (where relevant);
      - (iii) the times and days when the noise and vibration is likely to be generated;
      - (iv) a contact name and number of the works supervisor who can be contacted if any issues arise; and
      - (v) how noise and vibration complaints will be managed and responded to;

- (b) a description of the works and its duration, anticipated equipment to be used, the processes to be undertaken and the predicted noise and vibration levels; and
- (c) identification of the best practicable options that will be undertaken to mitigate and minimise any noise and vibration being produced that is likely to exceed the relevant levels of the following tables:
  - (i) Table E25.6.27.1 Construction noise levels for activities sensitive to noise in all zones except the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
  - (ii) Table E25.6.27.2 Construction noise levels for noise affecting any other activity; or
  - (iii) Table E25.6.28.1 Construction noise levels for construction less than 15 consecutive calendar days duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
  - (iv) Table E25.6.28.2 Construction noise levels for construction of 15 consecutive calendar days or more duration in the Business – City Centre Zone and the Business – Metropolitan Centre Zone; or
  - (v) Table E25.6.30.1 Vibration limits in buildings.
- (6) For the purpose of Standards E25.6.29(1) to E25.6.29(4A) above:
  - (a) planned work means work that has been planned to take place at least seven days before the work commences;
  - (b) the measurement and assessment of all construction noise must be in accordance with New Zealand Standard NZS 6803:1999 Acoustics – Construction noise; and
  - (c) the measurement of all vibration must be in accordance with E25.6.30 Vibration.

### Vibration

### E25.6.30. Vibration

- (1) Construction and demolition activities must be controlled to ensure any resulting vibration does not exceed:
  - (a) the limits set out in German Industrial Standard DIN 4150-3 (1999): Structural vibration – Part 3 Effects of vibration on structures when measured in accordance with that Standard on any structure not on the same site; and
  - (b) the limits in Table E25.6.30.1 Vibration limits in buildings in any axis when measured in the corner of the floor of the storey of interest for multi-storey

buildings, or within 500mm of ground level at the foundation of a single storey building.

Receiver	Period	Peak Particle Velocity Limit millimetres/second
Occupied activity	Night-time 10pm to 7am	0.3 mm/s
sensitive to noise	Daytime 7am to 10pm	2 mm/s
Other occupied buildings	At all times	2 mm/s

### Table E25.6.30.1 Vibration limits in buildings

Works generating vibration for three days or less between the hours of 7am to 6pm may exceed the limits in Table E25.6.30.1 Vibration limits in buildings above, but must comply with a limit of 5mm/s peak particle velocity in any axis when measured in the corner of the floor of the storey of interest for multi-storey buildings, or within 500mm of ground level at the foundation of a single storey building, where:

- (i) all occupied buildings within 50m of the extent of the works generating vibration are advised in writing no less than three days prior to the vibration-generating works commencing; and
- (ii) the written advice must include details of the location of the works, the duration of the works, a phone number for complaints and the name of the site manager.
- (2) Permanently installed stationary vibrating, reciprocating and rotating machinery and all piping, ducting and other equipment attached to such machinery must be installed and maintained so that any resulting vibration does not exceed the limits of Table E25.6.30.2 Vibration levels for stationary machinery when measured in any occupied room of any building on another site or in any occupied unit under different ownership from the source of the vibration. Vibration must be measured in accordance with ISO 2631-2:2003 Mechanical vibration and shock – Evaluation of human exposure to wholebody vibration – Part 2: Vibration in buildings (1Hz to 80Hz):

Table E25.6.30.2 Vibration I	levels for stationary r	nachinery
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Affected occupied building or area	Time of day	Maximum vibration level in root mean square velocity (mm/s) between 8 and 80Hz
Noise sensitive spaces	7am-10pm	0.20
Bedrooms and sleeping areas only within activities sensitive to noise	10pm-7am	0.14

(3) For vibration levels applying to work within the road, refer to E25.6.29.

### Blasting

### E25.6.31. Noise levels for blasting

- (1) The noise created by the use of explosives for any blasting activity measured at the boundary of the site on which the explosives are used must not exceed a peak sound pressure of 120 dB ( $L_{zpeak}$ ).
- (2) The noise created by the use of explosives for construction activities must not exceed a peak sound pressure level of 120dBC measured 1m from the façade of any occupied building.

### Helicopter noise

### E25.6.32. Noise levels for helicopters take-off or landing

(1) The take-off or landing of a helicopter on any site except for emergency services must not exceed  $L_{dn}$  50dB or 85dB  $L_{AFmax}$  measured within the boundary or the notional boundary of any adjacent site containing activities sensitive to noise and  $L_{dn}$  60dBA within the boundary of any other site.

### Transport noise

### E25.6.33. Noise levels for traffic from new and altered roads

(1) All new roads and all altered roads that are within the scope of New Zealand Standard NZS 6806: 2010 Acoustics – Road traffic noise – New and altered roads must comply with the requirements of New Zealand Standard NZS 6806: 2010 Acoustics – Road traffic noise – New and altered roads.

### E25.7. Assessment – controlled activities

There are no controlled activities in this section.

### E25.8. Assessment – restricted discretionary activities

#### E25.8.1. Matters of discretion

The Council will restrict its discretion to all of the following matters when assessing a restricted discretionary resource consent application:

- (1) for noise and vibration:
  - (a) the effects on adjacent land uses particularly activities sensitive to noise; and
  - (b) measures to avoid, remedy or mitigate the adverse effects of noise.

- (2) for internal noise levels of noise sensitive spaces in the Business City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone or the Business – Mixed Use Zone:
  - (a) reverse sensitivity effects; and
  - (b) alternative temperature control solutions.

### E25.8.2. Assessment criteria

The Council will consider the relevant assessment criteria for restricted discretionary activities from the list below:

- (1) for noise and vibration:
  - (a) whether activities can be managed so that they do not generate unreasonable noise and vibration levels on adjacent land uses particularly activities sensitive to noise;
  - (b) the extent to which the noise or vibration generated by the activity:
    - (i) will occur at times when disturbance to sleep can be avoided or minimised; and
    - (ii) will be compatible with activities occurring or allowed to occur in the surrounding area; and
    - (iii) will be limited in duration, or frequency or by hours of operation; and
    - (iv) will exceed the existing background noise and vibration levels in that environment and the reasonableness of the cumulative levels; and
    - (v) can be carried out during daylight hours, such as road works and works on public footpaths.
  - (c) the extent to which the effects on amenity generated by vibration from construction activity:
    - (i) will be mitigated by written advice of the activity to adjacent land uses prior to the activity commencing; and
    - (ii) can be mitigated by monitoring of structures to determine risk of damage to reduce occupant concern; and
    - (iii) can be shown to have been minimised by the appropriate assessment of alternative options; and
    - (iv) are reasonable taking into account the level of vibration and the duration of the activity (where levels of 10mm/s peak particle velocity may be tolerated only for very brief periods).
  - (d) whether the measures to minimise the noise or vibration generated by the activity represent the best practicable option.

- (2) for works in the road or rail corridor:
  - (a) whether the effects on amenity values and sleep quality generated by construction activity in the road or rail corridor are reasonable taking into account the background noise levels.
- (3) for reverse sensitivity effects:
  - (a) whether the activity or infringement proposed will unduly constrain the operation of existing activities (excluding construction or demolition activities).
- (4) for noise in the Business City Centre Zone, Business Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone or the Business – Mixed Use Zone:
  - (a) in addition to the assessment criteria in E25.8.2(1) above, all of the following will be considered:
    - the background noise at the affected receivers and the extent to which this is proposed to be exceeded;
    - (ii) the level of existing sound insulation (where that information is available) and ventilation options for affected receivers existing as at the date of notification of the Plan; and
    - (iii) the frequency and duration of the exceedance.
- (5) for alternative temperature control solutions:
  - (a) whether alternative solutions such as passive or mixed-mode cooling can provide a sufficient thermal comfort level that can be maintained having regard to ASHRAE (US) Standard 55:2013 - Thermal environmental conditions for human occupancy, CIBSE (UK) Technical Memorandum TM52:2013 – The limits of thermal comfort: avoiding overheating in European buildings, BS EN 15251:2007 – Indoor environmental input parameters for design and assessment of energy performance of buildings addressing indoor air quality, thermal environment, lighting and acoustics.

### E25.9. Special information requirements

There are no special information requirements in this section.

### ATTACHMENT E

# Council Decision to accept PPC38 under Clause 25 to First Schedule RMA

Resource Management Act 1991 - Clause 25 report and decision on a Private Plan Change Request from Western Park Village Limited at 522-524 Swanson Road, Ranui



**To:** Warren Maclennan – Manager North West and Islands, Plans and Places

From: Jo Hart – Principal Planner, Planning North West and Islands

Date: 26 November 2019

### Te take mō te pūrongo

### Purpose of the report

1. To consider, and make a decision on, whether to accept, for processing a private plan change request (the request), from Western Park Village Limited to rezone land at 522-524 Swanson Road, Ranui. The proposed private plan change request seeks to rezone the site from Business – Light Industry to Residential Mixed Housing Urban and Terrace Housing and Apartment Buildings in the Auckland Unitary Plan (Operative in Part).

### Whakarāpopototanga matua

### **Executive summary**

- 2. The request seeks to rezone approximately 2.5 hectares of land at 522-524 Swanson Road, Ranui (refer to Attachment A) from Business Light Industry to Residential Mixed Housing Urban and Terrace Housing and Apartment Building in the Auckland Unitary Plan (Operative in Part) (AUP).
- 3. Western Park Village Limited considers that the proposed private plan change is the most appropriate method to achieve its objective of facilitating growth and development of medium to high density residential dwellings within the site. The applicant's indicative figure for the potential density that could be achieved on the site is in the order of 75 to 180 units (a gross total site density of 1:250m<sup>2</sup>).
- 4. The site has been owned by Western Park Village Limited since 1998 and it has been used for temporary and permanent accommodation. Rezoning the land to residential zones will better reflect the current use of the land and provide for the future development of the site.
- 5. Under Clause 25 of Part 2 of Schedule 1 to Resource Management Act 1991 (RMA), the council is required to make a decision to either:
  - adopt the request as if it were a proposed plan made by the council, which must then be processed in accordance with the provisions of Part 1 of Schedule 1 (clause 25(2)(a)); or
  - b) accept the private plan change request, in whole or part, which then triggers a requirement to notify the request, or part of the request, under clause 25(clause 25(2)(b)); or
  - c) reject the private plan change request in whole or in part, in reliance on one of the limited grounds set out in clause 25(4); or
  - d) decide to deal with the request as if it were an application for a resource consent (clause 25(3)).
- 5. It is recommended that the private plan change request is accepted under clause 25(2)(b) and notified for submissions under Clause 26.

### Ngā tūtohunga Recommendation/s

That under delegated authority the Manager North West and Islands, Plans and Places:

- a) accept the private plan request by Western Park Village Limited, included as Attachment A to this report, pursuant to clause 25(2)(b) of Part 2 of Schedule 1 of the RMA for the following reasons:
  - i. with regard to relevant case law, there are no grounds to reject the private plan change request under clause 25(4)
  - ii. it is more appropriate to accept the request than to 'adopt' it or treat it as resource consent application.
- b) notify the request under clause 26 and progress it through the other statutory processes pursuant to Schedule 1 of the RMA.

### Horopaki

### Context

### Site and surrounding area

6. The subject site, known as Western Park Village at 522-524 Swanson Road, Ranui is located approximately 450 metres west of the Ranui local centre. The area is approximately 2.5 hectares and is in the shape of an 'L' (refer to Map 1 below).



Map 1: Aerial of 522-524 Swanson Road, Ranui

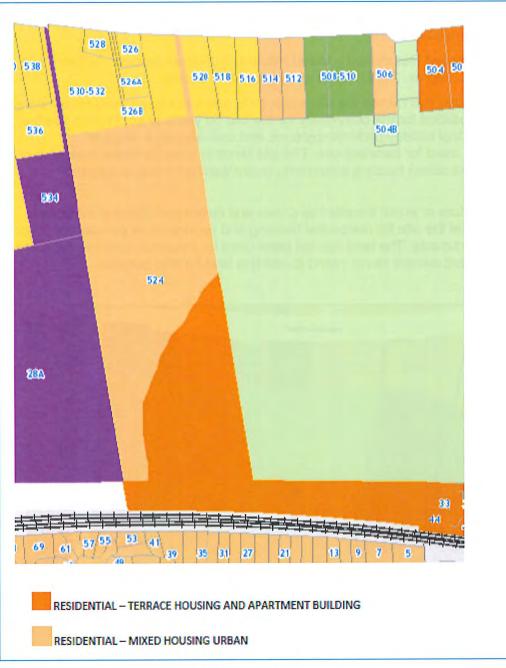
- 7. Currently the site contains a substantial number of temporary and permanent buildings providing residential accommodation, toilet and cooking facilities, and an administration type block in the north-eastern corner of the site. Many of these structures have been in place on the site for a number of years.
- 8. The site is relatively flat from the road frontage towards the south before falling to a stream which traverses the site from the south-western corner to exit approximately halfway up the eastern boundary. The site then rises from the stream towards the east. The highest part of the site is a narrow corridor which runs between the Ranui Domain (to the east) and the railway line located to the south of the site. The existing buildings on the site are located to the north/west of the stream with the area of land to the east being vacant and grassed.
- 9. Single storey residential dwellings on individual sites are located to the immediate north of Ranui Domain and adjoin the site to the east along its Swanson side frontage. This type of residential development also characterises the land to the north of the site across Swanson Road.
- 10. The land located to the immediate north-west of the site is occupied by a local church. Several properties zoned Business Light Industry are located to the south-west of the site and consists of industrial uses including a bus depot and storage businesses. The site is bounded in the south by the western line railway tracks.
- 11. The site is currently split zoned Residential Mixed Housing Suburban (approx. 1278m<sup>2</sup>) and Business Light Industry (approx. 24987m<sup>2</sup>) as shown in Map 1 below.
- 12. Western Park Village Limited has owned the site since 1998 and it has been used for temporary and permanent accommodation for the community for the last 50 years or so. Prior to this the site was used as a traditional holiday park/campground and now houses a range of accommodation units still used for transient use. The site tends to cater for those members of the community who cannot obtain housing elsewhere, or are waiting for social housing allocations.
- 13. Due to the improvised nature at which the site has grown and developed, the current owners wish to formalise the use of the site for residential housing and provide more permanent options for accommodating its occupants. The land has not been used for industrial activities for some time, if ever, and the current owners never intend to use this land for that purpose.



Map 2: Existing zoning of 522-524 Swanson Road, Ranui

#### Private plan change request

- 14. The request was lodged on 15 November 2019 (see Attachment A) and seeks to rezone parts of the site currently zoned Business Light Industry to a split zone of Residential Mixed Housing Urban (approximately 14, 470m<sup>2</sup>) and Terrace Housing and Apartment Building (approximately 10, 910m<sup>2</sup>). The area of the site currently zoned as Residential Mixed Housing Urban is excluded from the proposed plan change rezoning.
- 15. The area proposed to be rezoned Residential Mixed Housing Urban extends from the northern part of the site currently zoned Residential Mixed Housing Urban to the northern side of the stream. The area proposed to be rezoned Residential Terrace Housing and Apartment Building extends from the southern side of the stream to the western line railway to the south, and Ranui Domain and the land currently zoned Residential Terrace Housing and Apartment Building to the east (refer to Map 2). The only change is to the AUP zone maps. There are no changes to any other spatial layers or text in the AUP.





- 16. Western Park Village Limited's intention is to develop the land in a manner consistent with the proposed rezoning of the site, being intensive residential development in a range of sizes and forms. Due to the current social housing aspect of the existing site, Western Park Village Limited has already begun engaging with both Kiwibuild and Auckland Community House providers as to the practicality of incorporating social housing into any future development of the land to provide for the needs of the community. A concept master plan has been prepared as part of the Urban Design Assessment report (in Appendix 1 of that report). The Urban Design report gave an indication of the potential density that could be achieved on the site which is in the order of 75 to 180 units (a gross total site density of 1:250m<sup>2</sup>).
- 17. The applicant has provided supporting documentation for the request as follows:
  - Private plan change request
  - Section 32 evaluation report
  - Section 32 analysis table
  - Specialist reports:
    - o Urban design assessment
    - o Preliminary infrastructure assessment
    - o Integrated traffic assessment
    - o Correspondence with Te Kawerau ā Maki
    - o Detailed site investigation
    - o Flooding assessment and stream modelling
    - Acoustic assessment
    - o Consultation spreadsheet and correspondence.
- 18. The above documentation was provided as drafts which were then reviewed by council specialists. Further information was requested as this stage and incorporated into the final private plan change request where relevant. The applicant considers that some of the requests for information are matters that would be addressed in any future resource consent applications. I agree that some of the matters raised by council's specialists for further information is related to the detail required for resource consents.
- 19. I consider that the information lodged is sufficient for council to consider the request under clause 23(6). This clause allows council to reject the request or decide not to approve the plan change requested if insufficient information is provided to make a decision.

# Tātaritanga me ngā tohutohu

## Analysis and advice

## **Resource Management Act 1991**

- 20. The process for considering private plan change requests is set out in Part 2 of Schedule 1 of the Resource Management Act 1991. A request can be make to the appropriate local authority by any person under clause 21 of Schedule 1. After a request has been lodged, a local authority can seek further information under clause 23, and modify a request under clause 24, but only with the applicant's agreement.
- 21. Under clause 23(6), if an applicant refuses to provide any requested further or additional information, a local authority may reject or decide not to approve the request if it considers that there is insufficient information to consider or approve it.
- 22. Under clause 25, after receiving the request, all required information, and where relevant, modifying the request, the local authority is required to make a decision to either:

- adopt the request as if it were a proposed plan made by the council, which must then be
  processed in accordance with the provisions of Part 1 of Schedule 1 (clause 25(2)(a)); or
- accept the private plan change request, in whole or in part, which then triggers a requirement to notify the request, or part of the request, under clause 25 (clause 2592)(b)); or
- reject the private plan request, in whole or in part, in reliance on one of the limited grounds set out in clause 25(4); or
- decide to deal with the request as if it were an application for a resource consent (clause 25(3)).

### Options available to the council

23. I consider that the applicant has provided sufficient information to enable the request to be considered. I consider that the grounds for rejection in clause 23(6) (insufficient information) is not valid in this instance. The next sections of this report assesses the various options available to the council under clause 25.

#### Option 1 – Reject the request, in whole or in part

- 24. The council has the power to reject a private plan change request, in whole or in part, in reliance on one of the limited grounds set out in clause 25(4). If the private plan change request is rejected by the council, the applicant has the ability to appeal that decision to the Environment Court under clause 27 of Schedule 1.
- 25. The grounds for rejection under clause 25(4) are as follows:
  - a) the request or part of the request is frivolous or vexatious; or
  - b) within the last two years, the substance of the request or part of the request;
    - i. has been considered, and given effect to, or rejected by, the local authority or the Environment Court; or
    - ii. has been given effect to by regulations made under section 360A; or
  - c) the request or part of the request is not in accordance with sound resource management practice; or
  - d) the request or part of the request would make the policy statement or plan inconsistent with Part 5; or
  - e) in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than two years.

#### Is the request frivolous or vexatious?

- 26. The plan change request aims to provide for appropriate zoning which reflects both the current use of the site and the applicant's intention to develop the site for intensive residential development in keeping with the surrounding environment. The request includes a section 32 evaluation report which is supported by specialist assessments in relation to key matters considered to be material to the request, including economics, transport, infrastructure and urban design.
- 27. I consider that the council should <u>not reject</u> the private plan change request on the basis that it is frivolous or vexatious.

# Has the substance of the request been considered and given effect to or rejected by the council within the last two years?

28. Western Park Village attempted to rezone the land during the further submission phase of AUP in 2014. The further submission was in support of a submission which requested that zones, overlays, development controls and other rules were adjusted to provide sufficient residential development capacity and land supply, with an additional request to rezone the land to Residential Mixed Housing Urban.

- 29. However, no action came of the further submission and no further attempts to rezone the land have occurred. No resource consent applications for residential development of the land have been lodged with the council, and no appeals have been to the Environment Court.
- 30. I consider that council should not reject the request on the basis of this ground for rejection.

Has the substance of the request been given effect to by regulations made under section 360A?

- 31. Section 360A of the RMA relates to regulations amending regional coastal plans pertaining to aquaculture activities. The site is not within the coastal marine area, or involve aquaculture activities, and therefore section 360A of the RMA does not apply.
- 32. I consider that the council should not reject the request on the basis of this ground for rejection.

#### Is the request in accordance with sound resource management?

33. The term 'sound resource management practice' is an often-used planning term but is not defined in the RMA. Guidance is provided in the High Court decision of Malory Corporation Limited v Rodney District Council (CIV-2009-404-005572), where the issue on appeal was determining the correct interpretation of clause 25(4). The High Court considered this term in light of clause 25(4)(c) of Schedule 1 and stated:

"..the words "sound resource management practice" should, if they are to be given any coherent meaning, be tied to the Act's purpose and principles. I agree too with the Court's observation that the words should be limited to only a coarse scale merits assessment, and that a private plan change which does not accord with the Act's purpose and principles will not cross the threshold for acceptance or adoption".

- 34. The applicant considers that the rezoning of the site to align with its current use will make a positive contribution to the need for housing within Auckland. The applicant also considers that the adverse effects of future development proposals can be managed through the provisions of the AUP.
- 35. Council has consulted with Auckland Transport (AT) and Watercare, and engaged experts to consider the proposed plan change. While there are aspects of the private plan change request that still need to be tested through the submission and hearings process, the scope and extent of the changes sought are not considered to be 'not in accordance with sound resource management practice', at this stage.
- 36. The site is located within existing urban live zones, not in a greenfields area or outside the Rural Urban Boundary (RUB), so there is less likely to be issues related to urban land uses, staging or sequencing of growth. Watercare have confirmed that there is adequate capacity but further discussions will be required at the resource consent stage on connections to existing infrastructure and responsibilities for ongoing operation or maintenance.
- 37. Therefore, I consider that is appropriate that council <u>not reject</u> the request on the basis that it is contrary to sound resource management practice.

# Would the request or part of the request make the policy statement or plan inconsistent with Part 5 of the RMA?

- 38. Part 5 of the RMA sets out the role and purpose of planning documents created under the RMA, including that they must assist a local authority to give effect to the sustainable management purpose of the RMA. The proposal to rezone part of the site currently zoned Business Light Industry to Residential Mixed Housing Urban and Terrace Housing and Apartment Building will not make the AUP inconsistent with Part 5 of the RMA.
- 39. The proposed plan change seeks to amend the zoning of the site to enable use and development which will provide for the social wellbeing of the community while avoiding, remedying or mitigating the effects on the environment. The request is not contrary or conflict with the relevant provisions of the AUP. The request is seeking to rezone the site from light industry to residential uses the existing suite of residential zones.
- 40. It is therefore considered appropriate that the council <u>not reject</u> the request on the basis that it is inconsistent with Part 5 of the RMA.

#### Has the district plan to which the request relates been operative for less than two years?

- 41. The district plan provisions of the AUP relevant to this request were made operative on 15 November 2016. The provisions have therefore been operative for more than three years.
- 42. It is considered appropriate that the council <u>not reject</u> the request on these grounds as the relevant parts of the AUP have been operative for more than two years.

#### Option 2 – Decide to deal with the request as if it were an application for a resource consent

- 43. The council can, in some circumstances, decide to process a private plan change request as if it were an application for a resource consent. It is considered that the plan change process is the most appropriate process given the current zoning of the site, the existing use as temporary and permanent accommodation, and the applicant's future intentions to develop the land as intensive residential.
- 44. It is therefore considered appropriate that the council decides <u>not to</u> process the request as if it were an application for a resource consent.

# Option 3 – Adopt the request, or part of the request, as if it were a proposed plan made by the council itself

- 45. The council is able to decide to adopt the request and process it as though it were a councilinitiated plan change. If a request is adopted, all costs associated with the plan change are met by the council.
- 46. The request is a site specific proposal. While there is potential for there to be some social benefit to the public, this would only be applicable if the applicant developed the site to include a portion of social housing. Therefore, the immediate benefit is to the applicant. The applicant has also not sought that council adopt the request.
- 47. The private plan change request does not propose a planning response of a broader application that would affect the functions of the council under section 31 of the RMA. In addition, the request does not address a gap in the AUP's planning provisions. No new policy is proposed.
- 48. I consider that it is appropriate that the council does <u>not adopt</u> the request.

# Option 4 – Accept the private plan change request, in whole or in part, and proceed to notify the request, or part of the request

- 49. If the council accepts the request, in whole or in part, it must then proceed to notify the request, or part of the request, under clause 26. After the submission period has closed, the council would then need to hold a hearing to consider any submissions. A decision would then need to be made by council in relation to the request in accordance with Schedule 1 of the RMA. All costs associated with the request (including notification and any hearing would be met by the applicant).
- 50. Having regard to relevant case law<sup>1</sup>, this is the option that is supported on the basis that the request does not meet the criteria for rejection under clause 25(4) of Schedule 1 to the RMA. It is also considered that it is appropriate to accept the request rather than to adopt it or treat it as a resource consent application.

#### **Conclusion of options assessment**

51. It is recommended, after carefully assessing the request against the relevant matters set out in the RMA, and the associated case law, that council decides to accept the request and publicly notify it for submissions.

<sup>&</sup>lt;sup>1</sup> Malory Corporation Limited v Rodney District Council [2010] NZRMA 392 (HC)

# Tauākī whakaaweawe āhuarangi Climate impact statement

- 52. In June 2019, Auckland Council declared a climate emergency that included a commitment for all decision-makers to consider the climate implications of their decisions. In particular, consideration needs to be given in two key ways:
  - a) how the proposed decision will impact on greenhouse gas emissions and the approach to reduce emissions
  - b) what effect climate change could have over the lifetime of a proposed decision and how these effects are being taken into account.
- 53. The request to rezone land from Business-Light Industry to Residential-Mixed Housing Urban and Terrace Apartment and Buildings will have the potential to reduce greenhouse gas emissions for the following reasons:
  - potential connections to Ranui Domain, local streets and transport facilities, including Ranui Train Station, will support walking, cycling and public transport
  - there will be opportunities to enhance and improve the amenity of the natural environment with landscaping within the site, including adjacent to the stream.
- **54.** The site does have a stream running through it which shows as an overland flow path and as being within a flood plain. The applicant has addressed these at a high level in the request. The provisions of the AUP will need to be considered at the time a resource consent is lodged with the applicant showing how the development mitigates or avoids flood related risks including those upstream or downstream of the site. With the proposed zoning change to residential on the site, future housing developments, containing more vulnerable activities, are subject to additional assessment criteria than development under the current Business Light Industry zone.
- **55.** Healthy Waters have recommended that the applicant will need to demonstrate that residents can gain safe access and egress during a flood to manage risk, and that finished floor levels will be above the flood plain. The applicant considers that residential development at the intended scale has the ability to manage stormwater through design and layout of the proposed dwellings.
- **56.** A stormwater management plan detailing the stormwater management approach will also be required and will be assessed for approval within Auckland Council's Network Discharge Consent (NDC) process. The applicant will be required to show how the requirements of Schedule 4 of the NDC, which sets out the conditions of the consent, will be met from the proposed development.

## Ngā whakaaweawe me ngā tirohanga a te ropū Kaunihera

## Council group impacts and views

- 57. Auckland Transport staff reviewed the draft private plan change request and draft Integrated Transport Assessment (ITA). The feedback provided identified several transport issues where further information was required. These included:
  - That all access options be looked at to cover all areas of risks. One indicative access arrangement is shown but there is no mention of the impacts on 526 Swanson Road or of other options if this is not feasible for any reason
  - The stream crossing/flood plain has not been discussed in terms of access for the proposed THAB zone.
- 58. A final ITA has been included with the private plan change request. The ITA provides an indicative connection to Swanson Road. The ITA states that:

'there is a need to safely accommodate right turn entry and exit movements to and from the site. This is best achieved via a new priority controlled intersection to Swanson Road'.

- 59. However, the ITA states that the access solutions may change depending on the configuration and intensity of any proposed development. It also states that the design of the access, along with internal roads and access to individual sites, would be confirmed at the time of any development through the resource consent process. Now that the request has been formally lodged, Auckland Transport have indicated that they will continue to have a role in the process as a potential submitter.
- 60. Swanson Road is an arterial road and any vehicle access would require a restricted discretionary resource consent under the provisions of the AUP (E27.6.4.1). This will enable a more detailed assessment of the traffic effects of any activities seeking access onto Swanson Road. The internal road will also be finalised and assessed as part of later resource consent stages.
- 61. Healthy Waters has reviewed the draft documents. Their memo, dated 1 November 2019 states the following:

'With regard to the stormwater management effects and the provisions of the AUP, no significant information gaps were identified. Provided that the zone change proposed is to accommodate medium to high density residential facilities, the effects on stormwater management is considered less significant compared to the existing Light Industry Zone'.

- 62. Some of the further information was requested on matters which I consider are to be at the level of detail required during either the merits assessment of the proposal or any future resource consent application. Further information was requested for the applicant to have consideration to relevant policy directions with regards to steam restoration and enhancement opportunities. This had been identified during the planning review of the request and the applicant has provided an appropriate response within their final documents.
- 63. Watercare staff have reviewed the request. An updated design was prepared based on Watercare's feedback after the applicant met with several Watercare representatives. Watercare confirmed that their specific design criteria can be discussed at resource consenting and engineering approval stage and had no concerns about the proposed plan change.
- 64. Auckland Council parks staff have reviewed the plan change and have confirmed that there are no significant concerns that would prevent the request from being accepted. Discussions were had with the applicant about the likely location of building bulk and massing on the site to avoid loss of sunlight on Ranui Domain. However, it was agreed that these details, including connections to Ranui Domain, or alternatively provision of a reserve within the site, are better suited to resource consent applications for future development on the site. The appropriateness of the proposed zones on the development controls can be tested through the plan change process.

## Ngā whakaaweawe ā-rohe me ngā tirohanga a te poari ā-rohe Local impacts and local board views

- 65. Local boards' views are important in Auckland Council's co-governance framework. The views of the Henderson Massey Local Board will be sought on the content of the private plan change request. All local board feedback will be included in the hearing report and the local board will present its feedback to hearing commissioners, if the board chooses to do so. These actions support the local board in its responsibility to identify and communicate the interests and preferences of people in its area, in relation to the content of Auckland Council plans.
- 66. Local board views have not been sought on the procedural decision to adopt, accept, reject or convert a private plan change request to a resource consent. Although the Manager North West and Islands is required to consider local board views prior to making a regulatory decision, that requirement applies when the decision affects, or may affect, the responsibilities or operation of the local board or the well-being of communities within its local board area. The procedural

decision does not affect the Henderson-Massey local board's responsibilities or operation, nor the well-being of local communities.

## Tauākī whakaaweawe Māori Māori impact statement

- 67. On 17 April 2017, a number of amendments to the RMA came into force which place increased focus on engagement and consultation with iwi authorities as part of various plan-making processes.
- 68. The applicant advises that it is has engaged with the following iwi groups with an interest in the area (see below) providing the opportunity for feedback before the request was formally lodged with council. No changes were required to be made to the private plan change documentation as a result of this engagement. There was an interest to be involved further during the resource consent process.

Mana Whenua Group	Organisation	Response
Te Kawerau ā Maki	Te Kawerau lwi Tribal Authority and Settlement Trust	A meeting was held on 28 June 2019 with Robin Taua- Gordon (Heritage and Environment Officer) from the Te Kawerau Iwi Tribal Authority and Settlement Trust. A formal letter has been provided which confirms that Te Kawerau ā Maki have no objections to the private plan change. The letter of support is limited to the plan change only and does not relate to any future resource consent applications associated with any future building developments on the site.
Te Akitai Waiohua	Makaurau Marae Maori Trust	No response has been received
Ngāti Whātua Ōrākei	Ngāti Whātua Ōrākei	No response has been received
Ngāti Whātua o Kaipara	Nga Maunga Whakahi o Kaipara Development Trust	Responded to the email and deferred their input to Te Kawerau ā Maki
Te Rūnanga o Ngāti Whātua	Te Rūnanga o Ngāti Whātua	Responded to the email and deferred their input to Ngāti Whātua o Kaipara

69. If the council accepts the request and subsequently notifies it, all iwi authorities/mana whenua will have the opportunity to make submissions on the private plan change. As at this time, there are no Mana Whakahono a Rohe (iwi participation arrangements).

# Ngā ritenga ā-pūtea Financial implications

70. If the request is accepted, the council's costs associated with processing it would be met by the applicant.

## Ngā raru tūpono me ngā whakamaurutanga Risks and mitigations

- 71. The only potential risk associated with the recommendations made in this report is a judicial review by a third party. This risk is considered to be very low. A decision to reject the private plan change request would create a potential risk of an Environment Court appeal by Western Park Village Limited.
- 72. I recommend that the plan change request is accepted. Adoption, which has not been sought by the applicant, or acceptance of the private plan change request poses very little risk of legal action by Western Park Village Limited.

# Ngā koringa ā-muri Next steps

- 73. If the private plan change is accepted for notification, the implementation of this decision will follow the process set out in clause 26 of Schedule 1 of the RMA. This requires that the private plan change is notified within four months of being accepted, unless this timeframe is waived in accordance with section 37 of the RMA.
- 74. No substantial changes can be made to the private plan change request following this decision. Other procedural steps include seeking the Henderson-Massey Local Board's views.

## **Clause 25 Recommendation**

- 75. This private plan change request requires decision-making pursuant to **clause 25(2)(b)** of Part 2 of Schedule 1 of the Resource Management Act 1991, to determine whether it will be adopted, accepted, rejected or processed as a resource consent.
- 76. It is recommended that the private plan change request from Western Park Village Limited to rezone land at 522-524 Swanson Road, Ranui from Business – Light Industry to Residential – Mixed Housing Urban and Residential – Terrace Housing and Apartment Building be:
  - a) **accepted** under Clause 25(2)(b) of Schedule 1, Part 2 of the Resource Management Act 1991
  - b) progressed to notification under Clause 26, and through the statutory process.

Author	Jo Hart – Principal Planner, Planning North West and Islands		
	( Att		
	Date: 26/11/19		
Reviewed by	Christopher Turbott – Acting Team Leader, Planning North West and Islands		
	20/11/19		
	Date:		

# **Clause 25 determination**

- 77. In accordance with Auckland Council Combined Chief Executives Delegation Register (updated June 2019), all powers, functions and duties under Schedule 1 of the Resource Management Act 1991, except for the power to approve a proposed policy statement or plan under clause 17 of Schedule 1 (this power cannot be exercised by any Council officer or Hearings Commissioner), are **delegated** to the relevant T4 Manager.
- 78. Having read the Council planner's report and recommendations on the private plan change request, I am satisfied that I have adequate information to consider the matters required by the Resource Management Act 1991 (the RMA) and to make a decision under delegated authority.
- 79. Accordingly, I agree that this private plan change request by Western Park Village Limited be:
  - a) accepted under Clause 25(2)(b) of Schedule 1, Part 2 of the Resource Management Act 1991
  - b) progressed to notification under Clause 26, and through the statutory process.

Name:

Warren Maclennan

26/11/2019

Title:

Manager North West and Islands

Signed:

Date:

Ngā tāpirihanga

## Attachments

No.	Page	
А	Private Plan Change Request from Western Park Village Limited	



ATTACHMENT F

**QUALIFICATIONS** 

## JOANNA HART - CV & CODE OF CONDUCT

- 1.1 I have been involved with the processing and reporting on Private Plan Change 38 –
   522-524 Swanson Road, Ranui to the Auckland Unitary Plan (Operative in part) 2016.
   Details of my qualifications and relevant past experience is set out below.
- 1.2 While it is not necessary for an Auckland Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that the matters I have given advice and recommendations on is within my area of expertise, except where it is states that I am relying on the evidence of another person.

CAREER SUMMARY				
PERIOD	ORGANISATION	ROLE		
2010 – present	Auckland Council	Principal Planner, Plans and Places		
2008 – 2010	North Shore City Council	Environmental Planner, Built Environment		
2007 – 2008	North Shore City Council	Environmental Policy Advisor, Strategy and Policy		
2000 – 2001	North Shore City Council	Project Support Officer, Project 2020 (City Blueprint for North Shore Growth Strategy)		

### QUALIFICATIONS

Bachelor of Science, Auckland University, 1999

Master of Planning Practice (Hons), 2001

### AFFILIATIONS

New Zealand Planning Institute (Associate Member) 2015 to present – Graduate member, 2000-2015