

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

**Date:** Wednesday 15 and Thursday 16 November 2023  
**Time:** 9.30am  
**Venue:** Waiuku Community Hall  
8 King Street, Waiuku

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**PRIVATE PLAN CHANGE 91**  
**HEARING REPORT**  
**80 MCLARIN ROAD, GLENBROOK BEACH**  
**HD PROJECT 2 LIMITED**

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**COMMISSIONERS**

**Chairperson** Robert Scott (Chairperson)  
**Commissioners** Nigel Mark-Brown  
Juliane Chetham

**Sidra Khan**  
**KAITOHUTOHU WHAKAWĀTANGA**  
**HEARINGS ADVISOR**

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

## **WHAT HAPPENS AT A HEARING**

### **Te Reo Māori and Sign Language Interpretation**

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

### **Hearing Schedule**

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

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

### **Cross Examination**

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

### **The Hearing Procedure**

The usual hearing procedure is:

- **The chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- **The applicant** will be called upon to present their case. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant has presented their case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
  - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
  - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- The applicant or their representative has the right to summarise the application and reply to matters raised by submitters. Hearing panel members may further question the applicant at this stage. The applicants reply may be provided in writing after the hearing has adjourned.
- **The chair** will outline the next steps in the process and adjourn or close the hearing.
- If adjourned the hearing panel will decide when they have enough information to make a decision and close the hearing. The hearings advisor will contact you once the hearing is closed.

### **Please note**

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

**A NOTIFIED PRIVATE PLAN CHANGE TO THE AUCKLAND UNITARY PLAN BY HD PROJECT 2 LIMITED**

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**Reporting officer, Katrina David, Planner**

Reporting on proposed Private Plan Change 91 - 80 McLarin Road, Glenbrook Beach to rezone approximately 7.897 hectares of land from Future Urban Zone to Residential-Mixed Housing Suburban zone, create a new precinct, the Glenbrook 4 Precinct, aiming to guide future subdivision and development in the plan change area and extend the Stormwater Management Area Flow 1 control over the entire plan change area.

**APPLICANT:** HD PROJECT 2 LIMITED

<b>SUBMITTERS:</b>	
Page 193	Ngati Te Ata
Page 195	Pauli Lydia Bosch
Page 197	Benjamin Ross
Page 199	Pravin Hinwar
Page 201	Alvin Changamire

Page 203	Lania Gribben
Page 205	Robert Hughes
Page 208	Glenbrook Beach Residents & Ratepayers Association (Robyn Deuchar)
Page 210	Emma Ford
Page 212	Wendy Groom
Page 214	Kiri Bull
Page 216	Olivia Jackson
Page 218	Nadin Rathgeber
Page 220	Grant Hewison
Page 223	Ben Scott
Page 225	Catherine Thompson
Page 227	Ian Smith
Page 230, 236	Ellen-May Meharry
Page 233	Michael Wayne MacAulay
Page 238	Dianne Bradford
Page 239	Terry Yorke
Page 241	Wibke Yorke
Page 243	Aaron and Elizabeth Yorke
Page 247	Equal Justice Project (Dr Grant Hewison, Mair Gibbs and Brendan Zhang-Liao)
Page 257	Owen Yorke
Page 260	Watercare Services Limited
Page 265	Anton Tyers
Page 267	Shane Bradford
Page 269	Vincent Asia
Page 271	Suli Palu
Page 273	Kyle Cunningham
Page 275	Emma Cuming
Page 277	Tui Kaihu Trust (Victoria Lee McAnulty)
Page 280	Mark Olson
Page 282	Matthew Kerwin
Page 284	Vanshika Sudhakar
Page 286	Sarah Fisher
Page 293	Auckland Transport (Jason Ashby)
Page 305	Kahawai Point Developments Limited (John Duthie)

**FURTHER SUBMITTERS:**

Page 309	Auckland Transport (Chris Freke)
Page 317	Sarah Fisher



# Hearing Report for Proposed Private Plan Change 91: 80 McLarin Road, Glenbrook to the Auckland Unitary Plan (Operative in part)

Section 42A Hearing Report under the Resource Management Act 1991

**Report to:** Hearing Commissioners

**Hearing Date/s:** 15-16 November, 2023

**File No:**

**File Reference**

**Report Author** Katrina David, Senior Policy Planner, Central South, Plans and Places,  
Auckland Council

**Report Approvers** Craig Cairncross, Team Leader, Central South, Plans and Places, Auckland  
Council

**Report produced**

# Summary of Proposed Plan Change 91 (Private): 80 McLarin Road, Glenbrook

<b>Plan subject to change</b>	Auckland Unitary Plan (Operative in part), 2016
<b>Number and name of change</b>	Proposed Plan Change 91 (Private): 80 McLarin Road, Glenbrook to the Auckland Unitary Plan
<b>Status of Plan</b>	Operative in part
<b>Type of change</b>	Private Plan Change
<b>Clause 25 decision outcome</b>	Accept
<b>Parts of the Auckland Unitary Plan affected by the proposed plan change</b>	Chapter I Precincts – South GIS Viewer/planning maps <ul style="list-style-type: none"> <li>• Unitary Plan Zones</li> <li>• Unitary Plan Management Layers – Precincts</li> <li>• Unitary Plan Management Layers – Controls: Stormwater Management Area Control Flow 1 [rp]</li> </ul>
<b>Date of notification of the proposed plan change and whether it was publicly notified or limited notified</b>	14 April 2023 Publicly notified
<b>Submissions received (excluding withdrawals)</b>	39
<b>Date summary of submissions notified</b>	9 June 2023
<b>Number of further submissions received (numbers)</b>	2
<b>Legal Effect at Notification</b>	None
<b>Main issues or topics emerging from all submissions</b>	<ul style="list-style-type: none"> <li>• Transport effects</li> <li>• Infrastructure including water supply, wastewater, stormwater, transport, social services</li> <li>• Consistency with adjacent Glenbrook 3 Precinct development</li> <li>• Zone choice – Mixed Housing Suburban or Single House Zone</li> </ul>

	<ul style="list-style-type: none"><li>• Mana Whenua cultural values</li><li>• Rural/coastal character and amenity</li><li>• Climate change and natural hazards</li><li>• Extension of plan change area</li></ul>
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# Abbreviations

Abbreviations in this report include:

Abbreviation	Meaning
PC91	Proposed Private Plan Change 91
The Applicant	HD Project 2 Ltd
The Council	Auckland Council
RMA	Resource Management Act 1991
NPS	National Policy Statement
NES	National Environmental Standards
PC78	Proposed Plan Change 78 Intensification
AUP	Auckland Unitary Plan (Operative in part)
FUZ	Future Urban Zone
MHS Zone	Residential - Mixed Housing Suburban Zone
Neighbourhood Centre Zone	Business - Neighbourhood Centre Zone
Single House Zone	Residential – Single House Zone
SMAF1	Stormwater Management Area – Flow 1 Control
AEE	PC91 Assessment of environmental effects
Urban Design Assessment	PC91 Urban design assessment
Economic Report	PC91 Economic Report
ITA	PC91 Integrated Transport Assessment
Ecology Reports	PC91 Ecology reports
SHA	Special Housing Area
HASHAA	Housing Accords and Special Housing Areas Act
CVA/CIA	PC91 Cultural Values Assessment/Cultural Impact Assessment (Ngati Te Ata)
FULSS	Future Urban Land Supply Strategy 2017
MDRS	Medium Density Residential Standards

## Attachments

Attachments	
<b>Appendix 1</b>	Plan Change application material including clause 23 response
<b>Appendix 2</b>	List of plan change documents and numbering on Council's plan change website
<b>Appendix 3</b>	Submissions and further submissions <ul style="list-style-type: none"> <li>• Summary of Decisions Requested</li> <li>• Submissions</li> <li>• Further submissions</li> </ul>
<b>Appendix 4</b>	Qualifications and experience
<b>Appendix 5</b>	Specialist peer reviews
<b>Appendix 6</b>	Relevant statutory and policy framework – additional assessment <ul style="list-style-type: none"> <li>• NPS-UD Objectives and policies</li> <li>• Auckland Plan 2050</li> </ul>
<b>Appendix 7</b>	Recommended precinct provisions
<b>Appendix 8</b>	Single House Zone and MHS Zone objectives and standards

## Executive Summary

1. Proposed Private Plan Change 91 (**PC91**) to the Auckland Unitary Plan (Operative in Part) (**AUP**) seeks to rezone land at 80 McLarin Road, Glenbrook from Future Urban Zone (**FUZ**) to Residential – Mixed Housing Suburban (**MHS**) Zone and apply the Stormwater Management Area – Flow 1 Control (**SMAF1**). The plan change also proposes to apply a new precinct – the Glenbrook 4 Precinct.
2. The plan change seeks to enable a variety of housing types; integrate development with the existing Glenbrook Beach settlement; provide connections within the precinct and to the surrounding settlement; and protect and enhance ecological values of intermittent streams and wetlands. The proposed precinct included specific rules and standards relating to delivery of the indicative pedestrian/cycling link, vehicle access points and roundabout shown on the precinct plan; riparian and wetland margins; the integration of land use and water and wastewater infrastructure; and fencing.
3. The private plan change process set out in Part 2 of Schedule 1 of the Resource Management Act 1991 (**RMA**) was adhered to in developing PC91.
4. Following receipt of all further information PC91 was accepted for processing under Clause 25 of Schedule 1 on 22 February 2023.

5. PC91 was publicly notified on 14 April 2023 and closed for submissions on 15 May 2023. The summary of submissions was notified on 9 June 2023 and closed for further submissions on 23 June 2023.
6. Thirty nine<sup>1</sup> submissions and two further submissions were received. Key submission themes included the impact of the development on the character of the area, impacts with regard to climate change, adequacy of roading, public transport, water, stormwater and wastewater infrastructure and a request to change to Single House zoning rather than MHS zoning (with reference to covenants said to have been utilised for another local property development).
7. In preparing for hearings on PC91, this hearing report has been prepared in accordance with section 42A of the RMA.
8. This report considers the private plan change request and the issues raised by submissions and further submissions on PC91. The discussion and recommendations in this report are intended to assist the Hearing Commissioners, the requestor and those persons or organisations that lodged submissions on PC91. The recommendations contained within this report are not the decisions of the Hearing Commissioners.
9. This report also forms part of council's ongoing obligations to consider the appropriateness of the proposed provisions, as well as the benefits and costs of any policies, rules or other methods, as well as the consideration of issues raised by submissions on PC91.
10. A report in accordance with section 32 of the RMA was prepared by the applicant as part of the private plan change request as required under clause 22(1) of Schedule 1 of the RMA. The information provided by the applicant in support of PC91 (including the Section 32 Report and an Assessment of Environmental Effects is attached in Appendix 1.
11. In accordance with the evaluation in this report, I consider that the provisions as proposed by the applicant by PC91 are not the most appropriate way of achieving the objectives of the AUP(OP) and the purpose of the RMA.
12. I recommend further information is provided by the applicant to address concerns raised by Healthy Waters and submitters on stormwater management and adverse effects on water quality and flood risks on downstream stream properties.
13. If these matters can be satisfactorily addressed, and subject to the recommended conditions in Appendix 7, I consider that the plan change should be approved with modifications for the reasons set out in this report..

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<sup>1</sup> An additional submission was received but later withdrawn.

# 1. Purpose of the proposed private plan change

14. Proposed Private Plan Change 91 (**PC91**) to the Auckland Unitary Plan (Operative in part) (**AUP**) applies to 80 McLarin Road, Glenbrook Beach. The plan change seeks the following changes to the AUP:

- *rezone the land from Future Urban Zone (**FUZ**) to Residential – Mixed Housing Suburban (**MHS**) Zone*
- *apply the Stormwater Management area – Flow 1 (**SMAF1**) Overlay*
- *introduce a new precinct – Glenbrook 4 Precinct that modifies the standard MHS Zone provisions to reflect the site characteristics and context and to achieve site specific development outcomes.*
- *The private plan change request was lodged with Auckland Council (“**the council**”) by HD Project 2 Ltd (“**the applicant**”) on 13 July 2022. The objective of the plan change as expressed by the applicant in section 2.1.2 of the Section 32 evaluation report is to:*
  - *Achieve the co-ordinated expansion of the Glenbrook Beach coastal settlement in a manner that enables mixed housing opportunities for all ages and household types, and seamlessly integrates freshwater assets of the site with future development.*<sup>2</sup>

## 2. Site description and background

### 2.1. Background

15. The plan change applies to 80 McLarin Road, Glenbrook Beach, which is 7.9870 hectare in area. The site is currently zoned FUZ.
16. The site is in single ownership – being owned by HD Project 2 Ltd
17. In 2015 a large area of undeveloped land at Glenbrook Beach was identified as a Special Housing Area (**SHA**) under the Housing Accords and Special Housing Areas Act 2013 (**HASHAA**). The SHA included all the Future Urban zoned land (including the proposed plan change area) and a large area of Rural - Rural Coastal zoned land north of the FUZ.<sup>3</sup>
18. Through the HASHAA process, Kahawai Point Development Limited sought to rezone approximately 68 hectares of rural land to a combination of Residential - Single House, Special Purpose - Green Infrastructure Corridor, Public Open Space – Informal Recreation and Business - Neighbourhood Centre zones and to establish the Glenbrook 3 Precinct. This

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<sup>2</sup> Section 32, section 2.1.2, page

<sup>3</sup> [http://www.beehive.govt.nz/sites/default/files/2\\_Map\\_Auckland\\_Special\\_Housing\\_Areas\\_\(Tranche\\_1-8\).pdf](http://www.beehive.govt.nz/sites/default/files/2_Map_Auckland_Special_Housing_Areas_(Tranche_1-8).pdf) and <http://www.beehive.govt.nz/sites/default/files/1.Map-Special-Housing-Area%20-McLarin-Road-Glenbrook.pdf> accessed 3 August 2023

was granted with modifications. Through that process a submission by 'Kenneth Owen & Aaron Kenneth Owen Yorke' also sought to rezone the Future Urban zoned land to SHZ, including 80 and 140 McLarin Road. This submission by was rejected as part of that HASHAA Decision.<sup>4</sup> As a result, the zoning of 80 and 140 McLarin Road remained as FUZ.

## 2.2. Site and surrounding area

19. Section 5 of the plan change Assessment of Environmental Effects (**AEE**) includes a description of the site and surrounding area. Having undertaken site visits, most recently on August 29, 2023, I generally agree with the description of the site and surrounding area set out in the AEE.
20. A brief description of the site and surrounding area is included below.
21. The plan change area is located in the Glenbrook Beach settlement, bound by McLarin Road on the north-west and east. Glenbrook Beach is located at the end of a small peninsula of land surrounded by the Waiuku River on the west and Taihiki River to the north and east, both of which lead into the Manukau Harbour.
22. The settlement is accessed by one road in and out. It is approximately a 15 minute drive from Waiuku and a 24-29 minute drive from Pukekohe.<sup>5</sup>
23. The older residential area of Glenbrook Beach is to the immediate south-west of the plan change area, along Ronald Avenue. To the immediate north-west of the plan change area is newer residential development (Kahawai Point Development special housing area) enabled by the Glenbrook 3 Precinct. The Kahawai Point Development is currently being developed in stages. These surrounding residential areas are zoned Residential – Single House Zone (**SHZ**).
24. An area of Business – Local Centre zoned land which is not yet developed is on McLarin Road, directly to the east of the plan change area.
25. Just to the north of the Local Centre Zone, sleeved by an area of Open Space – Informal Recreation Zone, is land which is subject to a Notice of Requirement (NoR) by Counties Energy for a new electricity substation.<sup>6</sup>
26. Areas of Open Space – Informal Recreation Zone are throughout Glenbrook Beach including the Glenbrook Beach Recreation Reserve which adjoins the plan change area, to the west.

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4 <http://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/history-unitary-plan/modifications/upmod123specialhousingglenbrook3precinct.pdf>, page 29, accessed 3 August 2023

5 Based on Google Maps

6 Counties Energy's Decision confirming the NoR was notified (14 September 2023).

27. There is also an area of Future Urban zoned land directly to the south-west of the plan change area.
28. Beyond that, the surrounding area is zoned Rural – Rural Production, with some Rural – Rural Coastal Zones around the coast.
29. Figure 1 below shows an aerial of the plan change area within the Glenbrook Beach settlement, including the newer Kahawai Point Development within the Glenbrook 3 Precinct.
30. Figure 2 below shows the existing AUP zoning of Glenbrook Beach and the plan change area outlined in blue.
31. The plan change describes the plan change area as characterised by rolling topography, with shelter belt vegetation, three small natural wetlands, and a network of modified watercourses. A ridgeline runs from west to east across the centre of the site, separating the elevated plateau in the northern portion of the site from the sloping land to the south. The southwestern corner is low-lying and is located approximately 150m from the coast.
32. Overland flow paths traverse the plan change area, generally towards the low-lying area in the south-western corner of the plan change area. Pockets of the area are identified as being within the 1% annual exceedance probability (AEP) floodplain. These floodplains are associated with flat land in the northern portion of the site and the watercourse in the western site catchment. Another floodplain area in the southwestern catchment is connected to the significant floodplain system in the Glenbrook Beach township associated with the low-lying, flat land fronting the beach. A very small portion of that floodplain area is also subject to the coastal inundation mapping in the AUP.

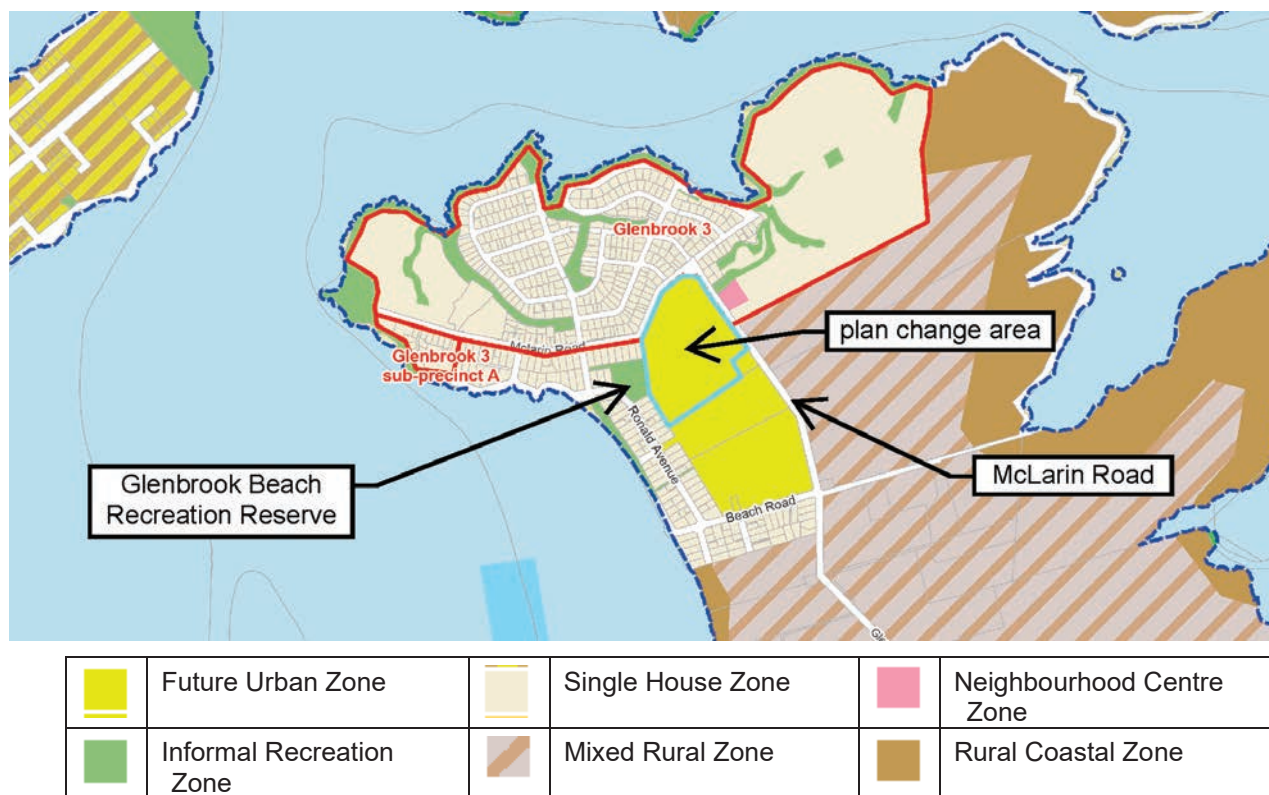


Figure 1: Glenbrook Beach settlement showing plan change area outlined in blue and newer residential development in Glenbrook 3 Precinct<sup>7</sup>



<sup>7</sup> Source: AUP GIS Viewer accessed 27 July 2023

**Figure 2: Glenbrook Beach AUP zoning and Glenbrook 3 Precinct.<sup>8</sup> Plan change area outlined in blue.**



### 3. Existing Plan Provisions

33. The plan change area is currently zoned FUZ. The FUZ is a transitional zone, applied to greenfield land that has been identified as suitable for urbanisation in the future. Future Urban zoned land is able to be used for a range of general rural activities, but cannot be used for urban activities until the land has been rezoned for urban purposes.

34. The FUZ provisions<sup>9</sup> focus on:

- Ensuring subdivision, use and development of the land does not compromise or prevent future urban development. For example fragmentation or urbanisation of the land is to be avoided, as is development that would create reverse sensitivity issues with future urban activities, or would require significant upgrades to infrastructure.<sup>10</sup>
- Providing for rural activities and services to support rural communities until the land is rezoned, in a manner that will achieve the Rural – Rural Production Zone objectives

<sup>8</sup> Source: AUP GIS Viewer accessed 27 July 2023

<sup>9</sup> AUP Chapter H18 FUZ

<sup>10</sup> H18.2 Objectives (3), (4), H18.3 Policies (4), (5), (6)

and policies (unless inconsistent with other FUZ policies). Such rural activities and services include those that rely on the quality of the soil or require a rural location to operate. The scale and type of development should maintain and complement rural character and amenity.<sup>11</sup>

35. Examples of permitted activities (subject to relevant standards) in the FUZ include:
- farming, greenhouses, forestry, on-site primary produce manufacturing, farm or forestry quarries, animal breeding or boarding<sup>12</sup>
  - one dwelling per site, home occupations, care centres up to 10 people, informal recreation, markets, mana whenua customary use.<sup>13</sup>
36. Notably most subdivision in the FUZ is a non-complying activity as are more than one dwelling per site, or minor dwellings or workers' accommodation that do not comply with relevant standards.<sup>14</sup>
37. Most other activities in the FUZ are provided for as a restricted discretionary or discretionary activity (subject to compliance with relevant standards). Examples include:
- intensive farming, intensive poultry farming, post-harvest facilities, rural commercial services and rural industries<sup>15</sup>
  - minor dwellings, workers accommodation<sup>16</sup>
  - community, healthcare or education facilities; care centres for more than 10 people, marae.<sup>17</sup>
38. The plan change area is also subject to the following additional controls:
- Natural Resources: **High-Use Aquifer Management Areas Overlay** [rp] – Glenbrook Kaawa Aquifer. The purpose of this overlay is to manage the take and use of groundwater in order to meet existing and future needs, while maintaining base flows for surface streams. The overlay also recognises the Vision and Strategy for the Waikato River in Schedule 2 of the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 for in the management of aquifers in the lower catchment of Auckland.<sup>18</sup>

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<sup>11</sup> H18.2 Objectives (1), (2), H18.3 Policies (1), (2), (3)

<sup>12</sup> H18.4 Activity table, Table H18.4.1 (A3, A6, A12, A21, A23, A16)

<sup>13</sup> H18.4 Activity table, Table H18.4.1 (A27, A33, A46, A53, A61)

<sup>14</sup> H18.4 Activity table, Table H18.4.1 (A28, A30, A32)

<sup>15</sup> H18.4 Activity table, Table H18.4.1 (A4, A7-A8, A15, A20)

<sup>16</sup> H18.4 Activity table, Table H18.4.1 (A29, A31)

<sup>17</sup> H18.4 Activity table, Table H18.4.1 (A48-A50, A47, A60)

<sup>18</sup> Chapter D1 High-use Aquifer Management Areas Overlay

- **Coastal Inundation 1 per cent AEP Plus 1m Control – 1m sea level rise.** Chapter E36 Natural hazards and flooding contains provisions relating to natural hazards, including coastal hazards. In order to be a permitted activity this control requires the finished floor level of habitable rooms in new buildings to be above the inundation level of the coastal storm inundation 1 per cent annual exceedance probability (AEP) plus 1 metre sea level rise area, otherwise they become a Discretionary activity.<sup>19</sup>
- **Macroinvertebrate Community Index – Rural.** This is used as a guideline for freshwater ecosystem health associated with different land uses in catchments.<sup>20</sup>

39. In addition to these specific provisions various Auckland-wide provisions also apply, including rules related to overland flow paths and flooding.

40. No AUP scheduled items or places apply to the plan change area.

## 4. Proposed Plan Change Provisions

### 4.1. Proposed plan change provisions - detail

41. The Structure Plan prepared by the applicant to inform and support the plan change identifies the applicant's vision statement:

*To create a new residential community at Glenbrook Beach that compliments the existing village, provides high quality mixed housing opportunities for all ages and household types, and seamlessly integrates the natural environment of the site with future development.*<sup>21</sup>

42. The Structure Plan prepared by the applicant identifies four key development principles that it states will influence development of the site:

- Principle 1: Enable a wider range of housing typologies and lot sizes that will cater to the full life-cycle population of Glenbrook.
- Principle 2: To integrate roading within the site with the established roading network around the site, to support traffic safety for all road users and provide connectivity to and through the site.
- Principle 3: Establish a pedestrian and cycle route through the site, to enable active frontage to the Glenbrook Beach Recreation Reserve, connect to the beach, future local centre and existing Kahawai Point SHA.

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<sup>19</sup> Table E36.4.1 Activity table (A12-A13) and Standard E36.1.1(1)

<sup>20</sup> AUP E1.3 Policies (1), (2)

<sup>21</sup> Structure Plan, page 32

- Principle 4: Protect and enhance the values and functions of natural ecosystems, including the hydrology of existing intermittent streams and wetlands, by mirroring natural systems and processes for stormwater management.
43. The Structure Plan states that while it is not a precise blueprint for growth, it is anticipated that growth will be in general accordance with the Structure Plan and Structure Plan map.
  44. The plan change proposes to apply the Stormwater Management Area – Flow 1 Control (**SMAF1**). It does not propose any amendments to the SMAF1 provisions.
  45. The plan change proposes to rezone the subject land to from FUZ MHS Zone and to introduce a new precinct, the Glenbrook 4 Precinct.
  46. The AEE states:
 

*... The objectives and policies of the MHS zone set the context for the nature and scale of land use activities anticipated at 80 McLarin Road through the PPC... There are few rules within the precinct that would take precedence over the rules and activity status that applies in the MHS zone or Auckland-wide rules of the AUP(OP). Most of the standards introduced by the Glenbrook 4 precinct apply to subdivision or land use development proposals of four or more dwellings. Precinct specific objectives, policies and assessment matters will apply in addition to those that are relevant with the MHS zone and region-wide provisions of the AUP(OP)*
  47. The proposed precinct includes objectives, policies, rules, notification requirements, standards, matters for discretion and assessment criteria.
  48. The objectives and policies relate to the delivery and timing of infrastructure (water supply, wastewater, stormwater and transport), key connections (walking, cycling, motor vehicles) and visual links within the precinct and the surrounding area, freshwater quality of intermittent streams and wetlands, biodiversity, management of stormwater, and housing typologies and housing choice.
  49. The proposed precinct rules relate to land use and subdivision, with three activity tables. The precinct states that all relevant zone, overlays and Auckland-wide activity tables apply unless otherwise specified in the precinct.
  50. Activity Table 1 relates to one rural activity which provides for grazing of livestock on sites greater than 2000m<sup>2</sup> as a permitted activity. The proposed precinct does not include any other provisions related to grazing of livestock.

51. Activity Table 2 relates to residential activities. Development of up to three dwellings that comply with the precinct standards is a Permitted activity,<sup>22</sup> whereas development of four or more dwellings is a Restricted Discretionary activity.<sup>23</sup> These precinct standards relate to infrastructure, the precinct plan, riparian margins and setbacks and fences. Development that does not comply with these standards are either Restricted Discretionary (fences and riparian margins and setbacks),<sup>24</sup> Discretionary (precinct plan),<sup>25</sup> or Non-complying (infrastructure)<sup>26</sup> activities.
52. Activity Table 3 relates to subdivision. Subdivision that is in general accordance with all of the precinct standards (except fences) is a Restricted Discretionary activity.<sup>27</sup> The precinct applies similar activities statuses for subdivision that is not in general accordance with the precinct standards i.e. Restricted Discretionary (riparian margins and setbacks),<sup>28</sup> Discretionary (precinct plan)<sup>29</sup> or Non-complying (infrastructure)<sup>30</sup> activities.
53. The proposed precinct requires that a resource consent application for four or more dwellings that complies with three of the precinct standards (infrastructure, precinct plan, riparian margins and setbacks) or any development that does not comply with the fencing standard must be considered without public or limited notification or the need to obtain written approval from affected parties unless special circumstances apply.<sup>31</sup>
54. As mentioned above the precinct proposes four standards that should be complied with. These are set out below, although the purposes are not included. See Appendix 1 for the full set of proposed precinct provisions.
55. The first standard (1 - Infrastructure) requires:<sup>32</sup>
  1. *Development* and subdivision in the Glenbrook 4 precinct must either:
    - (a) *be connected to publicly available reticulated water and wastewater networks with sufficient capacity to service the proposed development and/or subdivision, OR*

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<sup>22</sup> IXXX.4.1 Activity Table (A2)

<sup>23</sup> IXXX.4.1 Activity Table (A3)

<sup>24</sup> IXXX.4.1 Activity Table (A4) and (A5)

<sup>25</sup> IXXX.4.1 Activity Table (A7)

<sup>26</sup> IXXX.4.1 Activity Table (A6)

<sup>27</sup> IXXX.5.1 Activity Table (A8)

<sup>28</sup> IXXX.5.1 Activity (A10)

<sup>29</sup> IXXX.5.1 Activity (A9)

<sup>30</sup> IXXX.5.1 Activity (A11)

<sup>31</sup> IXXX.6 Notification (1)

<sup>32</sup> IXXX7.1 Land use and subdivision (1) Infrastructure

*(b) be supported by written confirmation from the infrastructure services provider for the area that planned capital works required to provide connections for water and wastewater are suitably advanced and capable of servicing proposed subdivision and development.*

56. This standard does not include any transport infrastructure requirements.

57. The second standard (2 - Precinct Plan) requires:<sup>33</sup>

1. *Development and/ or subdivision shall enable the connections, pathways, and infrastructure (including the roundabout) to be provided as shown in Figure 1 of the Glenbrook 4 Precinct Plan.*
2. *Roads are to be designed in accordance with the road cross sections for this Precinct in Figure 2 of the Glenbrook 4 Precinct Plan.*

58. The AEE states that the road cross sections included in the precinct are replicated from those in Glenbrook 3 Precinct.

59. The third standard (3 – Riparian Margins and Setbacks) requires:<sup>34</sup>

1. *Where development and/ or subdivision provides riparian margins, the development and/or subdivision shall comply with clauses (a) – (c), below:*
  - a) *A minimum 10m riparian yard setback must be provided between buildings and the top of the bank belonging to any intermittent stream or natural wetland.*
  - b) *Native planting shall be planted within 10m of any intermittent stream or wetland. Planting should be undertaken at a density of 20,000 plants per hectare, using eco-sourced native vegetation consistent with local biodiversity.*
  - c) *Riparian margins can be either located within private property and protected by a consent notice or covenant or vested at council's request.*

60. The fourth standard (4 – Fences) requires:

1. *Fences fronting a wetland, an intermittent stream, or the Glenbrook Recreation Reserve, must not exceed 1.2m in height, except that fences may be up to 1.6m in height if the fence is at least 60 percent visually permeable.*
2. *No fences are permitted within a planted riparian margin or within 10m of a wetland or an intermittent stream.*

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<sup>33</sup> IXXX7.1 Land use and subdivision (2) Precinct Plan

<sup>34</sup> IXXX7.1 Land use and subdivision (3) Riparian Margins and Setbacks

3. *All other fences must comply with H4.6.14 (Front, side and rear fences and walls in the Residential – Mixed Housing Suburban zone).*

61. The precinct relies on the underlying MHS Zone provisions to manage building height, impervious areas, height in relation to boundary, outlook and so forth.
62. The precinct plan (map) is consistent with the Structure Plan map and identifies:
- three indicative vehicle access locations – two onto McLarin Road and one to the adjacent Future Urban zoned site (south-east of site)
  - an indicative round-about on McLarin Road, just to the south of the Neighbourhood centre Zone
  - an indicative green interface on the boundary with Glenbrook Beach Recreation Reserve
  - an indicative pedestrian/cycleway across the plan change area between Glenbrook Beach Recreation Reserve and the existing Open Space – Informal Recreation and Neighbourhood Centre zones on the eastern side of McLarin Road.
63. A set of road cross section diagrams is contained in figure 2 of the precinct plan.
64. There are no special information requirements.

#### **4.2. Documents and technical reports provided with plan change**

65. The applicant provided a range of documents and technical reports when they lodged their plan change request, including an assessment of environmental effects and section 32 evaluation.
66. The council undertook a review of the information provided and requested that the applicant provide further information in accordance with Clause 23 of Schedule 1 to the RMA.<sup>35</sup>
67. The information sought through the Clause 23 request related to the following matters:
- Planning, statutory and general matters
  - Transport matters
  - Urban design matters
  - Stormwater and flooding matters
  - Parks and open space.
68. The council also made suggestions in relation to ecology and open space matters.

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<sup>35</sup> I note I was not involved in the review of the lodged application documents or clause 23 response.



69. The applicant provided their response on 21 October 2023.
70. Following review of the further information received the council requested further information in relation to the same matters. The applicant provided the additional further information on 25 January 2023.
71. It is noted that on the council website some of the lodged documents have been titled Appendix 1 -10. However these appendix numbers are not the same as those used in the applicant's lodged assessment of environmental of effects report. To avoid any possible confusion, this s42A report will refer to these documents by their title (or an abbreviation of) rather than any appendix reference.
72. However for the Clause 23 documents the council website is consistent with those used in the applicant's clause 23 covering letter i.e. Appendix A-K.
73. Appendix 2 of this report includes a table of all the plan change documents.

## **5. Analysis of the section 32 report and any other information provided by the applicant**

74. Section 74 of the RMA requires that a plan change must have particular regard to an evaluation prepared in accordance with Section 32 of the RMA.
75. Section 32(1)(a) of the RMA requires an evaluation report examining the extent to which the objectives<sup>36</sup> of the plan change are the most appropriate way to achieve the purpose of the Act.
76. Section 32(1)(b) requires the report to examine whether the provisions<sup>37</sup> of the plan change are the most appropriate way of achieving the objectives by (i) identifying other reasonably practicable options for achieving the objectives; (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and (iii) summarising the reasons for deciding the provisions.
77. Section 2.1 of the applicant's Section 32 Report describes the objectives of the plan change. It states the objective of the plan change is to:

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<sup>36</sup> RMA s32(6) defines "objectives" to mean (a) for a proposal that contains or states objectives, those objectives.

<sup>37</sup> RMA s32(6) defines "provision" to mean (a)... the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change.

*Achieve the co-ordinated expansion of the Glenbrook Beach coastal settlement in a manner that enables mixed housing opportunities for all ages and household types, and seamlessly integrates freshwater assets of the site with future development.*

78. The Section 32 Report notes the plan change seeks to apply, but not amend the objectives of the MHS Zone and the SMAF1 Control. The proposed Glenbrook 4 Precinct objectives are intended to be in addition to the zone and overlay objectives. The Section 32 Report identifies the 11 proposed precinct objectives stating they seek to achieve the following outcomes:

- *The provision of transportation connections within and through the precinct, including walking and cycling pathways.*
- *The roundabout shown in the Glenbrook 3 precinct provisions on McLarin Road is provided for in the proposed Glenbrook 4 precinct provisions.*
- *Good connectivity with and between existing public open spaces, including the coast, with existing community facilities, and with the planned local centre on McLarin Road.*
- *The provision of a wider variety of housing typologies and choices than presently exists within the Glenbrook Beach settlement.*
- *Subdivision and development that incorporates and integrates with intermittent streams and natural wetlands.*
- *Subdivision and development that is adequately serviced for water and wastewater by publicly available reticulated infrastructure networks.*
- *Stormwater is attenuated to manage effects on the downstream network during peak storm events and mitigate flooding on downstream properties, as the existing downstream stormwater network is likely to be under capacity to service development envisaged by the proposed plan change.*
- *Maintaining and enhancing identified freshwater values through site appropriate riparian margins and setbacks.*
- *Stormwater is adequately managed by applying water sensitive principles 'offline' of watercourses and wetlands.*

79. Section 2.2 of the Section 32 Report makes an assessment of the plan change objectives against Part 2 of the RMA, including consideration of Sections 5, 6, 7 and 8.

80. The Section 32 Report notes the future urban zoning of the land has already been “tested” through a robust planning process, and therefore “... *the urbanisation and loss of productive land have already been deemed to achieve the purpose of the Act.*”<sup>38</sup> The Section 32 Report considers the MHS Zone and SMAF1 provisions are also consistent with Section 5 of the RMA for the same reasons. I concur with the applicant on both these matters.

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<sup>38</sup> Section 32, page 13

## RMA – Section 5 Purpose

81. The Section 32 Report considers the proposed Glenbrook 4 Precinct objectives are consistent with the Section 5 of the RMA for the following reasons:
- *The plan change provides mixed housing opportunities for all ages and household types. This will enable people and communities to provide for their social and economic well-being.*
  - *The plan change promotes the efficient use of a scarce land resource.*
  - *Increased population is likely to make commercial activities more economically viable on the land that is zoned 'Business - Local Centre'.*
  - *The plan change will maintain freshwater assets of the site and enhance freshwater and ecological values for future generations.*
  - *The Auckland-wide storm water provisions will mitigate the potential adverse effects relating to stormwater runoff and maintain the life-supporting capacity of the receiving freshwater and coastal environs (which includes SEA-M2-32a).*
  - *Improved walking and cycling facilities between Glenbrook Beach, the Kahawai Point development and the future local centre that will provide an alternative to using vehicles for short, local trips.*
82. I agree with the applicant in relation to the first three matters and the last matter.
83. With regards to the statements about freshwater, ecological values, stormwater and coastal environs I disagree in part as I consider further information and amendments to the proposed precinct provisions are required in order to be consistent with Section 5. See section 8 of this report for further discussion on these matters.

## RMA – Section 6 Matters of national importance

84. Section 6 Matters of national importance sets out other matters that all persons exercising functions and powers under the Act “shall have particular regard to.”
85. I generally agree with the AEE in relation to Section 6(a), 6(b), 6(c), 6(d), 6(f), and 6(g) matters – provided my recommended amendments to the precinct provisions are made and the applicant provides further information/analysis as recommended (see sections 8 and 11 of this report). In my opinion (based on council’s expert advice) without these amendments the plan change will not be consistent with Part 2 of the RMA for the reasons set out in sections 8 and 11. These amendments and further information relate to stormwater runoff, water quality, ecological values and natural hazards (flooding and coastal inundation).
86. With regard to Section 6(e) matters I note that Ngati Te Ata do not support the plan change because they consider the applicant has “... *not indicated in any way how they propose to*

*actually respect, protect and recognise the cultural, social and environmental issues...*” they raised in their cultural impact assessment (CIA) provided with the plan change. The Ngati Te Ata submission does not provide any detail about how the plan change could better respond to their recommendations. However I consider the hearings process provides the opportunity for the plan change to recognise and provide for (e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga. The Ngati Te Ata submission is contained in Appendix 3.

87. In relation to Section 6(h) matters I note the Section 32 Report refers to future “industrial growth”, although I assume this is supposed to refer to residential growth. While I have concerns about the risk of increased natural hazards on downstream properties I consider these are unlikely to be significant. Further information from the applicant and/or amended precinct provisions will likely be able to manage and mitigate risks.

#### RMA – Section 7 Other matters

88. Section 7 Other matters, sets out other matters that all persons exercising functions and powers under the Act “shall have particular regard to.”
89. The Section 32 Report specifically addresses how the plan change will have regard to Section 7(a), (b) and (c) matters. It also discusses climate change (i.e. Section 7(i)).
90. With regards to Section 7(a) matters the Section 32 Report states that the proposed plan change will have regard to the protection of the environment, noting that the appropriate stormwater management will be incorporated into future development. Based on the definition of kaitiakitanga I consider Section 7(a) is more about tangata whenua exercising guardianship in accordance with tikanga Māori in relation to natural and physical resources, rather than about the protection of the environment per se. Given the Ngati Te Ata submission and CIA, I consider the applicant could provide further responses as to how the plan change has regard to (a) kaitiakitanga.
91. I agree with the Section 32 Report in relation to Section 7(b) and 7(c) matters. I also agree with the AEE that changing from a rural to urban zone will unavoidably result in a change of character, and that the MHS Zone provisions will generally manage the transition between the existing residential areas and development of the plan change area. However I consider the plan change provides an opportunity to improve the accessibility, function and amenity of Glenbrook Beach Recreation Reserve, and to better manage the interface with the reserve than currently proposed. I also consider further amendments are required to ensure a more consistent streetscape character.
92. I consider Sections 7(f) and 7(g) are relevant and the plan change has appropriate regard to these matters, noting the proposed approach to riparian margins will contribute to enhancing the quality of the environment. I also consider Section 7(d) is relevant noting the values of freshwater and coastal ecosystems. Dependant on the adequacy of further information

provided by the applicant (i.e. SMP), and further amendments to the precinct provisions (water quality, stormwater management), I consider the plan change can have appropriate regard to the intrinsic values of ecosystems.

93. With regard to Section 7(i) matters I note due to the location of the plan change, and the reliance on private vehicles, it will contribute to an increase in vehicle emissions despite trends of working from home and the use of more EVs. There are also concerns with regards to stormwater runoff and flood risk. Healthy Waters request the applicant provide further information about managing flood risk or to provide additional precinct provisions. Provided this matter is resolved I consider the plan change has had appropriate regards to the effects of climate change.

#### RMA - Section 8 Treaty of Waitangi

94. Section 8 of the RMA requires that all persons exercising functions and powers under the Act “shall take into account” principles of the Treaty of Waitangi / Te Tiriti o Waitangi.
95. The Section 32 considers the plan change will be consistent with the principles of the Treaty of Waitangi, stating it does not contradict the content of the cultural values assessment prepared by Ngai Tai Ki Tamaki. I note it was Ngati Te Ata, not Ngai Tai Ki Tamaki who provided a cultural impact assessment (CIA) on this plan change. I assume the Section 32 is referring to the CIA provided by Ngati Te Ata.
96. As discussed in section 9 of this report, I acknowledge that the applicant sought consultation with relevant iwi in the preparation of the plan change, and that Ngati Te Ata was the only iwi to provide input. However based on the Ngati Te Ata submission it appears Ngati Te Ata would not agree with the Section 32 assessment - that that plan change does not contradict their CIA.
97. Te Tiriti Principles are not a defined list, but generally relate to concepts of partnership; active protection; mutual obligation to act reasonably and in good faith; mutual benefit; development (i.e. the Treaty is adapted to modern changing circumstances); and rangatiratanga – recognising iwi and hapū rights to manage resources or kaitiakitanga over ancestral lands and waters. The applicant may wish to provide further information to support how they have taken into account the Treaty Principles, noting the Ngati Te Ata submission.

#### Assessment of other reasonably practicable options for achieving the objectives of the plan change

98. Section 3.1 of the Section 32 provides an assessment of alternative zoning options. I found this could be clearer as none of the five options assessed appear to include the full suite of provisions proposed by the plan change i.e. the proposed zoning, application of the SMAF1 Control and introduction of a new precinct. The five options assessed are:

- Option 1: Applying the Residential – Single House Zone Provisions
- Option 2: Applying the Residential – MHS Zone Provisions
- Option 3: Split zoning of the land [MHS and Single House Zone]
- Option 4: Split zoning – MHS Zone and open space zone
- Option 5: Expansion of Glenbrook 3 Precinct provisions

99. The Section 32 concludes Option 5 is the preferred option, stating:

- ... Option 5 is the most appropriate approach for achieving the objectives of the plan change because the zoning, precinct plan and provisions are all interlinked, and all require updating in order to fully achieve the objectives of the plan change.<sup>39</sup>

100. In my opinion Options 1, 2, 3 and 4 provide a reasonable analysis of zoning options potentially available for the site. These four options specifically state they do not include the a “precinct plan overlay”. By this I assume they mean the options do not include the application of a precinct.

101. Based on the zone proposed through the plan change, I assume the applicant’s preferred option in terms of zone choice is Option 2, however it does not state this. Overall I agree that the application of the MHS Zone is the most appropriate zone. See sections 8 and 11 for further discussion on this matter.

102. However I consider Option 5 could be clearer, especially as this is stated as the preferred option, although this just be a product of how this option is set out. This option is referred to as the expansion of the Glenbrook 3 Precinct, although the Section 32 appears to discount this, instead preferring the application of a new precinct rather than the expansion of the Glenbrook 3 Precinct. The Section 32 states:

*The objective of the plan change could be better achieved by creating new precinct provisions as opposed to making such extensive and complicated amendments to the Glenbrook 3 precinct.*

103. The Section 32 also states that some of the Glenbrook 3 Precinct provisions do not apply to the plan change area – this appears to be based on the application of the MHS Zone instead of the Single House Zone.

104. I generally agree that a new precinct is more appropriate than expanding the Glenbrook 3 Precinct, however I recommend that some of the matters included in the Glenbrook 3 Precinct (i.e. Te Aranga Principles) are included in the Glenbrook 4 Precinct. I also consider

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<sup>39</sup> Section 32 Report, page 20

further information and/or precinct provisions are required – as recommended in section 12 of this report.

105. I also note none of the options include consideration of applying the SMAF1 Control.

Cost benefit analysis, efficiency and effectiveness and risk of not acting (Section 32(2))

106. Section 3.2 of the Section 32 Report identifies environmental, economic (including employment), social and cultural costs and benefits. The Section 32 concludes the “... *overall benefits of the proposal outweigh the costs on the community, the economy and the environment.*”<sup>40</sup>

107. Section 3.2 of the Section 32 Report provides an assessment of efficiency and effectiveness. The Section 32 concludes that the proposed Glenbrook 4 Precinct provisions “... *will enable the efficient use of a values and scarce land resource that has been identified for urban expansion of Glenbrook Beach and that is strategically located and well suited to residential use...*”<sup>41</sup> It also concludes that the precinct provisions are effective.

108. Section 3.4 of the Section 32 Report considers the risk of not acting and states that information supporting the plan change is robust, sufficient and not uncertain. The report highlights that the Future Urban zoning of the site, in conjunction with the FULSS timing of when the site will be development ready (2023-2027) provide a high degree of certainty that the land will be urbanised and that the land will be used for residential use. The Section 32 concludes that the risk of acting is less than not acting.

109. As discussed throughout this report I consider (based on advice of experts) that further information is necessary to better understand the significance and level of adverse effects and whether the proposed precinct provisions will be adequate to manage these effects. I also consider further information is needed to meet the requirements of Section 32(4A), which is discussed below.

Section 32(4A)

110. Section 32(4A) requires:

*If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—*

*(a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and*

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<sup>40</sup> Section 32 Report, page 25

<sup>41</sup> Section 32 Report, page 23

*(b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.*

111. The Section 32 report does not include this information required by clause (4A). The AEE includes the ultimate goal as expressed by Ngati Te Ata in their CIA, but does not summarise the recommendations included in the CIA. The AEE states:

*The recommendations and values outlined in the CVA can be recognised and incorporated as the PPC area is developed via the Auckland-wide AUP(OP) provisions, including the SMAF1 overlay in relation to stormwater.*

*The west-east pathway that has been recommended in the CVA has been incorporated into the proposed precinct plan provisions. Cultural references along the west-east pathway can be incorporated at subdivision stage in consultation with Ngai Tai Ki Tamaki, without requiring these references to be adopted as part of the PPC.<sup>42</sup>*

112. In my opinion the plan change has not adequately, at this stage, fulfilled the requirements of Section 32(4A) and recommend that the applicant address this through their evidence.

## **6. Hearings and decision-making considerations**

113. Clause 8B of Schedule 1 of RMA requires that a local authority shall hold hearings into submissions on private plan changes.

114. Auckland Council's Combined Chief Executives' Delegation Register delegates to hearing commissioners all powers, duties and functions under the Resource Management Act 1991. This delegation includes the authority to determine decisions on submissions on a plan change, and the authority to approve, decline, or approve with modifications, a private plan change request. Hearing Commissioners will not be recommending a decision to the council, but will be issuing the decision.

115. In accordance with s42A(1), this report considers the information provided by the applicant and summarises and discusses submissions received on PC91. It makes recommendations on whether to accept, in full or in part; or reject, in full or in part; each submission. This report also identifies what amendments, if any, can be made to address matters raised in submissions. This report makes a recommendation on whether to approve, decline, or approve with modifications PC91. Any conclusions or recommendations in this report are not binding to the Hearing Commissioners.

116. The Hearing Commissioners will consider all the information submitted in support of the proposed plan change, information in this report, and the information in submissions, together with evidence presented at the hearing.

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<sup>42</sup> AEE, page 15



117. This report section 42A report has been prepared at the request of Auckland Council by Katrina David. I am a senior policy planner in Plans and Places at Auckland Council. A copy of my relevant work experience is contained in Appendix 4.

118. This report draws on technical advice provided by the following technical experts:

**Table 1: Specialist input into s42A report**

Area of expertise	Authors
Planning	Katrina David, Senior Policy Planner, Central South Team 1, Plans and Places, Chief Planning Office, Auckland Council
Technical expert – Urban Design	Jennifer Esterman, Urban Designer, Mein Urban Design and Planning Ltd
Technical expert – Transport	Wes Edwards, Transportation Advisor, Arrive Ltd
Technical expert – Ecology	Jason Smith, Environmental Scientist, Morphum Environmental Ltd
Technical experts – Healthy Waters	Kelly Seekup – Consultant Planner, on behalf of Healthy Waters, Auckland Council Sarah Basheer – Consultant Engineer, on behalf of Healthy Waters, Auckland Council
Technical expert – Parks	Andreas Lilley, Consultant Parks Planner, on behalf of Parks and Community Facilities, Auckland Council
Technical expert – Heritage	Rebecca Ramsey, Senior Specialist – Heritage, Heritage Policy Team, Plans and Places, Chief Planning Office, Auckland Council
Technical expert – Development Engineer	David Russell, Senior Development Engineer, Regulatory Engineering South 2 Team, RgEng&RsceConsts, Auckland Council Regulatory Services, Auckland Council

119. The technical reports provided by the above experts are attached in Appendix 5 of this report.

## 7. Statutory and policy framework

120. Private plan change requests can be made to the Council under clause 21 of Schedule 1 of the RMA. The provisions of a private plan change request must comply with the same mandatory requirements as Council initiated plan changes, and the private plan change request must contain an evaluation report in accordance with section 32 and clause 22(1) in Schedule 1 of the RMA.

121. Clause 29(1) of Schedule 1 of the RMA provides “except as provided in subclauses (1A) to (9), Part 1, with all necessary modifications, shall apply to any plan or change requested under this Part and accepted under clause 25(2)(b)”.
122. The RMA requires territorial/regional authorities to consider a number of statutory and policy matters when developing proposed plan changes. There are slightly different statutory considerations if the plan change affects a regional plan or district plan matter.
123. PC91 proposes district and regional plan matters in relation to 80 McLarin Road, Glenbrook:
- Rezone the plan change area from FUZ to MHS Zone. This is a district plan matter.
  - Apply the SMAF 1 to the plan change area. This is a regional plan matter.
  - Add a new precinct to the plan change area. The proposed plan change does not identify any of the proposed precinct provision as regional plan matters.

### 7.1. Resource Management Act 1991 – Regional and district plans

124. In the development of a proposed plan change to a regional and / or district plan, the RMA sets out mandatory requirements in the preparation and process of the proposed plan change. Table 2 below summarises matters for plan changes to regional and district plan matters.

**Table 2: Plan change matters relevant to regional and district plans**

RMA Section	Matters
Part 2	Purpose and intent of the Act
Section 32	Requirements preparing and publishing evaluation reports. This section requires councils to consider the alternatives, costs and benefits of the proposal
Section 80	Enables a ‘combined’ regional and district document. The Auckland Unitary Plan is in part a regional plan and district plan to assist Council to carry out its functions as a regional council and as a territorial authority
Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities

125. The mandatory requirements for plan preparation are comprehensively summarised by the Environment Court in Long Bay-Okura Great Park Society v North Shore City Council, Environment Court Auckland A078/2008, 16 July 2018 at [34] and updated in subsequent cases including Colonial Vineyard v Marlborough District Council [2014] NZEnvC 55 at [17]. When considering changes to district plans, the RMA sets out a wide range of issues to be addressed. The relevant sections of the RMA are set out in Tables, 2, 3 and 4.
126. The tests are the extent to which the objectives of PPC91 is the most appropriate way to achieve the purpose of the Act (s32(1)(a)) and whether the provisions:

- *accord with and assist the Council in carrying out its functions (under s 31) for the purpose of giving effect to the RMA;*
- *accord with Part 2 of the RMA (s 74(1)(b));*
- *give effect to the AUP regional policy statement (s 75(3)(c));*
- *give effect to any national policy statement (s 75(3)(a));*
- *have regard to the Auckland Plan 2050 (being a strategy prepared under another Act (s 74(2)(b)(i));*
- *have regard to the actual or potential effects on the environment, including, in particular, any adverse effect (s 76(3));*
- *are the most appropriate method for achieving the objectives of the AUP, by identifying other reasonably practicable options for achieving the objectives (s 32(1)(b)(i)); and by assessing their efficiency and effectiveness (s 32(1)(b)(ii)); and:*
- *identifying and assessing the benefits and costs of environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for:*
  - *economic growth that are anticipated to be provided or reduced (s 32(2)(a)(i)); and*
  - *employment that are anticipated to be provided or reduced (s 32(2)(a)(ii));*
- *if practicable, quantifying the benefits and costs (s 32(2)(b)); and*
- *assessing the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions (s 32(2)(c)).*

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

## 7.2. Resource Management Act 1991 – Regional Matters

128. There are mandatory considerations in the development of a proposed plan change to regional matters. Table 3 below summarises regional matters under the RMA, relevant to PPC91.

**Table 3: Plan change – regional matters under the RMA**

Section	Matters
Section 30	Functions of regional councils in giving effect to the RMA
Section 59	Sets out the purpose of a regional policy statement in giving effect to the RMA
Section 60	Sets out the requirement for and the process for, changes to the regional policy statement
Section 61	Sets out the matters to be considered for a regional policy statement

Section 62	Sets out the required contents of regional policy statements
Section 63	Sets out the purpose of regional plans
Section 64	Sets out the requirement for and the process for, changes to the regional coastal plan
Section 65	Sets out matters to be considered for changes to regional plans
Section 66	Sets out matters to be considered in (other) regional council plans
Section 67	Sets out required contents of regional plans
Section 68	Sets out the purpose and considerations of rules in regional plans (regional rules)
Section 69	Sets out matters to be considered for rules relating to water quality
Section 70	Sets out matters to be considered for rules relating to discharges

### 7.3. Resource Management Act 1991 – District Matters

129. There are mandatory considerations in the development of a proposed plan change to district plans and rules. Table 4 below summarises district plan matters under the RMA, relevant to PC91.

**Table 4: Plan change – District plan matters under the RMA**

RMA Section	Matters
Section 31	Functions of territorial authorities in giving effect to the Resource Management Act 1991
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	Outlines the requirements in the contents of a district plan
Section 76	Outlines the purpose of district rules, which is to carry out the functions of the RMA and achieve the objective and policies set out in the district plan. A district rule also requires the territorial authority to have regard to the actual or potential effect (including adverse effects), of activities in the proposal, on the environment
Section 77G	Outlines the requirements to incorporate Medium Density Residential Standards and to give effect to NPS-UD policy 3 or policy 5 in residential zones.
Section 77I	Sets out qualifying matters in applying MDRS and policy 3.

## 7.4. National Policy Statements

130. Sections 75(3)(a) and (b) of the RMA require a district plan to give effect to any national policy statements (**NPS**) the New Zealand Coastal Policy Statement (**NZCPS**) respectively. Therefore relevant NPS and NZCPS must be considered in the preparation, and in considering submissions on PC91.

### 7.4.1. New Zealand Coastal Policy Statement 2010

131. The purpose of the NZCPS is to state policies in order to achieve the purpose of the RMA in relation to the coastal environment. Of particular relevance to the plan change are those policies relating to:
- Treaty of Waitangi, tangata whenua and Māori (Policy 2)
  - integrated management of natural and physical resources (Policy 4)
  - indigenous biodiversity (Policy 11)
  - water quality and sediment (Policies 21 – 23)
  - coastal hazards (Policy 25).
132. Section 6.7 of the AEE addresses the NZCPS. The AEE states that the Auckland-wide stormwater quality and stormwater management provisions will apply to the plan change area. The AEE states these provisions will manage sediment and contamination runoff which could make its way into the coastal receiving environment, and that further mitigation will be considered as part of a future resource consenting process.
133. I agree with the AEE that the NZCPS is applicable to the plan change. However I have some concerns as to whether the effects of stormwater run-off are adequately avoided or mitigated. As discussed later in this report (section 8.7) the council's Healthy Waters' experts raise concerns about the Stormwater Management Plan provided with the plan change and the proposed management of stormwater run-off. Much of the coastal environment around Glenbrook Beach is a sensitive receiving environment with several SEA-Marine Overlays applying to much of the coastal environment around the plan change area.
134. In addition to this, properties downstream of the plan change area and a small portion of the plan change area itself are subject to coastal hazards and it is unclear at this stage if the plan change appropriately addresses this matter.
135. I also note that Ngati Te Ata have submitted, opposing the plan change. The Ngati Te Ata submission states the applicant has not demonstrated how they propose to respect, protect and recognise the cultural, social and environmental issues Ngati Te Ata raised in their Cultural Impact Assessment (CIA) provided to the applicant.
136. If these concerns are able to be addressed by the applicant, possibly with additional precinct provisions, I consider the plan change will be generally consistent with the NZCPS.

#### 7.4.2. National Policy Statement on Urban Development 2020

137. The National Policy Statement on Urban Development 2020 (updated May 2022) (**NPS-UD**) and amendments to the RMA (introduced through the Resource Management Act Enabling Housing Supply Act 2021) seek to ensure that New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of diverse communities. They also seek to remove barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure.
138. The NPS-UD and amendments to the RMA have introduced new concepts for "well-functioning urban environments" and "qualifying matters". The NPS-UD also includes specific direction on urban resilience to the effects of climate change.
139. As a tier 1 local authority, Auckland Council is required to provide sufficient development capacity to meet expected demand for housing and business land over the short to long term.
140. Section 6.1 of the AEE addresses the NPS-UD. The AEE considers the plan change to be consistent with the policy direction of Objective 1 and Objective 4 of the NPS-UD stating "... *the MHS zoning will increase housing supply that will improve housing affordability and increase variety in the available housing stock at Glenbrook Beach, thereby ensuring that there is housing that caters for different life stages.*"<sup>43</sup>
141. The AEE also states the proposed precinct provisions will result in a well-functioning urban environment, noting the proposed connections through and to/from the site will improve accessibility within Glenbrook Beach.
142. Notwithstanding that the subject site is zoned FUZ and thus considered appropriate for urban development, I consider the plan change is only partially consistent with Objectives (1), (6) and (8) and Policy (1), noting that a well-functioning urban environment includes good accessibility and supporting a reduction of greenhouse gas emissions. Due to the location of the plan change area, access to most employment areas, goods and services (including schools) will be via private vehicle; thus increasing private vehicle kilometres travelled (VKT), road safety risks and greenhouse gas emissions. The plan change is also not aligned with transport planning/funding. For similar reasons the council's consultant traffic expert Wes Edwards also considers the plan change is partially inconsistent with the NPS-UD.
143. I also note that the Auckland Transport submission also considers the plan change to be partially inconsistent with Objectives (1) and (3), and Policy (1). I disagree with Auckland Transport in relation of Objective (3), but agree in relation to the other matters. I consider the plan change is generally consistent with Objective (3)(a) because it is located near land zoned Neighbourhood Centre.

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<sup>43</sup> AEE, page 9

144. I agree with the AEE that the plan change is generally consistent with Objective (4), although it would be beneficial for the applicant to provide further detail on how the plan change will improve housing affordability in Glenbrook Beach, as stated by the AEE.
145. In terms of Policy 3, the AEE notes that the plan change area is not located near the City Centre, a Metropolitan Centre or within a walkable catchment of a rapid transit stop, however it is within 400m of a planned local centre. The AEE states “... *the level of intensification anticipated by the MHS provisions are commensurate with the level of commercial activity that is likely to occur at the future local centre and in accordance with Policy 3(d).*”<sup>44</sup>
146. I agree with the AEE that Policy 3(a-c) of the NPS-UD is not applicable to the plan change due to location. I also agree that the plan change area is within a 400m radius of a planned centre (zoned Neighbourhood Centre). In my opinion the urban form enabled by the MHS Zone (i.e. 8m permitted building height and low-medium residential density) is likely to be commensurate with the level of commercial activity and community services that may be expected in a Neighbourhood Centre Zone. However I note that currently there is no commercial activity or community services in the centred zoned land – it is currently vacant and undeveloped. See Appendix 6 of this report for further analysis of the NPS-UD objectives and policies.
147. The AEE does not provide an assessment against any other specific NPS-UD objectives and policies, but states:

*Overall, this proposal will provide for housing choice to meet Auckland's housing demand in a location that has proximity to the coast and amenities. Furthermore, land use and development infrastructure are integrated with each other as part of the proposal.*

*This PPC request will support good urban outcomes as the proposed rezoning and associated rules are likely to have positive effects on the quality of the built environment, and development within the PFC area will integrate well with the existing community and wider Franklin area. Adverse effects arising from the urban development of 80 McLarin Road can be appropriately avoided and mitigated through future resource consent processes.*<sup>45</sup>

### **7.4.3. National Policy Statement on Highly Productive Land 2022**

148. The National Policy Statement on Highly Productive Land (**NPS-HPL**) provides direction to improve the way HPL is managed under the RMA.
149. The NPS-HPL requires councils to identify and map highly productive land based on a set of criteria. However where land is already identified for future urban development, such as land zoned FUZ, it cannot be identified as highly productive land.

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<sup>44</sup> AEE, page 9

<sup>45</sup> AEE, page 9

150. Therefore because the plan change area is zoned FUZ, it is considered the NPS-HPL does not apply to PC91.

#### **7.4.4. National Policy Statement on Freshwater Management**

151. The National Policy Statement Freshwater Management 2020 (NPS-FM) provides direction for local and regional authorities about how they must carry out their responsibilities and functions in managing freshwater.

152. This NPS was amended in December 2022. The AUP has not been amended yet to give effect to this NPS.<sup>46</sup>

153. Requirements of the NPS include, but are not limited to:

- Manage freshwater in a way that ‘gives effect’ to the fundamental concept of Te Mana o te Wai. Te Mana o te Wai is a hierarchy of obligations that prioritises;
  - firstly the health and well-being of water bodies and freshwater ecosystems
  - secondly the health needs of people
  - thirdly the ability of people and communities to provide for their social, economic and cultural well-being, now and into the future.

Te Mana o Te Wai has six principles.

- Improve degraded water bodies and maintain or improve all others
- Avoid further loss or degradation of streams and wetlands.

154. The plan change contains a number of ecology reports prepared by Pattle Delamore Partners. For convenience I refer to these as ‘the Ecology Reports’.

155. Section 6.6 of the AEE assesses the plan change against the NPS-FM. The Ecology Reports identify that the site contains an intermittent stream and three small natural wetlands, which have low/degraded freshwater values. The AEE considers the watercourses cannot be considered as ‘outstanding’ as per Policy 8 of the NPS-FM.

156. According to the AEE, the Ecology Reports conclude that the site can be developed as anticipated by the MHS Zone without loss of the watercourse and wetlands and that the overland flow paths can be accommodated. This can be achieved by relying on the AUP Auckland-wide provisions that give effect to the NPS-FM. The also states that the application of SMAF1 will protect the ecological values of the stream and wetlands by managing run-off from impervious surfaces.

157. The AEE concludes:

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<sup>46</sup> The council must notify a plan change to do so by 31 December 2024, in accordance with s80A(4)(b) of the RMA.



*The precinct provisions will improve/ restore values of the degraded wetland and intermittent streams in a manner that is consistent with Policies 5 and 6. In particular, the precinct requires buildings to be setback at least 10m from streams and wetlands, with a minimum 10m wide planted riparian strip. Precinct provisions will allow Council to consider viable offset planting proposals where either it is impractical to provide the full riparian requirement and/ or where there is an opportunity to provide a net ecological benefit elsewhere within the precinct.*

*Overall, it is considered that freshwater resources within 80 McLarin Road can be managed in a way that gives effect to Te Mana o te Wai and the NPS-FM. This proposal enables the Glenbrook community to provide for its social, economic and cultural wellbeing in a manner that is consistent with the outcomes sought by the NPS-FM.<sup>47</sup>*

158. The plan change has been reviewed by Jason Smith (consultant ecology expert) on behalf of the council. His technical report is contained in Appendix 5. I rely on the advice of Mr Smith.
159. Mr Smith concludes that the plan change adequately addresses potential ecological effects, except for one matter – the mapping of the intermittent stream and wetlands.
160. Mr Smith considers that Clause 3.24 ‘Rivers’ of the NPS-FM arguably increases the need to identify and accurately map rivers and streams. Mr Smith recommends the inclusion of the intermittent stream and wetlands on the precinct plan, considering this would give effect to the NPS-FM to a greater degree than currently proposed by the plan change.
161. The plan change has also been reviewed by Kelly Seekup and Sarah Basheer on behalf of Healthy Waters. They raise concerns about the information provided in the SMP and consider further information is needed. Ms Seekup and Ms Basheer also recommend additional precinct provisions to manage stormwater quality
162. Based on the advice of Mr Smith, Ms Seekup and Ms Basheer I consider the plan change is generally consistent with the NPS-FM with amendments to the precinct provisions and provided the issues raised are resolved. See sections 8.7 and 8.9 for further discussion on freshwater values and recommendations to the precinct provisions.

#### **7.4.5. National Policy Statement for Indigenous Biodiversity**

163. The National Policy Statement for Indigenous Biodiversity (**NPS-IB**) came into force on 23 August 2023. This is after the plan change was notified, therefore the AEE does not consider this NPS.
164. The NPS-IB provides direction to council’s to protect, maintain and restore indigenous biodiversity requiring there is at least no further reduction nationally. It does this by providing

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<sup>47</sup> AEE, page 18

direction on how to identify and protect significant indigenous biodiversity and manage the adverse effects of subdivision, use and development. This is to be achieved:

- by recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity
- by recognising everyone is a steward of indigenous biodiversity
- by protecting and restoring indigenous biodiversity as necessary to achieve overall maintenance
- while providing for the social, economic and cultural wellbeing of people and communities now and in the future.<sup>48</sup>

165. The NPS is limited to land (terrestrial) ecosystems and some aspects of wetlands.
166. The AUP has not yet been amended to give effect to the NPS-IB. However the interpretation of a 'significant natural area' (SNA) includes an area of significant indigenous vegetation or significant habitat of indigenous fauna (regardless of how it is described) already identified in a plan or policy statement until such time it is effectively re-evaluated. This means 'significant ecological areas' (SEA [terrestrial]) already identified in the AUP should be considered a SNA for the purposes of the NPS-IB.
167. As identified in the AEE, the site is primarily in pasture with exotic trees as part of the shelter belt, and has degraded ecological values. There are no terrestrial SEAs identified on the site. This is confirmed by the council's consultant ecology expert Jason Smith.
168. The proposed precinct provisions require the 10m riparian margins of intermittent streams and natural wetland to be planted with indigenous plants, and protected through a consent notice, covenant or by being vested in council. This planting is expected to contribute towards improving both terrestrial and freshwater ecological values.
169. I also note the Ngati Te Ata Cultural Impact Assessment provided with the plan change states they support the removal of these exotic trees.
170. Overall I consider the plan change will be consistent with the NPS-IB.

## **7.5. National environmental standards or regulations**

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

### **7.5.1. National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS)**

172. The NES-CS provides a nationally consistent set of planning controls and soil contaminant values to ensure that land affected by contaminants in soil is appropriately identified and

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<sup>48</sup> NPS-IB Objective 1

assessed before it is developed and, if necessary, the land is remediated or the contaminants contained to make the land safe for human use.

173. A Preliminary Environmental Site Investigation on Contaminated Land (**PSI**) is included with the plan change, and the AEE notes that a detailed investigation will be completed at the integrated land use and subdivision consent stage. The AEE states that investigation concludes there are no HAIL sites or history of soil contamination or discharges that would make the site unsuitable for residential.<sup>49</sup> The AEE therefore considers there are no NES-CS triggers. However if the site is subsequently identified as a HAIL site through detailed investigations appropriate consents will be sought at resource consent stage with appropriate contamination remediation to be undertaken (if required) during the earthworks phase of any future land development projects.<sup>50</sup>
174. Based on this information I consider the plan change is not in conflict with the NES-CS. See section 8.5 for further discussion on contaminated land.

#### **7.5.2. Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F)**

175. The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (**NES-F**) was amended in 2022 with the amended regulations coming into effect on 5 January 2023.
176. The Freshwater NES regulates activities that pose risks to the health of freshwater and freshwater ecosystems.
177. Section 6.6 of the AEE addresses the NES-F along with the NPS-FM, although I note that assessment primarily focusses on the NPS-FM.
178. In relation to the NES-F the council's consultant ecology expert Jason Smith states:

*4.19 ...[the NES-F] offers a specific consenting pathway under Regulation 45C for a range of activities that relate to urban development and that could impact on wetlands. ...*

*4.21 Regulation 45C allows for these activities as a restricted discretionary activity, whereas the equivalent provisions for non-urban development would be a non-complying activity under Regulations 52 (for drainage of a natural wetland) and/or Regulation 54; or a prohibited activity under Regulation 53.*

*4.22 Regulation 45C(6) provides a framework of statutory tests that must be met before any resource consent is granted, including, as Regulation 45C(6)(c), that the effects management hierarchy is applied.*

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<sup>49</sup> AEE, page 16

<sup>50</sup> AEE, page 25

*4.23 It is therefore considered that the Regulation 45C pathway contains sufficient provision should there be any future need to apply for such consents, and no further effects management is required to assess this potential outcome from the plan change.*

179. Mr Smith also notes that these activities may also require consent under the AUP.

180. I adopt the advice of Mr Smith in relation to the NES-F.

## **7.6. National Adaptation Plan August 2022<sup>51</sup>**

181. The national adaptation plan (NAP) was prepared under section 5ZT of the Climate Change Response Act 2002. This is New Zealand's first NAP. It is a long-term strategy and sets out the Government's approach to adaptation. It considers the impacts of climate change now and into the future and it sets out how New Zealand will need to adapt, to become climate resilient.

182. The NAP does not contain rules that councils and developers must follow, but rather high-level actions that the Government will undertake and responds to risks raised in the climate risk assessment in 2020. However it does state that local government should act now to drive climate-resilient development in the right locations, highlighting that the management of significant risks from natural hazards is a matter of national importance under the RMA. The plan also highlights that the NPS-UD supports climate resilient development and that future development strategies (FDS) can help drive climate-resilient development in the right locations.<sup>52</sup>

183. A small portion of the plan change area is subject to flooding and the Coastal Inundation 1 per cent AEP Plus 1m Control. This is discussed in section 8.7 of this report. In summary the applicant has provided a flood hazard assessment, however experts for Healthy Waters, Kelly Seekup and Sarah Basheer have raised concerns with this assessment. If the applicant can provide an appropriate assessment or revised precinct provisions it is likely these risks can be mitigated.

## **7.7. National Emissions Reduction Plan June 2022<sup>53</sup>**

184. This plan was prepared under section 5ZI of the Climate Change Response Act 2002. This plan contains strategies, policies and actions for achieving New Zealand's first emissions budget as required by the Climate Change Response Act 2002. The strategy is based on five

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<sup>51</sup> Ministry for the Environment. 2022. Aotearoa New Zealand's first national adaptation plan. Wellington. Ministry for the Environment. <https://environment.govt.nz/assets/publications/climate-change/MFE-AoG-20664-GF-National-Adaptation-Plan-2022-WEB.pdf>

<sup>52</sup> Ministry for the Environment. 2022. Aotearoa New Zealand's first national adaptation plan. Wellington. Ministry for the Environment, pages 67-68

<sup>53</sup> Te hau mārohi ki anamata Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan June 2022

principles: 1. Playing our part; 2. Empowering Māori; 3. Equitable transition; 4. Working with nature and 5. A productive, sustainable and inclusive economy. Like the Adaptation Plan, the Emissions Reduction Plan does not contain rules that must be followed by councils and developer, but rather sets out a series of high level actions and initiatives<sup>54</sup> that will contribute to achieving a long term reduction in emissions. While concerns have been raised about the increased vehicle emissions that would result from rezoning the plan change area, I consider this is not relevant in the context of the Emissions Reduction Plan.

## 7.8. Auckland Unitary Plan

### 7.8.1. Regional Policy Statement

185. Section 75(3)(c) of the RMA requires that a district plan must give effect to any RPS. In addition, under section 74(2)(a)(i) regard shall be had to any proposed RPS. The council notified Plan Change 80 (**PC80**) to the RPS on 18 August 2022.
186. The Decision on PC80 was notified on 14 September 2023. PC80 responds to the NPS-UD and amendments to the RMA, and integrates the concepts and terms, well-functioning urban environment, urban resilience to the effects of climate change and qualifying matters, into the objectives and policies in several chapters of the RPS.
187. Section 6.4 of the AEE considers the following chapters of the RPS concluding:
- **B2 Urban growth and form:** Highlights the RPS seeks three outcomes:
    - Supply – adequate supply of land e.g. Objective B2.2(1) and Policy B2.2.2(1)
    - Urban form – compact urban form that makes efficient use of land, social facilities and infrastructure e.g. Objective B2.1(1) and Policy B2.2(4)
    - Quality – quality well-functioning urban environment that follows appropriate structure planning and considers quality of life for individuals and communities e.g. Objective B2.3.1(1) and Policies B2.3.2(1)-(3).
  - Considers the plan change aligns with objectives and policies in Chapter B2 highlighting the plan change will:
    - encourage residential development to locate within close proximity to existing open space and the centre
    - enable a variety of housing types to accommodate different lifestyles
    - result in a quality built environment – proposed precinct provisions require development to respond to the natural environment and create a safe and accessible residential neighbourhood that improves connectivity between existing residential areas and the centre zoned land.

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<sup>54</sup> E.g. Chapter 7 Planning and infrastructure and Chapter 10 Transport.

- **B3 Infrastructure, transport and energy:** The plan change is consistent with Chapter B3 stating it will capitalise on investments in publicly available reticulated water and wastewater; will not trigger any upgrades to the wider transport network; and will not require downstream public stormwater assets to be upgraded.
- **B6 Mana Whenua:** The plan change recognises and maintains the Treaty of Waitangi principles and the relationship of Mana Whenua to the plan change area. Highlights that the applicant engaged with all Mana Whenua identified by council with an area of interest to the plan change, and that only one iwi responded. The AEE refers to a cultural values assessment (CVA) provided by Ngai Tai Ki Tamaki, however I assume they are referring to that provided by Ngati Te Ata. Considers values and recommendations in CVA can be managed by existing AUP provisions and incorporated into development during resource consent stage.
- **B7 Natural resources:** The plan change is consistent with B7.3 Freshwater systems Objectives (1) – (3) and B7.2.1 Indigenous biodiversity Objectives (1) and (2). Highlights the plan change area does not contain any significant terrestrial habitats or biodiversity values, and has low freshwater ecological/environmental values. Considers Auckland-wide provisions will maintain and enhance freshwater values and proposed precinct provisions seek to enhance ecological values.
- **B10 Environmental risk:** The site is appropriate for residential development and environmental risk can be managed through the existing and proposed provisions of the AUP, including Chapter E36, SMAF1, and proposed precinct objectives and policies. Highlights the findings of the Geotechnical Report, Preliminary Site Investigate (PSI) and Stormwater Management Plan (SMP).

188. The AEE does not always identify which specific RPS objectives and policies it considers are relevant. For completeness I have identified which RPS objectives and policies I consider are relevant and provided an assessment below.

189. The RPS should be read as a whole and issues may relate to more than one chapter. The RPS does not provide a hierarchy between the different chapters and therefore outcomes sought by different chapters do not always align with each other. Overall I consider the plan change will be generally consistent with most of the relevant RPS provisions, provided the applicant is able to provide adequate further information requested and the precinct provisions are amended as recommended.

### B2 Urban Growth and form

190. I consider the following objectives and policies are relevant:

- B2.2 Urban growth, Objectives B2.2.1(1), (3), (4), (5) and Policies B2.2.2(3), (4), (5), (6), (7). See below for more detailed comment.

- B2.3 A quality built environment, Objectives B2.3.1(1), (3) and Policies B2.3.2(1), (2), (3): Generally consistent with recommended amendments to precinct provisions.
- B2.4 Residential growth, Objectives B2.4.1(1), (2), (3), (4) and Policies B2.4.2(3), (5), (6), (8), (9), (11): Generally consistent with most objectives and policies (with recommended amendments to precinct provisions), however noting concerns about lack of public transport, potential adverse effects on road safety. See section 8.8 for further discussion.
- B2.6 Rural and coastal towns and villages, Objectives B2.6.1(1), (2), Policies B2.6.2(1), (3). See below for more detailed comment.
- B2.7 Open space and recreation facilities, Policies B2.7.2(2), (7): Consistent.

191. Urban expansion and growth of the Glenbrook Beach settlement is anticipated by the Future Urban zoning of the site. While urban growth is primarily anticipated within the Rural Urban Boundary (**RUB**) (Objective B2.2.1(2)), the RPS also provides for growth in towns, and rural and coastal towns and villages, provided it is integrated with the provision of adequate infrastructure (Objectives B2.2.1(4) and (5), Policy B2.2.2(4)).
192. Rezoning of future urban zoned land is enabled by Policies B2.2.2(3) and (7). Policy (3) directs that rezoning should follow structure planning and plan change processes in accordance with Appendix 1 Structure Planning Guidelines. A structure plan was provided with the plan change, and in my opinion this has generally followed the structure planning guidelines, although further information is requested in relation to some of the technical reports provided e.g. Stormwater Management Plan (SMP).
193. Policy B2.2.2(7) also enables rezoning of land (both that inside the RUB and other future urban zoned land) to accommodate urban growth in ways that do all of the following:
- (a) support a quality compact urban form;*
  - (b) provide for a range of housing types and employment choices for the area;*
  - (c) integrate with the provision of infrastructure; and*
  - (d) follow the structure plan guidelines as set out in Appendix 1.*
194. In my opinion the plan change is consistent with Policy (7)(b) and (d). The proposed MHS Zone will enable a range of housing types, and a wider range than the Single House Zone. I also consider the plan change will be generally consistent with Policy (7)(c) in relation to water supply and wastewater infrastructure, noting the proposed non-complying activity status for subdivision and development that does not comply with the relevant standard.
195. In relation to transport infrastructure the plan change is less aligned, although amendments to the precinct provisions can go some way to mitigate this. Wes Edwards, council's transport expert considers the precinct provisions can be amended to better align future development and the delivery of transport infrastructure within the Glenbrook Beach settlement, and the slightly wider transport network (e.g. roundabout at Mission Bush Road/Glenbrook-Waiuku

Road intersection). However he considers the plan change is ultimately not well aligned with transport infrastructure projects and upgrades in the wider transport network.

196. With regards to Policy (7)(a) it could be argued that urbanising land in a small coastal and rural settlement that is some distance from other urban areas does not support a 'quality compact urban form'. However I come back to the fact the land is already zoned Future Urban. In my mind it would be illogical to zone land FUZ that is outside the RUB and then to say it cannot be rezoned (to an urban zone) because of its very location (which is something that cannot be changed). Therefore in relation to this plan change, my consideration of Policy (7)(a) is whether the proposed rezoning and precinct support a quality compact urban form within the plan change area and Glenbrook Beach settlement itself. Overall I consider it is (with recommended amendments), in particular noting that the plan change area is opposite Neighbourhood Centre zoned land.
197. I also note that *B2.6 Rural and coastal towns and villages* enables growth and development of existing or new rural/coastal town and villages in specific circumstances (Objective B2.6.1(1), Policies B2.6.2(1), (2)). While these provisions do not specifically refer to future urban zoned land I note that the plan change area is adjacent to the urban zoned land in Glenbrook Beach and is part of this rural/coastal village. Significant expansion of an existing rural/coastal should also follow the structure plan guidelines in Appendix 1 of the RPS (Policy B2.6.2(3)). Overall I consider the plan change (with recommended amendments) is consistent with these provisions.

### B3 Infrastructure, transport and energy

198. I consider the following objectives and policies are relevant and make the following comments:
- B3.2 Infrastructure, Objective B3.2.1(5). Consistent.
  - B3.2 Transport, Objective B3.3.1(1) and Policies B3.3.2(1), (2), (4), (5).
199. Concerns have been raised by council's transport expert that the plan change does not improve the integration of land use and transport (e.g. lack of public transport, does not reduce demand for private vehicle trips), and would result in potential adverse effects on the safety, efficiency and effectiveness of the wider transport network.
200. Amendments are considered to be required to the precinct provisions (including transport triggers) to better align with the above objectives and policies, although, in his view, not all issues are able to be mitigated.

### B6 Mana Whenua

201. I consider the following objectives and policies are relevant and make the following comments:
- B6.2 Recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation, Objectives B6.2.1(1), (2), and Policy B6.2.2(1)



202. It appears from the Ngati Te Ata submission that they are not satisfied with the proposed plan change, in particular stating it is not sufficient for the applicant to say they will work closely with Ngati Te Ata once they have consent.
203. Further information and potential precinct amendments are considered necessary to better align with these provisions. See sections 8.11 and 11.12 for further discussion.
- B6.3 Recognising Mana Whenua Values, Objective B6.3.1(1) and Policies B6.3.2(1-4), (6)
204. While the applicant has undertaken consultation with relevant iwi and included a CIA from Ngati Te Ata with the plan change, it is unclear how the plan change responds and integrates their values, mātauranga and tikanga. Further information and potential precinct amendments are considered necessary to better align with the above objectives and policies.
- B6.5 Protection of Mana Whenua cultural heritage, Objectives B6.5.1(3), (5) and Policies B6.5.2(6-8)
205. See comments above. Further information and potential precinct amendments are considered necessary to better align with the above objectives and policies.

#### B7 Natural resources

206. I consider the following objectives and policies are relevant and make the following comments:
- B7.2 Indigenous biodiversity, Objective B7.2.1(2). Consistent.
  - B7.3 Freshwater systems, Objectives B7.3.1(1-3), and Policies B7.3.2(1-6).
207. Heathy Waters have raised concerns with the plan change. Further information and amendments to the precinct provisions are considered necessary to ensure the plan change is consistent with these objectives and policies in particular Policies (1) and (5). See section 8.7 for further discussion.
- B7.4 Coastal water, freshwater and geothermal water, Objectives B7.4.1(4), (6), and Policies B7.4.2(1), (6-10).
208. As above further information and amendments to the precinct are considered necessary to ensure the plan change is consistent with these objectives and policies, in particular Policies (1), (7), (9). See section 8.7 for further discussion.

#### B8 Coastal environment

209. I consider the following objectives and policies are relevant and make the following comments:
- B8.2 Natural character, Objective B8.2.1(2), Policy B8.2.2(4). Generally consistent

- B8.3 Subdivision, use and development, Objectives B8.3.1(2), (7), and Policies B8.3.2(1), (2), (4), (7).

210. Generally consistent although noting Healthy Waters' concerns about potential adverse effects on the sensitive coastal receiving environment, and potential flooding risk on downstream properties also subject to coastal hazards. Further information and possible amendments to the precinct provisions are considered necessary to be consistent with Objective (7) and Policy (4).

- B8.4 Public access and space, Objective B8.4.1(1), and Policy B8.4.2(1). Consistent.

#### B10 Environmental risk

211. I consider the following objectives and policies are relevant and make the following comments:

- B10.2 Natural hazards and climate change, Objectives B10.2.1(1-6), and Policies B10.2.2(2-13).

212. Concerns raised about adequacy of natural hazard risk assessment and potential flooding risk on downstream properties also subject to natural hazards. Further information and possible amendments to the precinct provisions are considered necessary to be consistent with these objectives and policies, in particular Objectives B10.2.1(2), (3), (4) and Policies B10.2.2(2), (3), (4), (5), (7), (8).

- B10.4 Land – contamination, Objective B10.4.1(1), and Policies B10.4.2(1), (3): Consistent.

213. Overall I consider the proposed plan change is only partially consistent with the objectives and policies of the RPS. However I consider the plan change can be more consistent with the RPS (at least not inconsistent with) provided adequate further information is provided and amendments are made to the precinct, including responding to:

- mana whenua values, mātauranga and tikanga as expressed by Ngati Te Ata and consistent with Te Tiriti Principles
- flood risks, stormwater management and water quality (freshwater and coastal water)
- transport issues.

#### **7.8.2. Regional and District Plan provisions**

214. Section 6.3 of the AEE considers the land zoning provisions (H18 FUZ and H4 MHS Zone) and Auckland wide Chapters D9 SEA Overlay, E27 Transportation E38 Subdivision – Urban, E10 SMAF1 and 2, and E36 Natural hazards and flooding. In addition to these I consider Chapters E8 Stormwater – Discharge and diversion relevant, E1 Water quality and integrated management, and E3 Lakes, rivers, stream and wetlands to be relevant to the plan change.

#### Chapter H18 Future Urban Zone

215. The AEE states the FUZ objectives and policies (Chapter H18) are relevant to the plan change because they “... signal that the land has been earmarked for urban development and will no longer have a rural character once the land has been urbanised.” The AEE also highlights that the precinct enables grazing to be permitted until the site is developed for urban purposes, providing a transition between the current rural land use and the proposed residential use.
216. I agree with the AEE that the FUZ is relevant in that it clearly signals the land is suitable for urbanisation in the future and therefore the character will change. I also agree it is appropriate to provide for grazing of livestock on sites greater than 2000m<sup>2</sup> while the plan change area transitions to urban land use. However this is already a permitted activity in the MHS Zone,<sup>55</sup> so in my opinion this rule is not required in the precinct. See section 12.

#### Chapter H4 Residential – Mixed Housing Suburban Zone

217. The AEE highlights the MHS Zone outcomes and anticipated suburban built character which are managed and enabled by a suite of zone standards (e.g. bulk, height and location, onsite amenity). The only zone rules the precinct proposes to override is H4.6.14 (Fencing), and this is to enhance the relationship of the dwellings with the street.
218. The AEE notes that consent is required for four or more dwellings which means the council “... will have the opportunity to review the design of larger scale residential proposals to manage the effects of intensity on the character of the receiving environment through a resource consent process.”<sup>56</sup>
219. The AEE also highlights the zone description states it is a suitable zone for some greenfield areas. Overall the AEE concludes “... the MHS zone provisions are suitable to encourage a variety of housing choice while maintaining an appropriate suburban character and a reasonable standard of amenity for adjacent sites.”<sup>57</sup>
220. I generally agree with the AEE, however I consider further amendments are required to the precinct provisions relating to fencing. I also consider the precinct could better manage the interface with the Glenbrook Beach Recreation Reserve. See section 8.3.

#### Chapter D9 Significant Ecological Areas Overlay

221. The AEE highlights the downstream receiving coastal environment includes marine a SEA and considers the existing objectives and policies in D9 will adequately manage stormwater and that the SMP has included consideration of the SEA-Marine and the sensitive habitat of the Banded Rail/Moho pereu.

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<sup>55</sup> Table H4.4.1 Activity table (A27)

<sup>56</sup> AEE, page 11

<sup>57</sup> AEE, page 11

222. Auckland Council Healthy Waters' experts have concerns about the applicant's Stormwater Management Plan (SMP), adequacy of information and methods proposed to manage stormwater runoff into the sensitive receiving environment. See section 8.7 for further discussion on this matter.

#### Chapter E27 Transportation

223. The AEE highlights that the TIA/ITA concludes that the plan change "*...can be safely accommodated on the adjoining road network without adversely compromising its function, safety, or capacity, or without implementing further mitigation measures/ improvements to the road network*". The AEE concludes "*... the scale of residential development enabled by the PPC is appropriate from a transportation perspective and that E27 and the proposed precinct provisions have the capacity to manage potential adverse effects on the safety and operation of the local road network.*"

224. Wes Edwards, the council's transport expert, has concerns with the applicant's ITA, including that it does not undertake an assessment of effects on the wider transport network. Mr Edwards considers further amendments to the precinct are required to ensure adverse effects on the local road network are mitigated. See section 8.8 for further discussion on this matter.

225. The AEE states the proposed precinct provisions supplement the provisions in E27 "*... by indicating the possible location of road and pathway connections to adjacent land and by providing indicative cross sections for roads within the PPC area...*" and these indicative connections "*... will promote accessibility and mode choice both within the PPC area and the established Glenbrook Beach settlement*".

226. Mr Edwards recommends amendments to the proposed road cross sections (delete diagrams and replace with table) to align with current Auckland Transport road design requirements. Mr Edwards considers the applicant's assessment of accessibility by walking and cycling are overly optimistic, although notes this does not have an impact on the overall assessment.

227. See sections 8.8 and 11.7 for further discussion on this matter.

#### Chapter E38 Subdivision – Urban

228. The AEE highlights that the plan change does not seek any changes to Chapter E38, but that additional precinct provisions are sought to achieve the outcomes of the precinct. The AEE anticipates that most subdivision will follow a land use consent

229. The AEE states the "*... main purpose of the proposed precinct subdivision provisions is to ensure that residential sites are not created prior to reticulated public wastewater being available and to ensure that connections to adjacent land are provided in the locations indicated in the precinct plan. This is necessary to achieve the RPS and NPS-UD objective of*

*creating an accessible and well-functioning urban environment and to minimise social effects associated with creating a residential area with poor connectivity*<sup>58</sup>

230. I recommend amendments to the precinct subdivision provisions to ensure subdivision is also timed with necessary transport upgrades, and roads are designed to appropriate standards.

#### Chapter E10 Stormwater Management Area – Flow 1 and Flow 2

231. The AEE highlights the SMAF1 provisions mean any new road (more than 1000m<sup>2</sup>) and any new building (impervious surfaces more than 50m<sup>2</sup>) need a resource consent, providing the council an opportunity to review the adequacy of stormwater management measures being proposed. The AEE concludes the SMAF1 provisions will adequately manage potential adverse effects of stormwater runoff on freshwater values arising from urban development.
232. Auckland Council Healthy Waters experts support the application of SMAF1 to the site and consider these provisions will provide appropriate hydrology mitigation to retain base flow and reduce the risk of scoring the wetlands and streams. However they do not consider these provisions will manage all adverse stormwater effects.

#### E36 Environmental risk

233. The AEE notes the northern corner of the plan change area is subject to the 1% AEP Floodplain and the 1% AEP Coastal Inundation Overlay. The AEE considers the objectives and policies of Chapter E36 will avoid or minimise risk to occupants of buildings subject to these hazards while also minimising adverse hazard effects on other properties subject to these hazards within the catchment. The AEE also considers future resource consents for development and subdivision “... will require detailed flood assessments that consider the location and effect of development on flood plains and overland flow paths.” The AEE concludes “... urban residential use can be undertaken on the PPC land, in a manner that manages flood risk in accordance with Part E36.”<sup>59</sup>
234. Auckland Council Healthy Waters’ experts consider the flood hazard assessment within the applicant’s SMP is inadequate and recommend this is updated, stating should “... the Applicant not be able to provide a revised flood hazard assessment, the Applicant needs to propose appropriately robust precinct provisions (objectives, policies, standards) to ensure that downstream flood impacts and adverse effects on the receiving environment will be avoided and or mitigated at the Resource Consent/development stage, addressing the full plan enabled development and effects to ensure certainty of attenuation/mitigation at a catchment level.”<sup>60</sup> See section 8.8 for further discussion on this matter.

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<sup>58</sup> AEE, pages 12-13

<sup>59</sup> AEE, page 13

<sup>60</sup> Ms Seekup and Ms Basheer Specialist Peer Review, page 9

Chapters E8 Stormwater – Discharge and diversion relevant, E1 Water quality and integrated management, and E3 Lakes, rivers, stream and wetlands

235. The proposed precinct provisions include requirements to protect and enhance intermittent streams and wetlands, by requiring a 10m riparian and wetland margin and that this must be planted with native plants. Generally I consider this is consistent with the objectives and policies Chapter E1, although I do note some potential drafting issues such as interchangeably referring to either wetlands or natural wetlands.
236. In relation to the management of stormwater discharge and diversion Chapter E1 contains the objectives and policies and Chapter E8 contains the rules. As previously noted Ms Seekup and Ms Basheer have concerns with regards to the proposed management of stormwater discharges and recommend both amendments to the precinct and that the applicant provide further information.

### **7.9. Medium Density Residential Standards and Plan Change 78**

237. Medium Density Residential Standards (**MDRS**) were initially introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. These MDRS requirements have now been included in the RMA, with the RMA requiring the council to incorporate the MDRS into every relevant residential zone.
238. The outcome sought by the MDRS is:
- a well-functioning urban environment that enables people and communities to provide for their wellbeing (social, economic, cultural) and health and safety now and in the future<sup>61</sup>
  - relevant residential zones provide a variety of housing types and sizes that respond to housing need and demand, and the neighbourhood's planned urban built character (including 3 storey buildings).<sup>62</sup>
239. Section 77G of the RMA requires the incorporation of MDRS into every 'relevant residential zone'. Section 77I allows council to make the MDRS requirements less enabling of development if necessary to accommodate one or more qualifying matters.
240. The MDRS to be incorporated into the AUP are set out in Schedule 3A of the RMA and include objectives, policies, subdivision requirements and density standards. Density standards relate to the number of residential units for site, building height, height in relation to boundary, setbacks (yards), building coverage outdoor living space, outlook space, windows to street and landscaped areas.
241. The RMA definition of 'relevant residential zone' specifies in section 2 of the RMA is:

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<sup>61</sup> RMA Schedule 3A, clause 6(1) Objective 1

<sup>62</sup> RMA Schedule 3A, clause 6(1) Objective 2

relevant residential zone—

(a) means all residential zones; but

(b) does not include—

(i) a large lot residential zone:

**(ii) an area predominantly urban in character that the 2018 census recorded as having a resident population of less than 5,000, unless a local authority intends the area to become part of an urban environment:** [emphasis added]

(iii) an offshore island:

(iv) to avoid doubt, a settlement zone.<sup>63</sup>

242. In the context of this plan change the exclusion in clause (b)(ii) above is relevant.

243. Section 6.2 of the AEE discusses the MDRS and states:

*The MDRS is relevant to this application as it will require Auckland Council, as a Tier 1 territorial authority, to incorporate the changes prescribed by the MDRS into the MHS zone of the Auckland Unitary Plan (Operative in part) 2016 by 20 August 2022.*

*Any changes to the MHS zone (Auckland-wide) proposed by Auckland Council to give effect to the MDRS would also apply to the land subject to this PPC should the land be rezoned MHS as proposed.*

*Overall, the proposed MHS zoning aligns with the objectives of the MDRS by enabling effective and efficient subdivision and development of the site through an urban form that enables greater housing choice.<sup>64</sup>*

244. Plan Change 78 (**PC78**) is the council intensification planning instrument and is required to incorporate the MDRS requirements into 'relevant residential zones', and to give effect to Policies (3) and (4) of the NPS-UD.

245. On 4 August 2022 the council's Planning Committee resolved at PLA/2022/91(b):

*endorse the following settlements as not having the Medium Density Residential Standards incorporated into their residential zones as they do not meet the definition of 'relevant residential zone' in section 2 of the Resource Management Act 1991 due to their population size in the 2018 census being less than 5,000, and the council does not intend these areas to be part of the urban environment:*

*Helensville, Clarks Beach, **Glenbrook Beach**, Karaka, Maraetai, Riverhead, Snells Beach - Algies Bay, Wellsford, Kingseat, Te Hana, Parakai, Matakana, Whitford,*

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<sup>63</sup> RMA Section 2 Interpretation

<sup>64</sup> AEE, page 10

*Waimauku, Patumahoe, Stillwater, Kawakawa Bay, Omaha, Point Wells, Waiwera, Clevedon, Okura and Kumeu-Huapai. [emphasis added]*

246. As a result, the MDRS has not been incorporated into the provisions of the residential zones for the above settlements, including Glenbrook Beach, in PC78 as they do not meet the definition of ‘relevant residential zone’ in the RMA. PC78 was notified in August 2022 and is part way through the statutory intensification streamlined planning process. The statutory deadline for when a decision must be publicly notified on PC78 has been extended by a year (from 31 March 2024 to 31 March 2025).<sup>65</sup> At this stage only a limited number of hearings have been held, with the process largely on hold.
247. The council’s PC78 response to MDRS requirements includes removing the application of the Single House Zone and MHS Zone from within the urban environment, replacing it with either the Low Density Residential Zone (**LDRZ**), MHU Zone or Terrace Housing and Apartment Buildings (**THAB**) Zone. These relevant residential zones incorporate MDRS into them. The LDRZ<sup>66</sup> makes the MDRS less enabling of development where it accommodates one or more qualifying matters.
248. For the small settlements with a resident population of less than 5,000 (as of 2018 Census), where the council has resolved (PLA/2022/91(b)) that the council does not intend these areas to be part of the urban environment, the council is not required to incorporate the MDRS into the residential zones as they do not meet the definition of ‘relevant residential zone’ in the RMA.<sup>67</sup> Therefore PC78 proposes to retain the operative residential zones within these settlements e.g. Single House, MHS, Large Lot or Rural and Coastal Settlement zones. PC78 proposes minor amendments to the Single House and MHS Zones to reinforce that these zones can only be applied to smaller settlements outside the urban environment. PC78 also does not propose any amendments to any precincts that apply to the residential zones in these small settlements with less than 5,000 people.
249. The Independent Hearings Panel (IHP) appointed to make recommendations on PC78 has issued interim guidance on scope in relation to relief sought in submissions. i.e. what is ‘on’ PC78.<sup>68</sup> While this is interim guidance, and therefore may change, it is useful in understanding whether MDRS must be applied to smaller settlements with a population of less than 5,000 people.

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<sup>65</sup> Letter from the Minister for the Environment David Parker dated 6 April 2023. Available here <https://www.aucklandcouncil.govt.nz/have-your-say/hearings/types-of-hearings/npsud-independent-hearings/LegalGuidelinesAndProcedure/npsud-procedural-minute-2023-04-13.pdf>

<sup>66</sup> A new residential zone proposed in PC78.

<sup>67</sup> See RMA interpretation of ‘relevant residential zone’ (Part 1, Section 2)

<sup>68</sup> INTERIM GUIDANCE ON MATTER OF STATUTORY INTERPRETATION AND ISSUES RELATING TO THE SCOPE OF THE RELIEF SOUGHT BY SOME SUBMISSIONS – 12 JUNE 2023. <https://www.aucklandcouncil.govt.nz/have-your-say/hearings/types-of-hearings/npsud-independent-hearings/LegalGuidelinesAndProcedure/pc78-interim-guidance-2023-06-12.pdf>



86. *First, the fact that rural and coastal settlements may be within the “urban environment” (as defined), does not require the MDRS to be applied to the residential zones within them. The MDRS only has to be incorporated into “every relevant residential zone” of the relevant territorial authority. The definition of “every relevant residential zone” is (now) set out in section 2(1) of the RMA and does not include, inter alia, “an area predominantly urban in character that the 2018 census recorded as having a resident population of less than 5,000” that the local authority does not intend to become part of an urban environment. Therefore, **Council’s exclusion of the MDRS from residential zones meeting this criterion is lawful and in our view is unable to be challenged by way of submission to PC78. Put another way, submissions seeking application of the MDRS to residential zones excluded by reference to this aspect of the definition would not be “on” PC78.***<sup>69</sup> [emphasis added]

250. The 2018 Census population for Glenbrook is 2,193. This includes an area much larger than the residential area of Glenbrook Beach settlement, encompassing the wider rural area. As Glenbrook Beach has a population less than 5,000<sup>70</sup> and the council has resolved that it does not intend the area of Glenbrook Beach to be part of the urban environment, PC78 does not propose to incorporate the MDRS into the residential zoning provisions that apply to this land as they are not a ‘relevant residential zone’. Instead PC78 proposes to retain the Single House Zone as it is applied to the older residential part of Glenbrook Beach.

251. PC78 also does not propose any amendments to:

- SHA precincts, such as Glenbrook 3 Precinct.
- to the FUZ, either the spatial extent of it or the zone provisions.

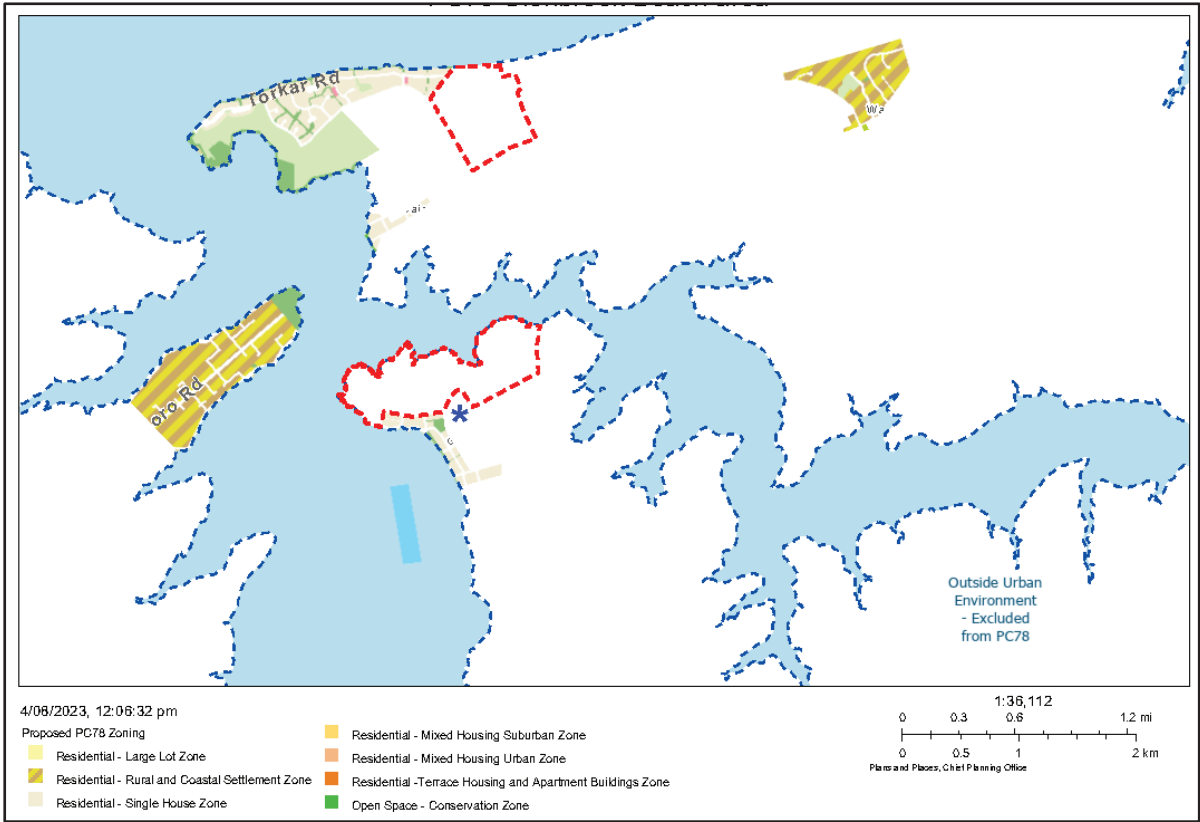
252. See Figure 3 below which shows the proposed planning maps of PC78 for Glenbrook Beach.

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<sup>69</sup> Interim guidance on matter of statutory interpretation and issues relating to the scope of relief sought by some submissions, 12 June 2023 <https://www.aucklandcouncil.govt.nz/have-your-say/hearings/types-of-hearings/npsud-independent-hearings/LegalGuidelinesAndProcedure/pc78-interim-guidance-2023-06-12.pdf>

<sup>70</sup> Stats NZ website, accessed 4 August 2023 <https://www.stats.govt.nz/tools/2018-census-place-summaries/glenbrook#more-data-and-information>

**Figure 3: PC78 proposed zoning for Glenbrook Beach, blue asterisk showing approximate location of PC91<sup>71</sup>**



- 253. Overall it is considered that PC91 cannot incorporate the MDRS into either the proposed residential zone or proposed Glenbrook 4 Precinct because the proposed zone is not a relevant residential zone as Glenbrook Beach is a settlement with a residential population of less than 5,000 (2018 Census), and the council has resolved that it does not intend the Glenbrook Beach area to be part of the urban environment. As a result it does not meet the definition of as ‘relevant residential zone’.
- 254. PC91 does not propose any amendments to the MHS Zone. However if the MHS Zone becomes the operative zone for the plan change area, then any amendments subsequently made to the MHS Zone provisions, through PC78 would also apply.
- 255. For the reasons set out above it is considered that the proposed Glenbrook 4 Precinct is not required to incorporate the MDRS.

<sup>71</sup> PC78 GIS Viewer, accessed 4 August 2023 <https://aucklandcouncil.maps.arcgis.com/apps/webappviewer/index.html?id=df2ce24d0c3046598604c21c40fdd45c>

## **7.10. Other relevant management plans and strategies prepared under any other Act**

### **7.10.1. The Auckland Plan**

256. In considering a plan change, a territorial authority must have regard to plans and strategies prepared under other Acts.
257. The Auckland Plan, prepared under section 79 of the Local Government (Auckland Council) Act 2009 is a relevant strategy document that council should have regard to in the preparation of PC91.
258. The Auckland Plan 2050 is the council's spatial plan, as required under the Local Government (Auckland Council) Act 2009. The Plan contains a 30-year high level development strategy for the region based on a quality compact approach to accommodating growth. This approach anticipates most growth through intensification within existing urban areas, with managed expansion into the region's future urban areas and limited growth in rural areas.
259. The Auckland Plan 2050 is set out under six outcomes, each with a series of directions and focus areas. The outcomes particularly relevant to this plan change are Homes and Places, Transport and Access, and Environment and cultural heritage.
260. The Auckland Plan 2050 also contains a Development Strategy which identifies a number of urban expansion areas in the southern sub-region, including the Future Urban zoned land in Glenbrook Beach.
261. The Development Strategy identifies two future urban areas in Glenbrook Beach:
- Glenbrook Beach 1 area applies to the area that is now the Glenbrook Precinct 3. The Auckland Plan anticipates approximately 843 dwellings for this area and identifies the area as being development ready.
  - Glenbrook Beach 2 area applies to all the Future Urban zoned in Glenbrook Beach, including the plan change area. Approximately 207 dwellings are anticipated for this area and it is expected to be development ready 2023 - 2027 (Decade One 2<sup>nd</sup> Half).
262. The Development Strategy and Future Urban Land Supply Strategy (FULSS) are closely linked. See section 7.10 below for discussion of the FULSS.
263. The Auckland Plan is briefly covered in section 7.1 of the AEE. The AEE considers that the plan change will be consistent with the directions under the housing outcome, stating that the MHS Zone provisions "... will encourage a quality compact urban form that will maximise the efficiency of infrastructure and will facilitate a variety of housing styles. In particular, Direction 2 identifies the need to construct a greater variety of houses that are suitable for individuals and families, of different sizes and price points."

264. Overall I consider the plan change generally aligns with the Development Strategy, however it presents some issues and inconsistencies with some of the outcomes, primarily due to its relatively isolated location. Never-the-less, the Auckland Plan does recognise that Auckland's system needs to "... cater for the different places where people live and work, from high density urban centres to local suburbs and rural areas ..." <sup>72</sup> and that new "... communities will be established in future urban areas on the fringe of Auckland's existing urban area and in rural and coastal settlements..." <sup>73</sup> such as Glenbrook Beach. I also consider the plan change and precinct provisions can be amended to better achieve some of the Auckland Plan outcomes. See sections 8 and 11 for further discussion and recommended amendments.
265. See Appendix 6 for a more detailed assessment against relevant part of the Auckland Plan.

#### **7.10.2. Future Urban Land Supply Strategy 2017 and Draft Future Development Strategy**

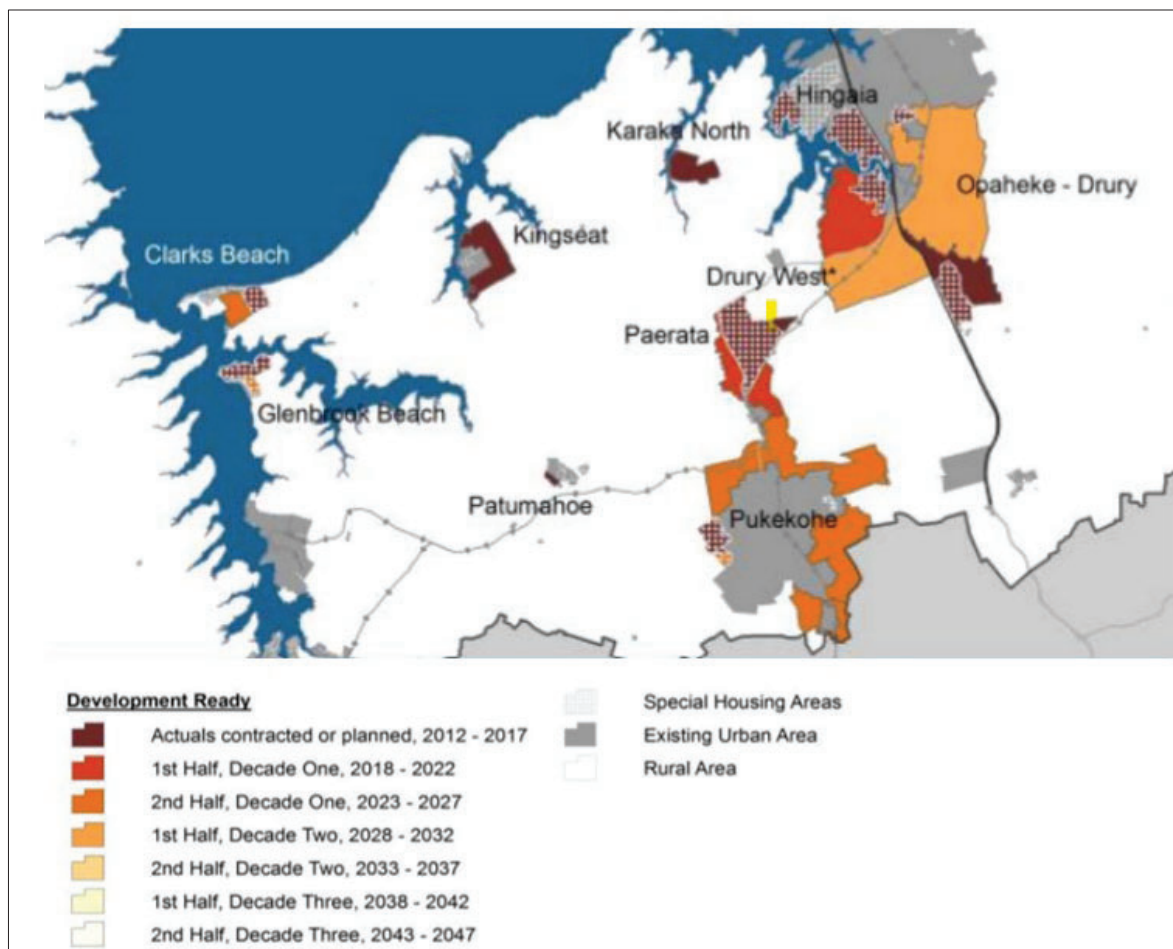
266. The Future Urban Land Supply Strategy 2017 (**FULSS**) is a council strategy that indicates the sequencing of when different Future Urban zoned areas across Auckland are anticipated to be development ready i.e. have infrastructure to support urban development.
267. In the southern sub-region, the FULSS identifies growth in large future urban areas, as well as rural settlements, providing for an anticipated dwelling capacity of 50,600 and an anticipated employment capacity of 30,300. See Figure 4.

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<sup>72</sup> Auckland Plan 2050, under Direction 2

<sup>73</sup> Auckland Plan 2050, under Development Strategy

Figure 4: Future Urban Land Supply Strategy 2017<sup>74</sup>



268. The FULSS identifies the Future Urban zoned land in Glenbrook Beach 2 area to be development ready in the second half of Decade One (2023-2027). The FULSS Glenbrook Beach 2 area includes the plan change area and the remaining Future Urban zoned land directly to the south-east of the plan change.<sup>75</sup>
269. The FULSS anticipated dwelling capacity for Glenbrook Beach 2 is 207. This compares to an anticipated 843 dwellings in the Glenbrook Beach 1 area which is covered by the Glenbrook Beach 3 Precinct.<sup>76</sup>
270. Section 7.2 of the AEE discusses the FULSS and considers that the plan change is not premature, noting it will take a few years for the planning and earthworks processes to be completed to enable buildings to be occupied. The AEE notes that the necessary reticulated water supply is already available and that Watercare expects the necessary public

<sup>74</sup> FULSS, extract of map from Appendix 2 of FULSS

<sup>75</sup> FULSS page 17

<sup>76</sup> FULSS page 19

wastewater infrastructure to be ready by 2026, which is within the FULSS development ready date.

271. A new Future Development Strategy (**FDS**) is being developed by the council as required by the NPS-UD.<sup>77</sup> Consultation on the draft FDS was from 4 June – 4 July 2023. It is expected the FDS will be finalised and adopted by Auckland Council by the end of 2023.

272. The Draft FDS states:<sup>78</sup>

*The purpose of the FDS ... is to set the high-level visions for accommodating urban growth over the long term and identify strategic priorities to inform other development related decisions.*

*Regard must be given to the FDS when preparing or changing RMA planning documents. Auckland Council is legally required (as part of the NPS UD) to plan well for growth, and produce a FDS that spatially identifies:*

- a. the broad locations in which development capacity will be provided over the long term, in both existing FUAs [future urban areas], to meet the requirements of clauses 3.2 and 3.3; and*
- b. the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and*
- c. any constraints on development.*

273. The draft FDS responds to a changing environment including the housing intensification required by the NPD-UD and the RMA MDRS, and the effects of climate change.

274. The consultation draft FDS proposes extending out the time periods for when different Future Urban zoned areas will be development ready. This is generally for infrastructure reasons.

275. The draft FDS also proposes further investigation or the removal of some Future Urban Areas. This may be because of significant hazards (e.g. flooding, coastal hazards), infrastructure or climate change.

276. For the Future Urban zoned area in Glenbrook Beach the draft FDS proposes the area will be development ready 2030+.

277. In relation to Glenbrook Beach 2 FUZ the draft FDS states:

*There is minimal delay anticipated in providing infrastructure to service growth in Glenbrook Beach. No bulk transport improvements are planned to support development and as there is no rapid transit network planned, this area would not contribute to VKT reduction.*

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<sup>77</sup> NPS-UD 2020 updated May 2022. Subpart 4, clauses 3.12 – 3.18

<sup>78</sup> Consultation Draft Auckland Future Development Strategy 2023-2053 (**Draft FDS**), page 12

*Distance from the existing urban area, lack of rapid transit and lower opportunities for mode shift mean strategic outcomes are unlikely to be achieved. Upgrade of the South-West Wastewater Treatment Plant is required to support future growth. ... There is potential for higher VKT and CO2 emissions per household at 2048 in the rural and coastal FUAs than all the larger FUAs and existing urban areas, due to these settlements being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services.<sup>79</sup>*

278. The FDS will eventually replace the FULSS. However at the time of writing the FDS is still a draft document and there is no certainty what the council's strategic approach will be towards the sequencing of when the Future Urban zoned land in Glenbrook Beach will be development ready. Therefore until the FDS is finalised and adopted, I consider the FULSS is the most appropriate strategy to consider in relation to the expected timing and sequencing of infrastructure.

### **7.11. Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan**

279. Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan (**Auckland's Climate Plan**) was adopted by council in 2020. It is intended that the plan will help deliver the Auckland Plan's high-level vision on climate change and is a roadmap to a zero-emissions, resilient and healthier region. The core goals are:

- to reduce greenhouse gas emissions by 50 per cent by 2030 and achieve net zero emissions by 2050 (**climate mitigation**)
- to adapt to the impacts of climate change by planning for the changes we will face (**climate adaptation**).

280. Auckland's Climate Plan has eight priorities related to natural environment; built environment; transport; economy; communities and coast; food; Te Puāwaitanga o te Tātai; and energy and industry.

281. Key considerations of this plan change are the impacts it will have on Auckland's overall greenhouse gas emissions, and whether it will elevate or alleviate climate risks such as flooding, coastal and storm inundation. The natural environment and transport priorities are particularly relevant to the plan change.

282. Carbon Dioxide emitted by road transport modes is identified as the primary greenhouse gas impacting the Auckland Region. Carbon dioxide is a long-lived greenhouse gas, meaning it accumulates and has long-lasting implications for climate. Auckland's Climate Plan points out that integrating land use and transport planning is vital to reduce the need for private vehicle travel and to ensure housing and employment growth areas are connected to efficient, low carbon transport systems. Auckland's Climate Plan seeks a 12 per cent reduction in total

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<sup>79</sup> Draft FDS

private vehicle VKT by 2030 against a 'business-as-usual' scenario through actions such as remote working and reduced trip lengths.<sup>80</sup>

283. The AEE does not provide an assessment of the plan change in relation to Auckland's Climate Plan, nor does it specifically consider the effects on climate change and greenhouse gas emissions. However it does suggest that employment sectors have changed with greater uptake of flexible working and working from home arrangements.
284. As previously mentioned the plan change is located in a coastal settlement that currently has very limited local amenities and services. There is an area of Neighbourhood Centre zoned land opposite the plan change area which is currently vacant. Once this is developed it will be able to provide some local services amenities for the community, and limited employment opportunities.
285. Waiuku is the nearest town, approximately 14-15km away, via rural roads. Glenbrook Beach is not serviced by public transport and none is planned or funded in the future. This means residents will need to rely on private vehicles to access most goods and services, including schools.
286. Auckland Council's consultant traffic expert Wes Edwards has reviewed the plan change and raises significant concerns with the plan change in terms of the impact it will have increasing vehicle kilometres travelled (VKT) and transport emissions. Mr Edwards technical report is contained in Appendix 7, and is discussed in more detail in section 8.8. In summary Mr Edwards considers the plan change is not consistent with Auckland's Climate Plan because of the location of the plan change area would increase private vehicle travel. In particular Mr Edwards highlights Action Area T1 (Changing the way we travel).
287. Overall I consider development enabled by the plan change could be resilient to the effects of climate change (i.e. flooding and coastal/storm inundation) if supported by further information and additional precinct provisions as recommended. See section 8.7. Furthermore development enabled by the plan change could contribute to some biodiversity and ecological improvements (planted riparian margins).
288. However like Mr Edwards, I consider the plan change is not consistent with the Climate Plan goal of reducing private vehicle use and greenhouse gas emissions. While the plan change encourages walking and cycling within the settlement, working from home may be an option for some residents, and the Neighbourhood Centre will provide some local amenities and services in the future; these do not change the fact the settlement is relatively isolated and private vehicles will be the primary means of transport for future residents. In saying this, it is acknowledged that the area has been zoned FUZ.

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<sup>80</sup> Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan 2020, page 47



### 7.11.1. Transport Emissions Reduction Pathway

289. The Transport Emissions Reduction Pathway (TERP) was endorsed by Auckland Transport's board and adopted by Auckland Council in August 2022.
290. The TERP gives effect to Auckland's Climate Plan target to halve Auckland's regional emissions by 2030 (against a 2016 baseline).
291. It sets out:
- what needs to happen to reduce Auckland's transport emissions by 64 per cent by 2030
  - what it will look like when we get there
  - to identify the potential barriers to achieving it.
292. The TERP provides formal direction that Auckland Council and Auckland Transport must follow in all of their activities. This includes updates of key planning and funding documents such as:
- The Auckland Transport Alignment Project (ATAP)
  - The Regional Land Transport Plan (RLTP).
293. The TERP identifies 11 areas of transformations that will create the sustainable transport system needed in 2030. The first six areas of transformation are most relevant to the plan change and relate to reducing reliance on cars and support people to walk, cycle and use public transport.
294. Neither the AEE nor the applicant's Integrated Transport Assessment consider whether the plan change aligns with the TERP.
295. Mr Edwards provides an assessment of the plan change in relation to the council directions set by the TERP (see pages 27-29 of his report). Ultimately Mr Edwards considers that the plan change is contrary to the TERP because of its location and the poor availability to local services and employment.
296. This notwithstanding, the plan change area is zoned FUZ, as previously discussed.

### 7.11.2. Long-term Plan

297. The 10-year Budget 2021-2031: Long-term Plan, Our Recovery Budget (**LTP**) was adopted in June 2021 and sets Auckland Council's direction and priorities for the next 10 years. At a high level the LTP seeks to:
- support Auckland's recovery from the impacts of COVID-19
  - lift investment by \$5.6 billion to a record \$31.8 billion over 10 years
  - increase spending on the environment and responding to climate change
  - protect key services and renewal of community assets.

298. The LTP identifies five key issues. Particularly relevant to the plan change is the rising investment demand the council is facing. The council does not have the capacity to support unlimited growth so will focus limited infrastructure investment capacity in the following key areas where:

- agreed with the government as part of the Auckland Housing Programme, including Mt Roskill, Māngere, Tāmaki, Oranga and Northcote
- significant government investment has been made, such as Drury in Auckland's south, and areas in Auckland's north-west
- investment in significant projects, such as the City Rail Link, is being made.

299. The LTP states that even in these focus areas the council will not be able to cover all the potential costs, and there will need to be prioritisation of projects within these areas. This focused approach will mean that the council will not be heavily investing in infrastructure to support other growth areas in the short to medium term beyond that which is already committed.

300. The plan change area is not located within a focus area, however one project committed to in the LTP that is relevant to the plan change is the South-west Wastewater Servicing project. This includes the construction of a new wastewater treatment plant; new wastewater pipeline, pump stations and harbour outfall at Clarks Beach. Construction is expected to be completed by 2026.<sup>81</sup> The LTP identifies \$218 million investment for this project.<sup>82</sup>

### **7.11.3. Franklin Local Board Plan 2020**

301. The Franklin Local Board Plan is a strategic three year plan, outlining the community's priorities. Local board plans guide local board activity, funding and investment decisions.

302. They also influence local board input into regional strategies and plans, including the Auckland Plan (the 30-year vision for Auckland), the council's 10-year Budget (Long-term Plan) and the annual budgets.

303. The current local board plan has six outcomes, each with a series of objectives and key initiatives. Objectives particularly relevant to the plan change are listed under the outcomes below:

- Outcome 1: Our strengths generate local opportunity and prosperity
- Outcome 2: Improved transport options and fit for purpose roads.
  - Improve existing and design new roads so that they are fit for purpose and safe while enabling environmentally sustainable transport choices
  - Enable communities to reduce carbon emissions by enabling active transport around and between towns and villages

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<sup>81</sup> LTP 2021-2031, volume 2, page 168

<sup>82</sup> LTP 2021-2031, volume 1 page 89

- Outcome 3: Fit for purpose places and facilities
  - Towns, villages, and settlements are planned and developed to support growing communities and retain local character
- Outcome 4: Kaitiakitanga and protection of our environment
  - Protect and enhance the mauri (lifeforce) of our awa (waterways), moana (harbour) and ngahere (indigenous forests)
- Outcome 5: Cultural heritage and Māori identity is expressed in our communities
- Outcome 6: A sense of belonging and strong community participation.

304. Outcome 2 recognises that the local board area faces many transport challenges especially in light of significant growth and climate change. For example many areas (greenfield and rural) are not serviced by public transport, and therefore are car-dependant. Local roads do not necessarily have capacity for future traffic volumes and are not designed to accommodate parking necessary for car-dependent communities. Improving walking and cycling opportunities is an important aspect of Outcome 2.
305. Section 4.2 of the Structure Plan (page 11) discusses the local board plan and highlights the local board outcomes related to improving transport options, improving road design and infrastructure and enabling active transport modes will directly benefit access to the structure plan area.
306. A draft local board plan is currently being prepared. At the time of writing this plan is being consulted on and it is expected to be adopted by the local board by 31 October 2023.
307. It is considered that the plan change is generally consistent with the Franklin Local Board Plan. The Franklin Local Board provided views on the plan change and area included in section 11.14.

#### **7.11.4. Iwi Management Plans**

308. When preparing or changing its District Plan, Section 74 (2A) of the RMA requires territorial authorities to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district i.e. Iwi Management Plans (IMP)
309. IMPs are an expression of mana whenua rangatiratanga and help guide their exercise of kaitiakitanga over natural and physical resources.
310. I have reviewed the relevant IMPs that I am aware of. Overall I consider there are no additional matters not already raised by the Ngati Te Ata Cultural Impact Assessment provided with the plan change and their subsequent submission.

## **8. Assessment of effects on the environment**

311. Clause 22 of Schedule 1 to the RMA requires private plan changes to include an assessment of environmental effects that are anticipated by the Plan Change, taking into account clause 6 and 7 of the Fourth Schedule of the RMA.
312. An assessment of actual and potential effects on the environment (**AEE**) is provided by the applicant in support of PC91.
313. Section 8 of the AEE identifies and evaluates the following actual and potential effects:
- Demographic and economic effects
  - Character and visual amenity effects
  - Geotechnical effects
  - Contamination effects
  - Effects on infrastructure
  - Stormwater runoff and water quality
  - Transport assessment
  - Ecological effects
  - Cultural and heritage effects
  - Social and community effects
314. For the purposes of this report I have set out my discussion under slightly different headings. Under each of my headings there are sub-headings containing a summary of what the application documents discuss on each topic, including any further information provided via their clause 23 response. This is then followed by a summary of the Council's specialist advice and then this report's analysis and conclusions. Relevant matters raised by submitters are also included in the discussion, along with a cross reference to further discussion on submissions in section 11.

## 8.1. Dwelling yield and capacity

### *Application*

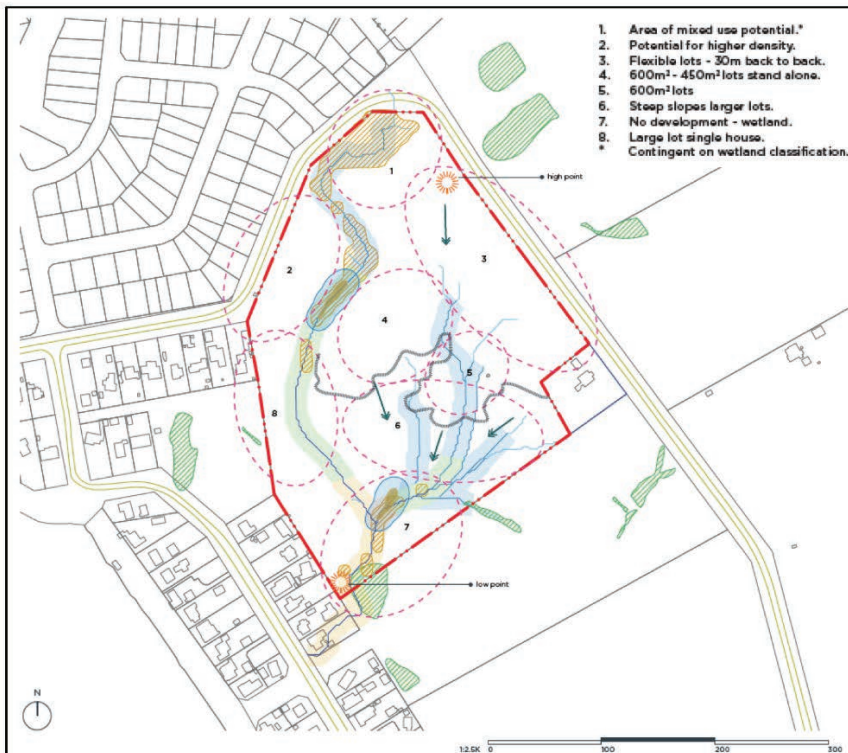
315. The AEE states that future "... *subdivision and development of the site will likely yield in the range 75-125 additional dwellings/lots*".<sup>83</sup> In other parts of the AEE it states that the plan change is estimated to enable approximately 100 dwellings.<sup>84</sup>
316. The plan change provides an economics report - Glenbrook Economics Report, 80 McLarin Road, prepared by Market Economics (m.e consulting), 11 April 2022 (**Economic Report**).
317. The Economic Report includes the following plan showing the potential site density layout and slope analysis, stating this is from the Development Feasibility Concept Masterplan Options Study prepared by Harrison Grierson, December 2020. See Figure 6 below.

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<sup>83</sup> AEE, page 4

<sup>84</sup> AEE, pages 12, 27, 31

Figure 5: Figure 2.2 from Market Economics Report



318. The report provides a ‘conservative dwelling yield scenario’ and a ‘high dwelling yield scenario’ based on four options. Each scenario and option includes an estimate of the number of ‘standalone dwellings’ and the number of ‘higher density dwellings’. The report states:

*From the initial concept masterplan options for 80 Mclarin Road<sup>4</sup>, four development options have been identified yielding a range of between 55-100 dwellings, based on a combination of standalone and higher density typologies. To reach the upper range of the dwelling yield, a greater proportion of the site will need to be zoned for higher density (Residential-Mixed Housing Suburban) along with smaller lot sizes and two-storey housing typologies.<sup>85</sup>*

319. Other plan change documents also rely on the estimated dwelling yield of up to 100 dwellings e.g. ITA, Geotechnical Report.

**Analysis**

320. I note the AEE states that future subdivision and development of the site will likely yield in the range of 75-125 additional dwellings/lots.<sup>86</sup> However this appears to be slightly different from the range of dwellings relied upon by some of the supporting technical reports (e.g.

<sup>85</sup> Economic Report, Page 11

<sup>86</sup> AEE, page 4

Economic Report, ITA, Preliminary Geotechnical Study). Furthermore from the information provided it is unclear whether the number of dwellings, or the potential effects from these dwellings, takes into consideration that up to three dwellings per site are a permitted activity in the MHS Zone (provided they comply with specific zone standards). In my opinion this matter could have implications for the conclusions made in the AEE and supporting technical reports.

- 321. The Economic Report refers to the Development Feasibility Concept Masterplan Options Study prepared by, Harrison Grierson, December 2020. This study was not attached to the Economic Report or provided as a separate document with the plan change application. However a copy is attached to the Geotechnical Report which also appears to rely on the study.
- 322. While the AEE does not refer to this study I consider this study is useful information in understanding the possible effects of the plan change and the appropriateness of the proposed MHS Zone and proposed precinct.
- 323. The Development Feasibility study includes four concept masterplans which include estimates of the number of dwellings, average lot size, and net developable area. It also identifies where higher density might be located and where larger lots might be needed due to steeper terrain. It is noted these concept masterplans were prepared for a feasibility discussion only, and yields and layout are indicative only and subject to change. Table 5 below includes a summary of this information taken from the four concept plans.

**Table 5: Summary of options contained in Development Feasibility – Concept Masterplan Options Study<sup>87</sup>**

Option	Number of dwellings	Net developable area	Average lot size	
1	55-60	4.25ha	800m2	Higher density (400m2 lots) closer to Neighbourhood Centre Zone
1B	70-75	4.1ha	650m2	Higher density closer to the future commercial zone – 400m2 lots Larger lots where steeper
2	75-80	4.3ha	600m2	Higher density closer to the future commercial zone 250-

<sup>87</sup> Development Feasibility – Concept Masterplan Options Study (2020), prepared by Harrison Grierson, pages 6 – 9. Contained in Appendix 1 of Preliminary Geotechnical Report (2021) prepared by Lander Geotechnical

				450m2 zero lots and two storeys. Larger lots where steeper
<b>2B</b>	90-100	4.7ha	450m2	Higher density closer to the future commercial zone 250-450m2 zero lots and two storeys. Larger lots where steeper

324. As previously mentioned the AEE states the site will likely yield 75-125 additional dwellings/lots. From the information available it is unclear where the higher estimate of 125 in the AEE comes from.
325. It is also unclear whether the yield estimate is based on one dwelling per site or whether it takes into consideration the fact that the MHS Zone provides for up to three dwellings per site as a permitted activity, provided they comply with specific zone standards. For example using the higher net developable area estimate above of 4.7ha and an average lot size of 450m2 (as per option 2B above), this could theoretically enable 104 sites/lots. In turn 104 sites could yield just over 300 dwellings in total i.e. approximately triple the amount of dwellings than what the plan change appears to estimate.
326. The Section 32 Report anticipates that most residential development will proceed as proposals for four or more dwellings, rather than as proposals for three or less dwellings.<sup>88</sup>
327. However I note there is no guarantee this will occur and the proposed precinct provisions do not require or encourage this. As a greenfield site, how and when development occurs could depend on a variety of factors. For example how and when subdivision occurs (vacant lot subdivision versus subdivision around existing development) and whether development is undertaken by one developer or multiple developers/builders.
328. I acknowledge the plan change area may be developed as anticipated by the Section 32 Report, or that it may be unlikely that the whole plan change area will be built out to maximum potential capacity (i.e. three dwellings per site). See residential demand assessment in the following section.
329. However I consider it is important that the plan change is appropriately assessed against the level of development that will be enabled by the AUP, if the site is rezoned to MHS. This is particularly relevant in considering effects on infrastructure capacity and needs as well as potential adverse effects on the environment. It is also important in understanding whether a

<sup>88</sup> Section 32 Report, page 10

different residential zone might be more appropriate for the location and site, such as the Single House Zone.

330. This matter has also been raised by Auckland Council's traffic expert, Wes Edwards, who notes that the Integrated Transport Assessment (ITA) estimate of traffic generation is based on 100 dwellings. Mr Edwards also considers that the estimated yield of 100 dwellings is an under-estimate and recommends that the applicant provides evidence on an appropriate likely upper limit on the number of dwellings that could be enabled by the proposed provisions.<sup>89</sup>
331. It would be helpful for the consideration of PC91 if the applicant clarifies what the estimated residential yield (dwelling and lot numbers) is they have based their assessment of effects on (including supporting technical reports), and whether these take into consideration that the MHS Zone permits three dwellings per site.
332. If the applicant's assessments do not take into consideration the full level of development enabled by the MHS Zone proposed (i.e. 3 dwellings permitted per site), then it would be useful if the applicant provides this assessment in order to better understand the scale of effects possible.

## **8.2. Demographic and economic effects**

### *Application*

333. The Economics Report addresses the following matters:
- *The likely residential demand by typology in Glenbrook, especially for higher density types.*
  - *The impact that the increased residential density would have on public schooling in the area.*
  - *The level and timing of commercial land demand in Glenbrook, and the amount of floorspace that will be required for retail and other activities by the future population.*<sup>90</sup>
334. Residential and retail demand is summarised below and education demand is addressed in section 8.11.

### **Residential demand**

335. In relation to expected household growth in South Auckland (based on Auckland Council's I11 projection model), the Economics Report concludes:

*Auckland Council I11 growth projections indicate an additional 1,300 households per annum to 2043 in Franklin ward. It is projected by 2043 a total of 60,260 households will*

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<sup>89</sup> Specialist Peer Review, Wes Edwards, Appendix 5 of this report

<sup>90</sup> Economic Report, page 1



*live in the area, receiving the largest share of growth for South Auckland and the third largest share of growth for the whole of the Auckland region.<sup>91</sup>*

336. In relation to existing household types the report states:

*Within the coastal north-western area of Franklin Ward (the coastal areas from Karaka to Waiuku), the main household types are couples with no kids (31%), two parent families with up to two children (28%), and single persons (18%).<sup>5</sup> This pattern differs slightly to the overall South Auckland and Auckland Region distribution with a higher proportion of couples in the coastal north-western area of Franklin Ward. This pattern is unlikely to change significantly in the coming years. ... Household types less likely to live in these areas are multi-family households ... and non-family households.<sup>92</sup>*

337. In relation to existing or planned residential development within a 10-15km radius of the plan change area the report states:

*We have assessed the pipeline for residential development within 10-15km of the site (mainly Glenbrook, Waiuku and Patumahoe), using data from Pacifecon Building Intelligence. That data shows that there are 336 residential projects, that are either completed, under construction or in planning (Figure 3.3). The majority (98%) of projects are standalone dwellings, 2% are residential developments or subdivisions and one terraced housing project (Figure 3.4). It is likely that the majority of the commenced projects will become capacity within a year to 18 months. ...*

*Some consents may not reach construction stage, but it is clear from the Pacifecon data that the main housing typology currently being developed or planned in a 10-15km radius of the site are standalone houses. This is to be expected given the location is peri-urban to rural in setting, with higher density housing more suited to urban type environments.<sup>93</sup>*

338. In relation to the demand for higher density dwellings the report concludes:

*This report has examined the market for higher density housing formats within the western areas of Franklin Ward (Karaka to Waiuku). Our assessment has shown that there is very minimal demand for attached dwellings in the area, with few high density builds recently constructed as well as few in the residential pipeline. There are a range of factors that will make Glenbrook a desirable residential location, but development should be in keeping with the current scale and typologies in the area as well as the residential pipeline. It will be important to ensure that any high density residential that is developed has high levels of amenity in order to overcome the demand preference for standalone dwellings in this location.*

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<sup>91</sup> Economic Report, page 18

<sup>92</sup> Economic Report, page 5

<sup>93</sup> Economic Report, pages 5-6

*Glenbrook has good access to local employment areas (Waiuku and Pukekohe), and a range of schools for all ages in the vicinity. The area will likely attract couples, two parent families with up to two children and single persons. Glenbrook is sufficiently removed from Auckland City with a coastal aspect which will appeal to some buyers over other locations in the South Auckland market.*<sup>94</sup>

### **Retail Demand**

339. The Economic Report provides information about retail demand, based on a retail catchment spanning from Waiuku to the west and Pukekohe and Karaka, extending east almost to Statement Highway 1. To the south the retail catchment does not extend into the Waikato region.
340. Waiuku is the closest local centre to the plan change area (approximately 15km, 15 minute drive). It has a range of retail shops and services with approximately 990 people employed within the centre. Pukekohe is the closest town centre (approximately 25km, 25-minute drive) and has a wider range of retail shops and services, and support approximately 3670 jobs. The report expects a sizable proportion of total catchment retail spend by households would be directed to these centres.
341. The report also notes the future development of the Drury Metropolitan Centre which is on the eastern edge of the retail catchment, and that once developed it is will likely capture a portion of demand from Glenbrook Beach as it is likely to offer a wider range of retail than Pukekohe does.<sup>95</sup>
342. In relation to the existing Neighbourhood Centre Zone at Glenbrook Beach the Economic Report notes it is approximately 4215m<sup>2</sup>. The report concludes:

*Additional housing in Glenbrook, including the proposed development that is subject to this Private Plan Change, means the future resident population will need a small commercial area to service their daily convenience retail and commercial service needs. Neighbourhood centres provide residents and passers-by with daily convenience retail and commercial service needs. Neighbourhood centres ... typically consisting of a mixture of dairies, takeaways, hairdresser, laundromats and bottle shops.*

*Given the future resident population in Glenbrook, around 370m<sup>2</sup> of core retail and hospitality GFA will currently (2021) be supported in the proposed Glenbrook neighbourhood centre and this will increase as the more households move into the area. A proposed Glenbrook neighbourhood centre should plan to accommodate approximately 656sqm GFA of core retail and hospitality stores. This might consist of:*

- *A dairy or general store.*

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<sup>94</sup> Economic Report, page 18

<sup>95</sup> Economic Report, pages 13-14

- *Either a café and/or takeaway store.*
- *In addition, around 10% of the centre's commercial floorspace could be devoted to household service activities such as a hair and beauty salon, laundromat, or real estate agency.<sup>96</sup>*

343. Section 7.1 of the Structure Plan (page 28) also summarises the Economic Report.

344. Section 8.4 of the AEE addresses demographic and economic effects and states:

*Based on the Market Economics report (**Appendix 8 of the Structure Plan**) Auckland Council's growth projections indicate an additional 1,300 households (per annum) are required to achieve this by 2043 in the former Franklin district/ Franklin ward.*

*This PPC can accommodate a small portion of the overall projected growth. As outlined within the Market Economics report, Glenbrook Beach has good access to amenities and schools and will be attractive to all age groups. The development enabled by the PPC will likely attract retirees, couples, two parent families with up to two children and single persons. Glenbrook Beach is sufficiently removed from urbanised areas of Auckland and has a coastal aspect which will appeal to buyers within the South Auckland market.*

*The employment sector has changed over the last three years with greater uptake of flexible working arrangements and working from home that enables decentralisation of employment sectors and working culture providing housing opportunities for a wider sector of the market.<sup>97</sup>*

#### *Analysis*

345. I note since the Economic Report was prepared, new projected population models for Auckland are available. Stats NZ December 2022 updated figures for the Franklin Local Board area projected population ranges from 121,000 (low), 141,500 (medium) to 163,600 (high) in 2043.<sup>98</sup>

346. Based on the Economic Report's assessment of retail gross floor area needed, there appears to be sufficient Neighbourhood Centre zoned land in Glenbrook Beach to meet the local convenience needs of the existing and future Glenbrook Beach community (including the plan change area), once it is developed. Based on this I accept the plan change will not

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<sup>96</sup> Economic Report, page 18

<sup>97</sup> AEE pages 22-23

<sup>98</sup> Stats NZ, published 12 December 2022 <https://www.stats.govt.nz/information-releases/subnational-population-projections-2018base2048-update/>

generate the need for more centre zoned land in Glenbrook Beach settlement in the foreseeable future.

347. At this stage the Neighbourhood Centre zoned land at Glenbrook Beach is vacant land with no development. Until this is developed residents at Glenbrook Beach will need to travel to other centres such as Waiuku and Pukekohe to fulfil all their retail needs and access other services and facilities that might otherwise be expected within a neighbourhood centre. See section 8.8 for discussion on traffic effects.
348. The Section 32 Report states that the proposed residential development would "... increase the financial viability of establishing businesses on the zoned local centre land"<sup>99</sup> and I generally agree with this.
349. I note the Economic Report states Glenbrook has good access to local employment areas (Waiuku and Pukekohe), although this only seems to be in relation to retail demand. The report does not appear to consider other employment opportunities such as rural, commercial or industrial activities that might be available in the local or sub-regional market. Similarly the AEE makes similar statements about good access to local employment areas but also refers to the Glenbrook Steel Mill. The AEE also appears to put some weight on recent changes and uptake of working from home/remote working opportunities.
350. I agree that work trends may be changing (i.e. from pre-Covid) with more work from home/remote working opportunities available for some employment sectors. However this is not necessarily an option for many employment sectors. Certainly the Glenbrook Steel Mill is a large local source of employment, but given that Glenbrook Beach is unlikely to provide any, or only very limited employment opportunities in the future (e.g. home occupations, retail and commercial services in Neighbourhood centre), it would be useful if the applicant provides further analysis of the employment markets it expects future residents of the plan change area to participate in. This will be useful to better understand effects of the plan change, in particular traffic effects and effects of vehicle emissions. Also see section 8.8.
351. With regard to residential demand I note the Economic Report conclusions that the majority of consented and planned housing is standalone, with limited demand for higher density terraced housing typologies in Glenbrook and the surrounding Franklin locality. Never the less the report considers there may be a willingness to trade private space for the opportunity to live in close proximity to the coast, and therefore there may be some demand for standalone dwellings on smaller lots (<400m<sup>2</sup>) and duplexes.
352. Based on this assessment of residential demand it appears there may not be significant demand for the housing that maximises the development potential of the MHS Zone. Nevertheless the MHS Zone will enable some variation in housing typologies if the developers chooses.

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<sup>99</sup> Section 32 Report, page 21

### 8.3. Urban design, character and visual amenity effects and interface with Glenbrook Beach Recreation Reserve

#### *Application*

353. The applicant's Urban Design Assessment has been prepared by Harrison Grierson (July 2022).
354. Further urban design and open space information was provided as part of their clause 23 response. The response was provided in October 2022 and included an amended Structure Plan (October 2022), a Context Analysis (October 2022) and covering letter with responses to specific urban design and open space questions. The applicant's clause 23 response is contained in Appendix 1 of this report.
355. Sections 2 and 3 of the Urban Design Assessment provides an analysis of the site and contextual setting. This includes identification of opportunities and constraints.
356. Section 4 of the Urban Design Assessment describes the key urban design objectives for the Glenbrook 4 Precinct and states the following four strategies have formed the focus of and directed the Glenbrook 4 Precinct Plan:
- **Access and Connectivity** - *Movement of traffic, pedestrians and cycle paths are defined based on clear and logical connection points into the surrounding area.*
  - **Residential Opportunities** - *Character and appearance of the proposed re-zoning aligns with character of the existing neighbourhood while providing additional choice.*
  - **Site Perimeter Treatment** - *The treatment of the built edges of the site respond to the character of adjacent built form and land use. When externally focused the built edge defines the possible street character.*
  - **Open Space and Stormwater Treatment** - *Open space is enabled that enhances site connectivity and provides opportunity for low impact stormwater treatment and biodiversity to become an intergrated element of the place.<sup>100</sup>*
357. Section 5 of the Urban Design Assessment provides the urban design assessment, including assessment of the proposed zoning and precinct provisions, along with conclusions.
358. The Urban Design Assessment concludes:

*Based on our assessment of the urban design aspects of the proposal to rezone 8ha of land at 80 McLarin Road, Glenbrook Beach, including the proposed Structure plan , the proposed Glenbrook 4 zoning provisions, and our understanding of the site and context we conclude that:*

- *As an outcome for the site and community, the transition from a Future Urban Zoned area to a Mixed Housing Suburban Zoned area is entirely anticipated.*

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<sup>100</sup> Urban Design Assessment, section 4.3

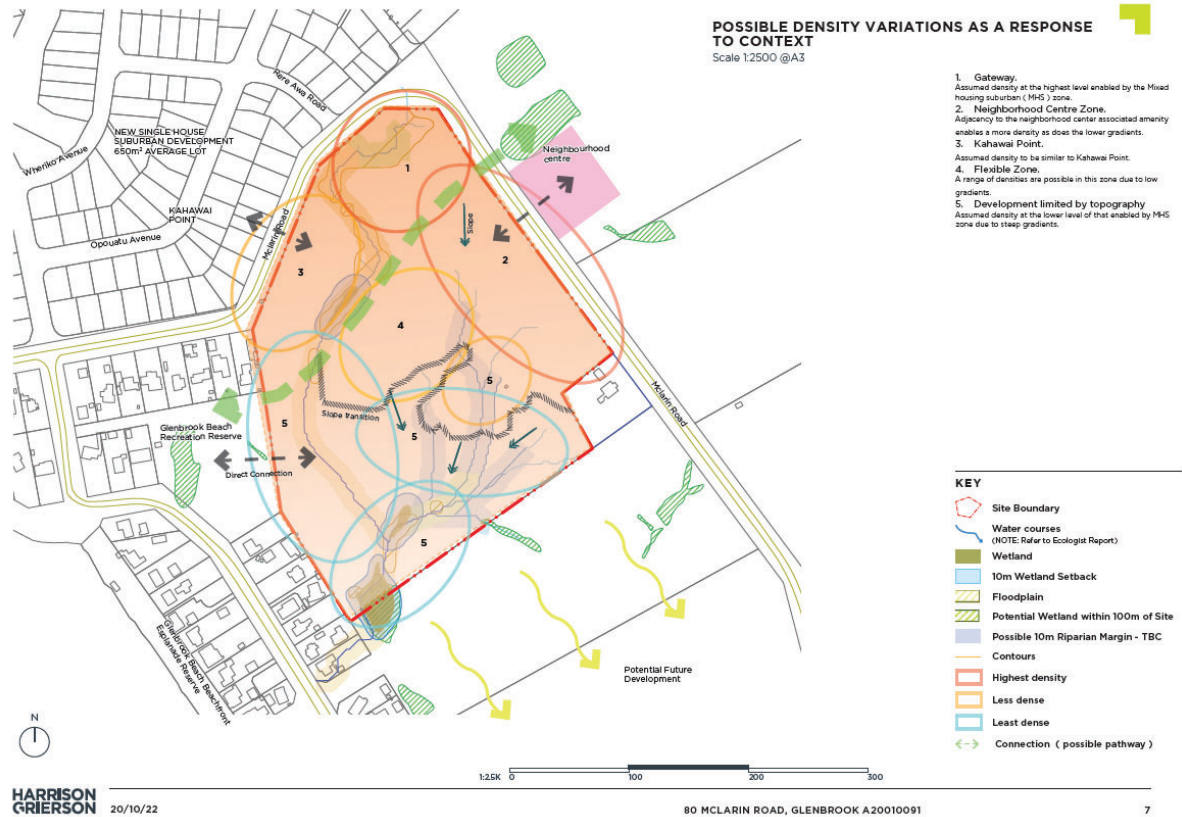
- *The scale and form of housing enabled by the proposed zoning would increase the variety of housing choices available.*
- *The outcomes as guided by the proposed structure plan would be within the context of the surrounding development and would enhance and complement the character and amenity of the surrounding area.*
- *The discretion applied through the resource consent process would be enough to manage the quality of any future development and in particular urban design outcomes as controlled within Glenbrook 4 Precinct Plan and the Zone provisions of the AUP(OP).*
- *The management and protection of on site natural wetlands and intermittent water courses will provide increased amenity and enhance the existing natural environment through provision of appropriate riparian margins and native vegetation.*
- *The provision of connected open space will add value and amenity to the surrounding area.*<sup>101</sup>

359. The Context Analysis includes several diagrams of the plan change area showing character opportunities and possible density variations in response to context. Notably areas 1 and 2 on the diagram below indicate where the highest level of density enabled by the MHS Zone is expected, whereas the southern half of the site is assumed to have the lower level of density enabled by the MHS Zone due to steeper gradients. See Figure 7 below.

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<sup>101</sup> Urban Design Assessment, page 17

Figure 6: Diagram from Context Analysis



360. Section 7.1 of the Structure Plan (page 29-32) also summarises the Urban Design Assessment.
361. The AEE comments that settlement patterns at Glenbrook Beach have changed over time. Development pre-2000 is typically detached dwellings on large lots (800m<sup>2</sup> - 1000m<sup>2</sup>), whereas lot sizes in the newer development at Kahawai Point Development range from 313m<sup>2</sup> - 800m<sup>2</sup>. The AEE states “... *This development has also introduced a more 'urban' landscape to a traditional beach settlement, with formed footpaths and kerb and channel drainage.*” The AEE considers that development of the plan change area would “... *fill a 'gap' in the landscape...*” between the original beach settlement along Ronald Ave and the newer development of Kahawai Point (Glenbrook 3 Precinct), and thus will become “... *part of a contiguous settlement in a broader landscape sense.*”<sup>102</sup>
362. The AEE notes commonalities between the MHS Zone and Single House Zone provisions which the proposed Glenbrook 4 Precinct does not vary, along with the Glenbrook 3 Precinct provisions (road cross section designs) that the proposed Glenbrook 4 Precinct adopts. Therefore the AEE considers the nature and form of development anticipated in the

<sup>102</sup> AEE page 24

Glenbrook 3 Precinct will be generally consistent with development currently observed within the settlement, particularly that in Kahawai Point (Glenbrook 3 Precinct).

363. For sites along the western boundary of the plan change area (i.e. Ronald Avenue) the AEE considers that site topography (e.g. steep escarpment, native vegetation, floodplain) will mitigate visual effects on amenity and provide a buffer between the old and new development.
364. The AEE considers that assessment criteria for four or more dwellings will allow consideration of effects on neighbourhood character and will ensure “...*that Council considers whether the intensity and scale of a residential development in the MHS zone is compatible with the character and amenity of the neighbourhood.*”<sup>103</sup>
365. The AEE notes that the Auckland-wide subdivision rules would apply to the site in terms of minimum vacant lot size for the MHS Zone. It points out that while the Glenbrook 3 Precinct, generally requires a larger lot size than what would be required in the Glenbrook 4 Precinct, the Glenbrook 3 Precinct does enable smaller lot sizes where development meets affordability and communal housing criteria.
366. The applicant’s clause 23 response also includes a response to a suggestion put forward by council’s Parks and Recreation Policy team for the provision of a park edge road along the boundary interface with the Glenbrook Beach Recreation Reserve. The applicant did not support this suggestion maintaining their approach that future road alignments are best confirmed during the resource consent process when “... *the location and design of roads can be effectively integrated with future subdivision and development, with the protection and enhancement of freshwater assets and with stormwater management.*”<sup>104</sup>
367. The AEE recognises the interface with the reserve is important, and states that through the precinct provisions “... *residential development will be designed in a manner that overlooks the Glenbrook Beach Recreation Reserve and increase public safety...*” highlighting that the existing residential properties adjacent to the reserve do not do this.<sup>105</sup>
368. Overall the AEE concludes the plan change will have:
- ... no significant adverse effects in relation to landscape character and visual amenity. The proposed precinct provisions will ensure existing important landscape features are secured on site and an appropriate buffer is provided to adjacent rural properties.*

Peer review

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<sup>103</sup> AEE, page 23

<sup>104</sup> Clause 23 response letter, section 6

<sup>105</sup> AEE, pages 24, 32



369. Jennifer Esterman (consultant expert) from Mein Urban Design + Planning has undertaken an urban design review of the plan change application on behalf of council. Ms Esterman has prepared a technical report which is attached in Appendix 5.
370. Ms Esterman considers the applicant's Urban Design Assessment has used a robust methodology. However Ms Esterman considers there are four matters raised in the applicant's Context Analysis that have not been reflected in the proposed precinct provisions. Ms Esterman provides an analysis of these matters in section 4 of her report and recommends amendments to the precinct in relation to the interface with Glenbrook Beach Recreation Reserve. This is discussed further below.
371. Andreas Lilley (consultant parks planner) has undertaken a review of the plan change application on behalf of Auckland Council's Parks and Community Facilities Department. Mr Lilley has prepared a technical report which is attached in Appendix 5. Mr Lilley's comments related to the Glenbrook Beach Recreation Reserve are addressed below. See section 8.8 for Mr Lilley's comments on walking and cycling connections.

#### Character and visual amenity

372. Ms Esterman describes the site characteristics and character of the surrounding area, noting the original coastal settlement contains older bach style housing generally setback from the road and on larger sites. This contrasts with the newer residential development of Kahawai Point development (Glenbrook 3 Precinct). The new development contains modern housing, predominantly single storey on more compact sites. Roads in the newer part of Glenbrook Beach are to urban standards, including the northern side of McLarin Road.
373. Ms Esterman comments that development of the Neighbourhood Centre Zone (opposite the plan change area) will be important for the area as there are currently no local shops or services in the settlement. Ms Esterman notes a recent subdivision consent<sup>106</sup> has been granted opposite the plan change area, which includes a new public road just to the south of the centre zoned land.
374. Ms Esterman provides an urban design assessment of matters raised in submissions, which are also addressed in sections 11.2 - 11.4 of this report. Many of these submission points relate to concerns about adverse effects on the character and visual aesthetic of the Glenbrook Beach settlement. Ms Esterman notes these submitters generally describe the existing area as a quiet, rural / coastal settlement, and some submitters consider the Single House Zone is more appropriate than the proposed MHS Zone. I note the Franklin Local Board views also expressed concern about the impact of development and consider lower density housing is better suited to a coastal settlement. In response to these submissions and concerns about character and visual amenity Ms Esterman concludes:

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<sup>106</sup> SUB60397335-A (50 Orawahi Road)

- The MHS Zone is an appropriate zone to apply, and is preferred over the Single House Zone. Ms Esterman states the Single House Zone and MHS Zone provisions that contribute to streetscape character are mostly the same<sup>107</sup>, with the exception of the alternative height in relation to boundary standard in the MHS Zone, the number of dwellings allowed per site and subdivision controls. The Glenbrook 3 Precinct also has specific fencing controls which are different to those in the Single House Zone. In response to submissions Ms Esterman recommends amending the proposed fencing standard for front boundaries, reducing the maximum permitted height similar to that required by the Glenbrook 3 Precinct, to ensure consistency in streetscape appearance. This is discussed in sections 11.3 and 11.4.
- Ms Esterman states:
 

*From an urban design perspective, the aesthetic of a neighbourhood is experienced from the public realm. From public streets the MHS zoning will not look materially different to the development throughout Kahawai Point given the plan provisions that control yard setback, landscape treatment within front yards and building height. Further to this, the existing Glenbrook Beach area does have some degree of infill development due to the size and shape of the existing lots. I acknowledge that the density within the MHS zone has the potential to be greater, but it also provides an opportunity to create more variety in housing typologies such as duplex houses.*<sup>108</sup>
- The MHS Zone and recommended amendments to the precinct provisions (fencing) will ensure a relative streetscape appearance/character consistency with development within the Glenbrook 3 Precinct.

#### Glenbrook Beach Recreation Reserve interface

375. Ms Esterman notes that the Structure Plan (and precinct plan) include an indicative green interface (along the boundary with the Glenbrook Beach Recreation Reserve) and an indicative pedestrian/cycle link connecting the reserve with the plan change area. She considers that achievement of the indicative pedestrian/cycle link is adequately covered by the proposed precinct provisions.

376. However Ms Esterman considers the precinct provisions need strengthening to achieve a suitable interface with the Glenbrook Beach Recreation Reserve, including opportunities for housing to overlook the reserve, and achievement of a green interface between the reserve and the plan change area.

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<sup>107</sup> i.e. front yard setback, height, height in relation to boundary, landscape requirement along the street front and fencing.

<sup>108</sup> Jennifer Esterman, Specialist Peer review, pages 14-15 (Appendix 5)

377. Ms Esterman considers these matters need to be addressed achieve the outcomes anticipated by the applicant's Urban Design Assessment, including those in relation to site perimeter<sup>109</sup> and open space<sup>110</sup>.

378. Ms Esterman highlights that while the proposed precinct does include policy related to the visual connection between residential development and public spaces, a fencing standard and assessment criteria (four or more dwellings, infringing fencing standard); this would not apply to the development of all dwellings. Ms Esterman states:

*... a permitted activity would have no requirement to orient a dwelling to overlook the reserve, both in terms of the MHS provisions and the proposed precinct provision. Given there is an intent to provide overlooking from dwellings to Glenbrook Beach Reserve, it is recommended that an additional standard is included within the precinct to achieve this. It is also recommended that the fencing standard be amended to remove reference to passive surveillance, as a fence in and of itself cannot achieve this.*<sup>111</sup>

379. Ms Esterman recommends a number of amendments to the proposed precinct to address her concerns about the interface with Glenbrook Beach Recreation Reserve. These are included in Appendix 5 of this report. In summary they include:

- Add an additional clause to Policy IXXX.3(4) to require subdivision and development to incorporate the green interface to Glenbrook Beach Recreation Reserve shown on the precinct plan.
- Include a new Standard within the precinct provisions to ensure dwellings that adjoin Glenbrook Beach Recreation Reserve overlook the reserve and protect the open space amenity of the reserve through a planted interface.
- Amend the activity table – proposed activities (A2) and (A3) to include the new standard
- Amend the fence standard to more accurately describe 'passive surveillance'
- Amend/add matters of discretion/assessment criteria to include new standard.

380. Mr Lilley provides a description of the reserve and highlights that public access to the reserve is currently only via a shared vehicle accessway from Hill Road. Similar to Ms Esterman, Mr Lilley has concerns about the interface with the Glenbrook Beach Recreation Reserve, including that it is unclear how the proposed precinct provisions will contribute to the outcomes sought in the Applicant's Urban Design Assessment. Mr Lilley states:

*A key consideration for the boundary interface is achieving an activated public entrance to the reserve with open sightlines and effective passive surveillance into the reserve, without undue bulk and dominance effects imposed by the new residential built form. It is*

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<sup>109</sup> Jennifer Esterman, Specialist Peer review, page 10

<sup>110</sup> Jennifer Esterman, Specialist Peer review, page 10

<sup>111</sup> Jennifer Esterman, Specialist Peer review, pages 10-11

*noted that council experience shows where developments back on to a reserve space rather than provide a public frontage, the maintenance burden on council can be higher due to increased litter and dumping on the reserve side of rear boundaries.*

381. Mr Lilley states other than the proposed fencing standard, no “... other standards are proposed to control the interface with the reserve, including there being no standards proposed for the green interface, no specific yard setback requirements, no controls on retaining combined with fencing, and no minimum glazing requirements on facades facing the reserve.”<sup>112</sup>

382. Mr Lilley also comments:

*... the lack of detail around the central cycleway / pedestrian interface with the reserve also provides no certainty around the desired activation of the reserve edge. Due to the extensive shared boundary with the reserve and the current lack of street frontage to the reserve providing any safe and legible access to the wider community, the plan change provides an opportunity to enhance the eastern access to the reserve in a safe and legible manner.*<sup>113</sup>

383. Mr Lilley acknowledges there are some proposed precinct provisions related to this interface. However he does not consider they will provide the level of certainty needed by council at this stage, that development will achieve a consistent boundary interface with the reserve.

384. Mr Lilley highlights that council’s Parks department initially requested the applicant consider including a park edge road or accessway with public pedestrian easement over it along the interface with Glenbrook Beach Recreation Reserve, as well as that development not be built up right to the site boundary. As mentioned above, the applicant did not support including a park edge road, maintaining that the roading layout was better determined at the resource consent stage (See clause 23 response).

385. Mr Lilley is of the opinion that a park edge road would achieve the best outcome providing a well landscaped and open connection with passive surveillance and sightlines into the reserve achieving Crime Prevention Through Environmental Design (CPTED) outcomes.

386. Mr Lilley considers, as an alternative, that a pedestrian access lot would also provide some benefit however considers it would be less desirable than a park edge road. A pedestrian lot could also provide a direct pedestrian connection from McLarin Road parallel with the property at number 78 and run the length of the reserve boundary.

387. If a park edge road or public pedestrian accessway are not to be required by the precinct, Mr Lilley considers additional precinct provisions are required to manage the interface between

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<sup>112</sup> Andreas Lilley, Specialist Peer review, paragraph 2.11

<sup>113</sup> Andreas Lilley, Specialist Peer review, paragraph 2.12

residential development and the reserve to achieve good outcomes for the open space including access, activation passive surveillance and avoiding dominance.

388. Mr Lilley's recommended amendments are included in Appendix 5. In relation to the interface with Glenbrook Beach Recreation Reserve Mr Lilley recommends the:

- Amend proposed precinct description and add new objective recognising the importance of a well-designed interface with the Glenbrook Beach Recreation Reserve to provide public access, effective passive surveillance and avoiding dominance effects.
- Add new policy and amend proposed standard 2 (precinct plan) providing for a park edge road along the interface with Glenbrook Beach Recreation Reserve.
- Or add a new standard for sites adjoining land zoned open space if a park edge road or pedestrian accessway is not required. New standard includes minimum glazing, 3m minimum building setback on the boundary adjoining the reserve, and planting requirements along the boundary to provide the green interface already shown on the precinct plan.
- Amend activity table, and amend/add matters of discretion and assessment criteria to reflect other recommended amendments above.
- Amend precinct plan to identify the park edge road adjacent to Glenbrook Beach Recreation Reserve. If road cross sections are retained add cross section for a park edge road, or include in road category table recommend by Mr Edwards.

389. Mr Lilley also recommends additional amendments in relation to walking and cycling, which are discussed in section 8.8.

### *Analysis*

390. I rely on the advice of Ms Esterman and Mr Lilley.

### Character and visual amenity

391. I agree with Ms Esterman's description that Glenbrook Beach settlement has two distinct areas (i.e. original settlement and newer area of Kahawai Point/Glenbrook 3 Precinct). I also agree with the AEE that the character has changed over time and that the Kahawai Point development has introduced a more urban landscape, with urban street treatments (e.g. footpath, curb, channels). When I visited Glenbrook Beach I observed the character of these two areas, in particular I noticed the differences in the roads between the older part (i.e. Ronald Avenue and Hall Road), which lacked footpaths and kerbs, and the newer part which had urban roads. I note that regardless of which zone is applied (i.e. MHS or Single House Zone) the road reserves within and adjoining the plan change area will be upgraded to urban standards, which will contribute to the streetscape character of the area.

392. I note that the older part of the settlement – zoned Single House, is subject to the Subdivision Variation Control. In this instance the control requires a minimum net site area of 800m<sup>2</sup> for these sites. The Subdivision Variation Control has generally been applied to areas

to protect their low density character, to avoid subdivision that detracts from natural landscape qualities that are defined by low density settlement patterns or where there are known infrastructure constraints.<sup>114</sup>

393. The outcomes sought by the MHS Zone are to increase housing capacity, intensity and choice<sup>115</sup> while also ensuring development is in keeping with the neighbourhood's planned suburban character. That planned character is expected to be mostly two storey buildings, both detached and attached.<sup>116</sup> Development should also provide quality on-site residential amenity for residents and adjoining sites and the street.<sup>117</sup> Non-residential activities are provided for when they are compatible with the scale and intensity of development anticipated by the zone and should contribute to the amenity of the neighbourhood.<sup>118</sup>
394. Many of the outcomes sought by the Single House Zone are similar to the MHS Zone. However the Single House Zone does not seek to increase housing capacity, intensity or choice. In terms of character, development should be in keeping with both the planned and existing suburban built character which is both one and two storeys.<sup>119</sup> Development should also maintain and be in keeping with amenity values of established residential neighbourhoods. Those amenity values may be based on special character informed by the past, spacious sites with some large trees, a coastal settling or other factors such as established neighbourhood character.<sup>120</sup> Appendix 8 contains a comparison of the objectives and standards of the Single House Zone and MHS Zone.
395. The character of both zones is expected to be suburban in nature. Both the AEE and Ms Esterman highlight many of the standards that affect streetscape character are the same in both zones, including the maximum building height (8m + 1m for roof pitch which enables two storeys); minimum yards; height in relation to boundary (excluding alternative rule); landscaped areas; retaining walls and fences; and impervious surfaces. The primary difference between the zones is the minimum net site area and the number of dwellings allowed per site.
396. However as highlighted by Ms Esterman the Glenbrook 3 Precinct provides for slightly smaller site sizes than the underlying Single House Zone and even smaller site sizes for affordable housing. The Glenbrook 3 Precinct density standard provides for one dwelling per 550m<sup>2</sup> (or this as an average with sites no smaller than 500m<sup>2</sup>). However it also provides for much smaller site sizes for affordable housing – at one dwelling for 300m<sup>2</sup>, with these making

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<sup>114</sup> AUP E38.3. Policies (27), (28), and (29)

<sup>115</sup> H4.2 Objective (1)

<sup>116</sup> H4.2 Objective (2)

<sup>117</sup> H4.2 Objective (3)

<sup>118</sup> H4.2 Objective (4)

<sup>119</sup> H3.2 Objective (2)

<sup>120</sup> H3.2 Objective (1)

up no more than 20 per cent of sites created within any one stage of the development.<sup>121</sup> This is evident in a recent subdivision consent granted opposite the plan change area. The consented subdivision plan is included in Ms Esterman's report. I agree with Ms Esterman on this, and also note that whilst the Single House Zone enables one dwelling per site (compared to the three dwellings per site in the MHS Zone) the Single House Zone also permits one minor dwelling per site. In terms of potential adverse effects on character and amenity I consider this also decreases the differences between the two zones.

397. In response to submissions and to ensure there is consistency in streetscape appearance, Ms Esterman recommends amending the proposed precinct provisions so that front boundary fences are a maximum of 1.2m in height or 1.8m height if the fence is at least 50 per cent visually permeable above 1.2m. This is similar to the maximum permitted height in the Glenbrook 3 Precinct,<sup>122</sup> but is amended slightly to allow additional height based on visual permeability. This contrasts with the MHS Zone which has a maximum height of 1.4m in the front yard and no requirement to be visually permeable. I rely on the advice of Ms Esterman and recommend amendments to the proposed precinct's fencing standards for the front yard. This is set out in Appendix 7 and discussed in sections 11.3 and 11.4.
398. I rely on the advice of Ms Esterman that from public streets the MHS zoning will not look materially different to development enabled in the Glenbrook 3 Precinct, and that amending the front yard fencing requirements will contribute to streetscape consistency.
399. I acknowledge that urbanisation of the plan change area will contribute to the changing character of the Glenbrook Beach settlement. This is a character that has already changed through development in the Glenbrook 3 Precinct. However based on Ms Esterman's advice I consider this changing character and visual amenity will not result in significant adverse visual and amenity effects.
400. I consider the MHS Zone will provide greater housing choice and diversity. Overall I consider the MHS Zone provisions in conjunction with the recommended Glenbrook 4 Precinct provisions will appropriately manage development to ensure a relative consistency of streetscape character and a suburban character anticipated by the zone.

#### Glenbrook Beach Recreation Reserve

401. When I visited the reserve I also observed that public access is only available through a shared vehicle accessway which appears to function more as a driveway for several residential properties and the Watercare reservoir located on the reserve. Public access into the grassed area of the reserve was also restricted by a locked gate and there was no obvious signage for the park. While the reserve does front onto Ronald Avenue a sloping area of bush prevents access from Ronald Avenue to the upper grassed area. I acknowledge

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<sup>121</sup> I453.5.2 Maximum Density

<sup>122</sup> I453.5.11 Fences (3) *Fences on the front boundary must not exceed 1.2m in height and must be at least 50 percent visually permeable.*

that the existing access to the reserve could be improved and this is noted in the Franklin Local Board views. Never the less it would still be shared with the residential properties. I also acknowledge that the reserve currently has no facilities or amenities, and there are currently no council plans for development of the reserve. However as noted by Mr Lilley as the population of the settlement grows this could lead to more use of the reserve and future council investment.

402. I generally agree with the concerns raised by Ms Esterman and Mr Lilley in relation to the interface with the Glenbrook Beach Recreation Reserve. In my opinion it is unclear from the proposed precinct provisions what the “indicative green interface” is that is shown on the proposed precinct plan. Also the way the provisions are drafted I consider it is uncertain whether subdivision/development would be required to provide a green interface, and if so how development would need to respond to this in order to be “in general accordance with” the precinct plan standard.”<sup>123</sup> I am also not convinced that restricting the height of fences along the interface with the reserve is sufficient to achieve the outcomes expressed in the applicant’s Urban Design Assessment.
403. In principle I agree that a park edge road, or at least a pedestrian accessway, along the boundary with the reserve would achieve a better outcome for the reserve, by providing alternative access to the reserve in a much more open and accessible manner than currently provided. I note Ngati Te Ata also state in their CIA they prefer the use of park edge roads, adjacent to open space zones, rather than private property backing onto these spaces.
404. If the plan change does not provide a park edge road or pedestrian accessway along the boundary of the reserve, any opportunity to open up access to the reserve will be limited to just the pedestrian/cycle link proposed by the precinct. While I support the inclusion of the pedestrian/cycle link and the connections it will provide through the plan change area, I consider it could either be in addition to or incorporated into a park edge road.
405. However I recognise that a park edge road may not be feasible due to the proximity of the intermittent stream and the proposed precinct requirement to provide a 10m planted riparian margin along the intermittent stream. Without a plan showing an indicative road and lot layout, in conjunction with the intermittent stream and wetlands and the indicative pedestrian/cycle link, it is difficult to understand how development within the precinct can best integrate with the Glenbrook Beach Recreation Reserve and improve accessibility and informal recreation opportunities in the reserve.
406. If the plan change does not include a park edge road or public accessway along the boundary with the reserve, I agree with Mr Lilley and Ms Esterman that the precinct provisions could better manage residential development that adjoins the reserve, than currently proposed. As suggested by Ms Esterman and Mr Lilley the precinct provisions could be amended to require a minimum amount of glazing for dwellings (similar to what is

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<sup>123</sup> See proposed Policy 4, rules (A2, A3, A7, A12, A9) and proposed standard 7.1.1(2) (as notified).



required in the Glenbrook 3 Precinct<sup>124</sup>), a minimum building setback of 3m (as opposed to the minimum 1m required by the MHS Zone), requiring the fencing to be partially visually permeable and requiring planting along the boundary with the reserve. These provisions would limit visual dominance of the built form and provide passive surveillance of the reserve, whilst also providing a level of privacy and security for residents. The planting requirement would also contribute to achieving the 'green interface' indicated on the precinct plan. In my opinion amendments such as these would better achieve proposed Objective 2 and Policy 6 and the outcomes expressed in the Urban Design Assessment and Structure Plan.

407. Overall I consider that the plan change could better integrate future development with the Glenbrook Beach Recreation Reserve in a way that improves accessibility and the amenity and function of the reserve.
408. Despite the discussion above I have not included any precinct provisions in relation to better integrating development with the Glenbrook Beach Recreation Reserve, in Appendix 7. as there are no submissions specifically relating to the reserve or open space more generally. However submissions addressed in section 11.3 could provide scope for these changes if submitters are able to provide further information. See section 11.3. I also note that the Ngati Te Ata CIA does indicate their preference of park edge roads and buffer zones around open space, rather than private property backing onto these spaces.

#### 8.4. Geotechnical effects

##### *Application and analysis*

409. A Preliminary Geotechnical Assessment Report (2021) has been prepared by Lander Geotechnical Consultant Ltd for the plan change. The report states:

*The site was found to be underlain by a thin mantle of South Auckland Volcanic Field weathered ash, with the majority comprising Puketoka Formation alluvial clays and silts, and Residual East Coast Bays Formation along the northern edge.*

*Based on our analyses and prevailing site conditions, potential geotechnical hazards on this site including coastal erosion, slope instability, liquefaction susceptibility, tsunami and earthquake risks are considered to be of **low risk** for this site. Volcanic risk should be considered and mitigated on a regional level.*

*However, there is softer ground in the lower lying (southern) portion of the land holding and consolidation settlement of these deposits induced by applied surcharges from future*

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<sup>124</sup> |453.5.12 Sites adjoining land zoned Open Space 1. Where a site or dwelling adjoins land zoned Open Space: Informal Recreation, or fronts a public walkway, the following applies: a. the facade of a dwelling or dwellings facing the open space must contain glazing that is cumulatively at least 30 percent of the area of the facade (excluding the garage door)

*development may present geotechnical constraints. This will not preclude development from occurring over this area, but will require further site investigations and engineering design at the time of a future Resource Consent.*

*Land modifications to create a future subdivision remain to be seen, however with appropriate engineering it is foreseeable that such works will not adversely affect prevailing conditions (and therefore should introduce no additional geotechnical hazards).<sup>125</sup>*

...

*Overall, it is considered that 80 McLarin Road is suitable for the PPC and residential intensification / development. Precedence in the area has been set via intensive development to the north in the adjacent Kahawai Point, and other residential developments in South Auckland in similar geology ..*

*The geotechnical hazards identified in this report, in particular the potential for consolidation settlement to be induced from imposed development surcharges, can be addressed and resolved {where required} in due course through appropriate site investigations and geotechnical design as part of the Resource Consent process.<sup>126</sup>*

410. Section 7.1 of the Structure Plan also summarises the Preliminary Geotechnical Report.

411. Section 8.6 of the AEE considers geotechnical effects. The AEE states:

*The geotechnical investigation report concludes that, with appropriate engineering design measures, the identified geotechnical conditions that form the base of the geotechnical assessment should not constrain future development (density or type of land use).*

*Potential geotechnical issues can be identified during detailed/ more specific investigation at the time of subdivision and development. This will ensure that any potential geotechnical issues can be avoided, remedied or mitigated to a no more than minor level through the Resource Consent and Building Consent processes.<sup>127</sup>*

412. I rely on the advice of the preliminary geotechnical study. At this stage the preliminary assessment is sufficient and confirms that geotechnical issues can be resolved through appropriate design methodologies, commensurate with development and earthworks plans as part of the resource consent process when detailed design and more specific investigations will be undertaken.

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<sup>125</sup> Preliminary Geotechnical Assessment Report (2021); Lander Geotechnical Consultants Ltd (**Geotechnical Report**), page 1

<sup>126</sup> Geotechnical Report, page 13

<sup>127</sup> AEE page 24

## 8.5. Contamination effects

### *Application*

413. ENGEO has undertaken contaminated land investigations across the plan change area and have provided a Preliminary Site Investigation (PSI) Report<sup>128</sup> for 80 McLarin Road.
414. As part of its investigations the PSI Report states it made a Contaminated Land Enquiry (SCE) to Auckland Council. The council's response (Sept 2021) indicates that the sites adjacent to the northern end of the property have been used for horticultural activity. Therefore, the site may have been subject to spray drift from pesticide use. However no other potentially contaminating activities were identified.<sup>129</sup>
415. The PSI report states that the following activities listed on the HAIL (Hazardous Activities and Industries List<sup>130</sup>) may have impacted the site:

- *HAIL ID H: Any land that has been subject to the migration of hazardous substances from adjacent land in sufficient quantity that it could be a risk to human health or the environment.*
  - *The sites adjacent to the northern end of the property were historically used for horticultural purposes, therefore the site may have been subject to spray drift during pesticide application on this neighbouring property.*
- *HAIL ID 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.*
  - *Agrichemicals, in particular superphosphate fertiliser, are likely to have been applied to the site to support use as grazing land. Cadmium is often co-located with the source of superphosphate fertiliser, resulting in a build-up of cadmium in soils where superphosphate fertiliser is regularly applied.*

416. The PSI concludes:

*For either HAIL IDs H or I to apply to the site, the contaminant concentrations must be at levels that pose an unacceptable risk to human health or the environment. Based on our experience on similar sites, it is unlikely that contaminants from one or both of the above HAIL land uses are present in site topsoil above standard residential Tier 1 human health criteria. As such, the site is not considered to meet the NES definition of a "piece of land" on which an activity or industry described in the HAIL is being undertaken, has been undertaken or is more likely than not to have been undertaken (MfE, 2012). Therefore, the*

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<sup>128</sup> Preliminary Environmental Site Investigation - 80 McLarin Road, Glenbrook, 2021, ENGEO

<sup>129</sup> PSI Report page 6

<sup>130</sup> HAIL; MfE, 2011)

*NES does not apply to the proposed land use change, or future subdivision and soil disturbance works associated with redevelopment activities.*

*Contaminants may be present in topsoil above regional background levels, meaning that topsoil excavated from site could not be disposed as cleanfill or re-used on another earthworks site without Auckland Council approval. It is recommended that prior to or as part of future redevelopment works, a Suitably Qualified and Experienced Practitioner (MfE, 2012) is engaged to sample topsoil for laboratory analysis of heavy metals / metalloids and organochlorine pesticides at a minimum rate of 1 per 1,000 m<sup>3</sup> of topsoil to be disturbed. These data shall be used to assess disposal and re-use options for excess topsoil generated during the redevelopment works.*

417. Section 7.1 of the Structure Plan (pages 26-26) also summarises the PSI report.

418. Section 8.7 of the AEE states:

*Based on the Preliminary Environmental Site Investigation (PSI) of the site undertaken by ENGEO Ltd at 80 McLarin Road including a desktop study and site walkover, there is no evidence that the PPC land area contains elevated levels of contaminants that would prevent or hinder the use, subdivision and development of the land for residential purposes.*

*These reports have taken into account the historic horticultural use which may have used spraying to remove pest plants. A detailed investigation will be completed at the integrated land use and subdivision consent stage.*

*There are no triggers for National Environment Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ('NESCS'), Chapter E30 of the AUP, as the site is not identified as a HAIL site in the council system. As stated above, if detailed site investigation identifies it as a HAIL site, appropriate consents will be sought at resource consent stage with appropriate contamination remediation to be undertaken (if required) during the earthworks phase of any future land development projects.*

#### *Analysis*

419. I rely on the advice of the PSI provided with the plan change, and agree with the AEE in relation to potential effects of contaminated land. It is therefore considered that any potential risk to human health can be appropriately managed, through any requirements at the consenting stage if needed.

### **8.6. Effects on infrastructure (water supply, wastewater, public utilities)**

#### *Application*

##### **Water supply and wastewater**

420. The plan change application includes a Civil Engineering Report, prepared by Harrison Grierson, (May 2022). Sections 9 – 11 of that report look at the availability of the public water supply and wastewater networks and public utilities.

421. Section 7.1 of the Structure Plan (pages 27-28) summarises the Civil Engineering Report.

#### Water supply

422. Section 8.8.1 of the AEE summarises the findings of the Civil Engineering Report as follows:

*There are multiple potential connection points available to connect the subject site to the existing reticulated water supply network. There are no identified network capacity constraints for the number of dwellings that are likely to result from an MHS zoning. The detailed design of the water network to service the subject site will be undertaken at resource consent stage in consultation with Watercare Services Limited and Council.*<sup>131</sup>

423. With regard to funding implications for water supply infrastructure the applicant's clause 23 response highlights that there are no capacity constraints and that "... Lines within localised frontages and internal roads are subject to works proposed in future subdivision applications independent of the plan change."<sup>132</sup>

#### Wastewater

424. Section 8.8.2 of the AEE acknowledges that there is no capacity in the existing wastewater network to service future development of the plan change and states:

*The principal constraints to servicing relate to a lack of capacity for both treatment and discharge of wastewater at a sub-regional level affecting Waiuku, Glenbrook Beach, Clarks Beach and Kingseat.*

*Resource Consents have been obtained by Watercare Services Limited (WSL) to construct a new outfall structure and to discharge a greater volume of highly treated wastewater into the Waiuku Estuary at Clarke Beach. WSL is not in the process of obtaining all necessary consents for a new wastewater treatment plant that will service the sub-region. WSL has advised that a new wastewater treatment plan should be fully commissioned and operational by June 2026.*

*The PPC aims to be aligned with the proposed infrastructure upgrade by WSL and the proposed precinct provisions require built form to be fully serviceable prior to development and only to proceed when the site is serviced by a reticulated wastewater service. Therefore, the PPC will have less than minor adverse effects on the capacity and performance of the publicly available reticulated wastewater network.*

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<sup>131</sup> AEE page 25

<sup>132</sup> Clause 23 Response, Infrastructure Memo, page 2

425. With regard to funding implications for wastewater infrastructure the applicant's clause 23 response refers to the Civil Engineering Report and correspondence with Watercare, and highlights that the new Watercare wastewater treatment plant is already funded.

#### *Analysis*

426. David Russell (Senior Development Engineer) has undertaken a review of the plan change on behalf of Council. His advice is included in Appendix 5 of this report.

427. Watercare Services Limited is the provider of reticulated water and wastewater in this general area, where it is provided. Watercare submitted on the plan change in relation to water supply (submission point **26.2**) and wastewater (submission point **26.1**). Also see section 11.6.

428. The Watercare submission confirms that water supply "... can be serviced from the existing Watercare network subject to potential local storage upgrades" and that "... there are no constraints to subdivision and development of the subject site from a bulk water supply perspective."<sup>133</sup> This is generally consistent with the Civil Engineering Report and AEE.

429. The Watercare submission also states that the applicant will need to fund any local water supply infrastructure necessary to service the plan change area, and that any water infrastructure will be required to comply with Watercare's Code of Practice for Land Development and Subdivision. Watercare states they will continue to work with the applicant to confirm the final design of the water supply network, which can be confirmed at resource consent stage.

430. The Watercare submission reiterates that there is no capacity in the existing bulk wastewater network to service the plan change area, and that they have some concerns for wastewater servicing. However Watercare consider that these concerns can be appropriately mitigated provided the precinct includes provisions that seek to avoid any development ahead of the Southwest Wastewater Servicing scheme becoming operational. As such the Watercare submission (**26.1**) "*... strongly supports precinct provisions that seek to avoid subdivision and development prior to the commissioning of the Southwest Wastewater Servicing scheme.*"

431. The Watercare submission also includes the same comments as mentioned above for water supply, about funding, compliance with Watercare's Code of Practice and that the final design of the proposed wastewater network can be confirmed at resource consent stage.

432. Mr Russell does not identify any other issues not already identified in the Watercare submission. Noting the wastewater constraints Mr Russell recommends the plan change include a requirement that the first development that creates a residential section or dwelling be required to provide a letter or equivalent from Watercare confirming that the connections for water and wastewater are available, or will be available by a set date. Mr Russell also

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<sup>133</sup> Watercare Services Limited Submitter 26, pages 3 and 4 of 5

comments that the developers and Watercare continue to work together to ensure the infrastructure necessary to plan change area is adequately. Overall Mr Russell does not consider the plan change should be declined.

433. I note the proposed precinct Objective 3 and Policies 2 and 3 seek to ensure future development of the plan change area is integrated and coordinated with the delivery of infrastructure, including reticulated water supply. Proposed precinct rules<sup>134</sup> and standards make subdivision and development a non-complying activity if it does not comply with the following standard:

*1. Development and subdivision in the Glenbrook 4 precinct must either:*

*(a) be connected to a publicly available reticulated water supply network that has sufficient capacity to meet needs of the proposed subdivision and/or development, OR*

*(b) be supported by written confirmation from the infrastructure services provider for the area that planned capital works required to provide connections for water and wastewater are suitably advanced and capable of servicing the proposed development or subdivision.*

434. Noting the Watercare submission and Mr Russell's comments, I consider the precinct provisions (in particular the non-complying activity status for non-compliance with the relevant standard) can generally manage future subdivision and development of the site and any potential adverse effects in relation to water supply and wastewater.

435. I note the Watercare submission does not seek to amend the proposed precinct provisions and as such I understand that Watercare are satisfied with the proposed precinct provisions as they relate to wastewater and water supply. However if Watercare seek amendments to improve these precinct provisions through their evidence I am happy to consider such amendments.

436. I am also aware that Watercare recently served a notice of requirement (NOR) on council for a new wastewater treatment plant to be located on Glenbrook Beach Road. This was publicly notified on 13 October 2023. It is my understanding that this is part of the Southwest Wastewater Servicing scheme mentioned above. While this still needs to undergo the appropriate planning processes before it is confirmed in the AUP it does in my mind support the statements made that a new wastewater treatment plant will be established to service the Glenbrook Beach area, including the plan change area.

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<sup>134</sup> Proposed Glenbrook 4 Precinct, Rules (A6) and (A11), Standard IXXX.7.1(1) Infrastructure (numbers as notified)

437. I note I do recommend minor amendments to the standard above including amending the purpose to better describe the purpose and outcome sought by the standard.. These amendments are set out in Appendix 7.

### **Public utilities**

#### *Application*

438. Section 8.8.3 of the AEE states public utility providers were consulted as part of the structure planning process and that it was confirmed that electricity and telecommunication services can be provided to serve the envisioned growth of the plan change area.

#### *Analysis*

439. With regards to the supply of electricity and telecommunications I accept the information provided in the AEE.

440. I also note that Counties Energy recently served Auckland Council a Notice of Requirement (NOR) to designate land at Glenbrook Beach for an electricity substation. The substation is to be located on the eastern side McLarin Road, opposite the plan change area. At the time of writing this report, the requiring authority (Counties Energy) issued their decision on the NOR – to confirm with modifications. The appeal period closed on 5 October. At the time of writing it is known whether any appeals were received.

## **8.7. Stormwater runoff, water quality and flooding**

#### *Application*

441. A Stormwater Management Plan (**SMP**) was provided with the lodged plan change and updated through the applicant's clause 23 response. The applicant states it intends that the SMP be adopted into the Auckland Council Healthy Waters Regional Stormwater Network Discharge Consent (**NDC**).

442. Section 7.1 of the Structure Plan (page 27) briefly summarises the SMP.

443. Stormwater runoff effects and water quality are discussed in section 8.9 of the AEE. The AEE concludes:

*A careful consideration of stormwater management has been undertaken across the PPC land and a strong framework for management is proposed that aligns with the recommendations from the Iwi and guidance from Council. The ability to address this development under the NDC using the SMAF 1 overlay will enable water sensitive development that will not compromise the surrounding natural environment and its ecological functions.*

*It is considered that a mixture of detention and retention measures will adequately 'throttle' the rate of run-off from new impervious surfaces to the southern corner of the site, which is low lying and prone to flooding during high-intensity rainfall events. This corner of the*



*site is identified on Council's Geomaps as being within both a 1% AEP floodplain and within a Coastal Inundation 1 % AEP overlay (both 1m and 2m sea level rise).*

*The site currently drains to through culvert prior to discharging to the Manukau Harbour. The SMP concludes that stormwater runoff from development that is typical of the MHS zone, can be mitigated on site without worsening the flood hazard for the low-lying residential properties on Ronald Road or requiring the culvert to be upgraded.*

*On this basis it is considered that stormwater from the impervious surfaces associated with urban development can be controlled and managed and no significant adverse effects are likely to result from development enabled by the MHS zone.” The AEE also notes that the council can review the appropriateness of stormwater measures during the resource consent process. Furthermore, the Council can review the appropriateness of stormwater measures during the resource consent process.<sup>135</sup>*

444. With regard to funding implications for stormwater infrastructure the applicant’s clause 23 response states:

*Due to the proximity of the site to Manukau Basin and no existing service connections, upgrades will be required. New assets to service the underlying lot will be subject to works proposed in future subdivision applications independent of plan change.<sup>136</sup>*

#### *Peer review*

445. Kelly Seekup (Consultant planner) and Sarah Basheer (Consultant Engineer) have reviewed the plan change on behalf of Healthy Waters Auckland Council. Their report is in Attachment 7 of this report.
446. Overall Ms Seekup and Ms Basheer have concerns with certain aspects of the proposed plan change and the SMP provided by the applicant. These concerns relate to the treatment of stormwater and effects on water quality, and effects of flooding and stormwater runoff on downstream properties (i.e. Ronald Avenue) and the sensitive receiving environment. They consider their concerns can generally be addressed by additional information and/or amendments to the precinct provisions.
447. Ms Seekup and Ms Basheer consider it is essential to ensure that effects are fully understood, and that the plan change demonstrates that adverse effects can be appropriately avoided or mitigated and that mitigation measures proposed are feasible. This needs to be done at the plan change stage rather than left to the resource consent stage so that potential development on the site is considered as a whole, and to ensure the precinct provisions proposed are appropriate.

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<sup>135</sup> AEE pages 26-27

<sup>136</sup> Clause 23 response Infrastructure Memo (Attachment C), page 2

448. Noting the applicant intends the SMP be adopted into the NDC Ms Seekup and Ms Basheer outline the relationship between the NDC, SMPs, the plan change process and the need for appropriate precinct provisions in sections 5, 6 and 8 of their report. They state:

*If an SMP is to be adopted following the approval of a notified plan change, the SMP must have been prepared to support the notified plan change and the plan change must be consistent with the SMP. The requirement that the plan change must be consistent with the SMP is to ensure that the precinct provisions are adequate to implement the management methods and mitigation measures set out in the SMP.<sup>137</sup>*

449. Ms Seekup and Ms Basheer consider the SMP (as notified) would not be acceptable in accordance with Healthy Waters' NDC requirements. Their key areas of concern are:

- *Significant site features and hydrology is one of the key elements that is required to be addressed to support proposed land development in SMPs prepared under Healthy Waters' NDC process. As the current hydraulic modelling assessment has not demonstrated or justified the baseline condition to be established to allow the impact assessment of all development scenarios, it does not demonstrate the mitigation required to support the proposed private plan change, it is considered that the SMP in its current form does not meet the performance requirements in Schedule 4 of the NDC.*
- *Based on the hydraulic modelling undertaken by the Applicant to date the SMP does not demonstrate that flood risks to the downstream properties posed by the proposed plan change could be mitigated.*
- *The SMP needs to identify a preferred stormwater management solution for development, that includes the practicality or feasibility of the solutions/options proposed, with precinct provisions to ensure that these measures will be provided as part of the development of the site.<sup>138</sup>*

450. Ms Seekup and Ms Basheer make a number of recommendations in relation to the plan change, including recommending amendments to the precinct provisions and further information required in the SMP. These are summarised below.

#### Stream hydrology

451. Ms Basheer supports the introduction of the SMAF1 Control to the entire plan change area and considers it will provide appropriate hydrology mitigation to retain base flow and reduce the risk of scoring the wetlands and streams. No amendments are recommended in relation to this.

#### Stormwater devices

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<sup>137</sup> Ms Seekup and Ms Basheer (Healthy Waters) Special Peer Review, page 5

<sup>138</sup> Ms Seekup and Ms Basheer (Healthy Waters) Special Peer Review, pages 7-8

452. Ms Seekup and Ms Basheer recommend the SMP is updated stating:

*Stormwater devices can have multiple functions covering water quality treatment, retention and detention for hydrology mitigation, as well as flood attenuation. Therefore, the Applicant's SMP needs to clearly state the target performance requirements and intended catchment areas to be serviced by the proposed basins, rain gardens and swales, in addition to the costs and feasibility to operate and maintain the proposed stormwater devices from a lifecycle costing perspective, as raised by Auckland Transport in their submission, to ensure that effects will be able to be practically mitigated.<sup>139</sup>*

#### Water quality – treatment of stormwater

453. Stormwater runoff from the watercourses in the southwestern corner of the site currently drain into the Waiuku River inlet of the Manukau Harbour. This is a sensitive receiving environment and it is identified in the AUP as a Significant Ecological Area - Marine (**SEA-M**) Overlay.<sup>140</sup> Therefore appropriate on-site treatment is required before being discharged, in order to avoid and/or mitigate adverse water quality effects. Ms Seekup and Ms Basheer consider the existing AUP provisions are not adequate to manage these effects and recommend the applicant provide additional precinct objectives, policies, rules and assessment criteria if the SMP is not adequately updated. In addition to this Ms Seekup and Ms Basher recommend further amendments are also made to the precinct provisions and provide suggested wording for these.<sup>141</sup>

#### Flooding and stormwater effects on downstream properties (i.e. Ronald Avenue)

454. Ms Seekup and Ms Basheer have identified a number of issues on this matter including what they consider to be inconsistencies within the SMP. They recommend the applicant revise their flood hazard assessment in order to demonstrate post development peak flow discharges from the PC91 area will result in no more than minor effects from flooding to the downstream properties.

455. Ms Seekup and Ms Basheer conclude:

*The potential flooding and stormwater runoff effects from future developments enabled by PPC 91 on the downstream properties need to be mitigated. Based on our assessment and the submissions received, until a revised flood hazard assessment with sufficient information is provided to demonstrate that any potential flooding and stormwater runoff effects will be avoided or appropriately mitigated, to safeguard the downstream properties and the SEA, we do not support PPC 91 from a stormwater and flooding perspective.*

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<sup>139</sup> Ms Seekup and Ms Basheer (Healthy Waters) Special Peer Review, page 4

<sup>140</sup> SEA-M2-32a, Marine 2

<sup>141</sup> For clarity these are in addition to the objectives, policies, and rules they recommend the applicant provide if the SMP is not updated.

*To resolve our concerns we need to see the following in the flood hazard assessment as part of this plan change process.<sup>142</sup>*

*Option 1:*

- *The applicant needs to either demonstrate that their proposed solutions will work (causing a net 0 increase in flood level downstream); or*
- *Demonstrate in the report how the current increase in flood level (of up to 100mm) will not adversely affect the downstream properties (e.g. new and existing floor levels are way above flood levels, no new flooding is anticipated);*
- *Confirmation of the feasibility of the proposed attenuation mitigation measures for the full plan change enabled growth and the modelled flood depth anticipated (are 3 basins needed or 4) and confirmation of how the precinct provisions will ensure that these will be provided as part of the resource consent process.*

*Option 2:*

*Should the Applicant not be able to provide a revised flood hazard assessment, the Applicant needs to propose appropriately robust precinct provisions (objectives, policies, standards) to ensure that downstream flood impacts and adverse effects on the receiving environment will be avoided and or mitigated at the Resource Consent/development stage, addressing the full plan enabled development and effects to ensure certainty of attenuation/mitigation at a catchment level.<sup>143</sup>*

456. Overall Ms Seekup and Ms Basheer recommend:

- applying the SMAF1 Control as proposed; and
- the applicant update the SMP to include:
  - practicality, feasibility and costs of stormwater solutions/options proposed, including for the operation and maintenance of proposed stormwater devices from a lifecycle costing perspective
  - what the preferred option/method is for the treatment of stormwater runoff
  - how stormwater runoff from private driveways and parking areas will be treated; and
- amend the precinct to include additional water quality/stormwater treatment provisions; and
- the applicant revise the flood hazard assessment within the SMP (including clarifying the number of attenuation basins needed, and inconsistencies in the increased flood levels (pre and post development); or additional precinct provisions are provided by the applicant to ensure downstream flood impacts and adverse effects on the receiving environment are avoided or mitigated (as described above).

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<sup>142</sup> These two options are an either/or i.e. only one option is required.

<sup>143</sup> Ms Seekup and Ms Basheer (Healthy Waters) Special Peer Review, pages 8-9

## *Analysis*

457. I rely on and adopt the advice of Ms Seekup and Ms Basheer.
458. The relationship between the AUP provisions, Healthy Water's NDC, SMPs and the plan change process is complicated. While the plan change process is not the process that adopts a SMP into the NDC, the SMP and the plan change need to be consistent in order for the NDC to be adopted.
459. The Structure plan guidelines set out in Appendix 1 of the RPS, set out the matters a structure plan should identify, investigate and address. The scale and detail of specialist documents supporting a structure plan or plan change process should be at a level appropriate to the scale of the area and complexity of issues identified.<sup>144</sup>
460. Although the plan change area is relatively small in comparison to many other greenfield areas, I consider it is important that the scale of effects is clearly understood at the plan change stage, in order to determine whether additional precinct provisions are required or whether the existing Auckland-wide provisions for subdivision and flooding can be relied upon to adequately manage future development of the site.
461. Based on the advice of Ms Seekup and Ms Basheer, I consider the information and analysis provided by the applicant is currently inadequate, in particular noting properties on Ronald Avenue downstream of the plan change are known to have flooding issues, and the sensitive coastal receiving environment (also a SEA-M).
462. Submitters and the Franklin Local Board have also raised concerns about the impact of flooding on downstream properties. See section 11.11 for further discussion of submissions. The map below shows the downstream properties subject to flooding and overland flow paths within the plan change area flowing into this area. Much of the land subject to the flood plains are also subject to coastal inundation risks.

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<sup>144</sup> AUP Appendix 1

Figure 7: Flood plains and overland flow paths<sup>145</sup>



463. I also note that council’s Section 35 Monitoring Report on AUP RPS Chapters B7.3 and B7.4 identifies that there is a gap in the AUP. With regard to land use change in growth areas (i.e. greenfield areas) the Monitoring Report states that the AUP:

*... could be more directive regarding the water related matters that plan changes should address to ensure that large-scale land use change achieves improvements in waterways. There should be greater recognition within the AUP that new precincts providing for greenfield growth need to include controls relating to contaminants and changes in hydrology in order to achieve a multi-stage, ‘treatment train’ approach and protect sensitive receiving environments.*<sup>146</sup>

464. This supports the advice of Ms Seekup and Ms Basheer who consider the AUP stormwater rules are not by themselves sufficient for new greenfield development, therefore precinct

<sup>145</sup> Source: Auckland Council GEOMAPS, Natural Hazards dataset, accessed 10 October 2023

<sup>146</sup> Auckland Unitary Plan RMA Section 35 Monitoring: B7.3 Freshwater systems and B7.4 Coastal water, freshwater and geothermal water Section 35 Monitoring Report, August 2022, Technical Report TR2022/14, Auckland Council, page 11

provisions are needed to ensure the SMP is implemented to manage stormwater discharges and associated effects (including water quality effects) in subsequent land development processes.

465. I also note that while the SMP and AEE state the SMP and stormwater management approach proposed aligns with the recommendations from the iwi (Ngati Ta Ata) and guidance from Council, this does not appear to be fully supported by either the Ngati Te Ata submission or the advice from Ms Seekup and Ms Basheer.
466. With regards to the SMP I adopt the advice of Ms Seekup and Ms Basheer and recommend it be revised to address the matters they have raised. In particular I agree that if the applicant does not resolve the matters raised by Mr Seekup and Ms Basheer about the potential adverse effects of flooding on downstream properties then the applicant should provide precinct provisions to ensure that adverse effects will be avoided and/or mitigated at the Resource Consent/development stage, addressing the full plan enabled development and effects to ensure certainty of attenuation/mitigation at a catchment level.
467. Generally I support the precinct provisions amendments recommended by Ms Seekup and Ms Basheer, and I note these are drafted on the assumption that the SMP will be adopted. However I consider their recommendations should be redrafted slightly to ensure that the objectives and policies related to water quality, habitat and biodiversity improvements are not linked only to the SMP. I also recommend a new objective – Objective 12, relating to flood risks to people and property and a slight amendment to the policies they have recommended. In my opinion the new objective is needed to provide a link to the new policy – Policy 11 Ms Seekup and Ms Basheer have proposed. For clarification I do not consider Objective 12 and Policy 11 resolve the concerns about flooding and the SMP.
468. Based on the advice of Ms Seekup and Ms Basheer I consider that adverse effects from stormwater run-off and flood risks to downstream properties are likely able to be appropriately avoided, remedied or mitigated; however at this stage the plan change has not adequately demonstrated this nor will the proposed provisions ensure this.

## **8.8. Transport effects and infrastructure (walking and cycling connections/greenways)**

### *Application*

469. The applicant's Integrated Transportation Assessment (**ITA**) has been prepared by Traffic Planning Consultants Ltd (March 2022).
470. Further information was provided twice as part of their clause 23 response. The first clause 23 response was provided in October 2022<sup>147</sup> and included further information on completed improvement works on connecting roads; updated crash data; planned public transport; road

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<sup>147</sup> PC 91 - Attachment D – Letter responding to transportation matters.

hierarchy and cross-sections; and the potential intersections (between plan change area and existing roads). The second clause 23 response was provided in January 2023<sup>148</sup> and included further information in relation to speed surveys at the potential intersection locations (plan change area and McLarin Road). These clause 23 responses are in Appendix 1 of this report.

471. Overall the ITA concludes:

- *The weekday peak hour traffic generation of the activities enabled by the Plan Change will be in the order of 100 traffic movements per hour in the AM and PM Peak hours respectively. The proposed residential development at 80 McLarin Road follows consent for the development of some 800 dwellings within the Glenbrook 3 Precinct to the north of the site, which would be expected to generate in the order of 680 peak hour trips upon its full completion.*
- *Key intersections to the south of the site, which provide onward access to local destinations such as Waiuku, Pukekohe and Paerata, will continue to operate with adequate capacity to cater for the anticipated additional traffic generated by the Proposed Plan Change.*
- *Following the recent completion of safety improvements on the adjoining road network to the south of Glenbrook Beach, provided as part of the Glenbrook 3 Precinct SHA development, the network is expected to continue to function safely. The proposed development at 80 McLarin Road is not expected to contribute towards any new adverse safety effects.*
- *Development enabled by the Plan Change will be served by access, parking and servicing arrangements designed to an appropriate standard consistent with the requirements of the AUP-OIP and Glenbrook 3 Precinct Plan, or as otherwise approved by way of a Resource Consent.*

*Overall, it is considered that the traffic engineering effects of the potential activities enabled by the Proposed Plan Change can be accommodated on the road network without compromising its function, capacity or safety. Therefore, the proposal is considered to have a less than minor impact.<sup>149</sup>*

472. Section 8.10 of the AEE summaries the findings of the ITA. The AEE summary is further summarised below.

473. **Wider road network:** The AEE and states:

*Upgrades to the wider road network (i.e. beyond Glenbrook Beach) will be needed to address long-term safety and performance issues. However, as stated in the ITA, the*

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<sup>148</sup> PC 91 - Traffic Information Request – 25 January 2023

<sup>149</sup> ITA pages 48-49



*estimated 1,000 daily trips from dwellings within the PPC area can be accommodated by McLarin Road and Glenbrook Road with less than minor effects.*

474. **Local roading network:** The AEE anticipates 1,000 traffic movements per day from the rezoned land, with a commuter peak hour traffic generation of about 100 traffic movements per hour. All traffic will access the existing local road network via new intersections, including a new roundabout on McLarin road near the future local centre. The road cross sections included in the Glenbrook 3 Precinct are included in the Glenbrook 4 Precinct, with the intention these will facilitate a legible, permeable and consistent street layout and design that is safe for all road users. The AEE considers compliance with the AUP Auckland-wide Chapter E27 provisions is appropriate to manage the design of onsite parking and manoeuvring space, and the width of garage doors. The AEE also considers the MHS Zone provisions coupled with the proposed precinct provisions will ensure passive surveillance of the street. The AEE concludes adverse effects will be appropriately mitigated managed or avoided at the time of development.
475. **Public transport opportunities:** The AEE acknowledges that Glenbrook Beach is not currently serviced by public transport, noting the nearest bus stop is over 8km away on Glenbrook Road. Therefore in the short-term the primary means of transport will be by car. However as the population of the area grows, the AEE expects public transport services to be provided, including a bus service along Glenbrook Beach Road to connect to Waiuku. The AEE concludes "...the area in the general vicinity of the site is expected to have improved accessibility to public transport services in the future."<sup>150</sup> The applicant's clause 23 response states:

*There are at present no confirmed plans for a bus service serving the subject site via Glenbrook Beach Road and McLarin Road, nor any confirmed triggers to determine when a public bus service would be introduced.*

*In referring to the expectation for a future bus service to connect to the subject site via Glenbrook Beach Road, the ITA is consistent with the approach and design philosophy for the recently completed Kahawai Point Special Housing Area (SHA). The SHA, located adjacent to the subject site, includes Collector Roads that were designed and vested to provide for school and future public bus services.*

*Such services would be expected to follow McLarin Road in the vicinity of the subject site. Locations for future bus stops and related infrastructure requirements would be determined during resource consent stages for the subject site and for land on the opposite side of McLarin Road.<sup>151</sup>*

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<sup>150</sup> AEE, page 28

<sup>151</sup> Clause 23 response, Transportation memo, page 6

476. **Walking and cycling:** The AEE comments that the proposed blue green corridors provide opportunities to establish connections within the site and the surrounding coastal environment. The adaptation of the Glenbrook 3 Precinct road design enables the creation of a low-speed environment within the proposed precinct. This means cyclist will be able to use these roads without the need for a designated cycle lane. Pedestrians and cyclists will generally use the footpath and roads for recreation purposes. Based on the ITA the AEE concludes that the plan change:

*... would not give rise to any significant adverse transportation effects. Rather, it would improve walking and cycling connections for the local community, in particular with Glenbrook Beach Recreation Reserve, the esplanade reserve, beach and boat ramp and the future local centre, and the population growth enabled by the PFC will support local amenities in the future that will also support walking and cycling trips.<sup>152</sup>*

477. With regard to funding implications for transport infrastructure the applicant's clause 23 response refers to the ITA stating:

*They have determined the proposed activity to have a less than minor impact on the bordered road, with no wider network upgrades required as a result of any potential yields. Localised frontages and internal roads are subject to works proposed in future subdivision applications independent of the plan change.<sup>153</sup>*

#### Peer review

478. Wes Edwards from Arrive has undertaken a review of the plan change application on behalf of council. Mr Edwards has prepared a technical report which is attached in Appendix 5.

479. Mr Edwards considers the key transport issues in relation to this plan change are:

- the increase in private motor vehicle travel on high-speed rural roads
- the effects of this additional travel on road safety, including the performance of key intersection – Mission Bush Road/Glenbrook-Waiuku Road
- inconsistency with higher order plans and strategies.

480. Mr Edwards is concerned about the relatively isolated location of the plan change area noting it has poor access to employment and services and is not serviced by public transport (either currently or planned). Mr Edwards is concerned that this will increase private vehicle trips and vehicle kilometres travelled (VKT), which will increase vehicle emissions. Mr Edwards considers this will also increase road safety risks (road crash risk) because travel will be on high-speed rural roads. Mr Edwards is also concerned about the timing of urbanisation of the plan change area, noting it may be earlier than the delivery of bulk transport infrastructure in the wider South Auckland region.

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<sup>152</sup> AEE, page 28

<sup>153</sup> Clause 23 response, Infrastructure Memo, page 1

481. For these reasons Mr Edwards considers the plan change is only partly inconsistent with higher order transport, planning and emissions reductions plans and strategies. This is summarised in Table 11 of Mr Edwards' advice. Therefore Mr Edwards recommends the plan change is declined.
482. Mr Edwards considers the inconsistencies are partly tempered by the fact the land is zoned Future Urban, and that provisions enabling less intensive development (such as those in the Glenbrook 3 Precinct and the Single House Zone) would provide greater consistency. However he notes urbanisation of the plan change area may be premature depending on the final FDS adopted by the council.
483. However if the plan change is approved, Mr Edwards considers the Single House Zone is more appropriate than the MHS Zone because less intensive residential development will mitigate some of the adverse effects. Mr Edwards also recommends amendments to the Glenbrook 4 Precinct provisions to help mitigate some of the adverse effects if the plan change is not declined. These amendments are set out in his advice (Appendix 5). In summary they include:
- adding a maximum density control (similar to that in the Glenbrook 3 Precinct)
  - requiring a pedestrian crossing facility on McLarin Road to be provided
  - adding a transport trigger allowing no more than 25 dwellings within the precinct until the necessary upgrades/roundabout at the intersection of Mission Bush/Glenbrook-Waiuku Roads are completed (or written confirmation is provided by Auckland Transport), otherwise development/subdivision is a non-complying activity
  - adding restricted discretionary assessment criteria to enable consideration of road safety
  - amendments to the road design requirements (delete cross sections and replace with table)
  - amendments to the objectives and policies to align with the other amendments.
484. Mr Edwards' also raises some concerns with the applicant's ITA and assumptions made in the assessment and recommends the applicant provide further information/analysis.

#### Adequacy of ITA

485. Mr Edwards states the applicant's ITA and further information provided in the clause 23 response have used common methodologies, however he considers the assessment is not adequate for the following reasons:
- the number of dwellings assumed (i.e. up to 100), and that this does not take into consideration that the MHS Zone enables three dwellings per site as a permitted activity
  - the modelling of some intersections is not robust

- does not include an assessment of effects on the wider strategic (arterial) transport network. This is a matter also noted in the Auckland Transport submission. See section 11.7.

486. Mr Edwards has undertaken an alternative assessment however recommends the applicant provides an updated assessment at the hearing.

487. A list of information Mr Edwards considers should be updated and provided by the applicant is provided in Table 6 below.

**Table 6: List of additional and updated information requested**

Issue	Recommendation
Insufficient basis for assuming 100 lots	Provide sound basis for number of lots/ dwellings
No assessment of more than 100 dwellings	Applicant may wish to repeat Mr Edwards assessment for 200 dwellings or use a different number
No assessment of effects on strategic (arterial) network – i.e. Glenbrook Road, SH22 etc.	Consider current capacity, cumulative effects, and expected upgrade timeframes
Apparent modelling errors:	
<ul style="list-style-type: none"> <li>• heavy vehicles apparently not included</li> <li>• discrepancies between diagrams and model results</li> <li>• results obtained using default parameters quite different to ITA results</li> </ul>	<p>Provide traffic counts and/or information on how heavy vehicles are represented and/or updated modelling results</p> <p>Provide confirmation of correct numbers and provision of updated diagrams and/ or updated model results</p> <p>Provide information describing how the intersections are represented in the models and how they have been calibrated and/ or provide updated modelling results</p>
Mission Bush intersection operating poorly	Updated modelling invited

#### Key areas of significant concern

488. **Intersection analysis - Mission Bush Roundabout:** In the absence of updated evidence from the applicant, Mr Edwards considers that a roundabout is required at the intersection of Mission Bush Road and Glenbrook-Waiuku Road as a prerequisite of PC91. Mr Edwards bases his assessment on an estimated yield of 200 dwellings. Mr Edwards considers the local road network could accommodate this level of development provided this intersection is upgraded.

489. As noted above if the plan change is approved, Mr Edwards recommends that the Glenbrook 4 Precinct provisions be amended to include a transport trigger in relation to works needed for the Mission Bush Road/Glenbrook-Waiuku Road intersection. Mr Edwards states:

*With respect to the timing of the Mission Bush roundabout, the roundabout would be required before development of this and surrounding precincts is completed. In my view it would also be required at some point in the future because of other development, even in the absence of PC91 development. For that reason the provision of the roundabout could be required before, or together with, any development in the PC91 precinct; however, that could result in the roundabout being implemented before it is needed. While that may be seen as desirable, in the context of funding constraints the necessary diversion of funds from other projects could be undesirable. For economic reasons, it may also be more feasible for the roundabout to be funded once initial development has been completed and sold. On balance, I consider a provision requiring the roundabout to be in place before any more than 25 lots are provided is warranted.*

490. Mr Edwards' intersection modelling and a concept design of this roundabout are included in Appendices A and B of his advice. Mr Edwards states, to his knowledge, Auckland Transport have not identified this intersection as likely to have poor performance in the future and there are no plans to upgrade this intersection.
491. **Additional travel:** As noted above Mr Edwards is concerned about the location of the plan change area, it's poor access to employment and services, the lack of public transport (either currently or planned), and therefore the increase in private vehicle trips and vehicle kilometres travelled (VKT). Compared to development in other locations closer to employment and services, Mr Edwards considers the plan change will increase vehicle emissions, and increase road safety risks (road crash risk) because travel will be on high-speed rural roads.
492. Mr Edwards also comments that additional travel to/from the plan change area will add pressure on transport infrastructure in the wider South Auckland area, stating "...while the transport infrastructure agencies are currently planning to implement additional transport infrastructure (including the Pukekohe Arterials and widening of the Southern Motorway between Papakura and Bombay) that infrastructure is not expected to be provided until after 2030 or later."
493. However Mr Edwards recognises that these concerns need to be viewed in the context of the plan change area already being identified as FUZ. As such Mr Edwards considers the plan change area is more suited to lower-intensity residential development, such as that enabled in the Glenbrook 3 Precinct and by the Single House Zone, than the MHS Zone proposed by the plan change.
494. In conclusion Mr Edwards states:

*My overall conclusion is that the plan change could be supported with some modifications including a reduction in development intensity, but that it is premature with respect to the expected provision of bulk transport infrastructure in the wider South Auckland sub-region. For that reason my overall recommendation is that the plan change be declined.*

*Should the plan change be approved, I set out in Appendix D a set of precinct provisions with possible amendments that could assist in partly managing some of the adverse effects on the transport environment.*

#### Walking and cycling connections

495. Mr Edwards considers the applicants' assessment of walking and cycling (active modes) is overly optimistic. For example he highlights the ITA suggests large parts of the wider rural area are within a desirable walking or cycling distance, without recognising these roads do not currently have walking or cycling facilities or assess the safety impact of active mode users on those roads. He also notes that the ITA adopts maximum walking and cycling distances of 1km and 5km respectively and then refers to these as desirable. However Mr Edwards notes this does not have a material impact on his assessment.
496. As noted above, Mr Edwards recommends the precinct be amended to require a pedestrian/cycling crossing facility on McLarin Road. This would connect the proposed pedestrian/cycling link through the plan change area to the Neighbourhood Centre zoned land. Mr Edwards also considers developers should upgrade the road frontage of McLarin Road where it adjoins the plan change area, noting this *would complete the path network on both sides of McLarin Road north of the site, and provide a footpath on the western side of McLarin Road east of the site.*
497. Mr Lilley also provides advice in relation to walking and cycling connections. Mr Lilley notes there is no Auckland Council Local Board greenway/local paths plan for Glenbrook Beach.
498. Mr Lilley supports the walking/cycle link shown on the proposed precinct plan, and considers it will contribute "... to connectivity within the wider open public open space network, particularly between the Neighbourhood Centre on McLarin Road and through the proposed plan change area to the beachfront reserve at Glenbrook Beach." However Mr Lilley notes it is unclear whether this link will be provided alongside, within or separated from the proposed road network. Therefore Mr Lilley recommends that the precinct plan should be amended to include an indicative road network to clarify the potential connectivity options that may be achieved and how the pedestrian / cycle link is integrated in to the road network.
499. Mr Lilley also considers it desirable that the precinct provide for a walkway network that runs parallel and outside of the restored 10 metre riparian margins of the intermittent stream network and recommends that the precinct plan be amended to include this.
500. Mr Lilley highlights that the indicative pedestrian/cycling link shown on the precinct plan broadly follows a similar alignment to part of the intermittent stream and could potentially be integrated into running parallel with it for part of its natural course.
501. Mr Lilley concludes:

*It is my assessment that the plan change provides assurance in part that the outcomes anticipated by the RPS, the National Policy Statement on Urban Development or Auckland Council's policies and plans to provide for a connected and integrated open space network as indicated in the*

*background documents supporting the plan change will be achieved in the implementation stage of the resource consent process. Further clarity could be achieved at the plan change stage by confirming an indicative roading layout that preferably incorporates a park edge road, integration of the east-west pedestrian/cycle route in to the roading layout, and confirms any public connectivity opportunities in conjunction with the restored riparian margins.*

502. In addition to Mr Lilley's recommendations about the Glenbrook Beach Recreation Reserve interface, including the park edge road (discussed in section 8.3), Mr Lilley recommends the following amendments to the Glenbrook 4 Precinct:

- Amend proposed Objective (2) to include reference to enhancing the amenity of pedestrians and cyclists.
- Amend proposed Policy 4 (precinct plan) to require pedestrian linkages be provided alongside/adjoining the restored riparian margins which are also offered to council for vesting.
- Various amendments to the proposed riparian margin standard, including specific requirements for walkways that are to be vested in council.
- Amend assessment criteria for subdivision in accordance with the precinct plan and development that does not comply with the riparian margin standard.
- Add special information requirements in relation to riparian planting, pathways plan, and intermittent streams and wetlands.
- Amend precinct plan to show an indicative road layout and indicative walkway network alongside the restored riparian margins.

### *Analysis*

503. I rely on the advice of Mr Edwards in regard to the adequacy of the applicant's ITA and consider it would be useful if the applicant provide the further information and analysis as set out by Mr Edwards. However I note that Mr Edwards has carried out his own analysis in the absence of information from the applicant. Therefore if the applicant does not provide the additional information identified by Mr Edwards, this will not affect my recommendations.

504. Similar to Mr Edwards comments, Auckland Transport's submission also notes that the plan change assessment of effects is limited to the immediate area and has not considered effects on the wider network nor the cumulative effects of development on the wider network apart for identifying some minor safety improvements at the main intersections serving the development. The Auckland Transport submission also notes there is not any assessment of future improvements that may be required to the network serving Glenbrook Beach. However, Auckland Transport also note that the plan change area is relatively small scale and is identified for development through its Future Uran zoning.

505. The Auckland Transport submission is discussed in more detail in section 11.7. In summary Auckland Transport states they do not oppose the plan change if the matters raised in their submission are adequately addressed. Auckland Transport request a range of new and updated provisions in relation to the proposed precinct plan (to provide a connected network

of roads), pedestrian and active modes, road cross sections, upgrade to McLarin Road frontage, intersections, stormwater management, vesting of public assets and consistency across private plan changes locally.

506. I acknowledge Mr Edwards' concerns about the relatively isolated nature of the plan change area, the lack of public transport and reliance on private vehicle use, thereby increasing vehicle emissions and VKT. See section 7 for discussion of various plans and strategies relating to reducing vehicle emissions.
507. With regards to the plan change area I note the strategic decision has already been made that the area is suitable for urbanisation. Whilst the AUP clearly intends for most of Auckland's growth to be accommodated within existing urban areas or expanded urban areas that are within the RUB, the AUP also provides for limited growth in rural and coastal settlements and FUZ outside the RUB. Therefore I do not agree with Mr Edwards that the plan change should be declined in effect due to the location of the plan change area.
508. Therefore in my mind the key question is not should the land be urbanised, but rather what is the appropriate level of urbanisation (i.e. what zone, what level of intensification), when should urbanisation happen/be enabled (i.e. what infrastructure is needed to service future development and will the timing of development be aligned with infrastructure delivery), and what is required to ensure adverse effects on the environment (including people and communities) are avoided, remedied or mitigated?
509. I acknowledge the Single House Zone will theoretically generate less VKT than the MHS Zone, because it will enable less dwellings, and therefore less households. However I prefer the application of the MHS Zone over the Single House Zone. I consider the MHS Zone is more efficient and appropriate because it will enable a greater variety of housing types and choice than the Single House Zone. Also see sections 8.3 and 11.2.
510. However in recommending the MHS Zone I consider it is important to avoid or mitigate potential or actual adverse effects on the safety, efficiency and effectiveness of the transport network. This is also a matter raised by many submitters. I rely on the advice of Mr Edwards in relation to what transport infrastructure upgrades are required and when, and recommend amendments to the precinct provisions to ensure these upgrades are provided as needed. These recommended amendments are set out in Appendix 7 and include:
- Urbanisation of rural roads adjacent to plan change area (i.e. McLarin Road): New policy, standard and restricted discretionary matters of discretion/assessment criteria recommended for infringement of standard.
  - Indicative pedestrian crossing facility on McLarin Road: Recommended to be added to the precinct plan and relevant policy amended. This aligns with the location of proposed indicative walking/cycling link.
  - Design and function of roads: Recommended to delete road cross sections and replace with table of road function and design requirements. New policy, standard



and restricted discretionary matters of discretion/assessment criteria recommended for infringement of standard.

- Upgrade of Mission Bush Road/Glenbrook-Waiuku Road intersection to a roundabout. New policy, standard (transport trigger) and information requirements added.

511. I note the AEE acknowledges McLarin Road will require upgrades (kerb, channels, footpaths and roundabout) and the new recommended standard will ensure these are undertaken. Replacing the proposed road cross sections with the road design and road function table will ensure the upgrade of McLarin Road or any new roads are designed in a way that is consistent with current Auckland Transport requirements.
512. Based on the advice of Mr Edwards, and current information available, I recommend a threshold/trigger standard be added to the precinct stating that no more than 25 dwellings be allowed within the precinct until the Mission Bush Road/Glenbrook-Waiuku Road intersection is upgraded. In my opinion this would manage the integration of development with transport as required by RPS B3.2.1 Objective (5) and B3.3.2 Objective (5), while allowing some progress to be made on development within the plan change area, but avoiding adverse safety and transport effects resulting from the occupation of development before the infrastructure is in place.
513. I am aware that a number of precincts recently included in the AUP include some form of trigger related to the delivery of transport infrastructure. Many of these precincts enable significantly more intensification, and therefore require a lot more in terms of transport infrastructure upgrades. Due to the level of development enabled by the plan change, and that a roundabout at the Mission Bush Road/Glenbrook-Waiuku Road intersection is the only upgrade outside the Glenbrook Beach settlement identified by Mr Edwards as necessary, the new precinct standard I have recommended is relatively simple in comparison to these.
514. The recommended trigger will not necessarily prevent development of more than 25 dwellings within the precinct. I have recommended non-compliance with this standard be a discretionary activity. In my opinion this will give the council the ability to exercise discretion to refuse consent where the specified works have not been undertaken (or Auckland Transport have not provided confirmation that the works are suitably advanced), and where the Applicant cannot satisfactorily demonstrate that the adverse effects of concern would be avoided or mitigated. A new policy is recommended to support this. This has been drafted to refer to 'upgrade' rather than specifically referring to roundabout in order to provide some flexibility to an applicant, in case an alternative upgrade can appropriately avoid, remedy or mitigate the adverse effects. A new special information requirement is also recommended to require an ITA be provided with such an application.
515. With regards to walking and cycling I support the proposed indicative pedestrian/cycle link shown on the proposed precinct plan. This will encourage active modes through the plan change area and Glenbrook Beach settlement.

516. I agree with Mr Lilley that it would be positive if future subdivision and development provides walking/cycling opportunities alongside the intermittent stream and wetlands.<sup>154</sup> This would provide public access to and could improve restoration outcomes, provide greater amenity to residents and enhance walking/cycling outcomes. However I do not consider it necessary for the precinct to require this, given there is only one identified intermittent stream within the plan change area.

## **8.9. Ecological effects, including riparian margins**

### *Application*

517. The plan change includes a number of ecology reports prepared by Pattle Delamore Partners Limited. These are grouped together in Appendix 6 of the AEE and include:

- Additional Wetlands Investigations (5 April 2022)
- Wetland Hydrology Assessment 80 McLarin Road, Glenbrook (December 2021)
- Detailed Ecological Assessments 80 McLarin Road, Glenbrook (December 2021)
- Ecological Feasibility Assessment 80 McLarin Road, Glenbrook (November 2020).

518. The ecology reports address terrestrial and freshwater ecology, but do not consider wider effects on marine ecology outside the plan change area.

519. The Ecological Feasibility Assessment concludes that the terrestrial ecological values are 'low' in the plan change area, although notes there is a small section (less than 1ha) of remaining forest to the west of the site. This remaining forest has an IUCN threat status of Endangered.

520. Freshwater waterbodies are identified within the plan change area, including intermittent and ephemeral streams and natural and induced wetlands. Overall the ecology reports consider the values of the waterbodies within the plan change area to be significantly degraded. Wetlands within 100m of the plan change area were also considered within the assessments, as required by Freshwater regulations.

521. Section 8.11.1 of the AEE addresses terrestrial and freshwater ecological effects. Overall the AEE concludes that the plan change will "... recognise and protect the ecological values that are present on the site and provide assurance that the identified opportunities for enhancement will be considered during subdivision and land use resource consent processes."<sup>155</sup>

522. The AEE states that the plan change seeks to improve the ecological environment stating that development will use "LIUDD" principles and will ensure the restoration of intermittent streams and natural wetlands. This will be achieved through riparian setbacks and planting which will provide shading of water bodies to assist with water retention during drier periods,

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<sup>154</sup> Such walkways should be located outside of the planted 10m riparian and wetland margins.

<sup>155</sup> AEE, page 29

improve in-stream habitat and water quality of surface water runoff. The AEE notes that the precinct provisions will enable consideration of offset planting where the proposed 10m riparian margin cannot be achieved.

523. The proposed precinct objectives and policies seek to maintain and enhance freshwater values of these waterbodies, in particular through the management of stormwater runoff and riparian margins. The objectives and policies also seek to improve biodiversity values and habitat.<sup>156</sup>
524. The proposed precinct rules and standards require a 10m riparian margin around intermittent streams and natural wetlands. The precinct also requires that these riparian margins are planted with native plants to a specified density and are protected by way of consent notice, covenant or vesting in council.
525. As part of council's clause 23 review, the council's consultant ecology expert Jason Smith (Morphum Environmental Limited, Senior Environmental Scientist) suggested additional amendments to the precinct provisions. These included:
1. amending the precinct plan to map waterbodies (intermittent streams and wetlands)
  2. amending the proposed precinct standard which required 5m of the 10m riparian margins to be planted so that the full 10m is required to be planted and that cycleways and pedestrian paths are to be excluded from the riparian planting area
  3. amending the precinct provisions to include additional provisions that relate to the enhancement of ecological functions, not linked to the implications of subdivision and development (e.g. similar to precincts recently added by Plan Changes 48 – 50 (in Drury)).
526. In response to the first matter (amending precinct plan), Pattle Delemore Partners agreed that the mapping and provision of freshwater waterbodies (streams and wetlands) in precinct plans provides guidance for future developments and is consistent with the objectives and policies of the AUP RPS and NPS-FM (2020), and is also consistent with the adjacent Glenbrook 3 precinct plan. Pattle Delemore Partners also noted that the areas currently mapped as wetlands may not be defined as wetlands in the future due to proposed changes to wetland regulations.<sup>157</sup>
527. The applicant's planner Mr Bryce Powell did not agree with Pattle Delemore Partners in regard to mapping waterbodies on the precinct plan. Mr Powell considers mapping waterbodies on the precinct plan is not necessary, noting that the streams are not permanent, are poorly defined channels and have not been surveyed in detail. Mr Powell

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<sup>156</sup> Proposed precinct Objectives (6), (9), (10) and Policies (7) and (9),

<sup>157</sup> Clause 23 response – Letter prepared by PDP Ltd

also considers that generally only significant watercourses are shown on existing AUP precinct plans.<sup>158</sup>

528. Mr Powell considers that the existing region-wide provisions are adequate to manage and enhance freshwater resources on the site that may be subject to change without adding further detail on the precinct plan. Mr Powell also considers that the subdivision consenting process is the appropriate time to accurately identify and protect freshwater resources, when they will be properly surveyed.<sup>159</sup>
529. In response to the second matter Pattle Delemore Partners agree a 10m wide riparian buffer should apply in the precinct to enhance the degraded freshwater systems and mitigate adverse effects on freshwater from changes of land use. They suggest amendments to the standard to require a minimum 10m riparian margin from streams and wetlands, planting to be in accordance of Appendix 16 of the AUP and that cycleways and pedestrian paths are to be excluded from riparian planting areas.
530. Mr Powell notes that the proposed precinct riparian planting requirements have been amended to include a minimum riparian planting requirement of 10m either side of a stream, in accordance with the guidance provided in TP 148. This he considers will enhance the existing and potential values of the intermittent streams and wetlands, and is beyond what is required in the MHS Zone.
531. Mr Powell states:

*The amended precinct provisions will allow Council to consider proposals that do not provide a 10m wide planted margin as a restricted discretionary activity. This will provide a mechanism for Council to consider situations where it makes little practical sense to provide the full 10m wide riparian planted margin and it also provides Council with an opportunity to consider proposals that offset the planting requirement to achieve a net ecological benefit.*

*This flexibility is important to achieve the efficient development of the precinct and provides an opportunity for the land developer to maximise ecological benefits across the precinct. For example, the northern reaches of the intermittent watercourses have less potential ecological value than in the southern portion of the site where there is greater capacity to enhance ecological values. ...*

*Offsetting also allows flexibility for a land developer in the vicinity of the western and northern boundaries, where a 10m wide riparian margin could leave limited space to develop viable housing projects alongside the Glenbrook Beach Recreation Reserve edge and McLarin Road edge*

*This approach is entirely consistent with the approach taken to managing natural resources in the proposed National Policy Statement - Biodiversity and is proposed in the changes in*

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<sup>158</sup> Clause 23 response – Covering Letter

<sup>159</sup> Clause 23 response – Covering Letter

*the exposure draft to the NES-F and NPS-FM. It also aligns with Part E3 of the AUP(OP) that relate to the management of watercourses across the Auckland Region..<sup>160</sup>*

532. In response to the third matter (amending precinct objectives and policies) Pattle Delemore Partner's reviewed the objectives and policies in the Drury Centre Precinct (PC48) and Drury East Precinct (PC49) relating to improvements in water quality, habitat and biodiversity. They generally agreed that the proposed precinct objectives and policies could be amended in a similar manner and suggested amendments to proposed Objective (9) and Policy (5) and new Objective (10). Mr Powell noted that these suggested amendments were incorporated into the precinct objectives and policies (i.e. notified version).

#### *Peer review*

533. Jason Smith has reviewed the relevant plan change documents including the applicant's clause 23 response, and submissions. Mr Smith's advice is included in Appendix 5 of this report.

534. Overall Mr Smith supports the plan change with the modification he recommends below.

535. Mr Smith considers that the series of ecology reports (including clause 23 response) have used appropriate methodologies, standards and guidelines to assess the site's ecological values, and that the effort expended in the site investigations is appropriate for the nature of the plan change and potential ecological effects.

536. Mr Smith agrees with the ecology reports that the on-site ecology values are low and degraded.

537. Mr Smith is satisfied that the proposed 10m riparian margin around intermittent streams and natural wetlands, in conjunction with the required planting and the on-going protection of these planted riparian areas, will address improvements in degraded waterbodies. Mr Smith also considers this is an adequate mechanism to address ecological impact that could result from the reduction of the 20m riparian margin required in the FUZ.

538. Mr Smith notes there have been changes to the National Policy Statement for Freshwater Management (**NPS-FM**) and the National Environmental Standard: Freshwater (**NES-FW**) since the plan change documents were prepared. These changes affect how wetlands will be considered in the future (i.e. protocols to delineate wetlands). Based on his review of Table 1 of the Wetland Assessment, the site visit, the current guidance from the Ministry for the Environment<sup>161</sup> Mr Smith considers there would be no reason to suspect that there would be any further changes to the classification of wetlands within the plan change area.

539. With regards to the NES-FM Mr Smith considers that the Regulation 45C pathway contains sufficient provision should there be any future need to apply for such consents, and no

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<sup>160</sup> Clause 23 response – Covering Letter

<sup>161</sup> Ministry for the Environment. 2022. Wetland delineation protocols. Wellington: Ministry for the Environment.

further effects management is required to assess this potential outcome from the plan change.

540. The only outstanding matter for Mr Smith is whether freshwater bodies are included on the precinct plan. Mr Smith is still of the opinion that the waterbodies (intermittent streams and wetlands) should be shown on the precinct plan for a number of reasons. A summary of Mr Smith's comments on this matter follows:

- Mapping of freshwater waterbodies on precinct plans is now considered standard practice, noting such mapping provides guidance for future developments – both in terms of showing opportunities and constraints for development to respond to. Including the waterbodies on the precinct plan would help realise the precinct outcomes.<sup>162</sup>
- The plan change documents do not show all the wetlands accurately mapped on one map so including them on one map would be useful.
- The applicant's ecologist also supports mapping the freshwater bodies on the precinct plan.<sup>163</sup>
- Notes the NPS-FM Clause 3.24 Rivers, contains provisions for Regional Councils that relate to the mapping and monitoring of freshwater watercourses. Accurately mapping freshwater bodies on the precinct plan now is an opportunity to meet these requirements. However Mr Smith considers mapping the waterbodies as 'indicative' is acceptable on the precinct plan.

541. Therefore Mr Smith recommends the Glenbrook 4 Precinct Plan be amended to show indicative intermittent streams and wetlands.

542. Submissions relating to ecological matters are addressed in section 11.10 of this report and is not repeated here. Mr Smith considers that submissions do not raise any new matters not already addressed above.

543. See section 8.7 in relation to effects on the SEA-M located in the coastal area around Glenbrook Beach settlement.

### *Analysis*

544. I rely on the expert advice of Mr Smith with regards to terrestrial and freshwater ecological values and the appropriate methods to mitigate adverse effects from subdivision and development enabled by the proposed plan change.

545. In principle I support including the indicative locations of the intermittent streams and wetlands on the precinct plan. As already discussed, My Lilley also recommends including these on the precinct plan.

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<sup>162</sup> Including proposed Objectives (6), (9) and (10) and proposed Policies (7) and (9)

<sup>163</sup> See Clause 23 response – Letter prepared by PDP Ltd (Attachment G), page 1

546. I note other precincts recently included in the AUP contain provisions related to protecting and enhancing streams and wetlands, and these precincts often show existing waterbodies on their precinct plans e.g. Waihoehoe Precinct,<sup>164</sup> Drury East Precinct,<sup>165</sup> and Warkworth McKinney Road Precinct Plan.<sup>166</sup>
547. My understanding of the plan change is that both wetlands and the intermittent stream are intended to be managed in the same way, both requiring a 10m setback where buildings are not able to be located, and that this 10m area is required to be planted with indigenous eco-sourced plants. I support this approach and consider it will contribute to achieving proposed Objective 10. I also consider it will contribute to new Policy 13 I have recommended.
548. However I do have some concerns with how the proposed riparian margin and setback standard is drafted which I consider could have unintended consequences.
549. The AUP definitions of “riparian margin” and “riparian yard” do not include wetlands:
- **Riparian margin:** *An area of land immediately adjacent to a permanent or intermittent river or stream.*
  - **Riparian yard:** *The area along the top of a permanent or intermittent river or stream measured horizontally and at right angles from the top of the bank.*<sup>167</sup>
550. So while the proposed purpose and clauses a) and b) of the standard refer to intermittent streams and wetlands, the first sentence of the standard and clause c) only refer to riparian margins. To provide clarity and avoid any implementation issues I consider this standard could be redrafted.
551. I also note the proposed precinct provisions inconsistently refer to both “wetlands” or “natural wetlands”. Section 6(a) of the RMA and the AUP (including the RPS) use the term “wetlands” while the NPS-FM and NES-F introduce the definition of “natural inland wetlands”. After Mr Smith provided his peer review I discussed this matter with Mr Smith who prefers the precinct use the term “wetland”. I support this and consider it would be consistent with the outcomes sought in the AUP for wetlands.
552. Notwithstanding my comments above I have not included amendments in my recommended precinct provisions to address these drafting concerns or to include the indicative locations of the intermittent stream and wetlands on the precinct plan, as such amendments might be outside the scope of submissions. However if the Hearing Commissioners consider it appropriate I would support such amendments.
553. In section 11.10 I also discuss a submitter’s suggestion that walkways/cycleways should not be located within the proposed riparian margins. I generally support this suggestion but have

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<sup>164</sup> AUP I452.10.1 Waihoehoe: Precinct plan 1 – Indicative Road and Open Space Network

<sup>165</sup> AUP I451.10.1 Drury East: Precinct Plan 1 – Indicative Road and Open Space Network

<sup>166</sup> AUP I555.10. Warkworth McKinney Road Precinct Plan

<sup>167</sup> AUP Chapter J Definitions

not yet included it within my set of recommended precinct provisions due to the drafting issues above. However I consider such an amendment could be included, perhaps similar to that in the Glenbrook 3 Precinct.<sup>168</sup>

554. I do however recommend several minor amendments to the provisions which are shown in Appendix 7. These include:

- Objective 9: Deleting the reference to “permanent” streams and replacing this with “wetlands”. I consider this corrects an error in fact as there are no permanent streams in the plan change area, whereas there are wetlands. This would then provide an appropriate link to the proposed standard which requires a 10m setback and planting around wetlands.
- Amending the purpose of the proposed riparian margin and setback standard to include “biodiversity, ecosystem health and freshwater quality”. In my opinion this better describes the purpose and outcomes sought by the standard and provides a better link back up to Policy 9 and Objective 10.

555. Also see section 11.10 and 11.12 for relevant submissions.

## **8.10. Cultural and heritage effects**

### **Heritage effects**

#### *Application*

556. The plan change includes an assessment on archaeology prepared by Danielle Trilford of CFG Heritage. Section 8.12.2 of the AEE summarises the conclusions and recommendations in the archaeology assessment as follows:

- *No archaeological and heritage constraints on the proposed plan change have been identified. As a precautionary measure, any earthworks and ground disturbance undertaken should be under a HNZPT archaeological authority, and further research into the locations of John Kent and Te Wherowhero's children's graves should be undertaken as part of the HNZPT application.*
- *Any other values associated with special interest groups, including tāngata whenua, can only be determined by them. ...*
- *Since archaeological survey cannot always detect sites of traditional significance to Māori, or wahi tapu, the appropriate tangata whenua authorities should be consulted regarding the possible existence of such sites, and the recommendations in this report.*<sup>169</sup>

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<sup>168</sup> I453.6.1.2(1)(c) pedestrian/cycle paths shall be located adjacent to, and not within the 10m planted strip.

<sup>169</sup> AEE, pages 30-31



557. Section 7.1 of the Structure Plan (page 29) also refers to the CIA. The Structure Plan highlights mana whenua values related to stormwater management.

558. The AEE concludes "... that there would be no significant adverse effects in terms of ... heritage matters resulting from the rezoning that could not be addressed by the planning provisions and consenting process."

*Peer review*

559. The potential effects on archaeology have been assessed by Rebecca Ramsey – Senior Specialist Heritage for the Council. Ms Ramsey's assessment includes a review of the plan change archaeology assessment. Her assessment does not address effects on mana whenua cultural values. Ms Ramsey notes that "... cultural and other values that mana whenua place on the area may differ from its historic heritage and are to be determined by mana whenua." Ms Ramsey's assessment is attached in Appendix 6.

560. Ms Ramsey states:

*3.2 The archaeological assessment provides a historical and archaeological background summary of the plan change area and wider heritage context through desktop research and field survey.*

*3.3 No historic heritage places (built and archaeological places) were recorded prior to, or through the 2021 assessment and field survey. The archaeological assessment concludes that no archaeological or heritage constraints are identified within the plan change area.*

*3.4 However, there remains a risk for potentially unrecorded archaeological deposits within the plan change area due to the proximity to the coast, key toānga waka (portages) and wider Māori and European settlement and occupation within the Glenbrook area and former Kahawai Block. Historical research also indicates the graves of John Kent and Te Wherowhero's children are located within the Kahawai Block. Further research is required to narrow down the location of the graves, which should be undertaken as part of an assessment to support an archaeological authority application to HNZPT.*

561. Overall Ms Ramsey agrees with the archaeological assessment on historic heritage and supports the plan change, stating:

*5.1 The archaeological assessment provides a full description of the heritage sites and values<sup>170</sup> within the plan change area.*

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<sup>170</sup> AUP - B5. Ngā rawa tuku iho me te āhua – Historic heritage and special character

*5.2 Any heritage effects associated to the plan change can be appropriately managed through the existing provisions in the AUP and under the Heritage New Zealand Pouhere Taonga Act (2014).*

#### *Analysis*

562. I rely on the expertise of Ms Ramsey with regards to potential effects on historic heritage. Based on this advice I consider any effects on historic heritage resulting from PC91 can be appropriately managed by the existing AUP provisions and requirements under the Heritage New Zealand Pouhere Taonga Act (2014).

563. No submissions raised specific matters in relation to effects on historic heritage. Ngati Te Ata submitted on the plan change, which is discussed below under cultural effects and in section 11.12.

#### **Cultural effects**

##### *Application*

564. Section 8.12.1 of the AEE considers cultural effects. A cultural impact assessment/cultural values assessment (**CIA**) by Ngati Te Ata Waiohua was provided with the plan change application. The Ngati Te Ata CIA is contained in Appendix 1.

565. The CIA sets out the traditional, cultural and historical associations of Ngati Te Ata to Glenbrook (Kahawai) and the surrounding area. Ngati Te Ata state that the CIA is an overview and a first step only, and has been limited by the information provided about the proposed plan change.<sup>171</sup> Further consultation and dialogue between Ngati Te Ata, the applicant and council is considered essential. The CIA states:

*14.2 The ultimate goal for Ngati Te Ata is the protection, preservation and appropriate management of our natural and cultural resources in a manner that recognises and provides for our interests and values, and enables positive environmental, social and economic outcomes. We support engagement and involvement that respects and provides for our cultural and traditional relationships to Glenbrook, its unique cultural identity, and input into shaping the physical, cultural, social and economic regeneration of these areas....*

*14.4 Based on our understanding of our history, our cultural experience we do not expect any 'significant' cultural constraints to the rezoning of this site.*

*However;*

*This is providing that further discussion takes place as more technical detail becomes known and the recommendations (cultural considerations) as outlined in this report are provided for in design, best practice and decision making moving forward.*

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<sup>171</sup> They note they have only reviewed the archaeology assessment

566. The CIA identifies a number of issues and makes a number of recommendations in relation to these issues. These are summarised below.

- **Cultural Site Visit and Archaeological Considerations:** Ngati Te Ata generally supports the recommendations made in the Archaeology Report.<sup>172</sup>
- **Cultural Aspirations:** The cultural aspirations of Ngati Te Ata align with Te Aranga principles of mana (authority), whakapapa (naming), taiao (natural environment), mauri tu (environmental), oranga (health), mahi toi (creative expression), tohu (cultural landscape) and Ahi ka (living). Development should be assessed with these principles and Ngati Te Ata's aspirations related to these.<sup>173</sup>
- **Removing Pine, Macrocarpa and noxious plants:** Ngati Te Ata support the removal of these trees and plants stating this will have a positive cultural effect. A number of different methods and outcomes are sought about the removal of the trees, replacement planting, a future park and cultural interpretation recognising the traditional history of Ngati Te Ata.<sup>174</sup>
- **Walkways/Pathways:** Ngati Te Ata generally support the development of neighbourhood parks; the use of open space as a buffer between new development; and 'park edge roads' adjacent to open space zones, rather than private property backing onto these spaces. They consider pathways provide positive outcomes, such as amenity for the local population, access to recreation, and improvements to local ecology. Pathways also offer positive opportunities to reflect and tell Ngati Te Ata's history and connection with the area, for example through information signs and tohu, and preferred naming. Appropriate design and Ngati Te Ata involvement is considered important.<sup>175</sup>
- **Earthworks:** Earthworks can significantly adversely affect Ngati Te Ata's cultural heritage and taonga including water, waahi tapu or sites of significance. The management of erosion and sediment control is important, and Ngati Te Ata consider developers must strive to achieve best practice such as GD05 rather than just meeting minimum requirements. Cultural monitoring is important as is the management of contaminated land and that contaminated land must not be used as fill.<sup>176</sup>
- **Stormwater:** The mixing of waters can adversely affect mauri (lifeforce), and Ngati Te Ata advocate for the highest level of stormwater treatment before being

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<sup>172</sup> CIA, pages 6-7

<sup>173</sup> CIA, page 8

<sup>174</sup> CIA, pages 9-10

<sup>175</sup> CIA, pages 11-12

<sup>176</sup> CIA, pages 13-14

discharged into waterways. The mauri, and life supporting capacity of all-natural waterways and the food producing capacity of natural waterways (including wetlands) should be protected and enhanced. Water should be conserved and used efficiently. Water sensitive design and stormwater flow quantity and control mechanisms can effectively mitigate cultural impact issues. Ngati Te Ata recommend a number of methods including the use of rain barrels and cisterns, permeable pavement, tree pits, vegetated swales, rain gardens, wetlands.<sup>177</sup>

- **Hazardous Substances:** Pollutants from construction processes and materials can potentially adversely impact cultural values, such as the relationship of Ngati Te Ata to wai (water) and the mauri of waterbodies including Taihiki Awa (River) and the Manukau Harbour. For example pollutants can destabilise Mana Whenua sites of significance and cause harm to food and food gathering resources, wildlife, drinking water, and recreation areas. Ngati Te Ata recommend a number of methods to be used during construction to mitigate risk.<sup>178</sup>
- **Wastewater:** The CIA states the discharge of effluent into natural water bodies is culturally offensive, and that land-based treatment is required instead, noting that Ngati Te Ata have long aspired to remove all wastewater discharge from the Manukau Harbour. Ngati Te Ata state they assume all future development in Glenbrook will be reticulated (i.e. no onsite waste disposal) and recognise that the South West Wastewater upgrade project will be a big improvement compared to the current situation. Never-the-less the CIA states Ngati Te Ata are concerned about effects of new development on existing wastewater infrastructure, including the increased risk of cumulative adverse effects as land uses change and development intensifies. Such cumulative effects must be considered when making decisions on future development. Ngati Te Ata consider new ideas and innovative technologies need to be explored for the treatment of wastewater and provide some examples.<sup>179</sup>
- **Intermittent Streams:** The removal of a portion of a stream could have adverse cultural effects, affecting waiora (life-giving properties water provides) and permanently removing its mauri (life force). The holistic Māori view of the connectivity between life systems means that the negative loss of one system is likely to impact on another or other systems. Intermittent streams have ecological and hydrological significance and provide the same functions as perennial streams. Ngati Te Ata consider that active streams should be retained where possible, but recognise that in some cases intermittent streams can be lost where appropriate mitigation takes

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<sup>177</sup> CIA, pages 15-21

<sup>178</sup> CIA, pages 22-24

<sup>179</sup> CIA, page 25

place. Ngati Te Ata states they would only support the removal of an intermittent stream if other options have been fully explored.<sup>180</sup>

- **Landscape Effects:** Ngati Te Ata state the land is their tupuna, and like their waterways they stir the inner minds memories and stories of past events and ancestors. Ngati Te Ata identify important views to/from different locations, including views of the Taihiki Awa (River), Waiuku Awa and Manukau Awa and from any location at Kahawai looking towards the western skyline. The CIA states “*Within this cultural context, the entire future development of the site is a key landscape and culturally attuned feature ... These landscape attributes will all need to be maintained and enhanced in the future development of the site.*” Existing landscape features such as wetlands are important. Built elements such as roads and paths are also potential landscape features because they are designed to connect people to natural features.<sup>181</sup>
- The CIA also states several “... *control conditions are recommended they include managing landscape, natural character and visual effects which serve to avoid and manage the adverse effects of built development e.g., a control relating to the exterior of all buildings.*” However no specific conditions are included in the CIA.
- **Road/Park/Open Space Naming:** Ngati Te Ata advocate Principle 4 in the Auckland Council road naming guidelines, which actively encourages the use of Māori road names. Ngati Te Ata provides a list of tupuna ancestor names that have significant relationships with Kahawai, stating they do not “... support names that have no meaning or historical tie to the area. These names play an integral part in the representation of Ngati Te Ata as mana whenua in Kahawai and are permanent yet subtle portrayals of our presence within the rohe (tribal area).”<sup>182</sup>

567. The AEE states that the CIA, and the recommendations contained within it, have been considered in the preparation of the plan change.

568. In summary the AEE:

- Recognises the Glenbrook Beach area has a strong cultural history due to its proximity to the coast and Manukau Harbour, and is within an area of high cultural and traditional importance to Ngati Te Ata. Notes the Glenbrook 3 Precinct was formed by iwi.
- States the applicants intend to have an ongoing relationship with Ngati Te Ata – through the consenting process.

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<sup>180</sup> CIA, page 26

<sup>181</sup> CIA, page 27

<sup>182</sup> CIA, page 28

- States the plan change approach to stormwater and the requirement for riparian planting is managed by application of the SMAF1 provisions and the proposed precinct provisions. The AEE considers these outcomes are consistent with CVA recommendations.

569. The AEE concludes:

*... it is considered that there would be no significant adverse effects in terms of cultural and heritage matters resulting from the rezoning that could not be addressed by the planning provisions and consenting process. Local iwi Ngāti Te Ata Waiohua have provided clear and detailed guidance on the history and values applied to the PPC land and local area. This includes a number of suggestions and recommendations around the redevelopment of the land, which will be taken forward in the planning provisions and by the applicants in respect of any future development.*<sup>183</sup>

#### Analysis

570. Māori cultural values are inextricably connected with the environment. Their cultural and traditional relationships with their ancestral lands, water, sites, waahi tapu and other taonga are a matter of national importance under the RMA. This is reflected in the AUP which recognises and provides for Mana Whenua values throughout, including at the RPS level. See section 7.8.1 for discussion on Chapter B6.3.
571. The Auckland Plan 2050 also recognises the important interconnections between Māori cultural values and the environment. For example Outcome: Environment and cultural heritage, Direction 2 *Apply a Māori world view to treasure and protect our natural environment (taonga tuku iho)*. This identifies Te Ao Māori concepts such as kaitiakitanga, rangatiratanga, whanaungatanga and manaakitanga and the integrated approach they offer in protecting and enhancing the environment, now and for future generations.
572. The plan change area is not within a Statutory Acknowledgement Area however the coastal marine area around Glenbrook Beach, which the plan change catchment drains into, is a coastal statutory acknowledgement area for Ngāti Tamaoho. I note Ngati Te Ata have not yet signed a settlement deed.
573. Ngati Te Ata is the only iwi who provided a CIA for the plan change and they are also the only iwi that submitted on the plan change. Therefore the discussion below focusses on Ngati Te Ata values and cultural effects, as identified by Ngati Te Ata.

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<sup>183</sup> AEE page 31

574. I acknowledge that only Ngati Te Ata can identify their cultural values in relation to Kahawai (Glenbrook Beach), and any potential or actual effects from the plan change on these values. I rely on the expertise, cultural knowledge and right of Ngati Te Ata to identify their cultural values, and adverse effects on these and appropriate mitigation measures.
575. Ngati Te Ata submitted on the plan change, opposing it (submission 1.1). The submission states:
- ... we believe the applicant has taken the liberty of assuming we welcome the development. This is not the case. The applicants have not indicated in any way how they propose to actually respect, protect and recognise the cultural, social and environmental issues we raised in the report. It is not suffice for the applicant to simply say they will work closely with us once they have consent.*
576. The Ngati Te Ata submission does not include any specific relief sought, such as preferred amendments to the precinct provisions that might satisfy their initial recommendations in their CIA. Ngati Te Ata may be able to provide further clarification through the hearing process as to what, if any, precinct amendments or other methods might appropriately respect, protect and recognise their cultural, social and environmental issues.
577. Many of the matters raised by Ngati Te Ata relate to matters covered in other sections of this report. Recommendations made in those sections may contribute to achieving outcomes set out in the Ngati Te Ata CIA. These are not repeated here.
578. I consider some matters raised by Ngati Te Ata in their CIA are addressed by existing AUP provisions (e.g. zone, Auckland-wide and overlays) and are better addressed at the resource consenting stage when more detailed work is undertaken, rather than in the plan change. For example effects from earthworks and hazardous substances from construction.
579. However I do consider there is an opportunity for the precinct provisions to identify Ngati Te Ata values and aspirations in relation to the plan change area, and to strengthen consideration of these at the consenting stage. There is also an opportunity for the precinct to include site specific provisions where Ngati Te Ata consider existing AUP provisions need supplementing or strengthening to achieve the outcomes they seek.
580. For example the addition of a precinct objective and policy related to Te Aranga Principles would encourage the integration of these principles at the subdivision and design stage and assessment criteria would ensure they are considered as part of any consenting. The inclusion of precinct provisions that incorporate Te Aranga Principles is sought by another submitter - Kahawai Point Developments Limited (40.4). Council's urban design expert Ms Esterman supports the inclusion of such provisions in the precinct. I also consider it appropriate to provide for the consideration of Te Aranga Principles at the time of subdivision

and development, and recommend precinct provisions to enable this. These amendments are shown in Appendix 7. See section 11.12 for further discussion of this matter.

581. With regards to the naming for future roads within the plan change area, I note this is part of Te Aranga Principles. Auckland Council's road naming guidelines also encourage the use of Māori road names and expect an applicant to engage with mana whenua on the matter.<sup>184</sup>
582. Overall I consider recommendations made in other sections of this report, relating to stormwater, interface with Glenbrook Beach Recreation Reserve, and Te Aranga Design Principles will contribute to avoiding, mitigating or remedying adverse effects on mana whenua cultural values. However Ngati Te Ata may be able to provide further guidance on whether these adequately address the matters raised in their CIA.

## 8.11. Social and community effects

### *Application*

583. The Economic Report identifies states there is a range of schools for all ages in vicinity of the plan change area. In relation to education demand the report concludes:

*Glenbrook primary school is the only school within the wider Glenbrook Beach settlement. Over the last 20 years, the school roll has increased by 43%, the fourth highest growth of all schools covered and second highest once the state integrated religious/private schools are removed. Looking at the future population projections for the area and that Glenbrook is becoming more town like in terms of its settlement pattern, Glenbrook primary school is likely to need to accommodate up to 109 additional students. Depending on the space per student ratios that currently exist in the school, it may be necessary to ensure additional space is provided.*<sup>185</sup>

584. Section 8.13 of the AEE addresses social and community effects and refers to the findings of the Economic Report. In summary the AEE concludes the plan change will have positive social, wellbeing and economic effects for the Glenbrook Beach community by:

- providing a wider range of housing options which is likely to result in more affordable housing
- promoting lifestyle choice and potentially attract residents from a range of demographics, noting the coastal location, good access to local employment areas (Glenbrook Steel Mill, Waiuku and Pukekohe) and the flexibility of working from home
- increasing viability and potential for commercial enterprises to establish in the local centre [Neighbourhood Centre Zone]

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<sup>184</sup> <https://www.aucklandcouncil.govt.nz/building-and-consents/resource-consents/types-resource-consents/subdivision-of-property/Documents/road-naming-guidelines.pdf>

<sup>185</sup> Economic Report, page 18



- providing safe pedestrian links between the plan change area and the existing residential area, Glenbrook Beach Recreation Reserve and the centre
- increasing public safety of the Glenbrook Beach Recreation Reserve because the residential development will be designed in a manner that overlooks the reserve, noting the existing adjacent residential properties do not.

### *Analysis*

585. With regard to potential education demand and effects on existing state schools in the area, I note the Ministry of Education is responsible for ensuring state schools are able to meet any increased demand, not just from the plan change, but from all demographic and population changes in the wider area. In my opinion potential adverse effects on existing schools will be able to be remedied by the Ministry of Education as part of their strategic planning for the wider area. However because there are no schools within the Glenbrook Beach settlement all students will need to commute, contributing to an increase in vehicle trips and emissions. This matter is discussed in section 8.8 of this report.
586. I agree with the AEE that the MHS Zone will enable more housing choice in the area, however whether this is affordable or even more affordable than what is already available remains to be seen. I note there are no provisions in the proposed precinct that will ensure the delivery of affordable housing (unlike the Glenbrook 3 Precinct), however technically smaller site sizes can result in reduced land and development costs. I consider the affordability of any housing development in the plan change area is more likely to depend on the target market and type of development undertaken by any developer.
587. Glenbrook Beach is a small coastal settlement, albeit one that is growing. Currently there are very limited community facilities and services in the settlement i.e. community hall, boat ramp and informal recreation areas. This is a matter raised by some submitters. The Glenbrook 3 Precinct encourages the development of a café and cultural information centre. The Neighbourhood Centre zoned land provides opportunities for smaller local shops and services to establish in the future.
588. There are currently no doctors or emergency services available in the settlement, a matter raised by some submitters. These submitters generally sought to decline the plan change, due in part to the lack of essential services and amenities, and/or the impact increased development will have on existing services and amenities. In terms of local amenities several submitters specifically expressed concern about the lack of play areas/playgrounds for children.
589. I agree with submitters there are limited community facilities and services in Glenbrook Beach. However I do not consider this a reason to decline the plan change. This is the nature of smaller rural and coastal settlements. As the population of Glenbrook Beach grows, either from development in the Glenbrook 3 Precinct or through the plan change area if the plan change is approved, the case for increasing/upgrading community facilities and local services may improve.

590. With regards to the provision of open space Mr Lilley has confirmed that no additional neighbourhood parks are required within the plan change area, regardless of whether the area is rezoned to Single House or MHS Zone. Mr Lilley notes that the council has recently approved the acquisition of two new neighbourhood parks within the Glenbrook 3 Precinct area.<sup>186</sup>

591. The Glenbrook Beach Recreation Reserve does not currently appear to provide much by way of informal recreation opportunities, noting access was locked when I visited. An increased Glenbrook Beach population and future development of the plan change area, including improved pedestrian and cycling connections and appropriate interface controls, may support upgrades to the reserve to provide increased amenity. Mr Lilley noted he supported additional open space demands being generated on the reserve for this reason. See section 8.3 for discussion about the interface with the Glenbrook beach Recreation Reserve.

592. I agree with the AEE that the plan change may result in some positive community and social effects, although not to the degree suggested by the AEE. Overall I do not consider the plan change (with amended precinct provisions as recommended) will result in any significant adverse social and community effects.

## 9. Consultation

593. Section 5 (pages 17-24) of the Structure Plan sets out the consultation undertaken by the applicant in the development of the structure plan. The Structure plan states that the following stakeholders were identified:

- Glenbrook Beach community and landowners
- Glenbrook Beach Residents and Ratepayers Association
- Tangata Whenua – Ngāti Te Ata
- Glenbrook 3 Special Housing Precinct (Kahawai Point) Developers
- Auckland Council Parks Department\*
- Franklin Local Board\*
- Auckland Transport\*
- Watercare Services\*
- Waka Kotahi (New Zealand Transport Agency)
- Ministry for the Environment
- Network Utility providers.

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<sup>186</sup> Mr Lilley Specialist Peer Review (Parks), see Appendix 5

594. The Structure Plan contains a summary of feedback and comments received from the stakeholders notated above with an asterisk (\*), along with a summary of public feedback received. This information is summarised in the sections below.
595. Further information about additional consultation undertaken by the council following lodgement of the plan change and where relevant submissions have been received is also outlined in the sections below.

### **9.1. Mana Whenua**

596. The Structure Plan states that the applicant reached out for comment to the six iwi identified as having interest in the project and/or site, and that Ngati Te Ata were the only Mana Whenua that expressed an interested.<sup>187</sup>
597. The AEE (section 8.12.1) states that Ngāti Te Ata Waiohū visited the site in 2021.
598. A CIA from Ngati Te Ata was provided by the applicant with the plan change request.
599. The AEE states that the CIA has been considered in the preparation of the plan change request. Discussion of the CIA is contained in section 8.10 of this report.
600. The plan change is within an area of interest<sup>188</sup> for the following iwi:
- Te Ākitai Waiohū
  - Ngāti Tamaoho
  - Te Ahiwaru - Waiohū
  - Ngāti Te Ata
  - Ngāti Maru
  - Waikato – Tainui.
601. These iwi were sent affected parties letters by the council when the plan change was notified. These letters also asked iwi whether in their view, a hearings commissioner with an understanding of tikanga Māori and the perspectives of local iwi or hapū will be required for the hearing of the plan change. No iwi responded to the council in response to whether a commissioner with an understanding of tikanga was preferred.
602. Through the public notification of the plan change, Ngati Te Ata submitted on the plan change, opposing it. Their submission and cultural values assessment are discussed in sections 8.10 and 11.12 of this report.
603. No other Mana Whenua groups submitted on the plan change.

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<sup>187</sup> Structure Plan (updated), page 23

<sup>188</sup> As identified in the council's GIS Viewer.

604. No iwi or hāpu have a Mana Whakahono a Rohe agreement with Auckland Council.

## 9.2. Public consultation

605. Section 5.1 of the Structure Plan describes the public consultation undertaken as part of the structure plan process, and summarises feedback and comments received.

606. The Structure Plan states they engaged with the local community through a leaflet drop to the area, encompassing the 'urban' residential area of Glenbrook Beach and adjacent rural properties. The leaflets included a brief scope of the proposal and the intention to collect public feedback if the plan change was accepted by the council. Contact details were provided on the leaflet and people were encouraged to make contact to receive further information and a feedback form.

607. The Structure Plan states the further information included "... a consultation document that outlined in more detail the proposal and high-level development outcomes for the site, addressing factors such as roading, stormwater, riparian streams/wetlands and housing typologies."<sup>189</sup>

608. The plan change does not include copies of the consultation material or the feedback forms, however it provides a summary of the public comments and feedback received. This summary is grouped into four issues and another for general feedback/comments. The summary includes a statement about how the structure plan does or does not respond to the comments and feedback. The feedback as grouped is listed below.

- Issue 1: Vision for McLarin Road. Feedback includes:
  - The existing community feel and character is important and should be preserved and/or enhances.
  - Infrastructure in support of the vision is important.
  - Protection of natural riparian and wetland areas for stormwater and wildlife.
- Issue 2: Housing types/sizes. Feedback includes:
  - Support a range of housing, with a mixture of high and medium density.
  - Single-story housing would be a preference, similar to the current residential area.
  - Housing with provision of back yard spaces.
  - Do not want terraced housing or apartment-style buildings.
- Issue 3: Traffic/open space/stormwater objectives. Feedback includes:
  - Open spaces, such as parks and community gardens, are needed.
  - Cycle lane and footpath provision long current rural roads will make these modes of travel safer and more attractive.
  - Provision for future public transport connections.

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<sup>189</sup> Structure Plan (updated) page 18

- Open spaces are important, protection of existing trees would contribute to atmosphere of the area.
- Issue 4: Mixed Housing Suburban Zone
  - Yes, MHS is the best zone to use.
  - Single House Zone is the best zone, as per current zoning of the existing residential area.
  - MHS Zone will bring greater density that doesn't suit the existing environment.
  - Use of this zone will result in the loss of the 'rural/beach' character of the community.
- General feedback/further comments
  - Do not want Kāinga Ora (Housing NZ) housing in the area
  - Provision of 'Kiwibuild Homes' should be at a low percentage.
  - Like the country feel.
  - Infrastructure provision is important, existing services are already constrained.

### 9.3. Franklin Local Board

609. The Structure Plan states that the applicant met with the Franklin Local Board on 26 April 2022 to discuss their proposal for 80 McLarin Road. A summary of the matters discussed is contained in section 5.2 of the Structure Plan.<sup>190</sup> In summary the local board comments related to:

- pedestrian connection through the plan change area to connect the Kahawai Point development to the Glenbrook Beach Esplanade Reserve
- development to 'activate' the Glenbrook Beach Recreation Reserve
- integrated traffic assessment to consider effects on local road network, concern that area accessed by a single road and no public transport
- the need for adequate visitor parking (onsite and on road) to be adequately recognised in the integrated traffic assessment given that most movements will be by private vehicles
- engagement with Ngati Te Ata and the Glenbrook Residents and Ratepayers Association.

610. The Franklin Local Board provided views on the plan change following the submission period. These views are included in section 11.4 of this report.

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<sup>190</sup> Structure Plan (updated) pages 18, 21-22

## 9.4. Auckland Transport

611. Section 5.4 of the Structure Plan states that a meeting with Auckland Transport representatives was held in March 2022. In summary the Structure Plan states that Auckland Transport:

- accepts the conclusions in the ITA that traffic generated by the plan change residential development would have marginal effect on the function/capacity of the road network.
- is concerned about the cumulative effects on the road network resulting from growth in Glenbrook Beach and wider residential centres, but acknowledged it is unreasonable to ask the applicant to upgrade the wider network
- encouraged the inclusion of active transport modes and better connectivity within the residential areas of Glenbrook Beach
- requested the roundabout indicated in the Glenbrook 3 Precinct, south of the business zoned land on McLarin road be shown on the structure plan.

612. Auckland Transport submitted on the plan change. See sections 8.8, 11.7 and 11.11 of this report for discussion of their submission.

## 9.5. Auckland Council Parks Department

613. Section 5.5 of the Structure Plan states that a meeting with representatives of the parks department was held on 21 March 2022. In summary the matters discussed included:

- Width and design of riparian margins for intermittent streams and wetlands. Parks expectation that 20m riparian margins would be planted with natives and vested in council at no cost.
- Future acquisition of land for open space by council is expected south of the plan change area.
- Connectivity through the plan change site important, including creation of walkways and/or cycleways.
- A road frontage along boundary with Glenbrook Beach Recreation Reserve a way to ensure better accessibility and passive surveillance of the reserve.

614. Andreas Lilley (consultant parks planner) as provided a peer review on behalf of Auckland Council Parks and Community Facilities has provided expert advice to council on this plan change. This is included in Appendix 5 of this report and is discussed in section 8.3 of this report as relevant.

## 9.6. Watercare Services

615. Section 5.5 of the Structure Plan states that communication with Watercare is ongoing. A summary of the discussions included in the Structure Plan is included below:

- Currently Glenbrook Beach, Kingseat, Waiuku and Clarks Beach serviced by three wastewater treatment plants. Population growth and associated development will bring these systems to capacity.
- New Southwest Wastewater Treatment Plant planned to service existing communities and long-term growth of the area. This will provide a high level of water treatment than at present.
- A consent order was granted by the Environment Court for the Southwest Wastewater Treatment Plant June 2018. This project is progressing in stages. As of April 2022 public consultation for the project was underway.

616. Watercare submitted on the plan change. See sections 8.6 and 11.6 off this report for discussion of their submission.

## 10. Notification and Submissions

### 10.1. Notification details

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

Date of public notification for submissions	14 April 2023
Closing date for submissions	15 May 2023
Number of submissions received	39 (40 received, 1 was withdrawn)
Date of public notification for further submissions	9 June 2023
Closing date for further submissions	23 June 2023
Number of further submissions received	2

618. All submissions were received on time. Copies of the submissions are attached as Appendix 3 to this report.

## 11. Analysis of submission and further submissions

619. The following sections address the submissions received on PC91. It discusses the relief sought in the submissions and makes recommendations to the Hearing Commissioners.

620. Submissions that address the same issues and seek the same relief have been grouped together in this report under the following topic headings:

- Submissions opposing PC91 in its entirety
- Request Single House Zone
- Covenants and current guidelines
- Amenity and existing character
- Climate change, carbon emissions, compact urban form
- Infrastructure – general, water supply and wastewater
- Transport infrastructure and traffic effects
- Essential services, facilities and local amenities
- Extend plan change area to include 140 McLarin Road
- Natural environment
- Stormwater and flooding
- Mana Whenua values
- Reverse sensitivity.

621. Most of these themes relate to previous analysis undertaken in this report.

622. Each of the following sections include a table setting out the relevant submission points and a recommendation on each point, with a discussion following each table. The discussion cross-references the relevant analysis conducted in section 8 of this report and adds further discussion where appropriate.

623. Further submissions have generally not been directly addressed unless containing pertinent new information – recommendations are made in accordance with the recommendation on the primary submission.

624. It is noted there are no submissions that support the plan change in its entirety, without seeking amendments.

### **11.1. Submissions opposing PC91 in its entirety**

<b>Sub. No.</b>	<b>Name of Submitter</b>	<b>Summary of the Relief Sought by the Submitter</b>	<b>Further Sub. No.</b>	<b>Planners Recommendations</b>
30.1	Vincent Asia	Decline the plan change.	No	Reject



32.1	Kyle Cunningham	Decline the plan change.	No	Reject
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Discussion

625. Both submitters seek a decision to decline the plan change. Submitter 30 states the reason for their views is “road closures”, but provides no other information. Submitter 31 states the reason for their views is “Insufficient industry tire for a drastic increase in population density” but also provides no other information.

Recommendations on submissions

626. That submissions **30.1** and **32.1** be **rejected**.

627. There are no amendments associated with this recommendation.

**11.2.Submissions - Request Single House Zone instead of Mixed Housing Suburban Zone**

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
7.3	Robert Hughes	Decline the plan change as existing zoning should be retained or at worst rezone to single house zone		Reject
8.1	Glenbrook Beach Residents and Ratepayers Association ATTN: Robyn Deuchar	Decline the plan change as existing zoning should be retained <sup>191</sup>		Reject
9.3	Emma Ford	Decline the plan change as the single house zone is more appropriate for the area		Reject
11.1	Kiri Bull	Approve the plan change but with the amendments that the single house zoning in the area be maintained		Accept in part

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<sup>191</sup> I note this submission does not request that the FUZ be retained but rather requests *that the council retain the H3 Residential Single House Zoning which is the current zoning our area has been operating under.*

12.3	Olivia Jackson	Request single house zone for the subject site		Reject
16.1	Catherine Thompson	Decline the plan change as the single house zone is more appropriate for the area		Reject
17.1	Ian Smith	Request that the single house zoning in the area be retained		Reject
18.1	Ellen-May Meharry	Request that the single house zoning in the area be retained		Reject
19.7	Michael Wayne MacAulay	Request that the single house zoning in the area be retained		Reject
20.3	Dianne Bradford	Request that the single house zone in the area be retained		Reject
21.1	Terry Yorke	Request that the single house zoning elsewhere in the area be retained		Reject
22.1	Wibke Yorke	Request that the single house zoning elsewhere in the area be retained		Reject
27.3	Anton Tyers	Request that the site be zoned single house		Reject
28.3	Shane Bradford	Request that the site be zoned single house		Reject
35.1	Mark Olson	Request that single house zone is maintained in the local area		Reject

## Discussion

628. Fifteen submitters request that the plan change area is rezoned to Single House Zone rather than the proposed MHS Zone. Most of these submitters request the plan change be declined, but never-the-less consider the Single House Zone is a more appropriate zone than the MHS Zone. A variety of reasons are given, many of which reflect the overall submission themes. In summary these include:

- effects on the character of a small rural or coastal settlement
- effects on amenity including lack of privacy, increased noise, concerns about an insecure environment
- lack of infrastructure, essential services and local amenities
- a desire that new development should be subject to the same controls/covenants they are
- concerns about flooding and effects of carbon emissions.

629. Many submitters note the existing residential areas of Glenbrook Beach settlement is zoned Single House Zone and consider that zone to be more appropriate for a small rural/coastal settlement. The Franklin Local Board also expresses the view that a lower housing density approach is better suited in this coastal settlement. Some submitters note that they chose Glenbrook Beach for its rural vision/lifestyle and that MHS Zone would negatively affect this.
630. As discussed in section 8.3, Ms Esterman consultant urban design expert considers the MHS Zone is more appropriate than the Single House Zone because it will provide for a greater variety of housing choice, whilst still delivering a streetscape that is relatively consistent with that of the Glenbrook 3 Precinct.
631. Ms Esterman notes that many of the zone standards that manage the built form are the same between the MHS Zone and Single House Zone, with the main difference being the minimum site size and number of dwellings permitted per site. Overall Ms Esterman considers the MHS Zone is a more efficient use of land and will provide greater housing choice compared to the Single House Zone. I agree with Ms Esterman on this matter.
632. However as discussed in section 8.8 Mr Edwards considers the Single House Zone is preferable to the proposed MHS Zone. In Mr Edwards' opinion application of the Single House Zone would help to mitigate some of the adverse traffic effects (increased vehicle emissions and road safety) because the Single House Zone enables less dwellings, therefore less households and less vehicle kilometres travelled.
633. I acknowledge Mr Edwards' concerns, in particular about increased vehicle emissions. However as previously mentioned the council has already identified the site as suitable for future urbanisation by virtue of the application of the FUZ. The AUP RPS sets out the policy framework and approach to the identification and rezoning of Future Urban zoned land. See section 7.8.1 for further discussion of this.
634. The differences and similarities between the MHS Zone and Single House Zone are discussed in section 8.3 and are not repeated here. Appendix 8 contains a comparison of the MHS Zone and Single House Zone objectives, policies and standards.
635. Overall I agree with Ms Esterman and recommend the MHS Zone as proposed by the plan change, rather than the Single House Zone requested by submitters. I recommend rejecting all these submission points with the exception of submission point 11.1. This is because submission point 11.1 seeks to approve the plan change with amendments. Therefore I recommend accepting in part submission point 11.1

#### Recommendations on Submissions

636. That submissions **7.3, 8.1, 9.3, 12.3, 16.1, 17.1, 18.1, 19.7, 20.3, 21.1, 22.1, 27.3, 28.3** and **35.1** be **rejected** for the reasons for the reasons set out in this report.
637. That submission **11.1** be **accepted in part** for the reasons set out above.
638. There are no amendments associated with these recommendations.

### 11.3.Submissions – Covenants and current guidelines

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
7.1	Robert Hughes	Request that new development meets current guidelines for house building		Reject
7.2	Robert Hughes	Request that new development includes existing covenants		Reject
8.2	Glenbrook Beach Residents and Ratepayers Association ATTN: Robyn Deuchar	Request that new development includes existing covenants		Reject
9.5	Emma Ford	Request that new development includes existing covenants		Reject
10.1	Wendy Groom	Request that new development complies with current guidelines		Reject
12.6	Olivia Jackson	Decline the plan change, but if approved, retain the rural character of the area and maintain covenants placed on buildings		Reject
17.2	Ian Smith	Request that new development includes existing covenants		Reject
19.2	Michael Wayne MacAulay	Request that new development includes existing covenants		Reject
20.2	Dianne Bradford	Request that new development has covenants like other local development and meets current guidelines for house building		Reject
27.1	Anton Tyers	Request that new development meets current guidelines for house building and includes covenants which other sites have in the area		Reject
28.6	Shane Bradford	Request that new development meets current guidelines for house building and includes covenants which other sites have in the area		Reject
31.3	Suli Palu	Request that new development meets current guidelines for house building and includes		Reject

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
		covenants which other sites have in the area		

## Discussion

639. A number of submissions request that the plan change be subject to the same covenants and/or guidelines that the existing properties in Glenbrook Beach are subject to.
640. It is unclear from the submissions what the specific covenants or guidelines referred to by submitters are or relate to, although most submitters have specifically referred to the Kahawai Point Development and/or the Single House Zone.
641. Some submitters have commented that future development within the plan change area should be subject to the same limitations and restrictions they are/have been subject to as a matter of fairness. Some submitters comment that requiring the same controls will retain/maintain the same rural/coastal character and vision of the area, noting this is why they have chosen to live at Glenbrook Beach. Another submitter specifically commented this would protect the current investments of the homeowners who have chosen this area.
642. In contrast one submitter (34) comments that Kahawai Point has proven that development guidelines and covenants fail. There is no submission point for this comment.
643. In terms of covenants, the Glenbrook 3 Precinct includes a policy and a standard requiring a 'no complaints' covenant to manage reverse sensitivity between future residential development and production farming activities. This only applies to residential lots adjoining Lot 2 DP 21692 which is a rural zoned site. No other Glenbrook 3 Precinct provisions require a covenant. The no complaints covenant and reverse sensitivity is discussed in section 11.13 of this report.
644. I note encumbrances/covenants may be private agreements between parties; others may be imposed by the council as a condition of consent/consent notice. As such not all covenants may relate to a resource management issue. The council would generally only enforce a council-imposed covenant, and would not get involved with the enforcement of private covenants. I am unaware of what, if any, other covenants exist between the developers of Kahawai Point (Glenbrook 3 Precinct) and land owners, or other guidelines the developer may require landowners to adhere to.
645. In terms of guidelines, if the submitters are meaning that the same AUP planning rules that apply to them should also apply to development within the plan change area, then I have discussed the similarities and differences between the Single House Zone and the MHS Zone in section 8.3. As noted many of the standards that manage the built form are the same in both zones, with the main difference being the minimum site size and number of dwellings permitted per site. Many of the Single House Zone standards that manage bulk and location

are not varied by the Glenbrook 3 Precinct e.g. maximum permitted building height, height in relation to boundary, building coverage. However the Glenbrook 3 Precinct does contain different standards for sites adjoining esplanade reserves, walkways and land zoned Open Space: Informal Recreation.

646. In addressing submitters concerns about the character or aesthetic of the area Ms Esterman recommends amending the proposed fencing standard for the front boundary. Ms Esterman considers this would improve streetscape consistency between development in the Glenbrook 3 Precinct and future development in the plan change area. I agree with this recommendation and it is included in Appendix 7. This is discussed in section 11.4 below.
647. The Glenbrook 4 Precinct does not propose any open space zones, but is adjacent to the Glenbrook Beach Recreation Reserve (zoned Open Space – Informal Recreation). The interface with this reserve is addressed in section 8.3. As discussed it is considered that the plan change could better manage the interface with this reserve to enhance the open space function and amenity and improve access to the reserve. If a park edge road is not feasible then the precinct could include additional fencing, setback, planting and glazing standards for sites adjoining the reserve, some of which are similar to what is required in the Glenbrook 3 Precinct.
648. However at this stage without clarity about the covenants and guidelines, and the matters dealt with by these then I cannot support these submissions. If submitters are able to provide further information about whether it is the Glenbrook 3 Precinct provisions they wish to apply to the plan change area, then I consider it would be appropriate to include provisions specific to the interface with the Glenbrook Beach Recreation Reserve. Also see section 8.3.

#### Recommendations on Submissions

649. Because it is unclear what covenants and guidelines submitters are referring to I recommend that submissions **7.1, 7.2, 8.2, 9.5, 10.1, 12.6, 17.2, 19.2, 20.2, 27.1, 28.6** and **31.3** be **rejected**.
650. There are no amendments associated with this recommendation.

### **11.4. Submissions – Amenity and existing character**

<b>Sub. No.</b>	<b>Name of Submitter</b>	<b>Summary of the Relief Sought by the Submitter</b>	<b>Further Sub. No.</b>	<b>Planners Recommendation</b>
2.2	Pauli Lydia Bosch	Decline the plan change because mixed housing will affect the aesthetic of the neighbourhood		Accept in part
4.1	Pravin Hinwar	Decline the plan change because apartments will affect the nature of their lifestyle block		Reject
5.1	Alvin Changamire	Decline the plan change because new housing will bring noise to the rural area		Reject

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendation
6.2	Lania Gribben	Decline the plan change because this type of development does not fit into the existing lifestyle		Reject
7.4	Robert Hughes	Decline the plan change because mixed housing will create a characterless noisy cramped insecure environment		Reject
9.4	Emma Ford	Decline the plan change because a cramped, noisy, characterless area would be detrimental to the area		Reject
12.1	Olivia Jackson	Decline the plan change because the change in zoning detracts from the surrounding area		Reject
12.2	Olivia Jackson	Decline the plan change because intensity of multistorey or multi occupancy properties [characterless, noisy, cramped] are inappropriate in the area		Reject
18.2	Ellen-May Meharry	Decline the plan change because of the impact his would have on the rural area [density, amenity, character]		Reject
19.1	Michael Wayne MacAulay	Decline the plan change because mixed housing will affect the aesthetic of the neighbourhood		Reject
20.1	Dianne Bradford	Decline the plan change because new development will affect the aesthetic of the neighbourhood		Reject
25.2	Owen Yorke	Decline the plan change because this type of development does not fit into the existing area and lifestyle		Reject
27.2	Anton Tyers	Decline the plan change because this type of development does not fit into the existing area and lifestyle		Reject
27.4	Anton Tyers	Decline the plan change because of the impact on neighbouring property occupiers		Reject
28.5	Shane Bradford	Decline the plan change because this type of development does not fit into the existing area and lifestyle		Reject
31.5	Suli Palu	Decline the plan change because this type of development does not fit into the existing area and lifestyle		Reject
33.1	Emma Cuming	Decline the plan change because this type of development does not fit into the existing rural area		Reject

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendation
37.1	Vanshika Sudhakar	Decline the plan change until the area is future proofed because further development in the area will impact on the existing lifestyle		Reject

## Discussion

651. A number of submitters have raised concerns about the impact the plan change will have on the amenity and character of the area, and their properties and enjoyment. Submitters generally described the area as being a rural or coastal/beachside community/settlement/village. Some referred specifically to Kahawai Point and Glenbrook Beach.
652. All submitters above request the plan change be declined, however most consider the Single House Zone is more appropriate than the MHS Zone. Concerns and matters raised by these submitters include:
- Development will be out of keeping and will adversely affect the quiet rural/coastal character, charm, village style and vision of the area. Some noted the quiet, small, rural/coastal character and lifestyle is why they chose to live there **(5.1, 6.2, 9.4, 12.1, 19.1, 20.1, 25.2, 27.2, 28.6, 31.5, 33.1, 37.1)**.
  - Development will be cramped, characterless, noisy, insecure, increase light contamination, or reduce privacy **(7.4, 9.4, 12.2, 18.2, 19.1, 20.1, 25.2, 27.2)**
  - Potential wind effects when the trees are cut down **(7.4)**
  - Loss of views, including from 147 McLarin Road **(25.2, 12.2)**
  - Impact of tall/multi-storey buildings **(33.1, 25.2)**
  - Apartments, multi-unit developments, duplexes, terraced housing and high density are not appropriate **(4.1, 25.2)**
  - Adverse effects of construction (at 147 McLarin Road) **(25.2)**
  - Impact on the investments they have made to live in the area **(7.4,12)**.
653. Submitter Pauli Lydia Bosch **(2.2)** specifically opposes the plan change because of the it will have on the “aesthetic of the neighbourhood”.
654. Effects on character and visual amenity are discussed in section 8.3 and not repeated here.
655. In response to submitters concerns more generally about the aesthetic of the area, Ms Esterman recommends amendments to the front boundary fencing standard to ensure a relative consistent streetscape character between development in the Glenbrook 3 Precinct and the plan change area. I note while none of the submissions specifically refer to fencing, in Ms Esterman’s view this is one of the elements that contribute to the streetscape character as viewed from the public realm. Ms Esterman considers that with amendments to the precinct fencing requirements, future residential development will generally be consistent



with the streetscape character, in particular that of the Glenbrook 3 Precinct/Kahawai Point Development.

656. I rely on the advice of Ms Esterman on this matter and recommend that the precinct front boundary fencing standard be amended as set out Appendix 7.
657. In my opinion the MHS Zone does not anticipate or provide for some of the housing typologies suggested by some submitters e.g. apartments, tall buildings or high density residential dwellings. As previously discussed the MHS Zone and Single House Zone share many of the same bulk and location standards, including a permitted building height of 8m (i.e. two storeys). While the MHS Zone does permit up to three dwellings per site with a smaller site size enabled, smaller site sizes are also enabled by the Glenbrook 3 Precinct in certain circumstances.
658. Overall I consider the precinct provisions (as recommended) in conjunction with MHS Zone provisions will appropriately manage effects on character and amenity values, including on-site amenity for residents. However as discussed previously I do recommend amending the fencing standard to improve streetscape consistency with the existing development in the Glenbrook 3 Precinct.
659. MHS Zone provides for onsite amenity of residents through daylight (H4.6.12), outlook space (H4.6.11) and outdoor living space (H4.6.13) standards. Infringement of zone standards, including building height require consideration of effects on the amenity of neighbouring sites and suburban built character of the zone. Development of four or more dwellings per site require consideration of effects on the neighbourhood character, residential amenity, safety and the surrounding residential area.
660. I consider construction effects can be appropriately managed through the Aucklandwide provisions and the consenting process.
661. I also note that the plan change area was identified as FUZ when the Proposed AUP was notified in 2013 and subsequently was included in the AUP when the made operative in part in 2016. Prior to that the area was identified as a structure plan area to provide for growth in the Glenbrook Beach village.<sup>192</sup> In my opinion it has been clear for quite some time that urbanisation of the plan change area is to be expected.

#### Recommendations on Submissions

662. That submissions **4.1, 5.1, 6.2, 7.4, 9.4, 12.1, 12.2, 18.2, 19.1, 20.1, 25.2, 27.2, 27.4, 28.5, 31.5, 33.1** and **37.1** are **rejected** for the reasons set out in this report.
663. There are no amendments in relation to this recommendation.

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<sup>192</sup> Part 17B Growth management of the Villages <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/district-and-regional-plans/district-plans/documents/franklintext/part17atoe.pdf>

664. That submission **2.2** is **accepted in part** for the reasons set out in this report.

665. Recommended amendments in response to these submissions are set out in Appendix 7.

### 11.5. Submissions – Climate change, carbon emissions, compact urban form

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
7.9	Robert Hughes	Decline the plan change because intensification of the site will not help carbon reduction plans for Auckland		Reject
8.5	Glenbrook Beach Residents and Ratepayers Association ATTN: Robyn Deuchar	Decline the plan change because intensification of the site will not help carbon reduction plans for Auckland		Reject
14.1	Grant Hewison	Decline the plan change because intensification of the site will have potential adverse impacts on gas emissions given the use of private vehicles & lack of public transport .		Reject
14.2	Grant Hewison	Decline the plan change because its location fails the direction towards a compact urban form		Reject
17.5	Ian Smith	Decline the plan change because intensification of the site will have potential adverse impacts on carbon reduction plans		Reject
24.1	Equal Justice Project ATTN: Dr Grant Hewison, Mair Gibbs and Brendan Zhang-Liao	Decline because the plan change fails to take into account and address the impact of the development and climate change		Reject
34.4	Tui Kaihu Trust ATTN: Victoria Lee McAnulty	Decline the plan change because further development in the area will impact on the existing coastal lifestyle and does not consider promotion of sustainability		Reject

#### Discussion

666. Six submitters seek to decline the plan change because of the impact it will have on climate change or because it does not promote sustainability. Their primary concern is that the plan change will increase carbon emissions (from vehicles), rather than reduce emissions. The reliance on private vehicles and lack of public transport is also highlighted.

667. Submitter Grant Hewison (**14.2**) considers the plan change does not promote a compact urban form. I address compact urban form in section 7.8.1 and do not repeat it here.

668. As discussed previously, in particular sections 8.8 and 7.10.3 Mr Edwards is also concerned about the increased vehicle emissions that will result from the plan change, and that it will not contribute to reducing vehicle emissions. I acknowledge these concerns and do not necessarily disagree with their concerns about the impact of vehicle emissions. However as previously discussed, the site is zoned Future Urban and therefore is identified as suitable for urbanisation. The overarching strategic direction set in the RPS is that most growth in Auckland is to be accommodated within the RUB, and that this should support a compact urban form. However the RPS also provides for the limited expansion of rural and coastal settlements and FUZ sites outside the RUB. The Auckland Plan also has a similar approach. In providing for limited growth in these settlements and outside the RUB, the predominate use of private vehicles is to be expected.

669. Overall I do not support declining the plan change because of the impact of vehicle emissions.

#### Recommendation on Submissions

670. That submissions **7.9, 8.5, 14.1, 14.2, 17.5, 24.1** and **34.4** be **rejected** for the reasons set out in this report.

671. There are no amendments in relation to this recommendation.

## 11.6. Submissions – Infrastructure – General, water supply and wastewater

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
13.1	Nadin Rathgeber	Decline the plan change because of lack of infrastructure		Accept in part
16.5	Catherine Thompson	Decline the plan change because of lack of infrastructure		Accept in part
20.5	Dianne Bradford	Decline the plan change because of a lack of infrastructure and amenities		Accept in part
25.5	Owen Yorke	Decline the plan change because of the impact on local amenities and [infrastructure, roading, public transport]		Accept in part
26.1	Watercare Services Limited	SW Wastewater Servicing Scheme to be operational before any new development be connected to network	FS02 - support	Accept in part 26.1 and FS02
26.2	Watercare Services Limited	No constraints to subdivision from a bulk water perspective		Accept
34.1	Tui Kaihu Trust ATTN: Victoria Lee McAnulty	Decline the plan change because of a lack of infrastructure [roading, potential for flooding, water]	FS02 - support	Accept in part 34.1 and FS02
35.2	Mark Olson	Decline the plan change because of a lack of infrastructure [stormwater, public transport]	FS01 – support in part	Accept in part 35.2 and FS01
37.2	Vanshika Sudhakar	Decline the plan change until the area is future proofed, given the lack of infrastructure and services [public transport, retail]		Accept in part
40.1	Kahawai Point Developments Limited c/- Tattico ATTN: John Duthie	Support the plan change with a deferred zoning subject to infrastructure provisions	FS01 – oppose in part	Reject 40.1 Accept in part FS01
40.2	Kahawai Point Developments Limited c/- Tattico ATTN: John Duthie	Support the plan change relating to specific provisions for the subject site and Glenbrook Beach 4 precincts and notification		Accept in part

### Discussion

672. This section includes submission points specifically about water supply or wastewater infrastructure. This section also covers submission points related to infrastructure generally. Some submitters refer to infrastructure without specifying the type of infrastructure, others mention more than one type of infrastructure including stormwater, wastewater, water supply, roading, public transport, walking and cycling.

673. Submission points that relate more specifically to or just to transport infrastructure are addressed in section 11.7 below. Regardless many of the concerns discussed are similar across these two sections.
674. Watercare’s submission relating to water supply (**26.2**) and wastewater (**26.1**) infrastructure is also discussed in section 8.6. In summary Watercare consider there are no constraints to the plan change from a water supply issues and that the resource consents stage can appropriately deal with the design and any upgrades needed at a local level. I note that the Watercare submission does not raise any concerns about the condition of existing water supply infrastructure and the impact the plan change may have on this.
675. In relation to wastewater, the Watercare submission confirms there is no capacity in the existing bulk wastewater network to service the plan change until the Southwest Wastewater Servicing scheme is operational. As mentioned in section 8.6 Watercare have served a NOR on the council for the Southwest Wastewater Treatment Plant (**SWTP**). Watercare considers their concerns about this lack of capacity can be appropriately mitigated by the inclusion of precinct provisions that seek to avoid any development ahead of the Southwest Wastewater Servicing scheme becoming operational. Therefore Watercare do not oppose the plan change, provided the precinct includes such provisions. I note the standard does not specifically require the Southwest Wastewater Servicing scheme to be operational before development/subdivision is enabled. However since there is no capacity in the wastewater network, and development must connect to a public reticulated network that has capacity, I consider this is adequate. Therefore I recommend accepting in part Watercare submission **26.1**.
676. The Franklin Local Board also recommend that no development starts before the Southwest Wastewater plant is operational.
677. Submitter Nadin Rathgeber (**13.1**) states there is no infrastructure, existing roads and stormwater are not coping now. They also consider that intensification should be focussed in the city and suburbs, not in coastal areas where there is “zero” infrastructure.
678. Dianne Bradford (**20.5**) considers there is no existing infrastructure to support multi-unit dwellings and mixed housing. Submitter Mark Olsen (**35.2**) also considers there is no infrastructure to support high density housing (e.g. public transport) and comments that even with a new stormwater system for the area there will be flooding in Ronald Avenue. Auckland Transport (**FS02**) support this submission point in part, and in particular they support any necessary upgrades to stormwater or road infrastructure (e.g. culverts) to mitigate any flooding or stormwater runoff impacts as a result of development at the plan change site on Ronald Avenue.
679. Submitter Vanishka Sudhakar (**37.2**) appears to be primarily concerned with transport infrastructure and is concerned existing infrastructure is inadequate and not robust enough to support future growth – an issue facing Auckland more generally. They consider adequate future planning is required before any major changes. Submitter Tui Kaihu Trust (**34.1**) is

concerned about existing transport infrastructure including road maintenance and safety issues, only one road in/out, no public transport, no park and ride or shared travel solutions, and streets without footpaths and wayfinding signage. They also comment that existing Watercare infrastructure has repeatedly proven it cannot service current needs, that notes that future improvements are still several years away.

680. Submitter Owen Yorke (**25.5**) is concerned about the current state or lack of multiple types of infrastructure, facilities and services including roading and transport, stormwater, wastewater, community gathering places, emergency services, retail outlets and water supply. The submitter specifically mentions that this year the community lost water supply due to a broken pipe across Taihiki River. The submitter states where “... *this density is enabled in other parts of Auckland it is logical and supported by the necessary infrastructure, funded by developers and ratepayers.*” Submitter Catherine Thompson (**16.5**) also comments they have already had issues with getting freshwater to the area, and that stormwater and wastewater appear to be at capacity.
681. The submission of Sarah Fisher (**38**) asks whether the new development will be serviced with fast fibre internet, and if so advocates that Ronald Avenue is also offered fibre.
682. I acknowledge the Glenbrook Beach settlement has no or limited infrastructure, including public transport, and social, community and wastewater infrastructure. Taking into account Watercare’s submission and the precinct provisions I consider the plan change can adequately mitigate adverse effects in relation to wastewater and water supply infrastructure.
683. I address social and community infrastructure in sections 8.2, 8.11 and 11.8 and do not repeat this here.
684. I address stormwater infrastructure in sections 8.7 and 11.11 and do not repeat this here. I note that Ms Seekup and Ms Basheer (Healthy Waters) consider the SMP, including the flood hazard assessment provided by the applicant would not be adequate to get approval to connect to the public stormwater network, and recommend a number of amendments and further information they consider necessary. I rely on the advice of Ms Seekup and Ms Basheer and also recommend amendments to the precinct and further information/ revised SMP is provided by the applicant. I consider these will address submitters general concerns about stormwater infrastructure and flooding.
685. I address transport infrastructure in sections 8.8 and 11.7 and do not repeat this here.
686. The submission of Kahawai Point Developments (**40**) states “*KPDL opposes any development within the PC91 plan change area until such time as the core infrastructure services of roading, wastewater and water are upgraded to service the entire existing and currently zoned Glenbrook Beach area, plus the PC91 area.*”
687. To achieve this they state they would support one of two options:

(a) a deferred zoning of the land pending the provision of water, wastewater and any necessary transport infrastructure; (40.1)

or include precinct provisions that would:

(b) ... make any subdivision or development of the Glenbrook Beach 4 proposed precinct a non-complying activity until the necessary water, wastewater and transport upgrades are complete and the notification provisions of the precinct making it clear that any application for a non-complying activity would be publicly notified. (40.2)

688. The submission also requests specific working amendments to the precinct provisions as follows:

(c) In addition to (a) or (b) above, amend clause IXXX7.1.i Infrastructure by adding the text (in red):

- i. be connected to publicly available reticulated water and wastewater networks with sufficient capacity to service the **existing Glenbrook area, Glenbrook 3 Precinct and the Glenbrook 4** proposed development and/or subdivision; OR
- ii. be supported by written confirmation from the infrastructure services provider for the area that planned capital works required to provide connections for water and wastewater **to service the existing Glenbrook area , Glenbrook 3 Precinct and the Glenbrook 4 Precinct** are suitably advanced and capable of servicing proposed subdivision and development; and
- iii. be supported by written confirmation from the infrastructure services provider for **transport** for the area that planned capital works required to provide connections for transport **from Glenbrook Road to service the existing Glenbrook area, Glenbrook 3 Precinct and the Glenbrook 4 Precinct are funded and suitably advanced and capable of servicing proposed subdivision and development.**

689. In response to submission point 40.1 (option (a)) I understand that 'deferred zoning' is a technique used in some District Plans, however deferred zoning is not a technique used in the AUP. The FUZ already signals that the land use will change in time to an urban zone and the AUP includes a policy framework for urban growth, which includes the integration of land use and the provision of infrastructure. See section 7.8 for further discussion.

690. Some AUP precincts, especially those that manage greenfield development, include rules and triggers that require specific infrastructure to be in place or funded before development can be undertaken. I consider this is a more appropriate method to use than a deferred zone. Therefore I do not support submission point 40.1.

691. With regard to submission point 40.2 (option (b) and (c)) I consider the proposed precinct already achieves this in part - for water and wastewater (i.e. As notified IXXX7.1.1 – Infrastructure and rules A6 and A11). While the proposed precinct provisions do not require the necessary infrastructure works to be completed and operational the provisions do require development and subdivision to be able to be connected to a water or wastewater network

that has sufficient capacity, or written confirmation must be provided by the relevant infrastructure provider that the necessary infrastructure works are suitably advanced and capable of servicing the development. Non-compliance with these rules is a non-complying activity. As noted above the Watercare submission does not seek specific amendments to these provisions.

692. With regards to transport infrastructure and confirmation requirement from Auckland Transport that necessary transport infrastructure is funded and suitably advanced - this is discussed in section 11.7 below. In summary Mr Edwards recommends a new standard requiring an intersection upgrade/roundabout at the Mission Bush Road/Glenbrook-Waiuku Road intersection to be completed or confirmation from Auckland Transport that such works are suitably advanced and capable of servicing the proposed subdivision and development.
693. What is missing from the proposed precinct provisions in the context of this submission point **(40.2)** is that as a non-complying consent application would be required to be publicly notified and that the provisions also apply to transport infrastructure. I consider the normal RMA notification tests are sufficient for non-complying activities. I consider Objective (3) and Policies (3) and (3A) (as recommended) provide a strong basis for determining the notification pathway for and application for discretionary or non-complying activities.
694. I note however that the proposed precinct notification provisions only specify that an application for four or more dwellings that comply with specific standards or development that does not comply with the fencing standard will be considered without public or limited notification and so forth. There are no notification rules stating all other consent applications will be subject to the normal tests for notification or that when considering who affected persons are the council will give consideration to those persons listed in Rule C1.13(4). To avoid confusion and to be consistent with the AUP precinct template I recommend the notification rule is amended to include these rules as set out in Appendix 7.
695. In regard to submissions that seek to decline the plan change due to a general lack or inadequacy of infrastructure I recommend accepting in part those submissions. This is because I recommend amendments to the precinct provisions to require specific transport infrastructure upgrades. I also recommend precinct amendments in relation to the stormwater management and infrastructure. I also recommend that further information is required to resolve concerns raised by Ms Seekup and Ms Basheer and submitters.

#### Recommendation on Submissions

696. That submission points **13.1, 16.5, 20.5, 26.1 (and FS02), 34.1, 35.2, 37.2** and **40.2** be **accepted in part** for the reasons set out in this report.
697. Recommended amendments in response to these submissions are set out in Appendix 7.
698. That submission point **26.2** be **accepted** for the reasons set out in this report.
699. There are no amendments in relation to this recommendation.



700. That submission point **40.1 be rejected**, and that **FS01** that opposes 40.1 in part **be accepted** for the reasons set out above.

701. There are no amendments in relation to these recommendations.

### **11.7.Submissions – Transport infrastructure and traffic effects**

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
2.1	Pauli Lydia Bosch	Decline the plan change because of lack of roading infrastructure		Accept in part
3.1	Benjamin Ross	Approve the plan change with amendments by allowing triggers for when Auckland Transport have to provide transit services to future proof public transport	FS01 - oppose	Accept in part
6.3	Lania Gribben	Decline the plan change because of a lack of suitable access with the proposed residential zoning would not be safe		Accept in part
7.6	Robert Hughes	Decline the plan change because of lack of roading infrastructure		Accept in part
7.8	Robert Hughes	Decline the plan change because of a lack of public transport		Accept in part
8.3	Glenbrook Beach Residents and Ratepayers Association ATTN: Robyn Deuchar	Decline the plan change because of lack of roading infrastructure		Accept in part
8.4	Glenbrook Beach Residents and Ratepayers Association ATTN: Robyn Deuchar	Decline the plan change because of a lack of public transport		Accept in part
9.1	Emma Ford	Decline the plan change because of lack of infrastructure		Accept in part
12.4	Olivia Jackson	Decline the plan change because of lack of infrastructure		Accept in part
15.1	Ben Scott	Approve the plan change subject to amendments to include upgrade of roads		Accept in part
16.4	Catherine Thompson	Decline the plan change because roads needs upgrading		Accept in part
17.3	Ian Smith	Decline the plan change because of a lack of public transport		Accept in part
18.3	Ellen-May Meharry	Decline the plan change because of lack of roading infrastructure		Accept in part
18.4	Ellen-May Meharry	Decline the plan change because of a lack of public transport		Accept in part
19.3	Michael Wayne MacAulay	Decline the plan change because of a lack of public transport		Accept in part
19.6	Michael Wayne MacAulay	Decline the plan change because of impact on roading and parking		Accept in part

25.3	Owen Yorke	Decline the plan change because of lack of upgrades to infrastructure [roading, parking, pedestrians		Accept in part
27.6	Anton Tyers	Decline the plan change because of a lack of public transport		Accept in part
28.2	Shane Bradford	Decline the plan change because of a lack of infrastructure		Accept in part
31.1	Suli Palu	Decline the plan change because of a lack of infrastructure [public transport]		Accept in part
36.1	Matthew Kerwin	Decline the plan change because of a lack of infrastructure [traffic]		Accept in part
39.1	Auckland Transport ATTN: Jason Ashby	Amendments to update Precinct Plan required to provide details of connected network of roads, walking and cycling routes and public roads to be vested		Accept in part
39.2	Auckland Transport ATTN: Jason Ashby	Amendments to Precinct Plan to remove cross sections [from Glenbrook 3 Precinct provisions] and update/upgrade them		Accept
39.3	Auckland Transport ATTN: Jason Ashby	Amendments to Precinct Plan required to upgrade requirements for McLarin Road frontage		Accept in part
39.4	Auckland Transport ATTN: Jason Ashby	Amendments to Precinct Plan required relating to intersections		Accept in part
39.5	Auckland Transport ATTN: Jason Ashby	Amendments to Precinct Plan required relating to pedestrian and active modes connections		Accept in part
39.7	Auckland Transport ATTN: Jason Ashby	Amend plan change to include precinct provisions relating to vesting of public assets subject to hazard assessment		Reject
39.8	Auckland Transport ATTN: Jason Ashby	Amend precinct provisions to ensure consistency across other local plan changes		Accept
40.3	Kahawai Point Developments Limited c/- Tattico ATTN: John Duthie	Support the plan change subject to funding to provide additional roading infrastructure	FS01 – oppose in part	Accept in part

## Discussion

702. Fifteen submitters<sup>193</sup> seek to decline the plan change due to adverse traffic effects and/or lack of transport infrastructure. Concerns raised by these submitters include:

- lack of public transport
- lack of or inadequate roading infrastructure to meet existing and future needs - including only one access road to/from the settlement via a rural road, impact if only access road is blocked (accident, flooding), roads in poor condition – lack of maintenance, impact of heavy vehicles (from development of the site), roading infrastructure not kept up with existing growth and no confidence this will improve
- lack of footpaths and cycle lanes including on Glenbrook Beach Road and in plan change area
- safety concerns – regarding a school bus pick-up/drop-off area in close proximity; more people using rural roads for walking, running and cycling without appropriate infrastructure; greater risk of accidents due to increased number of vehicles, risks associated with site being a corner site
- impact of on-street parking (already insufficient space) and need for on-site parking
- impact of additional traffic noise, road run-off (pollution), congestion and safety on specific site (147 and 184 McLarin Road) (25.3).

703. The Franklin Local Board makes several comments in relation to transport infrastructure including:

- noting there is no current or planned public transport in the area, despite it including a SHA.
- expressing concern applying urban standards to a coastal settlement where roads are narrow, and lack parking leading to access issues for large vehicles (waste collection) and emergency services
- requesting greater planning and provision of pedestrian/cycling connections and that the developer provides footpaths to connect to current pathways.

704. Mr Edwards addresses submissions in section 8 of his technical report, which is summarised below based on theme:

- Public transport: Mr Edwards highlights that the lack of public transport has been factored into the ITA and his review
- Lack of or inadequate roading infrastructure:
  - Mr Edwards considers the local road network has capacity to accommodate PC91, with the exception of the Mission Bush Road / Glenbrook-Waiuku Road intersection. The wider road network has constraints (especially at peak times)

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<sup>193</sup> Submission points 2.1, 6.3, 7.6, 7.8, 8.3, 8.4, 9.1, 12.4, 16.4, 17.3, 18.3, 18.4, 19.3, 19.6, 25.3, 27.6, 28.2, 31.1, 36.1.

which are planned to be addressed by the provision of new arterial roads in the longer term and passenger rail services in the shorter term.

- Mr Edwards highlights that maintenance of existing roads is the responsibility of Auckland Transport, with funding available from a variety of sources including from fuel excise duty (FED) and road user charges (RUCs) via the Land Transport Fund. Increased travel as the result of development enabled by PC91 would generate additional revenue.
- Road safety: Mr Edwards agrees that additional traffic from PC91 would increase the number of crashes however he considers “... *recent safety improvements to the roads appear to have resulted in a reduction in the crash rate which would also reduce the number of crashes that might otherwise have resulted from PC91. Provided the Mission Bush/ Glenbrook-Waiuku intersection is addressed, and appropriate active mode facilities are provided locally, I consider general road safety effects are likely to be moderate but would be reduced with a less-intensive zoning*”.
- Active mores: Mr Edwards notes that the precinct proposes a walking/cycling connection through the plan change area and that McLarin Rd (where it is adjacent to the plan change area) and new roads within the plan change area will need to be designed to urban standards with footpaths. Mr Edwards also recommends a pedestrian crossing facility on McLarin Road to enhance active modes and ensure a safe and efficient transport network.
- Parking: Mr Edwards highlights that due to legislative constraints the AUP is not able to include minimum parking requirements, although considers the precinct could include objectives, policies and assessment criteria for subdivision. However Mr Edwards considers this is not necessary as this is better dealt with through the Auckland-wide provisions.

705. I generally agree with Mr Edwards on these matters and consider my recommended amendments to the precinct provisions address some of these concerns.

706. In regard to submissions that seek to decline the plan change due to a general lack or inadequacy of transport infrastructure and road safety concerns I recommend accepting in part those submissions. This is because I recommend amendments to the precinct provisions to require specific transport infrastructure upgrades including a pedestrian crossing facility on McLarin Road, a roundabout at the Mission Bush Road/Glenbrook-Waiuku Road intersection, upgrade of McLarin Road to urban standards and road design requirements. I acknowledge these amendments may not address all submitter concerns (e.g. public transport).

707. Another submitter (**15.1**) seeks to approve the plan change with amendments and states “*Please look at the roads also, no public transport so we rely on our own vehicles.*” It is unclear what amendments they are seeking in relation to transport matters, but as stated above I do recommend amendments. Therefore I also recommend accepting in part this submission point.

708. Three submitters (**3, 40, 39**) generally support the plan change provided amendments are made to the precinct provisions to address their transport related concerns.
709. Submitter Ben Ross (**3.1**) supports the plan change but is concerned that the proposed precinct plan does not include the elements “*futureproof for public transport links on key roads*” and requests that the precinct is amended to include triggers for when Auckland Transport must provide transit services to Glenbrook Beach.
710. Auckland Transport (**FS01**) made a further submission opposing this submission point, stating it would be ultra vires to require Auckland Transport to provide a shuttle service. Auckland Transport also consider due to the population size and location of Glenbrook Beach, it is not a priority location for such a service. Auckland Transport state new/additional services need to be considered across the whole region, following appropriate processes (e.g. RLTP and Regional Public Transport Plan), rather than in an ad hoc manner. Mr Edwards agrees with Auckland Transport on this matter, and therefore does not support submission point **3.1**. I also agree with Auckland Transport and Mr Edwards on this matter and do not support the amendments requested by Mr Ross. However because I recommend approving the plan change with modifications I recommend to ‘accept in part’ this submission point.
711. Kahawai Point Developments (**submitter 40**) generally supports the plan change provided the following amendments are made to the precinct provisions including:
- *Include specific provisions to fund as a prerequisite any additional necessary infrastructure to manage road connections between Glenbrook Beach and Glenbrook Beach Road (40.3)*
712. Mr Edwards considers it is appropriate to make development dependent on the delivery of specific transport infrastructure (e.g. Mission Bush Road/Glenbrook-Waiuku Road intersection), but it is not necessary for the precinct provisions to require the developer to fund such work, recognising that cost sharing and other non-RMA funding agreements may be appropriate. I agree with Mr Edwards on this matter, and therefore do not support this submission point. However because the submission point supports the plan change with modifications, I recommend accepting this submission point in part.
713. Auckland Transport (**FS01**) partly oppose submission point **40.3**. Auckland Transport request that the submitter justify what transport network infrastructure is needed to mitigate adverse transport network effects of the plan change, and highlight that Auckland Transport has no funding responsibility for any identified measures or upgrades.
714. Auckland Transport (**submitter 39**) consider the plan change does not fully demonstrate consistency with NPS-UD Objectives (10 and (3) or Policy (1) due to the remote location, lack of public transport, and reliance on private vehicle. Auckland Transport also considers the plan change assessment of effects is limited to the immediate area, and has not considered impacts and cumulative effects on the wider network other than identifying some

minor safety improvements at the main intersections serving the development, nor provided an assessment of future improvements that may be required to the network service Glenbrook Beach.

715. Never-the-less Auckland Transport recognises that the plan change is relatively small scale and is already identified for development through its Future Urban zoning. Their submission states *“Auckland Transport is of the view that provided the identified local mitigation works are secured, the above macro policy considerations do not direct Auckland Transport to outright oppose PPC 91.”*

716. Overall Auckland Transport does not oppose the plan change provided the matters raised in their submission are addressed. Auckland Transport seek a number of amendments to the precinct provisions. Expert advice received from the council’s various experts is summarised below in relation to these submission points, followed by the comments.

#### Precinct plan (39.1)

717. Mr Edwards supports amending the precinct plan to show a connected network of roads and routes within the precinct and connecting to adjoining sites and streets rather than just the arrows proposed on the precinct plan. However Mr Edwards does not consider it necessary to identify which roads are to be vested in council. Mr Lilley (Council’s Parks expert) also considers the precinct plan should include an overall roading layout to *“... clarify the potential connectivity options that may be achieved and how the pedestrian / cycle link is integrated in to the road network”*<sup>194</sup>

718. I acknowledge the applicant considers road alignments are best confirmed at the consenting stage when the location of roads can be integrated with future subdivision and development, the enhancement and protection of freshwater assets and stormwater management.<sup>195</sup> I also agree with Mr Edwards, Mr Lilley and Auckland Transport that an indicative road layout would be beneficial, particularly to better understand how future development can best integrate with the surrounding area, and the other elements shown on the proposed precinct plan. However I do not consider it is necessary to include this on the precinct plan.

#### Road cross sections (39.2)

719. Mr Edwards supports deleting the road cross section diagrams and replacing this with a table setting out road requirements, similar to that recently included in the new precinct I453 Pukekohe East-Central Precinct. I support these amendments and recommend the precinct be amended as set out in Appendix 7.

#### McLarin Road Frontage upgrade requirements (39.3)

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<sup>194</sup> Andreas Lilley advice, pages 8 and 13

<sup>195</sup> Clause 23 response letter, Matter # OP2 (related to request for a park edge road)

720. Mr Edwards notes it is common practice that “... such upgrading to be undertaken as part of subdivision and development, although the legal precedent for requiring such upgrading could be enhanced by a precinct provision.” Mr Edwards supports including provisions requiring upgrading for the road frontage, but is of the opinion it is not necessary to upgrade the entire frontage as part of the initial stage. I support Mr Edwards recommendations on this. I consider this will alleviate some of the concerns raised by other submitters about road safety and the lack of footpaths. I recommend the precinct be amended as set out in Appendix 7.

#### Intersection serving both the Plan Change area and the land zoned for Business – Neighbourhood Centre Zone (39.4)

721. Mr Edwards is neutral with respect to a precinct provision requiring design approval of intersections or the roundabout on McLarin Road as he considers Auckland Transport will have sufficient opportunity to consider design through the consenting processes.

722. With regard to Auckland Transport’s request that the roundabout on McLarin Road be provided prior to occupation of the first dwelling within the precinct, Mr Edwards states it “... is possible the first dwellings in the Precinct could be accessed via other intersections and in that event the roundabout would not be required immediately. For that reason [I] support this submission point in part only.” I rely on the advice of Mr Edwards advice on this matter.

#### Pedestrian and active mode connections (Precinct Plan) (39.5)

723. Mr Edwards notes that the proposed precinct plan already includes a walking/cycling connection through the site (connecting Glenbrook Beach Recreation Reserve to the Neighbourhood Centre zoned land). Mr Edwards supports the provision of a crossing facility as part of the first stage, but considers the provision of other paths and connections can be provided as development of the land progresses (i.e. not required in first stage). I agree with Mr Edwards on these matters.

724. Mr Edwards also does not support a non-complying status for development that does not provide active mode connections. I support Mr Edwards recommendations in regard to the requirement for a pedestrian crossing on McLarin Road and consider it will alleviate some concerns from submitters about road safety. I recommend the precinct be amended as set out in Appendix 7.

#### Vesting of public assets subject to hazard assessment (39.7)

725. Auckland Transport seek “... to include precinct provisions (objectives and policies) to make clear that any internal road network or other infrastructure that is intended to be vested to Auckland Council must be located outside of any hazard areas so as to be resilient to the effects of climate change.” I acknowledge Auckland Transport’s concerns about the resilience of infrastructure. However I note that only a small part of the plan change area is identified as being subject to the 1% AEP floodplains or coastal inundation and the location of these are in the southern corner of the site and/or where wetlands are identified. Therefore



I consider it unlikely future roads would be significantly adverse effected by these risks and I do not support this point. I therefore recommend rejecting this submission point.

#### Recommendation on Submissions

726. That submission point **39.7** be **rejected** for the reasons set out in this report.
727. There are no amendments in relation to this recommendation.
728. That submission points **39.2** and **39.8** be **accepted** for the reasons set out in this report.
729. Recommended amendments in response to these submissions are set out in Appendix 7.
730. That submissions **2.1, 6.3, 7.6, 7.8, 8.3, 8.4, 9.1, 12.4, 15.1 16.4, 17.3, 18.3, 18.4, 19.3, 19.6, 25.3, 27.6, 28.2, 31.1, 36.1, 39.1, 39.3, 39.4, 39.5** and **40.3** be **accepted in part** for the reasons set out in this report.
731. Recommended amendments in response to these submissions are set out in Appendix 7.

## 11.8. Submissions – Essential services, facilities and local amenities

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
3.2	Benjamin Ross	Approve the plan change with amendments to provide for pocket parks to allow for localised green spaces		Accept in part
6.1	Lania Gribben	Decline the plan change because of a lack of appropriate public transport/schooling/retail in the area		Reject
7.5	Robert Hughes	Decline the plan change because of a lack of essential services [businesses/ retail / schools /fire + ambulance]		Reject
9.2	Emma Ford	Decline the plan change because of lack of essential services		Reject
10.2	Wendy Groom	Decline the plan change because of lack of public transport and essential services		Reject
12.5	Olivia Jackson	Decline the plan change due to a lack of essential services		Reject
13.2	Nadin Rathgeber	Decline the plan change because of lack of facilities		Reject
16.3	Catherine Thompson	Decline the plan change because of a lack of amenities		Reject
17.4	Ian Smith	Decline the plan change because of a lack of essential services and amenities		Reject
18.5	Ellen-May Meharry	Decline the plan change because of a lack of essential services and amenities		Reject
19.4	Michael Wayne MacAulay	Decline the plan change because of a lack of essential services and amenities		Reject
20.7	Dianne Bradford	Decline the plan change because of a lack of essential services		Reject
25.4	Owen Yorke	Decline the plan change because of the impact on local amenities		Reject
27.5	Anton Tyers	Decline the plan change because of a lack of essential services and amenities		Reject
28.4	Shane Bradford	Decline the plan change because of a lack of essential services and amenities		Reject
31.2	Suli Palu	Decline the plan change because of a lack of essential services and amenities [retail, medical]		Reject
34.2	Tui Kaihu Trust ATTN: Victoria Lee McAnulty	Decline the plan change because of a lack of amenities [play areas]		Reject
34.3	Tui Kaihu Trust ATTN: Victoria Lee McAnulty	Decline the plan change because of a lack of essential services [fire, police ambulance]		Reject

## Discussion

732. Sixteen submitters seek to decline the plan change due to adverse effects on existing and/or lack of essential services (emergency and medical services), community facilities and local amenities (e.g. shops, play areas, parks, boat ramp, schools) and job opportunities.
- Schools at capacity and limited school bus capacity
  - No emergency or medical services - nearest in Waiuku. Development away from main centres or central location will put more pressure on volunteer rural services
  - No retail, including groceries
  - No child care opportunities
  - No employment opportunities
  - No or very limited community facilities, including safe play areas. Impact on existing facilities and amenities e.g. boat ramp and parking, beach access
  - No overarching planning for a peninsular based coastal settlement. Concerned that previously discussed upgrades to community facilities and amenities have not happened e.g. Marine Centre as part of Glenbrook 3 Precinct.
733. One submitter, Benjamin Ross (**3.2**) supports the plan change if amendments are made to require the provision of pocket parks to allow localised green spaces. Mr Lilley addresses this matter and considers additional parks are not required in the plan change area. See section 8.11. I rely on Mr Lilley's advice that additional parks are not required within the plan change area and therefore do not support this submission. Because Mr Ross seeks the plan change be approved (with modifications), I recommend accepting his submission in point in part, although I do not support the specific amendments he requests.
734. As discussed earlier in sections 8.2 and 8.11 I agree with submitters that there are currently no or very limited local amenities, facilities or services in Glenbrook Beach, however I do not consider this a reason to decline the plan change. As the population of Glenbrook Beach grows, either through development within Glenbrook 3 Precinct or the plan change area (if approved) the case for increasing/upgrading community facilities and local services may improve. Potential adverse effects on existing schools will be able to be remedied by the Ministry of Education as part of their strategic planning for the wider area. The Neighbourhood Centre zoned land, once developed will be able to provide some local amenities and services.
735. In regard to submissions that seek to decline the plan change due to a general lack essential services (e.g. emergency and medical), local facilities and amenities, shops, schools and so forth I recommend rejecting those submissions. This is because I do not propose any amendments to the precinct that would address these concerns.

## Recommendation on Submissions

736. That submissions **6.1, 7.5, 9.2, 10.2, 12.5, 13.2, 16.3, 17.4, 18.5, 19.4, 20.7, 25.4, 27.5, 28.4, 31.2, 34.2** and **34.3** be **rejected** for the reasons set out above and in sections 8.2 and 8.11 of this report.
737. That submission **3.2** be **accepted in part** for the reasons set out above and in section 8.11 of this report.
738. There are no amendments associated with this recommendation.

### 11.9. Submissions – Extend plan change to include 140 McLarin Road

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
23.1	Aaron and Elizabeth Yorke	Request that 140 McLarin Road be included in the plan change area with the same zone		Reject

#### Discussion

739. Submitter Aaron and Elizabeth Yorke seek to approve the plan change with amendments. These amendments are the inclusion of their site 140 McLarin Road (Lot 1 DP 204733: NA132C/122) within the plan change area, with the same zone change as 80 McLarin Road.
740. The submitter provides some background on their site, stating it was originally part of 80 McLarin Road but was subdivided off prior to their ownership. They highlight that during the SHA process to rezone land from rural to Single House Zone and introduce the Glenbrook 3 Precinct, a submission sought to include 140 McLarin Road within that rezoning, but it was declined. Also see section 2.1 of this report for further information on this.
741. The submitter states through discussions with Harrison Grierson they requested they be included in the plan change before it was notified and state they were told by Harrison Grierson “... *The PPC will be publicly notified in due course and you (and others) will have the opportunity to review all of the information submitted with the PPC request and to make a submission. One such submission could be to request that your land be included in the rezoning process and that would enable you to promote this outcome through the process.*”
742. While there is currently no section 32/32AA report prepared for the proposed rezoning of 140 McLarin Road, I consider there may be some merit and logic in rezoning 140 McLarin Road the same as 80 McLarin Road, and applying the same precinct provisions as this would enable an integrated approach to urbanisation of the site and plan change area. The council’s urban design expert Ms Esterman makes a similar observation. The council’s transport and parks experts also suggest inclusion of 140 McLarin Road would not from their perspective increase adverse effects.

743. However I consider this submission may be considered out of scope of the plan change. Relevant caselaw can be found in *Clearwater Resort Ltd v Christchurch City Council*,<sup>196</sup> and *Palmerston North City Council v Motor Machinists Ltd*.<sup>197</sup> In *Motor Machinists* the High Court referred to its earlier decision in *Clearwater* and confirmed that a two limbed test must be satisfied.
1. The submission must address the proposed plan change itself, that is it must address the alteration to the status quo which the change entails; and
  2. The council must consider whether there is a real risk that any person who may be directly or potentially directly affected by the decision sought in the submission has been denied an effective opportunity to respond to what the submission seeks.
744. In *Motor Machinists* the High Court described the first limb as the “dominant consideration”, involving consideration of both “the breadth of alteration to the status quo entailed in the proposed plan change, and whether the submission then addresses that alteration.” The Court noted two potential ways of analysing this. One way is to ask whether the submission raises matters that should have been addressed in the Section 32 evaluation. If so, the submission is unlikely to fall within the ambit of the plan change. Another way is to ask whether the management regime in a district plan for a particular resource (such as a particular lot) is altered by the plan change. If it is not then a submission seeking a new management regime for that resource is unlikely to be ‘on’ the plan change.
745. In relation to the second limb the Court noted that “*To override the reasonable interests of people and communities by a submissional side-wind would not be robust, sustainable management of natural resources.*” Given the other options available, which include seeking resource consent, seeking a further public plan change, or seeking a private plan change, the Court determined that a “precautionary approach to jurisdiction imposes no unreasonable hardship.” The Court however noted that there is less risk of offending the second limb in the event that a change is merely consequential or incidental, and adequately assessed in the existing Section 32 evaluation. If the effect of regarding a submission as ‘on’ a variation would be to permit a planning instrument to be appreciably amended without a real opportunity for participation by those potentially affected, this is a powerful consideration against any argument that the submission is truly ‘on’ the variation.
746. I also recognise that the submitter has tried in the past to have the site rezoned as part of the SHA process that rezoned the land now within the Glenbrook 3 Precinct.
747. It is for the Hearing Commissioners to determine whether this submission is within scope of the plan change. If the Hearing Commissioners consider that this submission is in scope, and the submitter provides a section 32/32AA evaluation to support their request to rezone the site. If the submitter is able to provide the necessary evaluation to support their request and

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<sup>196</sup> *Clearwater Resort Ltd v Christchurch City Council* HC Christchurch AP34/02, 14 March 2003, at [66]

<sup>197</sup> *Palmerston North City Council v Motor Machinists Ltd* [2013] NZHC 1290, at [80] - [82]

any other necessary supporting evidence, I would be open to supporting this submission request.

#### Recommendation on Submissions

748. That submission **23.1** be **rejected** unless the submitter is able to provide the necessary evaluation and technical evidence to support their request.

749. There are no amendments in relation to this recommendation.

### **11.10. Submissions – Natural environment**

<b>Sub. No.</b>	<b>Name of Submitter</b>	<b>Summary of the Relief Sought by the Submitter</b>	<b>Further Sub. No.</b>	<b>Planners Recommendations</b>
2.3	Pauli Lydia Bosch	Decline the plan change because of the environmental impact		Reject
18.6	Ellen-May Meharry	Request more information about local wildlife		Accept in part
19.8	Michael Wayne MacAulay	Request more information about loss of trees		Reject
19.9	Michael Wayne MacAulay	Request more information about local wildlife		Accept in part
20.4	Dianne Bradford	Request more information about loss of trees		Reject

#### Discussion

750. Three submitters express concern about the impact on local wildlife and trees, and ask for further information on this.

751. Submitters Ellen-May Meharry (**18.6**) and Michael Wayne MacAulay (**19.9**) express concerns about wildlife and birds (e.g. heron, tui, pheasants, kingfisher, kereru/wood pigeon) who nest at 80 McLarin Road. Ellen-May Meharry states that many trees were removed when Kahawai Point was developed and that they have only observed these birds returning now they are nesting in the trees at 80 McLarin Road.

752. Submitters Michael Wayne MacAulay (**19.8**) and Dianne Bradford (**20.4**) both ask what will happen to the trees on 80 McLarin Road. Mr MacAulay considers these trees provide a significant wind shelter for existing houses in the area.

753. Submitter Pauli Lydia Bosch (**2.3**) opposes the proposed mixed housing because of environmental impacts but does not highlight any specific environmental impacts of concern.

754. The submission of Sarah Fisher (**38.1**)<sup>198</sup> also asks a number of questions about wetlands and riparian planting, and the implications for her property<sup>199</sup> which adjoins the plan change area. Ms Fisher asks if the council is not responsible for the cost of planting the riparian margins, how does she (as a neighbour) hold the developer to account. Ms Fisher also comments that cycleways and pedestrian walkways should not be attached to riparian planting areas to manage the risk of them sinking.
755. The council's expert ecologist (Jason Smith) responds to some of the submitters questions, but does not consider any amendments are required to address these submitters' concerns.
756. The applicant's Ecology Reports identify the trees on the site as being mature exotic trees within a shelterbelt. The AEE and Council's expert ecologist Jason Smith both consider the plan change area has low terrestrial ecological values, noting other than the shelterbelt trees the site is in grassed pasture. I also note that in their CIA Ngati Te Ata support the removal of the pine and macrocarpa trees and other plants from the site that they consider to be pest plants.
757. While the existing trees might provide habitat for various birds and provide a level of shelter from the wind, they are not protected in the AUP. Being exotic trees, the AUP does not restrict removal of the trees, unless they are within 10m of a stream or within 20m of a natural wetland.<sup>200</sup> The proposed precinct provisions require a 10m riparian yard/margin around the intermittent streams and natural wetlands and that these be planted in native plants, which I support. This will contribute to improving the biodiversity of the area and improve habitat.
758. However with regards to biodiversity I consider the precinct provisions could be improved, and I recommend some minor amendments to better align with Objective 10. This is discussed in section 8.9. For that reason I recommend **accepting in part** submissions **18.6** and **19.9** as they relate to general concerns about biodiversity and habitat.
759. I also generally support the suggestion of submission **38** (Sarah Fisher) that walkways/cycleways should not be located within a riparian or wetland margin. I consider paths should be avoided within such margin/yards (unless necessary to cross a stream) in order to better achieve the outcomes sought to restore and enhance the intermittent streams and wetlands. I note the Glenbrook 3 Precinct includes a standard to this effect.<sup>201</sup> However I have not included this in my recommended precinct provisions (Appendix 7) at this stage. As discussed in section 8.9 I have several concerns with how the proposed riparian margin and setback standard is drafted.

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<sup>198</sup> There is only one submission point (38.1) for this submission. See section 11.11 in relation to flooding concerns.

<sup>199</sup> 32a Ronald Avenue

<sup>200</sup> See Table E15.4.1 Activity table - Auckland-wide vegetation and biodiversity management rules

<sup>201</sup> I453.6.1.2(1)(c) *pedestrian/cycle paths shall be located adjacent to, and not within the 10m planted strip.*

### Recommendation on Submissions

760. That submissions **2.3**, **19.8**, and **20.4** be rejected for the reasons above.
761. There are no amendments in response to these submission points.
762. That submissions **18.6** and **19.9** be accepted in part for the reasons set out in this report.
763. Amendments in response to this recommendation are included in Appendix 7.

### **11.11. Submissions – Stormwater and flooding**

<b>Sub. No.</b>	<b>Name of Submitter</b>	<b>Summary of the Relief Sought by the Submitter</b>	<b>Further Sub. No.</b>	<b>Planners Recommendations</b>
7.7	Robert Hughes	Decline the plan change because the site is susceptible to flooding		Accept in part
15.2	Ben Scott	Approve the plan change subject to amendments to include upgrade of stormwater system	FS01 – support in part	Accept in part
16.2	Catherine Thompson	Decline the plan change because stormwater provision needs upgrading		Accept in part
17.6	Ian Smith	Decline the plan change because of potential for flooding		Accept in part
19.5	Michael Wayne MacAulay	Decline the plan change because of potential for flooding		Accept in part
20.6	Dianne Bradford	Decline the plan change because of potential for flooding	FS02 - support	Accept in part
28.1	Shane Bradford	Decline the plan change because of potential for flooding	FS02 - support	Accept in part
31.4	Suli Palu	Decline the plan change because of potential for flooding	FS01 – support in part	Accept in part
38.1	Sarah Fisher	Request for further information and clarification about riparian planting, flooding measures, housing types, time scales		Accept in part
39.6	Auckland Transport ATTN: Jason Ashby	Amend plan change to include precinct provisions relating to stormwater management	FS02 - support	Accept in part

### Discussion

764. Nearly a third of submitters have raised concerns with stormwater and flooding.
765. Submitters **7.8**, **19.5**, **20.6**, **28.1**, and **34.1** all observe that 80 McLarin Road appears to be susceptible to flooding. Submitter **19.5** also comments that recent weather events are likely



to become more frequent. Submitters **7.8** and **34.1** are concerned about how runoff from development of the plan change area will affect properties already affected by such issues.

766. Submitter Ben Scott (**15.2**) requests the plan change be approved, but with amendments. They highlight flooding issues on Ronald Avenue and request a thorough upgrade and effective stormwater plan. They state the stormwater system is inadequate, noting that during heavy rain the cesspits fill up quickly, and struggle even in normal rain events. Auckland Transport (**FS01**) support this submission point in part, and the need to provide necessary infrastructure upgrades (e.g. culvert upgrades) to mitigate adverse stormwater runoff effects on Ronald Avenue and the safe, effective and efficient use and operation of this road.
767. Submitter Catherine Thompson (**16.2**) also considers “... *stormwater provision needs upgrading as high density housing will mean that the houses on the beach will again be over run with the amount of water coming off the new development.*”
768. Submitter Ian Smith (**17.6**) highlights that the contours of the plan change area (sloping towards Glenbrook Beach residents) already contributes to flooding and considers developing the site is a future safety hazard.
769. Submitter Sarah Fisher (**38.1**) does not state whether she supports or opposes the plan change but she does ask a number of questions and raises a number of concerns. A key concern is that development of the plan change area will increase the risk of flooding for her property<sup>202</sup> and others on Ronald Avenue. Ms Fisher states that from her experience an area around the fence line of her property and the plan change area is a wetland (having not been dry for the last two years), and provides photos of what appear to be surface water along the fence line. Ms Fisher states she is keen to work with the planners and ecologists to get a ‘win win’ situation for all. I note Ms Fisher also made a further submission, supporting several submission points in relation to flooding and stormwater infrastructure.
770. Submitter Auckland Transport (**39.6**) requests that the proposed precinct provisions area amended to “... *include objectives, policies, and rules relating to stormwater including to address whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets (as a matter for discretion and policy).*” Ms Seekup and Ms Basheer support this submission and incorporate this request into their recommendation.
771. The Franklin Local Board also expresses concern about the inadequacy of stormwater infrastructure and the existing runoff issues for Ronald Avenue.
772. Ms Seekup and Ms Basheer have confirmed that flooding is a long term known issue for the Ronald Avenue properties (28-38 Ronald Avenue) that back onto 80 McLarin Road and address submission in section 7 of their report.
773. As discussed in section 8.7 Ms Seekup and Ms Basheer have significant concerns about the adverse effects of stormwater runoff, including effects of flooding on Ronald Avenue

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<sup>202</sup> 32 Ronald Avenue

properties and effects on the sensitive coastal environment. Ms Seekup and Ms Basheer consider the SMP (including flood hazard assessment) provided is currently insufficient to demonstrate adverse effects will be mitigated and that the proposed precinct provisions are appropriate. Ms Seekup and Ms Basheer recommend amendments to the precinct provisions and in addition that the applicant update the SMP or demonstrate that

774. I acknowledge submitters concerns, in particular the potential adverse effects on Ronald Avenue properties. As set out in section 8.7 I recommend a number amendments to the precinct provisions in addition to further information from the applicant (as recommended by Ms Seekup and Ms Basheer). In particular I highlight the need for the applicant to either demonstrate that the post development peak flow discharges from the plan change area will result in no more than minor effects from flooding to the downstream properties flooding or to provide additional robust precinct provisions to ensure these adverse effects can be adequately mitigated at the consenting stage. I consider these recommendations will generally address most of the concerns raised by submitters.

#### Recommendation on Submissions

775. That submissions **7.7, 15.2, 16.2, 17.6, 19.5, 20.6, 28.1, 31.4, 38.1** and **39.6** (and FS01, FS02) be **accepted in part** for the reasons set out in this report.

776. Amendments in relation to these recommendations are set out in Appendix 7 to this report

### **11.12. Submissions – Mana Whenua values**

<b>Sub. No.</b>	<b>Name of Submitter</b>	<b>Summary of the Relief Sought by the Submitter</b>	<b>Further Sub. No.</b>	<b>Planners Recommendations</b>
1.1	Ngati Te Ata	Indicate how it is proposed to actually respect, protect and recognize the cultural, social and environmental issues raised in Cultural Values report		Accept in part
40.4	Kahawai Point Developments Limited c/- Tattico ATTN: John Duthie	Support the plan change subject to inclusion of Te Aranga principles	FS02 - support	Accept

#### Discussion

777. Ngati Te Ata (**1.1**) oppose the plan change because they consider the applicant has not demonstrated how they propose to respect, protect and recognise the cultural, social and environmental issues they raised in their CIA. Their CIA was included as part of the plan change and the issues they raised are summarised in section 8.10.

778. Based on the concerns raised by Ngati Te Ata in their CIA and submission I recommend amendments to the precinct that partially address some of their concerns. These recommendations include:

- Adding a new objective (Objective 14) seeking subdivision and development respects Mana Whenua values.
- Adding a new policy (Policy 12) that encourages development to incorporate Te Aranga principles, including the principles of Mana, Whakapapa, Taiao, Mauri tu, Mahi toi, Tohu and Ahi ka.
- Adding a new policy (Policy 13) that seeks to avoid or mitigate adverse effects on Mana Whenua values by taking an integrated approach to stormwater management, maintaining and enhancing the mauri of intermittent streams and wetlands, and protecting the mauri of Waiuku Awa and Manukau Harbour.
- Adding matters of discretion and assessment criteria for several restricted discretionary activities including:
  - subdivision that complies with the precinct standards (IXXX.8.1(1)(l) and IXXX.8.2(1)(d)(iii))
  - development of four or more dwellings that comply with the precinct standards (IXXX.8.1(2)(l)) and IXXX.8.2(2)(d)(vii))
  - development of up to three dwellings that do not comply with the riparian margins and setback standard (IXXX.8.1(3)(h))
  - subdivision and development of four or more dwelling/lots that does not comply the riparian margins and setback standard (IXXX.8.1(4)(k))

779. In addition I recommend new precinct provisions related to the management of stormwater and water quality including; new objective (Objective 13), policy (Policy 11), rules, standard , and matters of discretion/assessment criteria. These are discussed in section 8.7.

780. I also recommend minor amendments in relation to riparian margins and setbacks, which are discussed in section 8.9.

781. Although Ngati Te Ata oppose the plan change I consider these recommendations partially address some of the matters raised by Ngati Te Ata.

782. Kahawai Point Development (**40.4**) support the plan change subject to the inclusion of Te Aranga principles. As noted above I recommend including provisions related to Te Aranga principles, as this aligns with one of the recommendations in the Ngati Te Ata CIA. As mentioned in sections 8.3 and 8.10 Ms Esterman also supports including Te Aranga Design Principles in the precinct provisions, noting the Glenbrook 3 Precinct has such provisions. I recommend a new objective, policy and matters of discretion/assessment criteria be included in the Glenbrook 4 Precinct. These are set out in Appendix 7.

### Recommendation on Submissions

783. That submission **1.1** be **accepted in part** for the reasons set out in this report.

784. That submission **40.1** be **accepted** for the reasons set out in this report.

785. Amendments in relation to these recommendations are set out in Appendix 7.

### **11.13. Submissions – Reverse sensitivity**

<b>Sub. No.</b>	<b>Name of Submitter</b>	<b>Summary of the Relief Sought by the Submitter</b>	<b>Further Sub. No.</b>	<b>Planners Recommendations</b>
25.1	Owen Yorke	Request that consideration be given between boundary of urban and future urban zones given the potential effects		Reject

### Discussion

786. Submitter Owen Yorke (25.1) states they currently lease the Future Urban zoned land (Clelland Land) to the south of the plan change area, and have done so for many years.<sup>203</sup>

The submission states:

*The property works in conjunction with the main farm in the production of dairy (milk) and the breeding and raising of stock for replacement stock, meat works and for sale. We believe that rezoning to 80 McLarin Rd to high density will lead to conflict between the farm operation and high density urban zoning.*

787. The submitter lists a number of concerns including complaints to farming practices (e.g. noise, order, dust, use of chemical); risk of urban people trespassing onto rural land (healthy and safety risks); planting on boundary that is harmful to farm animals; and increased litter from urban uses that could adversely affect the farm water supply and stock. The submitter suggests options that could address these effects at the rural/urban boundary including:

- *Urban residents agree to and have a non complaints clause (Kahawai Point)*
- *Urban boundary set backs (Kahawai point - No non residential buildings within 6m of boundary)*
- *Planting along urban boundary (Kahawai Point - 3m of planting)*
- *Boundary fencing that is stock friendly and in conjunction with setbacks and planting works for the urban dweller (As per Kahawai Point Boundary)*
- *Caveats for urban residents that limit the use and planting on rural boundaries (As per Kahawai Point).*

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<sup>203</sup> Submission refers to 147 and 187 McLarin Road. There is no 147 McLarin Road in council's GIS Viewer, however 149 McLarin Road is directly opposite the plan change area.

788. The AUP RPS contains several policies seeking to manage reverse sensitivity risks including B2.4.2 *Residential intensification Policy (7) Manage adverse reverse sensitivity effects from urban intensification on land with existing incompatible activities*. RPS Appendix 1 also expects a structure plan to address reverse sensitivity effects on use and development.<sup>204</sup> Reverse sensitivity is a term used to describe the sensitivity of some activities to other lawfully established activities in the vicinity.
789. Across Auckland rural and residential zones are located directly adjacent to each other, including the existing residential zoned properties along Ronald Avenue that adjoin the south-western boundary of the farm sites leased by the submitter. The Aucklandwide and zone provisions manage adverse effects of land use, and usually it is the activity generating the adverse effect that needs to manage the effect. However some provisions provide for a slightly higher level of affect at the interface of different zones.
790. For example Chapter E25 Noise seeks 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. These provisions are based on what zone the activity is undertaken, but also recognises the interface between different zones.
791. Standard E25.6.15 sets the maximum permitted noise levels from activities within the FUZ (and other rural zones), as measured within the boundary of any residential zoned site. These maximum permitted noise levels are slightly higher than what is permitted for activities within the residential zones, recognising that slightly higher noise levels are expected to arise from rural activities in the rural zones and FUZ. I note that the noise levels set in Standard E25.6.15(1) do not apply to the noise of farm animals (unless they are confined within a building or enclosure) or the use of mobile agricultural horticultural machinery or equipment.<sup>205</sup>
792. I consider the Aucklandwide noise provisions are sufficient to manage potential adverse reverse sensitivity effects from noise, especially noting the submitters farming operation on the sites adjoining the plan change area appears to be primarily used for grazing purposes.
793. In addition to the Aucklandwide and zone provisions, some precincts include additional provisions to manage the interface between different zones. As previously mentioned, the Glenbrook 3 Precinct includes a 'no complaints' provision that applies to any new residential properties that adjoin the rural land to the east of the precinct (Lot 2 DP 21692).<sup>206</sup> That

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<sup>204</sup> AUP RPS 1.4.4 Use and activity (7)

<sup>205</sup> E25.6.15(b) and (c)

<sup>206</sup> I453.6.1.9 Reverse Sensitivity

precinct also includes yard<sup>207</sup> and fencing<sup>208</sup> standards that apply to properties adjoining the adjoining the rural site (Lot 2 DP 21692). These provisions apply for as long as a farming operation is being undertaken on the rural site. I understand that the no complaints covenant provision was offered by the applicant who proposed the precinct through the SHA process.<sup>209</sup>

794. In my opinion a key difference between the Glenbrook 3 Precinct and the proposed Glenbrook 4 Precinct is that the Glenbrook 3 Precinct adjoins rural zoned land where as the Glenbrook 4 Precinct adjoins Future Urban zoned land. While the FUZ enables rural activities to be undertaken, this is with the expectation that the FUZ will eventually be urbanised. In my opinion requiring a different treatment along the boundary with the applicants' site is not appropriate or necessary given that rural activities are expected to transition to urban in the future.
795. Overall I do not consider additional precinct provisions are necessary to manage the rural/residential interface between the applicant's site and the plan change area.

#### Recommendation on Submission

796. That submission **25.1** be **rejected** for the reasons above.
797. There are no amendments in response to this recommendation.

### 11.14. Submissions – Consistency across precincts

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Sub. No.	Planners Recommendations
39.8	Auckland Transport ATTN: Jason Ashby	Amend precinct provisions to ensure consistency across other local plan changes		Accept

#### Discussion

798. Submitter Auckland Transport (**39.8**) seek a consistent of approach and drafting of precinct provisions across other precincts introduced through recent plan changes, including those in Drury and Pukekohe, provided that this exercise does not adversely affect the outcomes the plan change is seeking. Auckland Transport requests that necessary drafting amendments

<sup>207</sup> I453.5.10 Yards (1) no habitable building within 6m yard adjoining rural site, and minimum 3m planting requirements within yard.

<sup>208</sup> I453.5.11 Fences (5) a soldi fence of minimum 1.5m in height along boundary

<sup>209</sup> <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/history-unitary-plan/modifications/upmod123specialhousingglenbrook3precinct.pdf> Decision Report, pages 17-18

are made to the proposed precinct in order “... *to achieve consistency and clarity, including in relation to objectives, policies, rules, methods and precinct plans, across private plan changes including those arising from recent decisions applying within Drury and Pukekohe East.*”

799. While it is unclear exactly which precinct provisions Auckland Transport are seeking to be amended to be consistent with other precincts, in drafting the recommended precinct provisions I have turned my attention to provisions in other recently added precincts to ensure consistency, where I consider it appropriate and relevant to this precinct. For example:

- New standard IXXX.6.7 *Road design and upgrade of existing rural roads* is based on I453 Pukekohe East-Central Precinct
- New matters of discretion (IXXX.8.1(7)) and assessment criteria (IXXX.8.2(6)) for subdivision/development that does not comply with standard IXXX.6.7 are based on I451 Drury East Precinct
- New special information requirement IXXX.10.1 Traffic assessment is based on I451 Drury East Precinct
- Deleting the road cross sections and replacing with IXXX.12 Appendix 1 - New table of road function and design elements is based on I453 Pukekohe East-Central Precinct.

800. I have also made some minor amendments to the proposed precinct provisions to improve consistency with the standard AUP precinct template and numbering, which are included in the recommended precinct provisions in Appendix 7. These include:

- deleting the heading IXXX.5 Subdivision Activity Table and adding the heading IXXX.7 Assessment – controlled activities. This is to ensure that the precinct numbering aligns with the template (i.e. .5 is always for notification rules, .6 is always for standards and so forth)
- amending or adding the preamble statements about whether the overlay, Auckland-wide and zone provisions apply to IXXX.1 Precinct description, IXXX.2 Objectives and IXXX.3 Policies
- amending the preamble before the activity table to add reference to the activity status for subdivision pursuant to section 11 of the RMA.
- adding the standard notification rules (normal RMA test and affected persons). This is discussed in section 11.6 as it relates to submission point 40.2.

801. In my opinion these recommended amendments improve consistency with other precincts and the standards AUP precinct template.

802. In addition to the matters set out above, I do have some further concerns in terms of consistency with the standard AUP precinct template, and the relationship of the precinct provisions with the underlying zone and/or Auckland-wide provisions. I have not recommended any changes to the precinct in relation to these at this stage as there may not be scope under this submission. These are

#### Recommendation on Submission

803. That submission **39.8** be **accepted** for the reasons above.

804. Amendments in response to this recommendation are included in Appendix 7.

### **11.15. Franklin Local Board views**

805. The Franklin Local Board provided the following views at their 27 June 2023:<sup>210</sup>

That the Franklin Local Board:

- a) provide local board views on Plan Change 91 by HD Project 2 Ltd for 80 McLarin Road, Glenbrook Beach with the following feedback:
  - i) express concern about the development impact on a coastal area site and consider a lower housing density approach is better suited in this coastal settlement.
  - ii) express concern regarding the inadequate stormwater infrastructure drainage issues where Ronald Ave runoff is already a problem.
  - iii) express concern applying urban standards to a coastal settlement with narrow roading and lack of parking, leading to problems for large vehicles, including waste collection and more alarmingly emergency vehicles, who are unable to safely traverse the roads when cars are parked either legally or illegally.
  - iv) request that greater planning and provision for creation of adequate pedestrian and cycling connections to existing pathways be required as part of the plan change area to access the business zone area, and recommend that footpaths that are provided by the developer connect to current pathways.
  - v) note that there is no current or planned public transport for this area, despite it including a Special Housing Area.
  - vi) recommend that no development commences before the Southwestern wastewater plant is operational.
  - vii) note that further planning and provision is required on the connection road from the existing reserve on Ronald Avenue.
- b) decline to appoint a local board member to speak to the local board views at a hearing on Plan Change 91.

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<sup>210</sup> Resolution FR/203/96. Also available here:

[https://infocouncil.aucklandcouncil.govt.nz/Open/2023/06/20230627\\_FR\\_MIN\\_11867\\_WEB.htm](https://infocouncil.aucklandcouncil.govt.nz/Open/2023/06/20230627_FR_MIN_11867_WEB.htm)



806. The local board views are included in discussion under the relevant topic section above in section 11.

## 12. Recommended Changes and Section 32AA Analysis

### 12.1. Recommended changes within scope of submissions

807. The amendments I recommend are set out in full in Appendix 7 and relate to the following effects and matters raised in submissions:

- a. traffic/transport
- b. stormwater, water quality and flooding
- c. biodiversity/ecology
- d. amenity
- e. effects on Mana Whenua values.

808. The rationale for my recommended amendments is discussed in detail under the relevant topics in sections 8 and 11. Table 7 below provides a summary of the amendments I recommend to the precinct provisions, grouped by topics, that I consider are within scope of the submissions.

809. These recommended changes require an additional assessment in accordance with S32AA of the RMA, which is also included in Table 7 below. This further evaluation is only made in respect of the changes I have recommended in Appendix 7 to this report and discussed above. It is at a level of detail which, in my opinion, corresponds to the scale and significance of the proposed changes.

810. Overall I consider the recommended changes to the precinct provisions better achieve the purpose and objectives of the plan change, than the provisions proposed by the applicant.

811. I also consider the recommended changes better achieve the relevant RPS provisions.

**Table 7: Summary of rationale for recommended changes to Glenbrook 4 Precinct and Section 32AA analysis**

Recommended amendments to Glenbrook 4 Precinct – by theme	Discussion
Transport, including walking and cycling <ul style="list-style-type: none"> <li>• Amend Objective (3) and Policy (4) (active mode/crossing facilities)</li> <li>• Delete road cross sections and replace with road design requirements and new</li> </ul>	Will better achieve the objectives of the plan change, including proposed Objectives (2), (3), (4), (5).  Will better achieve RPS: <ul style="list-style-type: none"> <li>• Policy B2.2.2 (3) and Appendix 1</li> <li>• Policies B2.3.2 (1), (2)</li> <li>• Objective B3.3.1 (1), Policies B3.3.2 (1), (5).</li> </ul>

Recommended amendments to Glenbrook 4 Precinct – by theme	Discussion
<p>standard. Amend activity status for development that does not comply with this from discretionary to restricted discretionary.</p> <ul style="list-style-type: none"> <li>• New Policy 3A, activity, standard and information requirement – avoiding adverse effects on transport network by limiting subdivision and development until specific upgrades are made</li> </ul>	<p>Will provide social and environmental effects and benefits, by improving the efficiency and effectiveness of the local transport network, and improving safety of all road users. Without these recommended changes there will likely be adverse effects on health and safety, and social and economic costs associated with road crashes.</p> <p>The pedestrian road crossing facility and urban upgrades on McLarin Road will improve road user safety and encourage active modes within Glenbrook Beach settlement.</p> <p>Replacing road cross section with road design requirements will ensure consistency with current Auckland Code of Practice for Land Development and Subdivision (Chapter 3: Transport). Will also ensure minimum road widths are sufficient to accommodate necessary functional design elements needed and that local roads are designed for low traffic speeds which will support cycle use.</p> <p>Economic costs – upgrades within Glenbrook Beach settlement (i.e. pedestrian crossing facility, rural road upgrade)</p> <p>Economic costs to developer for upgrades within Glenbrook Beach settlement (i.e. pedestrian crossing facility, rural road upgrade), however upgrades to rural roads would ordinarily be required from a developer and inclusion of these provisions will not require additional financial costs to developer</p> <p>New Policy 3A cascades down from Objective 3 and identifies specific roading upgrades needed to avoid, remedy or mitigate adverse effects on the safe and efficient operation of the transport network, in particular the upgrade of the Mission Bush Road/Glenbrook-Waiuku Road intersection identified necessary by Mr Edwards. Without this Mr Edwards considers the intersection will be operating poorly by 2030, even without the plan change which will increase safety risks.</p> <p>New Standard IXXX.6.6 Staging of subdivision/development with transport infrastructure upgrades and the discretionary activity status for non-compliance with this standard, and the new special information requirements will enable appropriate consideration of adverse effects on the safe and efficient operation of the transport network, noting Glenbrook-Waiuku Road is an arterial road, while providing some flexibility if an alternative method to a roundabout would achieve the same mitigation.</p>

Recommended amendments to Glenbrook 4 Precinct – by theme	Discussion
	<p>Economic costs in relation to the Mission Bush Road/Waiuku-Glenbrook Road intersection upgrade requirement.</p> <ul style="list-style-type: none"> <li>• Economic cost to developer both in contributing costs to intersection upgrade/roundabout if required, and by preventing development from progressing until upgrade complete/suitably progressed. Upgrade of intersection/roundabout is not currently funded or identified on a work programme, therefore delays to development of the plan change area could be significant.</li> <li>• Economic costs to Auckland Transport for upgrade of intersection and impact of adding new unplanned and unfunded works to work schedule. However based on Mr Edwards advice this intersection would have poor performance/safety without plan change so costs to Auckland Transport would likely eventuate even without the plan change.</li> </ul>
<p>Stormwater, flood risk and ecology</p> <ul style="list-style-type: none"> <li>• Delete Objective 11 (attenuating stormwater) and incorporate into new Policy 11.</li> <li>• New Objective 12 (avoiding flooding effects)</li> <li>• New Objective 13 (stormwater quality/quantity)</li> <li>• New Policy 11 (SMP)</li> <li>• New standard (stormwater quality), rules and matters of discretion/assessment criteria</li> </ul>	<p>Will better achieve Part 2 of the RMA, including s6(h), s7(d), s7(f)</p> <p>Will better achieve RPS:</p> <ul style="list-style-type: none"> <li>• Objective B7.3.1 (3), Policies B7.3.2 (1), (5)</li> <li>• Policies B7.4.2 (1), (7), (9)</li> <li>• Objective B6.3.1 (2)</li> <li>• Policy B2.2.2 (3) and Appendix 1.</li> </ul> <p>In my opinion Objective 11 identifies the method to achieve the outcome and is better incorporated into new Policy 11. New Objective 12 and Objective 13 provide clearer outcomes in terms of managing stormwater runoff (flooding, water quantity and water quality).</p> <p>Policies 7 and 10 are also combined into new Policy 11 and identify methods for achieving the outcomes.</p> <p>New Standard IXXX.6.5 Stormwater quality, the restricted discretionary activity status for development that does not comply with it, and matters of discretion/assessment criteria will ensure stormwater contamination is avoided or minimised, whilst providing flexibility to the developer to use alternative methods that achieve the same result.</p>

Recommended amendments to Glenbrook 4 Precinct – by theme	Discussion
	<p>These recommended changes will provide positive social, cultural and environmental effects and benefits by managing stormwater quality and quantity. Without these recommended changes there will likely be social, economic, cultural and environmental costs associated with flooding and discharge.</p> <p>Economic benefits to developer in terms of connecting into the NDC.</p> <p>Note: these recommended provisions are drafted on the assumption that issues raised by Ms Seekup and Ms Basheer are resolved. If these matters are not resolved additional precinct provisions will be required, in particular in relation to flood risks to people and property and treatment of discharge into a sensitive coastal receiving environment (i.e. SEA-M).</p>
<p>Mana Whenua values and Te Aranga Principles</p> <ul style="list-style-type: none"> <li>• New Objective 14 (Mana Whenua values)</li> <li>• New Policies 12 (Te Aranga principles), 13 (Mana Whenua values)</li> <li>• New matters of discretion/assessment criteria</li> </ul>	<p>Will better achieve Part 2 of the RMA, including s6(e), 7(a), s8.</p> <p>Will better achieve RPS:</p> <ul style="list-style-type: none"> <li>• Objectives B6.2.(1), (2) and Policy B6.2.2(1)</li> <li>• Objectives B6.3.1(1), (2) and Policies B6.3.2(1-4), (6)</li> <li>• Objective B6.3.1(1) and Policies B6.3.2(1-4), (6).</li> </ul> <p>Will provide positive cultural, social and environmental effects and benefits.</p> <p>Recognising Mana Whenua values and incorporating Te Aranga Principles into development and subdivision of plan change area will enhance Mana Whenua values and opportunities for Mana Whenua to be involved in more detailed design stage of development. Inclusion of Te Aranga principles is consistent approach to Glenbrook 3 Precinct.</p> <p>These provisions do not change the activity status, or impose additional controls i.e. no lost development potential.</p> <p>Economic costs to developer in terms of costs time/financial to engage with Mana Whenua during the detailed design stage, however the applicant has already stated they intend do so with Ngati Te Ata, therefore unlikely to be additional costs than already anticipated.</p>
<p>Riparian and wetland margins</p> <ul style="list-style-type: none"> <li>• Minor amendment to Policy 9</li> </ul>	<p>Amendment to Policy 9, corrects an error (no permanent streams in the plan change area, but there are wetlands), and</p>

Recommended amendments to Glenbrook 4 Precinct – by theme	Discussion
<ul style="list-style-type: none"> <li>Minor amendment to purpose of standard</li> </ul>	<p>better aligns with the proposed riparian margins and set back standard.</p> <p>Amendment to standard IXXX.6.3 better describes the purpose of the standard and provides a better link back up to Objective 10 and Policy 9, therefore more likely to achieve the objectives of the precinct.</p> <p>Could improve efficiency at consenting stage as provides clarity as to the purpose and intent of the standard.</p> <p>Environmental benefits.</p>
<p>Amend fencing standard to reduce the maximum height limit.</p>	<p>Benefits by enabling more opportunity for passive surveillance and better achieves Policy 6.</p> <p>Improves consistency of streetscape character</p> <p>No additional economic costs to developers or land owners</p>
<p>Amend precinct description stating subdivision and development will integrate with the delivery of infrastructure, and add additional purpose to Standard IXXX6.1.</p>	<p>Better reflects the outcomes sought in Objective (3) and Policy (3). No additional consenting requirements.</p>
<p>Consistency amendments including:</p> <ul style="list-style-type: none"> <li>Preambles before/after each section re: relationship with zone, overlay and Aucklandwide provisions</li> <li>inclusion of standard notification rules</li> <li>Formatting, renumbering and minor corrections</li> </ul>	<p>More efficient and effective for plan users and council staff processing consent applications by:</p> <ul style="list-style-type: none"> <li>Improving consistency where possible with the AUP template for precincts</li> <li>Improving consistency and readability e.g. formatting, renumbering</li> <li>Improving accuracy of information and correcting minor errors e.g. Neighbourhood Centre instead of Local Centre, correct names used (Glenbrook Beach Recreation Reserve) and so forth, improves consistency and accuracy</li> </ul>

## 12.2. Potential changes outside the scope of submissions

812. In addition to the recommended changes included in Appendix 7 and discussed in section 12.1, I do have some further concerns in terms of consistency with the standard AUP precinct template and the relationship of the precinct provisions with the underlying zone

and/or Auckland-wide provisions. I have not recommended any changes to the precinct in relation to these at this stage, however I consider it could be beneficial to do so to avoid any potential implementation issues and improve consistency. For example:

- Activity (A1) *Grazing*... duplicates the same activity and permitted status in the underlying zone, therefore is not need. There are also no precinct objectives or policies to support this.
- The activities (A2) *Development of up to three dwellings*... and (A3) *Development of up to four or more dwellings*... use slightly different terminology to the MHS Zone, and do not specify whether the number of dwellings is per site. In contrast proposed notification rule IXXX.5(1)(a) does say “per site”. This could result in implementation issues.
- The precinct uses the term “riparian margin” for both intermittent streams and wetlands, but wetlands are not included in the AUP definition of riparian margin. The precinct also uses the terms “wetland” and “natural wetland” interchangeably. See section 8.9 for further discussion.
- The precinct standards do not clearly state which activities must comply with them. They could also more clearly state which Auckland-wide, zone and overlay standards apply.

### **12.3. Further information requested**

813. I consider it would be beneficial if the applicant provided further information or clarification to address several matters and concerns raised in the body of this report, including:

- Whether the AEE and supporting reports took into consideration the maximum plan enabled yield, noting the MHS Zone provides for up to three dwellings per site as a permitted activity.
- The matters raised by Mr Edwards about the ITA – although I note Mr Edwards has carried out his own analysis in the absence of information from the applicant.
- An indicative road and lot layout to better understand how future development will integrate with the immediate surrounding area, the intermittent streams and wetlands and the indicative pedestrian/cycle link.
- Additional information to meet the requirements of Section 32(4A). See section 5.

814. Ms Seekup and Ms Basheer also raise significant concerns in relation to the SMP generally and in particular the flood hazard assessment. These concerns, and the information necessary to resolve them, are set out in sections 8.8 and 11.11 of this report. Based on the advice of Ms Seekup and Ms Basheer, the matters raised by submitters, including those adjacent to the plan change area, the known flood issues on Ronald Avenue and the sensitive receiving environment I consider it is necessary to resolve these issues before I confirm my final recommendation on the plan change. I consider there is a risk of acting

without this information, as additional precinct provisions may be needed to resolve these matters.

### **13. Conclusions**

815. Having considered all of the information provided by the requestor, carried out an assessment of effects, reviewed all relevant statutory and non-statutory documents and made recommendations on themed submissions, I recommend that the applicant provide further information to resolve the stormwater, water quality and flooding matters raised in sections 8.8 and 11.11.
816. If these matters are adequately resolved then I consider PC91 should be approved, subject to the amendments to the Glenbrook 4 Precinct provisions as set out in Appendix 7 to this report.
817. Provided the above matters and issues are adequately resolved, I recommend that:
- the plan change area be rezoned from FUZ to MHS Zone, and the AUP planning maps/GIS Viewer is amended accordingly
  - the plan change area have the SMAF1 Control applied, and the AUP planning maps/GIS Viewer is amended accordingly
  - the plan change area have the Glenbrook 4 Precinct applied, and the AUP planning maps/GIS Viewer is amended accordingly
  - the Glenbrook 4 Precinct provisions be amended as set out in Appendix 7, and AUP Chapter I is amended accordingly to include the new precinct.
818. Provided the above matters and issues are resolved, PC91 with its recommended amendments will:
- assist the council in achieving the purpose of the RMA
  - give effect to the relevant National Policy Statements
  - be consistent with Auckland Unitary Plan Regional Policy Statement
  - be consistent with the Auckland Plan 2050 and Future Urban Land Supply Strategy (2017).



### **14. Recommendations**

819. That, the Hearing Commissioners accept or reject submissions (and associated further submissions) as outlined in this report.
820. I still have concerns about stormwater management and effects on water quality and flood risks on downstream stream properties, and consider that there is insufficient information to resolve these concerns at this stage. Healthy Waters' experts have provided a list of

information and options they consider necessary to resolve their concerns. This is set out section 8.8 of this report.

821. If these matters can be satisfactorily addressed, and subject to the recommended conditions in Appendix 7, I consider that the plan change should be approved with modifications.
822. I note that my recommendations will be confirmed or may be further modified in the future s42A Addendum Report once I have reviewed the applicant's and submitters' evidence.

## 15. Signatories

	Name and title of signatories
Authors	Katrina David Senior Policy Planner, Central South, Plans and Places, Auckland Council 
Reviewer / Approved for release	Craig Cairncross Team Leader, Central South, Plans and Places, Auckland Council 



## APPENDIX 1

### APPLICATION MATERIAL AND CLAUSE 23 RESPONSE

This appendix has not been re-produced in this agenda but the information can be found here:

<https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=191>



## **APPENDIX 2**

### **LIST OF PLAN CHANGE DOCUMENTS AND NUMBERING ON COUNCILS PLAN CHANGE WEBSITE**



Appendix 2: List of plan change documents and numbering on Council’s plan change website

**Table 1: Information provided by the applicant for the private plan change when lodged**

Document title	Specialist	Date	File name on council website
Covering letter			
Assessment of Environmental Effects (AEE)	Harrison Grierson, (Maneesha Sakamuri, Bryce Powell)	8 July 2022	
Structure Plan Document (Appendix 1 of AEE)	Harrison Grierson (Joshua Waterman)	14 July 2022	
Section 32 Evaluation (Appendix 2 of AEE)	Harrison Grierson (Bryce Powell)	8 July 2022	
Certificate of Title (Appendix 3 of AEE)			
Proposed Changes to the AUP (Appendix 4 of AEE)		Not dated	
Stormwater Management Plan (Appendix 5 of AEE)	Harrison Grierson	September 2022	Appendix 6
Ecology and Wetlands Reports (Appendix 6 of AEE): <ul style="list-style-type: none"> <li>• Technical memorandum</li> <li>• Wetland Hydrology Assessment</li> <li>• Ecological Feasibility Assessment</li> <li>• Detailed Ecological Assessments</li> </ul>	Pattle Delamore Partners Ltd	5 April 2022, November 2020 and December 2021	Appendix 2
Urban Design Assessment (Appendix 7 of AEE)	Harrison Grierson	12 July 2022	Appendix 10
Glenbrook Economics Report (Appendix 8 of AEE)	m.e consulting	11 April 2022	Appendix 8
Cultural Impact Assessment (Overview) (Appendix 9 of AEE)	Ngati Te Ata Waiohua	November 2021	Appendix 9
Archaeological Assessment (Appendix 10 of AEE)	CFG Heritage	9 August 2021	Appendix 1
Civil Engineering Report (Appendix 11 of AEE – referred to as Infrastructure Report)	Harrison Grierson	2 May 2022	Appendix 7

Preliminary Geotechnical Assessment Report (Appendix 12 of AEE)	Lander Geotechnical Consultants Ltd	13 September 2021	Appendix 4
Integrated Transport Assessment (Appendix 13 of AEE)	TPC Traffic Planning Consultants Ltd	March 2022	Appendix 5
Preliminary Environmental Site Investigation (Appendix 14 of AEE)	ENGEO Limited	15 November 2021	Appendix 3

**Table 2: Information provided by the applicant as Clause 23 response**

Document title	Specialist	Date
Covering letter	Harrison Grierson (Bryce Powell)	
Attachment A: - Easement Instrument 6663883.1		
Attachment B: Stormwater Management Plan	Harrison Grierson	12 December 2022
Attachment C: Infrastructure Memo	Harrison Grierson	21 October 2022
Attachment D: Letter responding to transportation matters	TCP Traffic Planning Consultants	3 October 2022
Attachment E: Context Analysis	Harrison Grierson	October 2022
Attachment F: Minutes of meeting with Healthy Waters	Harrison Grierson and Healthy Waters	30 August 2022
Attachment G: Letter prepared by PDP [Ecology]	Pattle Delamore Partners Ltd	30 September 2022
Attachment H: Structure Plan Document	Harrison Grierson	20 October 2022
Attachment I: Section 32 Evaluation	Harrison Grierson	18 October 2022
Attachment J: Assessment of Environmental Effects	Harrison Grierson	17 October 2022
Attachment K: Proposed Changes to the AUP		Not dated
Traffic Information Request	TCP Traffic Planning Consultants	25 January 2023

## **APPENDIX 3**

### **SUBMISSIONS AND FURTHER SUBMISSIONS**





**From:** [Roimata Minhinnick](#)  
**To:** [Unitary Plan](#)  
**Cc:** [Riki Minhinnick \(Ngāti Te Ata\): K Flavell](#)  
**Subject:** Fw: Proposed Plan Change 91 (Private): 80 McLarin Road, Glenbrook  
**Date:** Saturday, 15 April 2023 1:00:49 pm  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image003.png](#)

---

**Ngati Te Ata Submission Regarding Proposed Plan Change 91 (Private) 80 McLarin Road, Glenbrook. Proposed Plan Change 91 (Private): 80 McLarin Road, Glenbrook.**

Tena Koe

Ngati Te Ata undertook a site visit and prepared a cultural values assessment report for this project. However we believe the applicant has taken the liberty of assuming we welcome the development. This is not the case. The applicants have not indicated in any way how they propose to actually respect, protect and recognise the cultural, social and environmental issues we raised in the report. It is not suffice for the applicant to simply say they will work closely with us once they have consent.

1.1

We therefore give notice that we oppose the application.

Nga mi hi  
Roimata Minhinnick  
Lead Negotiator Ngati Te Ata

ps I have cc the Chairman of Te Ara Rangatu o Te Iwi o Ngati Te Ata Waiohua Inc and Environmental Manager.

----- Forwarded message -----

**From:** Harry Barnes <[harry.barnes@aucklandcouncil.govt.nz](mailto:harry.barnes@aucklandcouncil.govt.nz)>  
**Date:** Fri, 14 Apr 2023, 8:19 am  
**Subject:** Proposed Plan Change 91 (Private): 80 McLarin Road, Glenbrook  
**To:** [m.kaihau.12@gmail.com](mailto:m.kaihau.12@gmail.com) <[m.kaihau.12@gmail.com](mailto:m.kaihau.12@gmail.com)>

14 April 2023

Ngāti Te Ata

Ngāti Te Ata

Tēnā koe,

**Proposed Plan Change 91 (Private): 80 McLarin Road, Glenbrook**

You are receiving this letter as the council believes **Ngāti Te Ata** may be affected by this plan change.

This private plan change seeks to rezone approximately 7.897 hectares of land at 80 McLarin Road, Glenbrook from Future Urban Zone to Residential – Mixed Housing Suburban zone and introduce a new precinct and stormwater control.

Please find enclosed a copy of the public notice that will appear in the New Zealand Herald on **14 April 2023**.

Auckland Council invites you to make a submission on the plan change should you want to. Further explanation of the plan change can be found on our web site

[www.aucklandcouncil.govt.nz/planchanges](http://www.aucklandcouncil.govt.nz/planchanges) or visit any library or council office for online viewing.

We are also interested to hear from you on whether, in your view, a hearings commissioner with an understanding of tikanga Māori and the perspectives of local iwi or hapū will be required for the hearing of this Private plan change.

Please note that the closing date for submissions is **15 May 2023**.

If you have any questions or would like more detailed information on the plan change, please contact [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

Nāku noa, nā,

Harry Barnes

Planning Technician

Auckland-wide Planning Unit

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Pauli Lydia Bosch  
**Date:** Wednesday, 19 April 2023 12:30:52 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Pauli Lydia Bosch

Organisation name:

Agent's full name:

Email address: paulibosch22@gmail.com

Contact phone number:

Postal address:  
 7 Tahuna Minhinnick Drive  
 Glenbrook  
 Auckland 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:

Property address: 80 McLarin Road, Glenbrook

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Glenbrook is a semi-rural development. The proposed development will significantly impact the infrastructure such as roads. The Glenbrook Roads are already under pressure and this will affect it ver negatively. I am also opposed to the proposed mixed housing as this will have an impact on the aesthetic of the neighbourhood as well as an environmental impact.

2.1  
2.2  
2.3

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

Submission date: 19 April 2023

### Attend a hearing

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

### Declaration

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Benjamin Ross  
**Date:** Wednesday, 19 April 2023 5:45:51 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Benjamin Ross

Organisation name:

Agent's full name:

Email address: ben.r001@gmail.com

Contact phone number: 022 336 4789

Postal address:  
14b McLarin Road  
Glenbrook  
Auckland 2681

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

##### **My submission relates to**

Rule or rules:

IXXX Glenbrook 4 Precinct Provisions especially in relation to I453 Glenbrook 3 I453.1 Precinct.

I453 Glenbrook 3 I453.1 Precinct, I453.3 Policies, 9. Require that the design of any subdivision and development within the precinct incorporates the following elements of the precinct plan:  
c. futureproof for public transport links on key roads;

IXXX Glenbrook 4 Precinct does not have this despite it fronting those same key roads as Precinct 3. It needs to be inserted with a hard trigger date

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The reason for inserting (futureproof for public transport links on key roads) into Precinct 4 is it unified with Precinct 3 in the Unitary Plan allowing for eventual hardcoding of triggers for when Auckland Transport must provide transit services.

As a supplementary note such triggers would be 1000 residents for an AT Local MaaS type service

and 3,000 for feeder services operating every 30mins using a 20 seater mini bus.

All this to allow at least some alternative to be put in place before Glenbrook hits Beachlands size which that does require full transit services

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

Details of amendments: As noted above with transit that hardcoding of trigger points for transit services apply. Also ammendment for provision of pocket parks between 200m2 and 500m2 one pocket park for each 50 properties to allow localised Green Spaces.

3.2

Submission date: 19 April 2023

### **Attend a hearing**

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

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

### **Declaration**

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

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

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

No

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Pravin Hinwar  
**Date:** Monday, 24 April 2023 8:30:30 am

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Pravin Hinwar

Organisation name:

Agent's full name:

Email address: rish.hinwar@gmail.com

Contact phone number:

Postal address:  
27 Opouatu Avenue  
Glenbrook  
Auckland 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:

Property address: 80 McLarin Road, Glenbrook

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

we bought the property as a lifestyle block and having potential apartments builds significantly goes against what we bought the property for and will guarantee that the faith of the agreement is disturbed.

4.1

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

Submission date: 24 April 2023

### Attend a hearing

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

### Declaration

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

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

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

Yes

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



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Alvin Changamire  
**Date:** Tuesday, 2 May 2023 6:45:55 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Alvin Changamire  
Organisation name:  
Agent's full name:  
Email address: vajnrchangamire@gmail.com  
Contact phone number:  
Postal address:  
47b Mclarin Road  
Glenbrook  
Auckland 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91  
Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:  
Change to mixed urban housing  
Property address: 80 Mclarin Road Glenbrook  
Map or maps:  
Other provisions:

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

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

The reason for my or our views are:  
I moved here from the big smoke to be in a small community where I can be far away from the Auckland noise, being the noise to rural Auckland seems a bit unfair for people like us who bought here knowing there would only be H3 housing

5.1

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

Submission date: 2 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Lania Gribben  
**Date:** Tuesday, 2 May 2023 9:30:48 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Lania Gribben

Organisation name:

Agent's full name:

Email address: laniagribben@hotmail.com

Contact phone number: 02102458075

Postal address:  
 66 Mclarin Road  
 Glenbrook  
 Glenbrook  
 Auckland 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:

The Rezoning of 80 Mclarin Road from Future Urban zone to Residential – Mixed Housing Suburban zone.

Property address: 80 Mclarin Road, Glenbrook

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Glenbrook Beach/Kahawai Point is a rural single/two storey dwelling zone which draws people to our area because of the quiet nature. We do not have appropriate public transport/schooling/retails to cater for such proposed development.

6.1

Having this type of development in our area is detrimental and does not fit in with the current lifestyle of Glenbrook. We only have one access in and out of Glenbrook, with a road that is constantly being fixed with only the current development anymore traffic and this pace with a new zoning would just not be safe

6.2  
6.3

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

Submission date: 2 May 2023

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Robert hughes  
**Date:** Wednesday, 3 May 2023 6:16:01 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Robert hughes

Organisation name:

Agent's full name:

Email address: hughes.rob@hotmail.co.uk

Contact phone number:

Postal address:

91 mclarin road

Glenbrook

Auckland 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:

Property address: 80 mclarin road

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Any new development at 80 McLarin Road needs to follow the current guidelines we have all been required to meet in our current house builds. | 7.1

Please include the covenants that are in place with the current developer.  
Any changes to our current zoning would be detrimental to the rural vision which made people settle here in the first place. | 7.2  
7.3

We want an environmentally conscious, safe secure area that embraces and promotes its natural environment.

Our preference is for 80 McLarin Road to be remain as is or at worse be zoned H3 single housing one or two storey. | 7.3

We want to avoid the characterless, noisy, cramped, insecure environment that a mixed housing | 7.4

zoning could create.

We are concerned about a lack of privacy and a lack off provision for privacy which can be of concern to the community living below this development. | 7.4

What will happen to all the trees located on this development? We have great wind protection, nice views etc, this development will ruin this | 7.4

Glenbrook Beach and Kahawai Point are a small rural community that are not designed for the intensity of multi- unit dwellings. | 7.4

We have no local businesses or shopping centres and all that traffic will have to pass along one road to get anywhere. | 7.5  
7.6

There is a school bus operating a pickup, drop-off service within very close proximity to the proposed development site which causes concerns about issues of child safety.

Our local rural schools are mainly at capacity and further development puts the level of teaching of our children at risk | 7.5

We have no local fire protection which would be needed for rescue in multi -unit dwellings. | 7.5

We have no immediate access to emergency services and Auckland council already does a terrible job of preparing areas BEFORE building housing, investment in emergency services, roads etc are needed before any further housing developments are made  
It took 22 minutes for a fire engine to get out here, and 29 minutes for an ambulance!

We have chosen to live out here and Deal with long commute because of the rural nature and any development will not protect the current investments of the homeowners who have chosen this above all others.

Due to the remoteness of the Glenbrook Beach and Kahawai Point and its lack of public transport, people are heavily reliant on personal transport for all their needs and activities. Intensifying our housing stock will not help Auckland City Council's carbon reduction plans. | 7.8  
7.9

We only have one access road which can be blocked by parked cars, fallen trees, flooding or accidents. The road is also prone to damage which has impacted out cars and I feel that this will only get worse with further development and even more cars! | 7.6

From our current observation 80 McLarin Road appears to be susceptible to some flooding and I am concerned about how that what will be moved if developed.  
Being a small rural coastal settlement of less than 5000 people we need to maintain our current zoning of single housing one or two storeys. | 7.7  
7.3

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

Submission date: 3 May 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

Yes

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

**Glenbrook Beach Residents & Ratepayers Association Submission  
Proposed Unitary Plan Change 91 (Private) at 80 McLarin Road Glenbrook 2681**

We appreciate this opportunity to express our community views.

The Glenbrook Beach Residents and Ratepayers Association does not support the Auckland Unitary Proposed Plan Change 91 (Private) at 80 McLarin Road. We request that the council retain the H3 Residential Single House Zoning which is the current zoning our area has been operating under. The association also requests that the Auckland City Council maintains the covenants existing in the Kahawai Point Development managed by Kahawai Point Development Ltd.

8.1

8.2

The reasons the Association oppose this plan change are:

We feel we meet the current requirement conditions to meet the H3 Residential – Single House Zone and not a Mixed Housing Suburban Zone. The council’s H3 Single House Zone description reads ‘Single House Zone is to maintain and enhance the amenity values of established residential neighbourhoods in wastewater serviced rural and coastal towns and settlements with a residential population of less than 5000 (as determined in the 2018 census) Please note the total population in the Glenbrook area in the 2018 census was 2193. To support the purpose of the zone, multi-unit development is not anticipated with additional housing limited to the conversion of an existing dwelling into two dwellings and minor dwelling units. The zone is generally characterised by one to two storey high buildings consistent with a suburban built character. The zone does not incorporate Medium Density Residential Standards as it is not a relevant residential zone. We note that the less than 5000 population and the last sentence above are both highlighted in the Council’s H3 Residential - Single House Zone description. Under Objectives H3.2 (2) states that the development is in keeping with the neighbourhood’s existing or planned suburban build character and predominantly one to two storey buildings.

We understand that HD Project 2 Limited have asked to create a new precinct, Glenbrook 4 but we request that the council take into consideration that this new development is on the opposite side of the road to our current Kahawai Point development operating under the H3 Housing Zoning. When this proposal rezoning was first announced this association received many concerned comments from residents especially from nearby residents saying that they were not happy having to comply with strict H3 Single House Zoning and Covenants and possibly people on the other side of the McLarin Road may not be required to follow the same rules. Please note the strength of our community is our togetherness and being isolated with no police, fire protection, medical facilities, a few farm jobs, no current shops, no public transport or government facilities necessitates a reliance on each other for any help, hence community togetherness is extremely important.



Both Glenbrook Beach and Kahawai Point are situated at the end of an 8 kilometre single access road which can easily be blocked or destroyed by flooding, fallen trees and accidents and that would completely isolate our community and would require either helicopter or boat access to service our community.

It is our understanding also that Watercare has just signed an unconditional agreement to purchase 372 Glenbrook Beach Road Glenbrook for the purpose of building a new wastewater plant to service the wider areas of Waiuku, Glenbrook Beach, Clarks Beach, Waiau Pa and Kingseat. While the creation of these facilities will provide the necessary wastewater infrastructure needed for this part of the Franklin District this in itself will create additional traffic demand to service this facility and will further impact on the use of our limited access road for residents of Glenbrook Beach and Kahawai Point.

8.3

Further, with no public transport except for a school bus, every working adult needs vehicle transport and based on the 2018 census figures 57.6% of the Glenbrook area residents drive a private vehicle to work, 17.3% drive a company vehicle and 18.5% work from home. This puts a lot of pressure on parking spaces and we need the larger sections under H3 zoning for vehicle parking requirements. We don't want blocked streets in an emergency.

8.4

The district has experienced flooding in the area with many orchards on the edge of this development being badly flooded. This also caused road erosion and we are still dealing with multiple potholes in our one access road which Auckland Transport has recently completed some temporary repairs after the Auckland Storm.

It also works against the carbon emissions reduction plans as car usage is high and travel distances are long. The travel distance to the southern motorway Papakura on ramp from the centre of Kahawai Point is 33 kms so intensification does not help. As a community we appreciate the good planning the Auckland City Council has provided to date. Our local board representative is well respected for the work she has done in the area and we respectfully ask the council to take into account our community views regarding the proposed private plan change 91.

8.5

Robyn Deuchar  
Chairperson  
Glenbrook Beach Residents and Ratepayers Association

[gbratesidentsandratepayersass@gmail.com](mailto:gbratesidentsandratepayersass@gmail.com)

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Emma Ford  
**Date:** Thursday, 4 May 2023 5:16:03 pm

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Emma Ford  
 Organisation name:  
 Agent's full name:  
 Email address: emma.let97@gmail.com  
 Contact phone number:  
 Postal address:  
 4 Whareono Road  
 Glenbrook Beach  
 Auckland 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91  
 Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:  
 Change of zoning to Mixed Housing Suburban Zone.

Property address: 80 McLarin Road

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Glenbrook Beach is a rural community with a single-access country road, no public transport, no shops or amenities and is unsuitable for a Mixed Housing Suburban Zone. | 9.1  
 | 9.2

The current H3 Residential Single House Zoning applied to the remainder of the area is more appropriate for a small coastal community with the current infrastructure. | 9.3

Recent examples of infrastructure not coping with even the current capacity, let alone the increased intensity proposed, are the single burst water main and the massive roading pothole problem. Both of these instances currently have temporary fixes and would only be exacerbated by this proposal.

The environmentally conscious, open spaced, coastal community is what draws people to the area. Allowing a cramped, noisy, characterless area would be to the detriment of the community. | 9.4

I have no problem with 80 McLarin Road being developed, however, because of the stated reasons it must be to the same standard as the rest of the development as H3 Residential Single House Zoning and comply with the current local covenants to preserve the community.

9.5

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

Submission date: 4 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Wendy Groom  
**Date:** Thursday, 4 May 2023 10:16:08 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Wendy Groom  
 Organisation name:  
 Agent's full name:  
 Email address: wendymforbes@xtra.co.nz  
 Contact phone number:  
 Postal address:

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91  
 Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:  
 Houses need to comply with our current guidelines. We have no public transport or retail of any type

10.1  
10.2

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
 We are a semi rural community with no amenities or public transport.

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

Submission date: 4 May 2023

### Attend a hearing

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

### Declaration

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - KIRI BULL  
**Date:** Friday, 5 May 2023 11:15:38 am

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: KIRI BULL

Organisation name:

Agent's full name: KIRI BULL

Email address: ericandkiri@hotmail.com

Contact phone number:

Postal address:  
 10 OTOHIKAWA AVE  
 GLENBROOK  
 AUCKLAND 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:

We do not support the Auckland Unitary Proposed Plan Change 91 (Private) at 80 McLarin Road.  
 We request that the council retain the H3 Residential Single House Zoning which is the current zoning our area has been operating under.

Property address: 80 McLarin Road Glenbrook

Map or maps:

Other provisions:

We also want to include the covenants that are in place with the current developer.

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

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

The reason for my or our views are:

Any changes to our current zoning would be detrimental to the rural vision which made people settle here in the first place

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

Details of amendments: Being a small rural coastal settlement of less than 5000 people we need to maintain our current zoning of single housing one or two storeys

11.1

Submission date: 5 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Olivia Jackson  
**Date:** Sunday, 7 May 2023 11:15:51 am

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Olivia Jackson

Organisation name:

Agent's full name:

Email address: robotroses@proton.me

Contact phone number:

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:

Property address: 80 McLarin Road, Glenbrook

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

HD Project 2 Limited proposes changing the Auckland Unitary Plan at 80 McLarin Road, Glenbrook and I live in a nearby property that is affected by the proposal.

Glenbrook Beach has been chosen by many for the rural vision/lifestyle. Changes to the current zoning detracts from that and is not in keeping with the area that surrounds it.	12.1
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Glenbrook Beach and Kahawai Point are a small rural community however the intensity of multi-storey or multi-occupancy properties are inappropriate for this area. Our preference is for 80 McLarin Road to be zoned H3 single housing one or two storey.	12.2 12.3
---	--------------

There is no public transport in our area and parking is already an issue with insufficient space. We want to avoid the characterless, noisy, cramped, insecure environment that a mixed housing zoning could create. Our singular access road is in a poor condition and in a constant state of repair. The road needs a serious investment to support the increased private vehicle traffic along with heavy vehicle movements such as concrete trucks and trucks carrying heavy machinery or building	12.4 12.2 12.4
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supplies.

The local rural schools are mainly at capacity and we have no immediate access to emergency services. | 12.5

If 80 McLarin Road proceeds as a new housing development, then it must retain the vision for the area, as well as protect the current investments of the homeowners who have chosen this area and had covenants or restrictions placed on them for their builds. | 12.6

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

Details of amendments: Refer to previous comments.

Submission date: 7 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Nadin Rathgeber  
**Date:** Sunday, 7 May 2023 11:15:53 am

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Nadin Rathgeber  
Organisation name:  
Agent's full name: Nadin Rathgeber  
Email address: nrathgeberhughes@gmail.com  
Contact phone number: 027 222 3211  
Postal address:  
Auckland  
Auckland 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91  
Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:  
Property address:  
Map or maps:

**Other provisions:**

The plan to change this into a mixed housing suburban zone is wrong on all levels. This is a small coastal community that with the new subdivisions already in place and still to come is already under immense strain. There is NO infrastructure. There are NO jobs in this area. There is NO public transport. The stormwater is already not coping and areas are flooding. The waste water pipe will not be able to cope. There are NO facilities such as a playground, cafe, shop, doctor anything. Roads can't cope with current amount of traffic. Travel time to Auckland is 2 hours at peak times. YOU are not in your right mind to add more housing in this area. STOP!!~!!~!~  
There is Paerata, Drury South, Park Green, Karaka, who in your mind is going to live here?????  
Intensify the city and suburbs not the coastal areas where there is ZERO infrastructure. Convert Office buildings into apartments. STOP THIS NONsense.

13.1  
13.2

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

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

The reason for my or our views are:  
You are destroying this country!!!! STOP this.

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

Submission date: 7 May 2023

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Grant Hewison  
**Date:** Sunday, 7 May 2023 10:15:55 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Grant Hewison

Organisation name:

Agent's full name:

Email address: grant@granthewison.co.nz

Contact phone number: 021577869

Postal address:

grant@granthewison.co.nz

Auckland

Auckland 1011

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

##### **My submission relates to**

Rule or rules:

The entire Plan Change

Property address: The entire Plan Change

Map or maps: The entire Plan Change

Other provisions:

The entire Plan Change

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

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

The reason for my or our views are:

My reasons for opposing the entire Plan Change are set out below.

Resource Management Amendment Act 2020

First, the Resource Management Amendment Act 2020 ('RMAA2020') has reintroduced specific consideration of climate change and these provisions had effect from 30 November 2022. I believe they apply to Plan Change (91).

In particular, the RMAA2020 provisions state that Councils must have regard to emissions reduction plans and national adaptation plans under the CCRA (as amended by the Climate Change Response (Zero Carbon) Amendment Act 2019) when making and amending regional policy statements, regional plans and district plans (sections 61, 66, 74 RMA).

## 61 Matters to be considered by regional council (policy statements)

... when preparing or changing a regional policy statement, the regional council shall have regard to —

(d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and

(e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

## 66 Matters to be considered by regional council (plans)

... when preparing or changing a regional plan, the regional council shall have regard to—

(d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and

(e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

## 74 Matters to be considered by territorial authority

... when preparing or changing a district plan, a territorial authority shall have regard to—

(d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and

(e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

I note that an emissions reduction plan has been made in accordance with section 5ZI of the Climate Change Response Act 2002 - Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan (June 2022). In addition, a national adaptation plan has also been made in accordance with section 5ZS of the Climate Change Response Act 2002 – Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan (August 2022).

Plan Change (91) does not appear to have regard to either Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan (June 2022) nor Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan (August 2022).

## Emissions Reduction and Plan Change (91)

As noted in Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan (June 2022):

“Well-functioning urban environments can reduce emissions and improve wellbeing Urban environments with a variety of mixed-use, medium- and high-density development that is connected to urban centres, as well as active and public transport routes, will help reduce greenhouse gas emissions. That is partly because they provide more options for people to travel between where we work, live, play and learn. Well-planned urban areas provide an opportunity to realise wider benefits too. They enable a greater supply and diversity of housing to be built at pace and scale, improving affordability. Good access to active and public transport routes that safely take people to workplaces and education centres can provide greater access to learning and job opportunities for households, improve public health and wellbeing and strengthen community cohesion.”

In terms of climate change, the potential adverse impacts of future development from Plan Change (91), mainly includes the use of additional private vehicles. Currently there are no public transport services at Glenbrook Beach, with the nearest existing bus stops to the subject site being located

14.1

over 8km away on Glenbrook Road, which is served by the route 395 between Papakura and Waiuku. Like any outer development proposed in Auckland, Plan Change (91) will result in an increase in Vehicle Kilometres Travelled ("Vkt") and greenhouse gas emissions because:

- residents will consider themselves residents of Auckland city, as a whole, and will make use of the amenities, services, retail, education, etc in a large segment of Auckland. There is no public transport or cycling network for these trips that will be easier than driving. They will therefore drive, if they can, or be chauffeured if they can't.

- the new residences will increase the Vkt of visitors too. This will include tradespeople, friends and visitors, community service providers, people maintaining council assets, couriers, and trucks delivering to retail outlets. This is a lost opportunity for emissions reductions. Instead of making shorter trips, trips by more sustainable travel modes or trips to more places per trip - as would happen if these new dwellings were added within the built environment via intensification, each of these people will have to make longer trips to visit this development, and will drive.

- Plan Change (91) fails the 'climate test' because Auckland cannot provide a low car lifestyle overall without residential development being built in proximity to the amenities of the city. Development must be within the existing built environment.

I cannot see Plan Change (91) suggesting anything other than an increase in Vkt and will undermine the direction towards a Quality Compact Urban Form. Plan Change (91) will have long term, substantial and difficult-to-reverse negative impacts on Auckland's greenhouse gas emissions.

14.2

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

Submission date: 7 May 2023

### **Attend a hearing**

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

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

### **Declaration**

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

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

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

No

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Ben Scott  
**Date:** Monday, 8 May 2023 9:46:11 am

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Ben Scott

Organisation name:

Agent's full name: Ben Scott

Email address: ben.scott@hynds.co.nz

Contact phone number: 0275648172

Postal address:  
26 Ronald Ave  
Glenbrook Beach  
Glenbrook  
Waiuku  
Glenbrook  
Waiuku 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:

Property address: Ronald Ave

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The stormwater system on Ronald Ave is hopelessly inadequate, When the last Cyclone/ Large downpour happened the system over flowed and many houses were under water. Obviously this was a rear event, however any heavy rain the cesspits out front fill up very quickly and the water has no where to go, it struggles in normal rain events. . It needs a pump station or the like to mechanically transfer the water over to the beach? I am afraid of more captured water coming down from the subdivision further making this issue worse. I have pictures of the street under water etc and am happy to share, give me a bell if required. 0275 648 172.

I have no issue with housing going in.

Please look at the roads also, no public transport so we rely on our own vehicles.

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

Details of amendments: Thorough upgrade and effective stormwater plan. The floods highlighted where the water wanted to go. It made a channel over to the beach eventually. Make it easy for it to go there? And or upgrade the Retention/pumpstation tanks for it to accommodate.

15.2

Submission date: 8 May 2023

### **Attend a hearing**

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

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

### **Declaration**

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

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

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

Yes

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



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Catherine Thompson  
**Date:** Tuesday, 9 May 2023 12:00:40 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Catherine Thompson  
Organisation name:  
Agent's full name: Catherine Thompson  
Email address: cath.thompson2@hotmail.co.uk  
Contact phone number:  
Postal address:  
1A First Ave  
Glenbrook Beach  
RD1 Waiuku 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91  
Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:  
Property address: 1A first Ave and 14D Mclarin Rd Glenbrook  
Map or maps: 80 McLarin Rd  
Other provisions:  
intensive housing  
Access Road  
Stormwater provision  
Up grade on water and sewage provisions

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

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

The reason for my or our views are:

- High density housing is not suited to the area it should be the same as single dwelling, one or two story high, per section as in the adjoining subdivision at Kahawai Point including the covenants that govern the area. Any new housing should be in line with the new subdivision as well as the older area. | 16.1
- Stormwater provision needs upgrading as high density housing will mean that the houses on the beach will again be over run with the amount of water coming off the new development. | 16.2
- The area at 80 McLarin Rd also even from your maps appear be subject to flooding, is this a good thing? The water will then wash down on the houses below on Ronald Ave. |
- The amenities, or lack of, is not conducive of more housing. No shops or schooling, It is a trip out to Glenbrook for any of these facilities. | 16.3

The only access road is not up to more traffic, and is seriously in need of upgrading and is not suitable for increased housing. As for saying there has been few accidents the place only had farms/orchards out here apart from the old established area at the actual beach and McLarin Rd. We have already had problems with getting fresh water to the area, stormwater and sewage appears at capacity. what happens with more intensive housing and increase of population.

16.4

16.5

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

Submission date: 9 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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

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



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only

Submission No:

Receipt Date:

### Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full  
Name) \_\_\_\_\_

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

\_\_\_\_\_

**Address for service of Submitter**

\_\_\_\_\_

Telephone:

Fax/Email:

Contact Person: (Name and designation, if applicable)

### Scope of submission

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

Plan Change/Variation Number

PC 91

Plan Change/Variation Name

80 McLarin Road, Glenbrook

**The specific provisions that my submission relates to are:**

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

Plan provision(s)

Or

Property Address

Or

Map

Or

**Other (specify)**

### Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

\_\_\_\_\_

\_\_\_\_\_

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

*I J Smith*

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

Date

**Notes to person making submission:**

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

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

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

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

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

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

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

### Submission Private Plan Change PC91 80 McLarin Road

I request that the council retain the H3 Residential Single House Zoning which is the current zoning our area has been operating under. I also ask that the Auckland City Council maintains the covenants existing in the Kahawai Point Development. I ask that the council consider the following.

17.1  
17.2

- The Kahawai Point and Glenbrook Beach is a rural coastal community which had a population of just over 2000 residents based on the 2018 census. Under the proposed plan change 78 information sheet 4 it states that MDRS does not apply to small settlements of less than 5000 people and rural areas and coastal settlements.

- The Auckland City Council Planning people have done a very good job in understanding what constitutes a successful, healthy, safe, secure area that embraces and promotes the natural rural environment. With very little infrastructure in our area people living here need to rely on each other for support. The affordable home options available have been designed in a way that works with our current community housing typologies.

- I understand that developers want to build as many living spaces on the smallest amount of land, then walk away, leaving the local residents and council to deal with the aftermath. Please don't allow this in our community.

- Our community has no public transport. I understand that it would be uneconomical for Auckland Transport to service our small community, hence every person uses cars for all their activities.

17.3

- We also have no fire protection, so multi unit buildings need to be avoided. The nearest fire brigade is in Waiuku which is a volunteer brigade. Not ideal for any large fires. Also, with one easily blocked rural single access road into the community, there is no guarantee they will be able to get to fight a fire or help with flooding especially in an Auckland emergency.

17.4

- We currently have no shops, local police or medical centres in our community to support large developments.

- I understand that local schools are full, so consideration needs to be given to additional education facilities to support any additional housing.

- Any new housing development must maintain the vision for the area, as well as protect the current investments of the homeowners who have chosen this area above all others.

- Intensifying our housing in rural areas will not help Auckland City Council's carbon reduction plans and it will put added pressure on rural roading requirements.

17.5

- 80 McLarin Road, with its land sloping towards the Glenbrook Beach residents, is already contributing to potential flooding and adding more buildings is a future safety hazard. Glenbrook Beach Road is already flood-damaged with recent rainfall, with some houses already impacted.

17.6

I thank the Auckland City Council planners for their good work in the past and only request them to continue to provide a well planned safe Glenbrook Beach/Kahawai Point housing plan that enhances the special existing character of our community.

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

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



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

#### Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full Name) Miss Ellen-May Meharry

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

**Address for service of Submitter**

76 McLarin Road, RD1, Glenbrook Beach, Waiuku, 2681

Telephone:  Fax/Email:

Contact Person: (Name and designation, if applicable)

#### Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

**The specific provisions that my submission relates to are:**

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

Plan provision(s)

Or  
Property Address

Or  
Map

Or  
**Other (specify)**

#### Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:


Glenbrook Beach has always been a 'small' Rural Coastal Village and joined now by Kahawai Point, this community has increased, but has to date, still maintained its "Village' feeling. The designed intesity proposed with multi-unit dwellings makes this no longer a Rural Coastal 'Village'.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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

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

05/12/2023  
Date

**Notes to person making submission:**  
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.  
 Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.  
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 I could  /could not  gain an advantage in trade competition through this submission.  
 If you could gain an advantage in trade competition through this submission please complete the following:  
 I am  / am not  directly affected by an effect of the subject matter of the submission that:  
 (a) adversely affects the environment; and  
 (b) does not relate to trade competition or the effects of trade competition.

- ✚ Any changes that are made to the current zoning would go against the "Rural Vision" of this settlement, which is what has drawn people to settle here in the first place.
- ✚ Any new housing development should, I feel, retain the current vision for this area and protect the investments of current homeowners, with the preference being that of Zone H3, single housing, one or two storey. High density mixed zoned housing can cause noisy, cramped and insecure environments, not to mention that they have no character. Re-zoning, I feel, would not give consideration to current homeowners and the investments we have made to live here prior to this development. | 18.1  
| 18.2
- ✚ As being one of these home owners, I am concerned also about a lack of privacy or even the provision for privacy, especially for the properties having 3 storey houses built on their boundaries. | 18.2
- ✚ The increase of more housing will also increase the light contamination, again, what current residents moved here to get away from. | 18.2
- ✚ With higher volumes of houses comes a higher volume of vehicles. As you aware Glenbrook Beach Road is the only access into Glenbrook Beach/Kahawai Point and a high volume development as proposed for 80 McLarin would only put more pressure on this road. With the current weather issues we have recently experienced highlighting a degradation on this road, further intensity is only going to cause more issues. | 18.3
- ✚ There is no public transport to Glenbrook Beach/Kahawai Point due to its remoteness, which means more cars on the road. More cars on the road will mean that cars will be parked on the roads, which highlights an issue of roads being blocked and not accessible for Emergency Services. | 18.4
- ✚ There are no Emergency Services at Glenbrook Beach/Kahawai Point. The nearest Fire, Ambulance and Police are located in Waiuku. | 18.5
- ✚ The local schools for this area are already at capacity.
- ✚ What will happen to the local wildlife?  
This area has always been a nesting area for Heron, not to mention many other species of bird including Tui, Kereu (Wood Pigeon) and King Fisher. With the development of Kahawai Point came the removal of a lot of trees and with them, these species. It is only now that we are starting to see them again as they are now nesting in many of the trees on 80 McLarin. | 18.6



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

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FORM 5



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

For office use only
Submission No:
Receipt Date:

**Submitter details**

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full Name) Mr Michael Wayne MacAulay

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

**Address for service of Submitter**

76 Mclarin Road, RD1 Glenbrook Beach, Waiuku 2681

Telephone:  Fax/Email:

Contact Person: (Name and designation, if applicable)

**Scope of submission**

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

Plan Change/Variation Number

Plan Change/Variation Name

**The specific provisions that my submission relates to are:**

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

**Submission**

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Glenbrook Beach - Kahawai Point are a small rural community which is not and has not been designed for the high intensity of multi-unit dwellings.

19.1

The development of 80 McLarin Rd, should adhere to the guidelines and covenants as require for Kahawai Point Development.

Please provide the current covenants that are in place for the proposed development for 80 McLarin Road, RD1 Glenbrook Beach, Waiuku 2681. Note Continued on seperate page...

19.2

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

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

14 / 05 / 2023  
Date

**Notes to person making submission:**  
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**If you could gain an advantage in trade competition through this submission please complete the following:**

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

Continuation of: Reason for my views...

- Due to the location of Glenbrook Beach/Kahawai Point there is little to no public transport which will mean that the new development as per the current and pre-existing development will rely heavily on personal transport which in turn will increase greenhouse gases, meaning that the higher intensity of the dwelling the more pollution and an increase of the carbon footprint for the greater Auckland area. 19.3
- With high intensity housing and living next door to this development I have concerns regarding the lack of privacy, increase of noise and lighting contamination of the area in general but particularly at night. 19.1
- Changes to the current zoning would take away from the village style and rural vision to which allot of people moved to this area to have and enjoy. 19.1
- I want to avoid a cramped, insecure, noisy and characterless outlook and environment that will be created by re-zoning to mixed housing.
- There is currently no local or immediate access to Fire and Emergency services such as Fire, Ambulance or Police and should high intensity dwellings be permitted and a fire break out the prospect of spread is extremely high with little to no possibility to quickly bring this under control. 19.4
- With recent weather events I have noticed that 80 McLarin Rd is susceptible to flooding and these weather events have become more frequent in recent years and are expected to continue if not worsen in the future. 19.5
- I believe that the new housing development should retain the area vision of beachside community and consider the current homeowners like myself plus the investment(s) I have made to live in my chosen area. 19.1
- There is only one road in/out for this community and the higher the intensity of the housing the higher the parking requirements and obstructions of roads due to parking requirements. 19.6
- There will be a higher impact on the road, plus a higher possibility of accidents due to the increased number of vehicles. There will be faster degradation of the road and with the recent storm events then this can be and has been blocked due to flooding and fallen trees.
- My preference since the current and included expansions to the Glenbrook Beach subdivisions have less than 5000 people, that the area be zoned to H3 allowing single dwelling of one or two story that will promote a safe, secure area that embraces the current and natural environment. 19.7
- What will happen to the trees currently at 80 McLarin Rd as these create a significant wind shelter for the existing houses in the area. 19.8
- I hold concerns for the local wildlife such as the nesting Herons, King Fisher, Tui, Pheasants and other wildlife that reside in the land area designated as 80 McLarin Road. 19.9
- As the local schools are at capacity and there is currently one bus operating this raises concerns for safety as well as ability to address schooling for the increasing population. 19.1

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

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



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Auckland 1142

For office use only
Submission No:
Receipt Date:

## Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full Name) \_\_\_\_\_

**Organisation Name (if submission is made on behalf of Organisation)** \_\_\_\_\_

**Address for service of Submitter** \_\_\_\_\_

Telephone:  Fax/Email:

Contact Person: (Name and designation, if applicable) \_\_\_\_\_

## Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

**The specific provisions that my submission relates to are:**

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

Plan provision(s)

Or  
Property Address

Or  
Map

Or  
**Other (specify)** \_\_\_\_\_

## Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

\_\_\_\_\_

\_\_\_\_\_

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

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

\_\_\_\_\_  
Date

**Notes to person making submission:**

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

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

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

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

PC91 80 McLarin Road, Glenbrook.

Submission by Dianne Bradford.

**I oppose the specific provisions – The reasons for my views are:**

- I believe that any changes to the current zoning will negatively impact the rural aspect and vision of the area which is the reason that my family moved here. | 20.1
- There are current guidelines regarding building and developments that the entire community at Kahawai Point has had to adhere to and I would like to see that the development at 80 McLarin Road adheres to these same guidelines. | 20.2
- I would like to see that the new development at 80 McLarin Road abides by the existing covenants. | 20.2
- I would prefer 80 McLarin Road to be zoned H3 single housing of one or two levels. | 20.3
- I am concerned that mixed housing will open the site up for a cramped and noisy environment, which goes against the vision of the community of Glenbrook Beach and Kahawai Point. | 20.1
- I am concerned for the environment and the existing trees and I would like to know what will happen to them. | 20.4
- There is no existing infrastructure to support multi-unit dwellings and mixed housing. There are no grocery stores or public transport. | 20.5
- There is only one access road to Glenbrook Beach and Kahawai Point and I am concerned about the safety for drivers and pedestrians due to cars lining Glenbrook Beach Road due to inadequate parking spaces and garaging at 80 McLarin Road. | 20.5
- 80 McLarin Road is a corner section that aligns with Glenbrook Beach Road. There are no walking paths along Glenbrook Beach Road.
- There is a school pick up and drop off point opposite the proposed development site and excessive cars raises concerns regarding child safety.
- We have one access road – Glenbrook Beach Road – extensive development will negatively impact the access. | 20.5
- 80 McLarin Road, Glenbrook, looks to be susceptible to flooding. | 20.6
- There is no immediate access to emergency services. | 20.7

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Terry Yorke  
**Date:** Saturday, 13 May 2023 3:15:43 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Terry Yorke

Organisation name:

Agent's full name:

Email address: [twyorke@gmail.com](mailto:twyorke@gmail.com)

Contact phone number:

Postal address:  
149 McLarin Road,  
Glenbrook Beach  
Waiuku 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:  
Rezoning to Mixed Housing Suburban zone from future urban

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
I believe that this development should follow the same rules as the current development at Kahawai Point, ie H3 single house one or two story.

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

Details of amendments: I request that the council retain the current H3 Residential Single House Zoning already in place at Kahawai Point Development.

Submission date: 13 May 2023

### Attend a hearing

21.1

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

**Declaration**

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

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

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

No

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



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Wibke Yorke  
**Date:** Saturday, 13 May 2023 4:00:47 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Wibke Yorke

Organisation name:

Agent's full name: Wibke Yorke

Email address: [twyorke@gmail.com](mailto:twyorke@gmail.com)

Contact phone number:

Postal address:  
[twyorke@gmail.com](mailto:twyorke@gmail.com)  
RD1  
Waiuku 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:  
Re-zoning of 80 McLarin Road from Future Urban to Residential Mixed Housing Suburban Zone.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I am a neighbour and longterm resident in Glenbrook Beach which is a small rural community any changes in the zoning to Residential Mixed Housing Suburban would be detrimental to the rural small town feel of our community. Due to the remoteness and lack of infrastructure in Glenbrook Beach high intensity housing will also put further pressure on our small community. My preference would be for 80 McLarin Road to be zoned H3 single housing one or two storey which is in line with the neighbouring development at Kahawai Point.

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

Details of amendments: Change the zoning from Future Urban to H3 single housing one or two storey.

22.1

Submission date: 13 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Aaron and Elizabeth Yorke  
**Date:** Saturday, 13 May 2023 5:15:43 pm  
**Attachments:** [Identified property.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Aaron and Elizabeth Yorke

Organisation name:

Agent's full name:

Email address: akoyorke@gmail.com

Contact phone number: 0272810204

Postal address:  
140 McLarin Rd  
Glenbrook Beach  
Auckland 2681

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

##### **My submission relates to**

Rule or rules:

We oppose the extent of PC91 in terms of the exclusion of 140 McLarin Road (Lot 1 DP 204733: NA132C/122 being 0.3082ha)

Property address: 140 McLarin Rd, Glenbrook Beach

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

History

- We are 4th generation residents of Glenbrook Beach and live/own 140 McLarin Road.
- 140 McLarin Road was originally part of 80 McLarin Rd Property.
- The house and section 3082m2 was subdivided from balance block to become 140 McLarin Rd by the previous owner.
- 80 McLarin Rd was historically used by then owner for dairy operation and still is to this day.
- The property has been zoned for residential growth for a number of years going back to the former Franklin District Plan and potentially the Franklin County District Scheme and it was understood that this would provide for village growth needs into the future.
- Zoned Future Urban Zone under the Auckland Unitary Plan, The properties 80 McLarin and 140 McLarin was sought to be a Special Housing Area in conjunction with the Kahawai Point

development.

- A change to zoning to urban was sought under the SHA process, supported/encouraged by Auckland Council but was not agreed to by the hearing panel at the time. (Kahawai Point were successful with the zone change).
- 80 McLarin Rd property sold to current owner.
- Harrison Grierson requested feedback from us regarding the rezoning. Feedback provided on some but not all issues raised by us were provided. Our main request was to include us in the rezone plan. After contacting Harrison Grierson, Phillip Comer responded in writing with the following to this point.

Preliminary Structure Plan

"You are quite correct that your property backs on to 80 McLarin Road and this was evident from the start. At project-start, we did encourage that our client engage with immediate neighbours to gauge sentiment and whether or not other landowners of land in the Future Urban zone would want to rezone their land too. For whatever reason, but certainly beyond, HG control, this does not appear to have happened. I note what you say about the Kahawai Point consultation process but that process sought to rezone a huge area of rural zoned land for residential activities including affordable housing under the Special Housing Area legislation, and whilst the AUP(OP) was still not operative. The process had to be belt and braces as a result and consultation levels reflected this. The proposed PPC concerns 8ha of Future Urban zoned land that has already been identified for urban development and we have consulted with the community on this basis and within the Covid constraints that have applied. The PPC will be publicly notified in due course and you (and others) will have the opportunity to review all of the information submitted with the PPC request and to make a submission. One such submission could be to request that your land be included in the rezoning process and that would enable you to promote this outcome through the process. We are at a very early stage in the overall statutory process for the PPC and pre-lodgement is about consultation and post-lodgement is about assessment, analysis, and response. You will have the opportunity to have your say"

Property location circled in attached map

#### 1. Include 140 McLarin Rd in the plan change

The proposed development will border onto two of our boundaries (Northern and Western). We have been involved in the past with future urban zone decisions for the site and surrounds going back to the Franklin District/County and the plan change for Kahawai Point as our family farm borders this development so are aware of the complexity and requirements.

23.1

As our property was originally nominated for inclusion in the SHA as advised above with the proposed development land which was fully supported by the Auckland Council.

We request that our property at 140 McLarin Road is included in the same zone change, if successful, as 80 McLarin Rd.

Cookie cutting our property from the development rezoning is not a sound resource management response.

The size (3082m<sup>2</sup>) of 140 McLarin Rd means that under the future urban zone it is not able to be used for a range of general rural activities and it is therefore better suited for residential development. A better resource management response would be to include it in the current plan change process as the result is that we would have no reasonable use for the property going forward. An ongoing future urban zone is not practical given the ability to build on the property is restricted under the zone due to required setbacks from boundaries. No additional dwelling (main or minor) is allowed on the site due to the section size. It should also be noted that ours is of only two occupied habitable sites in the future zone with the other on beach road with all boundaries not affected by proposed zone change.

Our other concern is that if the property is not considered through this plan change process, then it may never happen. We understand it would simply be unaffordable for us to promulgate our on private plan change request for the property. A process we are told costs 100s of thousands of dollars and a cost that would outweigh any benefit gained through development on such a small site. Should the balance of the future urban zoned land (Clelland block) be proposed for rezoning in the future, we may well miss out again and the site would sit as an anomaly hang over of 3082m<sup>2</sup> of future urban zoned land surrounded by residential zoning.

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

requested

Details of amendments: Include 140 McLarin Rd (3082m2) into the same zone change as 80 McLarin Rd Glenbrook Beach

Submission date: 13 May 2023

Supporting documents  
Identified property.pdf

### **Attend a hearing**

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

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

### **Declaration**

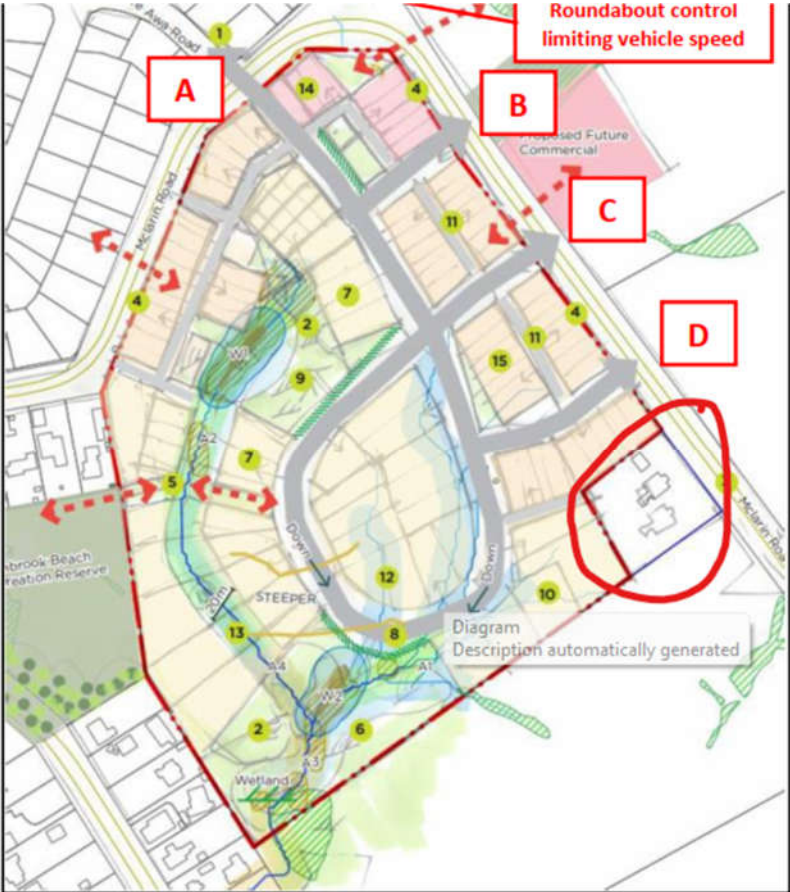
Could you gain an advantage in trade competition through this submission? No

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

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

Yes

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



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Equal Justice Project  
**Date:** Saturday, 13 May 2023 10:00:36 pm

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Equal Justice Project

Organisation name: Equal Justice Project

Agent's full name: Dr Grant Hewison

Email address: [grant@granthewison.co.nz](mailto:grant@granthewison.co.nz)

Contact phone number: 021577869

Postal address:  
[grant@granthewison.co.nz](mailto:grant@granthewison.co.nz)  
Auckland  
Auckland 1011

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:  
The entire plan change

Property address: This private plan change seeks to rezone approximately 7.897 hectares of land at 80 McLarin Road, Glenbrook.

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
Submission on PC 91 (Private): 80 McLarin Road, Glenbrook  
Equal Justice Project

#### Introduction

1. The Equal Justice Project ('EJP') is a non-partisan pro bono charitable entity (CC54347) that utilises law students' legal training and knowledge to advocate for change, including the promotion of effective climate action in Auckland.

2. The EJP welcomes the opportunity to make submissions on Plan Change 91 (Private): 80 McLarin Road, Glenbrook.

3. By way of introduction, following the release of the third Intergovernmental Panel on Climate Change (IPCC) on 4 April 2022, the UN Secretary-General said that:

“We are on a fast track to climate disaster. Major cities under water. Unprecedented heatwaves. Terrifying storms. Widespread water shortages. The extinction of a million species of plants and animals. This is not fiction or exaggeration. It is what science tells us will result from our current energy policies. We are on a pathway to global warming of more than double the 1.5°C limit agreed on in Paris. Some Government and business leaders are saying one thing but doing another. Simply put, they are lying. And the results will be catastrophic. This is a climate emergency.”

4. At COP27 on 8 November 2022, the UN Secretary-General followed this extraordinary statement above by then saying that: “We are on a highway to climate hell with our foot on the accelerator.”

5. The New Zealand Parliament declared a climate change emergency in December 2020. Similar declarations have been made in many other jurisdictions. Parliament’s declaration includes recognition of: “the devastating impact that volatile and extreme weather will have on New Zealand and the wellbeing of New Zealanders, on our primary industries, water availability, and public health, through flooding, sea-level rise, and wildfire damage.” Parliament’s emergency declaration stated that “climate change is one of the greatest challenges of our time” and that “New Zealand has committed to taking urgent action on greenhouse gas mitigation and climate change adaptation.” Included in the declaration is a commitment to implement the policies required to meet the targets in the Climate Change Response (Zero Carbon) Amendment Act 2019, and to increase support for striving towards 100 percent renewable electricity generation, low carbon energy, and transport systems.

6. In its Report New Directions for Resource Management in New Zealand (June 2020), the Resource Management Review Panel devoted an entire chapter to climate change and natural hazards. At the outset of Chapter 6 on climate change and natural hazards, the Review Panel observed:

“Climate change is often described as the defining issue of our time. Limiting global warming to 1.5 degrees Celsius above pre-industrial levels will require rapid, far-reaching and unprecedented changes in all aspects of society. We are already experiencing the effects of climate change, including through flooding and coastal erosion that threaten our essential infrastructure and the safety of whole communities. We need to respond with urgency.”

7. These Submissions are being made following the disastrous climate change induced floods and slips that have wreaked havoc across the upper North Island in early 2023. The Prime Minister Chris Hipkins acknowledged that a cause of these floods and slips is climate change. If ever there was a ‘wake-up call’ to turn the words of the New Zealand Parliament’s declaration of a climate change emergency into action, this has to be it.

#### Submissions

Private Plan Change (91) seeks to rezone approximately 7.897 hectares of land at 80 McLarin Road, Glenbrook. Specifically, this plan change aims to: - Rezone the site from Future Urban zone to Residential – Mixed Housing Suburban zone; - Create a new precinct, the Glenbrook 4 Precinct, aiming to guide future subdivision and development in the plan change area; and - Extend the Stormwater Management Area Flow 1 control over the entire plan change area.

Our submission relates to the entire Plan Change.

The EJP opposes the entire Plan Change.

The decision the EJP seeks from the Council is to decline Plan Change (91).

#### Reasons for opposing the entire Plan Change

Our reasons for opposing the entire Plan Change are set out below.

Resource Management Amendment Act 2020



First, the Resource Management Amendment Act 2020 ('RMAA2020') has reintroduced specific consideration of climate change and these provisions had effect from 30 November 2022. We believe they apply to Plan Change (91).

In particular, the RMAA2020 provisions state that Councils must have regard to emissions reduction plans and national adaptation plans under the CCRA (as amended by the Climate Change Response (Zero Carbon) Amendment Act 2019) when making and amending regional policy statements, regional plans and district plans (sections 61, 66, 74 RMA).

61 Matters to be considered by regional council (policy statements)

... when preparing or changing a regional policy statement, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

66 Matters to be considered by regional council (plans)

... when preparing or changing a regional plan, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

74 Matters to be considered by territorial authority

... when preparing or changing a district plan, a territorial authority shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

We note that an emissions reduction plan has been made in accordance with section 5ZI of the Climate Change Response Act 2002 - Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan (June 2022). In addition, a national adaptation plan has also been made in accordance with section 5ZS of the Climate Change Response Act 2002 – Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan (August 2022).

Plan Change (91) does not appear to have regard to either Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan (June 2022) nor Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan (August 2022).

Emissions Reduction and Plan Change (91)

As noted in Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan (June 2022):

"Well-functioning urban environments can reduce emissions and improve wellbeing Urban environments with a variety of mixed-use, medium- and high-density development that is connected to urban centres, as well as active and public transport routes, will help reduce greenhouse gas emissions. That is partly because they provide more options for people to travel between where we

work, live, play and learn. Well-planned urban areas provide an opportunity to realise wider benefits too. They enable a greater supply and diversity of housing to be built at pace and scale, improving affordability. Good access to active and public transport routes that safely take people to workplaces and education centres can provide greater access to learning and job opportunities for households, improve public health and wellbeing and strengthen community cohesion.”

In terms of climate change, the potential adverse impacts of future development from Plan Change (91), mainly includes the use of additional private vehicles. Currently there are no public transport services at Glenbrook Beach, with the nearest existing bus stops to the subject site being located over 8km away on Glenbrook Road, which is served by the route 395 between Papakura and Waiuku. Like any outer development proposed in Auckland, Plan Change (91) will result in an increase in Vehicle Kilometres Travelled (“Vkt”) and greenhouse gas emissions because:

- residents will consider themselves residents of Auckland city, as a whole, and will make use of the amenities, services, retail, education, etc in a large segment of Auckland. There is no public transport or cycling network for these trips that will be easier than driving. They will therefore drive, if they can, or be chauffeured if they can't.

- the new residences will increase the Vkt of visitors too. This will include tradespeople, friends and visitors, community service providers, people maintaining council assets, couriers, and trucks delivering to retail outlets. This is a lost opportunity for emissions reductions. Instead of making shorter trips, trips by more sustainable travel modes or trips to more places per trip - as would happen if these new dwellings were added within the built environment via intensification, each of these people will have to make longer trips to visit this development, and will drive.

- Plan Change (91) fails the 'climate test' because Auckland cannot provide a low car lifestyle overall without residential development being built in proximity to the amenities of the city. Development must be within the existing built environment.

We cannot see Plan Change (91) suggesting anything other than an increase in Vkt and will undermine the direction towards a Quality Compact Urban Form. Plan Change (91) will have long term, substantial and difficult-to-reverse negative impacts on Auckland's greenhouse gas emissions.

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

Submission date: 13 May 2023

### **Attend a hearing**

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

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

### **Declaration**

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

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

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

No

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Mair Gibbs and Brendan Zhang-Liao  
**Date:** Monday, 15 May 2023 2:00:49 pm  
**Attachments:** [Equal Justice Project Submission on PC 91\\_20230515132723.511.pdf](#)

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The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Mair Gibbs and Brendan Zhang-Liao

Organisation name: Equal Justice Project

Agent's full name:

Email address: mgib818@aucklanduni.ac.nz

Contact phone number: 02041083715

Postal address:

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

##### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

The plan change has no specific provision addressing the climate change impact of outer Auckland development, the brief mention of walking and cycling in attachment E is insufficient and out of touch with the realities of modern transport needs.

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

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

The reason for my or our views are:

Plan Change (91) fails to take into account, and address, the climate change impact of the development.

24.1

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

Submission date: 15 May 2023

Supporting documents

Equal Justice Project Submission on PC 91\_20230515132723.511.pdf

#### Attend a hearing

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

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

**Declaration**

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

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

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

No

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

## Submission on PC 91 (Private): 80 McLarin Road Glenbrook Equal Justice Project

### Introduction:

1. The Equal Justice Project ('EJP') is a non-partisan pro bono charitable entity (CC54347) that utilises law students' legal training and knowledge to advocate for change, including the promotion of effective climate action in Auckland.
2. The EJP welcomes the opportunity to make submissions on Plan Change 91 (Private) Glenbrook.
3. The EJP recognises the potentially dire effects of climate change and advocates for the immediate implementation of mitigatory measures. The urgency of the need for affirmative climate protection, namely an active reduction in greenhouse gas emissions, cannot be understated; "we are on a highway to climate hell with our foot on the accelerator".<sup>1</sup>
4. The New Zealand Parliament declared a climate change emergency in December 2020. Similar declarations have been made in many other jurisdictions. Parliament's declaration includes recognition of: "the devastating impact that volatile and extreme weather will have on New Zealand and the wellbeing of New Zealanders, on our primary industries, water availability, and public health, through flooding, sea-level rise, and wildfire damage." Parliament's emergency declaration stated that "climate change is one of the greatest challenges of our time" and that "New Zealand has committed to taking urgent action on greenhouse gas mitigation and climate change adaptation." Included in the declaration is a commitment to implement the policies required to meet the targets in the Climate Change Response (Zero Carbon) Amendment Act 2019, and to increase support for striving towards 100 percent renewable electricity generation, low carbon energy, and transport systems.<sup>2</sup>
5. In its Report *New Directions for Resource Management in New Zealand* (June 2020), the Resource Management Review Panel devoted an entire chapter to climate change and natural hazards. At the outset of Chapter 6 on climate change and natural hazards, the Review Panel observed:<sup>3</sup>

"Climate change is often described as the defining issue of our time. Limiting global warming to 1.5 degrees Celsius above pre-industrial levels will require rapid, far-reaching, and unprecedented changes in all aspects of society. We are already experiencing the effects of climate change, including through flooding and coastal erosion that threaten our essential infrastructure and the safety of whole communities. We need to respond with urgency."

6. The devastating effects of climate change are already being felt across New Zealand. Auckland and the Upper North Island have been devastated by floods in 2023, Prime

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<sup>1</sup> COP27 on 8 November 2022, the UN Secretary-General

<sup>2</sup> [https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb\\_20201202\\_20201202\\_08](https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb_20201202_20201202_08)

<sup>3</sup> Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 164.

Minister Chris Hipkins acknowledged that climate change was/is causally linked to this extreme weather.<sup>4</sup> The destruction of houses and crops and the crippling of communication lines and power systems illustrates not only the present nature of climate change, but the subpar response to this recent extreme weather phenomena indicates that we are entirely unprepared to face this core challenge of our generation.

## Submissions

Private Plan Change (91) seeks to rezone approximately 7.897 hectares of land at 80 McLarin Road, Glenbrook. Specifically, this plan change endeavours to:

- Rezone the site from Future Urban zone to Residential – Mixed Housing Suburban zone.
- Create a new precinct, the Glenbrook 4 Precinct, aiming to guide future subdivision and development in the plan change area.
- Extend the Stormwater Management Area Flow 1 control over the entire plan change area.

Our submission relates to the entire Plan Change.

The EJP opposes the entire Plan Change.

The decision the EJP seeks from the Council is to decline Plan Change (91).

## Reasons for opposing the entire Plan Change:

In light of the recognised pressing threat of climate change outlined above, the Resource Management Amendment Act 2020 (herein referred to as the RMAA2020) established specific climate change considerations, these provisions have been legally effective since the 30<sup>th</sup> of November 2022.<sup>5</sup> As per the RMAA2020, Councils must have regard to the emissions reduction plans and national adaptation plans under the Climate Change Response Act in respect of making and amending regional policy statements, regional plans and district plans. These relevant statutory provisions are as follows:

### **61 Matters to be considered by regional council (policy statements)**

... when preparing or changing a regional policy statement, the regional council shall have regard to—

(d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and

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<sup>4</sup> <https://www.youtube.com/watch?v=NScyur2wgIc>

<sup>5</sup> Resource Management Amendment Act 2020 Commencement Order 2021.

(e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

#### **66 Matters to be considered by regional council (plans)**

... when preparing or changing a regional plan, the regional council shall have regard to—

(d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and

(e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

#### **74 Matters to be considered by territorial authority**

... when preparing or changing a district plan, a territorial authority shall have regard to—

(d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and

(e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

The proposed Plan Change (91) does not have regard to New Zealand’s current emission reduction plan (*Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand’s First Emissions Reduction Plan*, June 2022), nor does it align with the existing climate change adaptation plan (*Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand’s First National Adaptation Plan*, August 2022).

As per the June 2022 Emissions Reduction Plan, creating cohesive communities with functional and effective public transport options is central to reducing private vehicle use and by extent reducing the emissions resulting from transport. The location of 80 McLarin Road Glenbrook is not conducive to this goal of sustainable transport, the closest bus stop at present is on Irwin Road, a three and a half hour walk from the site. The Plan Change (91) explicitly states within page 6 of ‘traffic matters’ that there is no existing plans for a bus route nor any ‘confirmed triggers to determine when a public bus service would be introduced’. In order for a public transportation to effectively serve the relevant community it is must be integral at all points of the developmental process—crucially at the point of site selection. Making a vague commitment to potentially add a bus stop location at some point within the developmental process is grossly inadequate.

Although making a literal determination of the level of increased gas emissions is not possible, it can be readily anticipated that an ongoing reliance on private vehicles will negatively impact

the councils goals to reduce Vehicle Kilometres Travelled and greenhouse gas emissions.<sup>6</sup> Beyond this particularly problematic lack of any realistically available public transport options, like any proposed outer development in Auckland Vehicle Kilometres Travelled and subsequently greenhouse gas emissions will inevitably increase because:

- Residents will be required to journey into Auckland city to access essential products and services as these developments are not self-sufficient, they are not built around pre-existing amenities.
- In addition to residents being required to travel via car for basic necessities of life, services such as tradespeople, postal/courier services etc. will frequently be required to drive to and from the development, further increasing the Vehicle Kilometres Travelled as a direct result of the development. The extent of this stretching of the physical distance between the core Auckland population and the cities central services hub is radically increased by outer developments. The speed of the population increase as a result of the lack of incremental expansion does not allow for service providers to exist on an internal basis within the community—forcing a high degree of outsourcing and subsequently increased Vehicle Kilometres Travelled.
- Plan Change (91) fails the ‘climate test’ because Auckland cannot provide a low car lifestyle overall without residential development being built in proximity to the amenities of the city. Development must be within the existing built environment.

Attachment E of the plan lists ‘Enhanced neighbourhood accessibility, connectivity, and walkability’ and ‘Promote walking and cycling as local means of transport’ amongst the ‘opportunities’ provided by the site. This advocating for the inarguably climate friendly transportation methods of ‘walking and cycling’ is out of touch with the real transport related issues facing outer Auckland developments. Walking and cycling are only realistically appropriate options for highly localised transport needs, this fails to acknowledge the isolated nature of the site from the majority of work and study opportunities. The unrealistic nature of walking and cycling as methods of transport that align with the communities needs in conjunction with the lack of existing public transport system/s—and the apparent lack of intention to effectively create such a system—illustrates that allowing the proposed plan change to take effect is fundamentally at odds with the Councils responsibility to mitigate the effects of climate change.

In line with this failure of Plan Change (91) to respect and conform to societal climate change obligations, the Equal Justice Project actively opposes Plan Change (91) in its entirety and urges the Council to decline the proposal. .

24.1

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<sup>6</sup> Agenda, *Komiti mō te Whakarite Mahere, te Taiao, me ngā Papa Rēhia / Planning, Environment and Parks Committee* (8 December 2022), page 54.



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Owen Yorke  
**Date:** Sunday, 14 May 2023 8:30:51 pm

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Owen Yorke

Organisation name:

Agent's full name: Aaron Yorke

Email address: owenbarb147@gmail.com

Contact phone number: 0210447490

Postal address:  
147 McLarin Rd  
Glenbrook Beach  
Auckland 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:

- Rezoning of the site from Future Urban zone to Residential – Mixed Housing Suburban zone.
- Create a new precinct, the Glenbrook 4 Precinct, aiming to guide future subdivision and development in the plan change area

Property address: 147 and 184 McLarin Rd, Glenbrook Beach

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I currently lease the Future Urban Zone which is rural to the south (Clelland Land) of the proposed development and have done so for many years. The land is used for Dairy Farming operations such as but not limited to

- Producing Hay and Silage
- Animal Grazing
- Feed Cropping

The property works in conjunction with the main farm in the production of dairy (milk) and the breeding and raising of stock for replacement stock, meat works and for sale. We believe that rezoning to 80 McLarin Rd to high density will lead to conflict between the farm operation and high density urban zoning. Our concerns are as follows

- Resident complaints to farming practices –

- o Noise (Machinery and animal)
- o Odours (Stock and fertilisers)
- o Use of chemicals / fertiliser on the property
- o Dust

- Trespassing of urban people and pets onto the rural land. There are issues around Health and Safety of trespasses should this happen. Obviously pets such as dogs that can harass stock causing injury or death to animals has been experienced in other like situations where urban meets rural operations.
- Increased wind blown litter from the urban zone and the environmental impact on the farm water ways and stock if ingested by the animals.
- The planting of plants by residents bordering the rural zone that could be hazardous (poisons) to farming animals

There are agreements backed by covenants etc between us and the Kahawai point development, who's boundary runs along our main farm boundary, agreements and measures can be made that control and limit the above impacts of urban on rural operations.

Some option for consideration regarding the boundary between urban and the future urban rural zones –

- Urban residents agree to and have a non complaints clause (Kahawai Point)
- Urban boundary set backs (Kahawai point - No non residential buildings within 6m of boundary)
- Planting along urban boundary (Kahawai Point - 3m of planting)
- Boundary fencing that is stock friendly and in conjunction with setbacks and planting works for the urban dweller (As per Kahawai Point Boundary)
- Caveats for urban residents that limit the use and planting on rural boundaries (As per Kahawai Point)

25.1

We do not believe that the housing density that has been applied for will tie in well with the old beach village and the newer but smaller single house kahawai point properties we see. We believe that high density detached, duplex and terraced housing will not suit the area being a beach / rural environment. We would not support a development that is not reflective of the rural coastal settlement character of the area. The density proposed is more in keeping with urban/suburban parts of Auckland.

25.2

I would not support multi-level dwellings as we believe this will constrict our current view from parts of our property situated at 147 McLarin Rd of the land and sea that we enjoy. Street and urban lighting will create light pollution that is not present with the current rural setting.

We believe that the development will have a detrimental effect on our local amenities and the way of life that we enjoy and have done so for many years.

Should the rezone be approved then we are extremely concerned that due to the close proximity to the development our property will be affected immensely by machinery noise, machinery vibration, dust pollution (current water is supplied through onsite tank water collected via rain off the roof), flooding due to poor stormwater control, sediment runoff and build rubbish. Some of the above has been experienced with the development of the neighbouring Kahawai Point development.

25.2

#### Traffic and Roothing

The position of our property will be affected by additional traffic noise, pollution (road run off), congestion and safety. Issues have and are already being experienced with the current increase of traffic that Kahawai Point has brought to the rural roads and although promised of road upgrades (funded through development contributions?), the overall quality of the road in and out of the beach has worsened considerably and got more dangerous for motorists, bikers, cyclists, and pedestrians. Adding more traffic to a road designed as a rural road will exacerbate the problems. We know of others that have had to invest in a new driveway layout to address the already increased traffic numbers from the current development and increased road usage that it brings. We believe that it is only a matter of time before someone becomes seriously hurt or killed due to the poor state and design of the local roads. Couple this with more people using the rural roads for walking, running, and biking with no footpaths or cycle lanes on a large amount of McLarin Road we believe it is a disaster waiting to happen. The necessary traffic/pedestrian related infrastructure upgrades have not kept up with the effects of growth in the area and we have no confidence that this would improve under the plan change proposal.

25.3

The zone change and development will only worsen the above and what now needs to be considered regarding the roads is the effect that the proposed water treatment plant construction traffic and staff will have on a road that is already failing due to increased use. The heavy vehicle impacts have not been addressed and the road serving Glenbrook Beach (noting that there is no

alternative) is in a degraded state.

Local amenities such as the boat ramp and beach parking are currently not able to cope with the growing demand and although upgrades and new options such as the Kahawai Point marine centre have been spoken about but no development has progressed and our understanding is that the plan for this has been squashed by the council.

25.4

Our local ramp is not able to manage the parking demand and is in of dire need of money spent to increase parking and the safety of this facility and others. Two years ago we had to fight back on a Council proposal to designate boat trailer parks for freedom camping use. There appears little overarching planning for what is a peninsular based coastal settlement with an historic character changing to reflect the SHA but a character that would be compromised by the density proposed. This is not an urban or suburban area where public amenities abound nor should they for a coastal settlement.

We believe that the current emergency services cannot adequately service the existing population to provide protection / service to people and property with a real fear that should the one road in become impassable then there is a real possibility that life and or property will be lost. Has a consultation with the emergency services and local education providers taken place? It is vital that these core local providers are able to manage the proposed population increase should rezoning be given and development be completed.

We struggle to understand the logic around rezoning an area to the proposed density when the area.

- Has no access or support facilities to public transport such as buses, trains and ferries.
- Has only one road in and out to the area. Once cut off no emergency services or other services such as telecommunications and power personal can access.
- Has roads that are designed for rural use not urban traffic.
- Are a considerable distance away from first responders such as fire, medical and police.
- Have no local retail outlets.
- Have run down and struggling facilities such as beach access and parking, boating access and parking, community gathering places, footpaths, and cycle ways.
- Limited infrastructure such as water, stormwater, and sewer. Only this year the community lost water supply due to a broken pipe across Taihiki River. We then saw multiple water trucks using rural road and adding to its woeful and dangerous state.
- Where this density is enabled in other parts of Auckland it is logical and supported by the necessary infrastructure, funded by developers and ratepayers.

25.5

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

Details of amendments: Refer to "The reason for my views are"

Submission date: 14 May 2023

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Attn.: Planning Technician

[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**TO:** Auckland Council

**SUBMISSION ON:** Plan Change 91 (Private): 80 McLarin Road, Glenbrook

**FROM:** Watercare Services Limited

**ADDRESS FOR SERVICE:** [Mark.Iszard@water.co.nz](mailto:Mark.Iszard@water.co.nz)

**DATE:** 15 May 2023

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

## 1. INTRODUCTION

### 1.1. Watercare's purpose and mission

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council ("**Council**").

Watercare provides integrated water and wastewater services to approximately 1.7 million people in Auckland. Watercare collects, treats, and distributes drinking water from 11 dams, 26 bores and springs, and four river sources. A total of 330 million litres of water is treated each day at 15 water treatment plants and distributed via 89 reservoirs and 90 pump stations to 450,000 households, hospitals, schools, commercial and industrial properties.

Watercare’s water distribution network includes more than 9,000 km of pipes. The wastewater network collects, treats, and disposes of wastewater at 18 treatment plants and includes 7,900 km of sewers.

Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with the effective conduct of its undertakings and the maintenance of the long-term integrity of its assets. Watercare must also give effect to relevant aspects of the Council’s Long Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Urban Land Supply Strategy.<sup>1</sup>

## 2. SUBMISSION

### 2.1. General

This is a submission on a change proposed by HD Project 2 Limited (“**Applicant**”) to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 14 April 2023 (“**Plan Change**”).

The Applicant proposes to rezone approximately 7.897 hectares of land at 80 McLarin Road, Glenbrook from Future Urban zone to Residential – Mixed Housing Suburban zone.

The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing to ensure that the effects on Watercare’s existing and planned water and wastewater network are appropriately considered and managed in accordance with the Resource Management Act 1991.

In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, Te Tahua Taungahuru Te Mahere Taungahuru 2018 – 2028/The 10-year Budget Long-term Plan 2018 – 2028, the Auckland Future Urban Land Supply Strategy 2015 and 2017, the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater Code of Practice for Land Development and Subdivision and the Watercare Asset Management Plan 2022 – 2042. It has also considered the relevant RMA documents including the Auckland Unitary Plan (Operative in Part) and the National Policy Statement on Urban Development 2020 which (among other matters) requires local authorities to ensure that at any one time there is sufficient housing and business development capacity which:

- (a) in the short term, is feasible, zoned and has adequate existing development infrastructure (including water and wastewater);
- (b) in the medium term, is feasible, zoned and either:
  - (i) serviced with development infrastructure, or

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<sup>1</sup> Local Government (Auckland Council) Act 2009, s58.

- (ii) the funding for the development infrastructure required to service that development capacity must be identified in a Long Term Plan required under s93 of the Local Government Act 2002; and
- (c) in the long term, is feasible, identified in relevant plans and strategies by the local authority for future urban use or urban intensification, and the development infrastructure required to service it is identified in the relevant authority's infrastructure strategy required under the Local Government Act 2002.<sup>2</sup>

## **2.2. Specific parts of the Plan Change**

The specific parts of the Plan Change that this submission relates to are:

- (a) the proposed Glenbrook 4 Precinct provisions for water supply and wastewater; and
- (b) the effects of the Plan Change on Watercare's existing and planned water and wastewater network.

**2.2.1** Watercare has reviewed the Plan Change and considers that:

- (a) the proposed water and wastewater capacity and servicing requirements have been assessed as part of the Proposal.
- (b) Water supply can be serviced from the existing Watercare network subject to potential local storage upgrades.
- (c) Wastewater can be serviced, provided that subdivision and development is avoided prior to the commissioning of the new bulk wastewater scheme that will service the communities of Waiuku, Glenbrook Beach, Clarks Beach and Kingseat.
- (d) The proposed precinct provisions are appropriate insofar as they relate to the coordination of subdivision and development with the delivery of public bulk wastewater infrastructure.
- (e) The matters raised by Watercare in this submission must be addressed to ensure any adverse effects of the Proposal on Watercare's existing wastewater infrastructure network will be appropriately managed.

## **2.3. Water and Wastewater Servicing for the Plan Change Area**

### **2.3.1. Water supply servicing for the Plan Change Area**

The bulk Patumahoe watermain links Glenbrook to the wider Auckland Regional municipal water supply. The Patumahoe watermain has capacity to service the existing community as well as the development envisaged in the Future Urban zoned land. Watercare agrees that

<sup>2</sup> National Policy Statement on Urban Development 2020, subpart 1, 3.2 to 3.4.

there are no constraints to subdivision and development of the subject site from a bulk water supply perspective.

26.2

Funding of the local water supply infrastructure necessary to service the Plan Change area is at the cost of the Applicant. All water infrastructure will be required to comply with Watercare's Code of Practice for Land Development and Subdivision. Watercare will continue to work with the Applicant to confirm the final design for the water supply network. The Applicant will need to work with Watercare in advance of lodging resource consents for subdivision to confirm the requirement for any local storage upgrades. Final design of the proposed water supply network can be confirmed at resource consent stage.

### **2.3.2. Wastewater**

Watercare agrees with the applicant's assessment that there is no available capacity in the wastewater network for development of the subject site. The Southwest Wastewater Servicing scheme is required to be operational before any new development on the subject site can be connected to the Watercare network.

Watercare strongly supports precinct provisions that seek to avoid subdivision and development prior to the commissioning of the Southwest Wastewater Servicing scheme. Funding of the local wastewater infrastructure necessary to service the Plan Change area is at the cost of the Applicant. All wastewater infrastructure, including local reticulation and pump station design, will be required to comply with Watercare's Code of Practice for Land Development and Subdivision. Final design of the proposed wastewater network can be confirmed at resource consent stage.

26.1

## **2.3 DECISION SOUGHT**

In relation to the proposal's water supply solution, Watercare considers there are no reasons to decline the Plan Change.

On the basis that there is no capacity in the existing bulk wastewater network to service the development, Watercare have some concerns for wastewater servicing. Watercare considers that these concerns can be appropriately mitigated by the inclusion of precinct provisions that seek to avoid any development ahead of the Southwest Wastewater Servicing scheme becoming operational.

## **HEARING**

Watercare wishes to be heard in support of its submission.

15 May 2023

Mark Iszard  
**Head of Major Developments**  
**Watercare Services Limited**

Address for Service:

Mark Iszard

Head of Major Developments

Watercare Services Limited

Private Bag 92 521

Wellesley Street

Auckland 1141

Phone: +64 21 913 296

Email: [mark.iszard@water.co.nz](mailto:mark.iszard@water.co.nz)



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Anton Tyers  
**Date:** Monday, 15 May 2023 12:30:29 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Anton Tyers  
 Organisation name:  
 Agent's full name: Anton Tyers  
 Email address: anton.tyers@hotmail.com  
 Contact phone number:  
 Postal address:  
 53 Tahuna Minhinnick Drive  
 Glenbrook  
 Auckland 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91  
 Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Concerns that the intensive nature of the change will affect the local communities safety and value.

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

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

The reason for my or our views are:

The new development at 80 McLarin Road needs to follow the current guidelines we have all been required to meet in our current house builds. This would mean the developer needing to agree of the covenants which are in place for the Kahawai Point Subdivison.

27.1

- Any changes to our current zoning would be detrimental to the rural vision which made people settle here in the first place.

27.2

- We want an environmentally conscious, safe secure area that embraces and promotes its natural environment. This was the original vision of the area and has created a special place which deserves to be preserved.

- My preference is for 80 McLarin Road to be zoned H3 single housing one or two storey.

27.3

- there is likely to be a lack of privacy and a lack of provision for privacy which can be of concern to the community living below this development. | 27.4
- Glenbrook Beach and Kahawai Point are a small rural community that are not designed for the intensity of multi- unit dwellings. |
- We have no local businesses or shopping centres. | 27.5
- There is a school bus operating a pickup, drop-off service within very close proximity to the proposed development site which causes concerns about issues of child safety. |
- Our local rural schools are mainly at capacity. | 27.5
- We have no local fire protection which would be needed for rescue in multi -unit dwellings. |
- We have no immediate access to emergency services. |
- Any new housing development must maintain the vision for the area, as well as protect the current investments of the homeowners who have chosen this area above all others. | 27.1
- Due to the remoteness of the Glenbrook Beach and Kahawai Point and its lack of public transport, people are heavily reliant on personal transport for all their needs and activities. Intensifying our housing stock will not help Auckland City Council’s carbon reduction plans. | 27.6
- We only have one access road which can be blocked by parked cars, fallen trees, flooding or accidents. Any intensive development will put added pressure on our access road. |

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

Submission date: 15 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Shane Bradford  
**Date:** Monday, 15 May 2023 12:45:28 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Shane Bradford

Organisation name:

Agent's full name:

Email address: shanespdk8@gmail.com

Contact phone number:

Postal address:  
 11 Otohikawa Ave  
 Glenbrook  
 Auckland 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:

Property address: 80 McLarin Road, Glenbrook

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

80 McLarin Road is susceptible to flooding and there is no immediate access to emergency services. | 28.1

The site is a corner that coincides with Glenbrook Beach Road. A rural and busy road as it is the only access road to both Glenbrook Beach and Kawahai Point. I am concerned that a multi-unit dwelling will cause cars to overflow the development and park on Glenbrook Beach Road endangering both drivers and pedestrians. | 28.2

There are no walking paths on Glenbrook Beach Road or at 80 McLarin Road.

I prefer 80 McLarin Road to be zoned as H3 single housing of one or two levels. | 28.3

There is no public transport, and no grocery stores or dairies. | 28.4

I'm concerned that a multi-unit complex will degrade the beautiful green rural vision of the community, which is the reason that I moved to the area.

28.5

All developments within the Kahawai Point development have had to adhere to the imposed covenants and the building guidelines. I believe it is only fair and just that the development of 80 McLarin Road also has to adhere to these same covenants and guidelines.

28.6

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

Submission date: 15 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Vincent Asia  
**Date:** Monday, 15 May 2023 2:15:27 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Vincent Asia  
Organisation name:  
Agent's full name:  
Email address: vincent.asia@hotmail.com  
Contact phone number: 0224983691  
Postal address:  
3 Whareono Road  
Glenbrook Beach  
Auckland 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91  
Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:  
Roads  
Property address: 80 Glenbrook Road  
Map or maps:  
Other provisions:

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

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

The reason for my or our views are:  
Road closures

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

Details of amendments: Decline plan change

Submission date: 15 May 2023

30.1

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

From: [Unitary Plan](#)  
 To: [Unitary Plan](#)  
 Subject: Unitary Plan Publicly Notified Submission - Plan Change 91 - Suli Palu  
 Date: Monday, 15 May 2023 2:30:31 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Suli Palu

Organisation name:

Agent's full name: Suli Palu

Email address: Tika.palu@me.com

Contact phone number:

Postal address:

46 Tahuna Minhinnick Drive

Glenbrook

Auckland 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:

Property address: 80 McLarin Road Glenbrook 2681

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

No public transportation to this small community and as such requires all residents to use a private or commercial motor vehicle. This has the potential to have 1 to 2 vehicles per house which requires off street parking to prevent on street parking and the related congestion.

31.1

There is currently no retail or medical facilities in the area so all residents need to travel to either Waiuku (15 minute drive) or Pukekohe (25 minute drive) if they require any services.

With one road in / one road out and no through traffic this does not make for a strong business case for any retail option to become profitable as it will be totally reliant on the local community for their income.

31.2

We understand the local primary school is already at capacity with one school bus for the Glenbrook School to and from Glenbrook Beach and 1 bus service for the closest high school Waiuku College.

Our preference is for the area to have no more than H3 Zoning as applied for Glenbrook Precinct 3 - Kahawai Point which is restricted to H3 housing 1 or 2 storey single dwelling. Please ensure any covenant has guidelines similar to Kahawai Point so that the rural and coastal feel of the area is

31.3

maintained.

Our observations are that 80 McLarin Road and the adjoining farmland on the westerly side of McLarin Road is very susceptible to flooding. This is already impacting on the residents of Ronald Ave who regularly experience flooding from water runoff from this land.

31.4

We are a small rural coastal area and wish to maintain this. We believe any approved increase in density would significantly change this community and environment.

31.5

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

Submission date: 15 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Kyle Cunningham  
**Date:** Monday, 15 May 2023 2:45:29 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Kyle Cunningham

Organisation name:

Agent's full name:

Email address: kylec.film@gmail.com

Contact phone number:

Postal address:

2681

Glenbrook

Waiuku 2681

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:

Property address: 27 tahuna minhinnick

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Insufficient industry tire for a drastic increase in population density

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

Submission date: 15 May 2023

32.1

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Emma Cuming  
**Date:** Monday, 15 May 2023 3:45:36 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Emma Cuming

Organisation name:

Agent's full name:

Email address: clumsyemz@hotmail.com

Contact phone number:

Postal address:  
2681

Glenbrook 2681

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

##### My submission relates to

Rule or rules:

Property address: 80 McClarin rd

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

This is a rural area and we love the quiet living. Putting in massive fall buildings will disrupt the feel of the area.

33.1

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

Submission date: 15 May 2023

#### Attend a hearing

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

#### Declaration

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Victoria Lee McAnulty  
**Date:** Monday, 15 May 2023 4:45:28 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Victoria Lee McAnulty

Organisation name: Tui Kaihu Trust

Agent's full name: Victoria Lee McAnulty

Email address: victoriamcanulty@gmail.com

Contact phone number: 0212803837

Postal address:  
victoriamcanulty@gmail.com

2120

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:  
Proposed Plan Change 91

Property address: 80 McLarin Road Glenbrook

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Glenbrook Beach originated as a few coastal baches on farmland, growing to support the Steel Mill labour need, then developing as a relaxed rural/coastal community. Our community has more than doubled in the last five years, with the development of Kahawai Point, adding families, home-businesses, vehicles and other infrastructure pressure on a poorly serviced rural location.

34.1

The single road into Glenbrook Beach and Kahawai Point is poorly surfaced & regularly requires remedial works; has areas of poor visibility, sharp corners and lacks safe passing or shoulder opportunities.

There is no local commercial centre, public transport or other facility to support further increased scale of township, further impacting road use as locals travel to neighbouring Waiuku and Pukekohe for supplies.

34.2

The coastline is susceptible to coastal inundation, more recently severe flooding and with recent extreme weather events risks being cut off from other communities without ability to self-sustain. The existing Watercare infrastructure has repeatedly proven this cannot service the current

34.1

township. Future improvements are several years away and in the early stages of community consultation.

On-going civil works in the Kahawai Point development have stripped natural contours, native plantings and impacted coastal birdlife. This further development, the frustration of additional vehicles on an already impacted road, and the mass scale of construction will all detrimentally impact the aesthetic and experience of coastal living.

34.4

Children enjoy the freedom of a small coastal community, playing at the beach and zipping between properties in a community small enough to not only consider, but know their neighbours and ensure we are a family first community. There are no safe play areas for children away from the proposed excessive traffic increase.

34.2

Local opportunities for childcare, schooling, other education, work and activity are non-existent, with all locals requiring access to those services, travelling outside the community to do so, each in private vehicles where there is no Public Transport offering.

Further, there are no Public Transport Connections, Park and Ride services or other shared travel solutions in place, increasing road users on an aged road service with several high-risk crash sites. The single entry/egress point to Glenbrook Beach and Kahawai Point more recently services a community of 5000+/-, with regular pothole and other issues ensuring safe travel. The road has several bends and blind-spots with inadequate signage or travel restrictions ensuring the safety of drivers and pedestrians.

34.1

Several streets within the community are without way-finding signage, footpaths, reasonable car parking allowances or general consideration of high-traffic conditions.

Fire, Ambulance and police services are managed out of Pukekohe and Waiuku, or farther afield subject to availability. Increasing community capacity away from a main centre or central location further impacts often volunteer rural services.

34.3

The development vision lacks sustainability: in proposed community integration, scale, transportation, lack of immediate infrastructure and material accessibility.

Watercare proposes major future road works impacting the single road entry for a period of 18months, with staged obstructions for the duration. The scale of this proposed plan change would exacerbate volume of road users, increase travel risk through failing roads and scale of road use, and generate frustrations in a community recovering from the effects of intensification over such a short period.

Kahawai Point has proven that development guidelines and covenants fail. Proposing this plan change at the current starting point risks the land, community, environment and culture of Glenbrook Beach.

Further intensification of this coastal community risks our natural environment, rural and coastal lifestyles, food production and shared resources of water, energy, data etc,: the latter regularly interrupted through supply issues impacting the current users.

34.4

**\*\*Further development at Glenbrook Beach has an opportunity to promote sustainability, through passive design, appropriate materials, scale, transport, connections and community. This proposed plan change does not adequately consider the integration or impact of effects in a unique and sensitive coastal environment, or within the rural community.**

34.4

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

Submission date: 15 May 2023

**Attend a hearing**

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

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

**Declaration**

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

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

- Adversely affects the environment; and

Does not relate to trade competition or the effects of trade competition.

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Mark Olson  
**Date:** Monday, 15 May 2023 5:15:30 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Mark Olson  
 Organisation name:  
 Agent's full name: Mark Olson  
 Email address: markdebraolson@gmail.com  
 Contact phone number:  
 Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 91  
 Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

**My submission relates to**

Rule or rules:  
 Rezoning from Future Urban zone to Residential.

Property address: 80 McLarin Road

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

- 1/ Why should there be a zoning change for this address when the rest of the Glenbrook Beach / Kahawai Point was developed under a different zoning. If they want to developed this address it should be under the same zoning as the rest of the current development. | 35.1
- 2/ Even with a new stormwater system for the area there will still be flooding in the Ronald Ave, High rainfall, high tides, westerly winds and low atmosheric pressure has in the past resulted in Ronald Ave being part of the harbour. | 35.2
- 3/ There is no infrastructure such as public transport to support high density housing. And if everyone was honest there will never be any.
- 4 /It will have a negative affect on the surrounding land values.
- 5/ From my observations todays high density housing areas become tomorrows slums with all the associated problems that come with that,

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



Submission date: 15 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Matthew Kerwin  
**Date:** Monday, 15 May 2023 8:45:26 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Matthew Kerwin

Organisation name:

Agent's full name: Matthew Kerwin

Email address: ranga132213@gmail.com

Contact phone number:

Postal address:  
 ranga132213@gmail.com  
 Auckland  
 Auckland 2681

### Submission details

#### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

#### My submission relates to

Rule or rules:

Property address: 91 mclarin road

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I dont believe that our area is capable of handling the high volume of traffic and movement that the housing development will bring

36.1

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

Submission date: 15 May 2023

### Attend a hearing

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

### Declaration

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

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

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

Yes

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 91 - Vanshika Sudhakar  
**Date:** Monday, 15 May 2023 11:15:27 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Vanshika Sudhakar

Organisation name:

Agent's full name:

Email address: vanshika-s@hotmail.com

Contact phone number:

Postal address:  
 23 Opouatu Avenue  
 Kahawai Point  
 Auckland

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

##### My submission relates to

Rule or rules:

Property address: 80 McLarin Road

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

As a young family, my husband and I purchased our first home in Glenbrook for a number of reasons. It allowed us to purchase a home in a rural setting, which was affordable and with a reasonable amount of land when compared to other upcoming developments in Auckland. Glenbrook also came with the charm of being a smaller, more secluded development.

Our concerns are that due to the proposed changes in the plans, the development will lose this charm. It will lose the idyllic setting which has was originally created by Kahawai Point

37.1

Further, our concerns are also in relation to the lack of infrastructure currently in place to support the growing development. There is currently only one way in and out of Kahawai Point, there is no access to the area by way of public transport, and there are no stores to assist with making the area self sufficient. With a busier area, will come a higher demand for more robust infrastructure. However, the issue facing Auckland right now seems to be poor future planning. For example, South Auckland is struggling to keep up with the booming number of developments in relation to

37.2

roading and ease of accessibility. It is our concern, that notwithstanding on a smaller scale, a busier development will face similar issues without adequate future planning ahead of any major changes.

For these reasons, we ask that the plan is declined until the area sufficiently future proofed.

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

Submission date: 15 May 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

**From:** [sarah.fisher](#)  
**To:** [Unitary Plan](#)  
**Subject:** Submission on plan change 91 private 80 Mclarin road, Glenbrook  
**Date:** Monday, 15 May 2023 11:59:54 am

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**Re: submission by Sarah Fisher 32 a Ronald ave, Glenbrook Beach on plan change 91 (private) 80 Mclarin road, Glenbrook**

I have some questions regarding the proposed changes at [80 McLarin Road](#) and have attached some photos of my present back yard that backs onto the field western side for supporting evidence.

38.1

### **Wetlands – Riparian planting**

Prattle Delamore Partners in Sept 2022 response to Bryce Powell Senior Planner from Harrison Grierson Ltd:

Recommend wetlands to be 20 metres wide and that it is not at the councils cost to plant. On page 2 they discuss cycleways and pedestrian walkways to be excluded from the riparian planting area.

As you can see from my photos attached and taken today (15<sup>th</sup> May) – I have major flooding issues from the water run off from the farm.

Since living here 2012 I have not found a suitable solution to my issue and I am unclear from all of the literature I have read for this change in proposal whether the area on my fence line (Lot 71) is considered as wetlands or not.

I have no understanding on whether there will be riparian planting or indeed how far back from my fence line would be the first house be built in this new Mixed Housing zone being proposed. I appreciate this will be up to building consent finally but I have concerns already that I need to have better drainage on my section and I have been waiting to find out what the proposed changes are so I can work alongside the planners and developers to work out what type of fence / irrigation I can do on my side of the section. At the moment I have resulted to digging a trench since all the bad weather.

If the council is not responsible for the cost of the riparian planting – how do I as a house owner hold the developers accountable?

To manage the risk of the cycleways and pedestrian walkways from sinking – it would be a good idea to not have them attached to the riparian planting area.

### **Stormwater and potential flooding**

Bryce and Powell in their amended report Oct 2022, page 8 mentions storm water is suitably managed by applying water sensitive principles “offline” of water courses and wetlands.

What does this actually mean?

I am very keen to work alongside the planners and ecologists to get a win win situation for all. I need to have a dry section and reduce the water flow under my house. With the changing weather in the last two years I have not seen the pond forming on the fence line get dry. This is why I want you all to be aware that this area certainly is a wetland area. I have tried to drain the water via a trench to the neighbours fence but you can see that this is not draining away and has

had no benefit. I really concerned with more housing will there be an increased risk of flooding for myself and my neighbours on Ronald ave? Is keeping my fenceline as wetlands the answer?

### **Building date start estimate**

There is no discussion about proposed building start time or a potential time frame for building consent etc.

I know that the sewage plant is being considered for 2026 and whether this fits in with this timeframe? A rough estimate would be good to know for us residents.

### **Fast broadband**

There has been no mention of whether these new properties will receive fast internet fibre like the Kaiwahi point did – if this is the case I would like to advocate on behalf of Ronald Ave neighbours that we should be offered the fast fibre internet as well – as it would not be that difficult to channel this through to us via our back yards. A lot of us still rely on a copper wire connection or via VDSL. Can I propose this is something that is discussed and put forward.

### **Type of housing and descriptions of type of housing**

If there is to be an estimate of 100 houses in position and there are a lot of wetlands areas and streams: one can only assume that there will be housing that is more than 2 storey high in places? Can you confirm that the houses will not be more than two storey high please.

I am pleased to hear that there will not be social housing which is one of my concerns; but again it is not a nice feeling knowing that each side of my house now will have housing and that potentially at the side of the house I socialise on re: my east but in this document it is discussed as the MHS western side – there may be three level houses looking at me and my family.

It would have been really helpful to have a description between Mixed housing / Single housing and Special Housing – I really do not know what the definition is of all three of these terms and I could not see a definition in the documents.

Mixed housing does sound colourful and has raised some concerns amongst the neighbours what this means. But I feel rest assured that because of poor infrastructure at Glenbrook Beach with transport, shops etc; we can assume that the housing will be private residential and not social housing or half way houses etc.

Thanks for taking time to read this. Looking forward to hearing back from you.

Sarah Fisher  
32 a Ronald ave, Glenbrook beach  
0212976148

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Continuou







15 May 2023

Plans and Places  
Auckland Council  
Private Bag 92300  
Auckland 1142

Attn: Planning Technician

Email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 91: 80 MCLARIN ROAD,  
GLENBROOK**

Please find attached Auckland Transport's submission on Proposed Private Plan Change 91 to the Auckland Unitary Plan (Operative in Part).

Should you have any queries in relation to this submission, please contact Jason Ashby (Senior Planner, Land Use Policy/Planning) [Jason.Ashby@at.govt.nz](mailto:Jason.Ashby@at.govt.nz).

Yours sincerely

Jason Ashby  
**Senior Planner, Land Use Policy and Planning**



cc.  
Bryce Powell (Harrison Grierson) [B.Powell@harrisingrierson.com](mailto:B.Powell@harrisingrierson.com)

Encl: Auckland Transport's submission on Proposed Plan Change 91: 80 McLarin Road, Glenbrook

**FORM 5 - SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 91:  
80 MCLARIN ROAD, GLENBROOK UNDER CLAUSE 6 OF SCHEDULE 1, RESOURCE  
MANAGEMENT ACT 1991**

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142

**Submission on:** This private plan change seeks to rezone approximately 7.897 hectares of land at 80 McLaren Road from Future Urban zone to Residential – Mixed Housing Suburban zone. The proposed Private Plan Change also seeks to introduce the Glenbrook 4 Precinct, aiming to guide future subdivision and development in the plan change area and to extend the Stormwater Management Area Flow 1 control over the entire plan change area.

**From:** Auckland Transport  
Private Bag 92250  
Auckland 1142

## **1. Introduction**

- 1.1 HD Project 2 Limited (the 'applicant') has lodged a Private Plan Change 91 ('PPC 91' or 'the Plan Change') to the Auckland Unitary Plan: Operative in Part ('AUP(OP)'). The Plan Change seeks to rezone approximately 7.897 hectares of land in Glenbrook Beach at 80 McLaren Road from Future Urban zone to Residential – Mixed Housing Suburban zone. The proposed Plan Change also seeks to introduce the Glenbrook 4 Precinct applying to the rezoned land.
- 1.2 The Plan Change seeks to apply the Stormwater Management Area – Flow 1 (SMAF1) overlay to 80 McLaren Road and "apply new precinct provisions that modify the standard MHS zone provisions to reflect site characteristics and context and to achieve site development outcomes on this basis". The precinct includes provisions that relate to transport and refers to the provision of approximately 100 residential units.
- 1.3 Auckland Transport is a Council-Controlled Organisation (CCO) of Auckland Council and a Road Controlling Authority with the legislated purpose to contribute to an "effective, efficient and safe Auckland land transport system in the public interest". In fulfilling this role, Auckland Transport is responsible for:
- a. The planning and funding of public transport;
  - b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle);
  - c. Operating the roading network; and
  - d. Developing and enhancing the local road, public transport, walking and cycling networks for the Auckland region

- 1.4 Auckland Transport could not gain an advantage in trade competition through this submission.

## 2. Strategic context

- 2.1 The key overarching considerations and matters of interest for Auckland Transport are described below.

### Auckland Plan 2050

- 2.2 The Auckland Plan 2050 ('Auckland Plan') is a 30-year plan for the Auckland region outlining the long-term strategy for Auckland's growth and development, including social, economic, environmental and cultural goals. The Auckland Plan is a statutory spatial plan required under section 79 of the Local Government (Auckland Council) Act 2009. The Auckland Plan provides for between 60 and 70 per cent of total new dwellings to be built within the existing urban footprint. Consequently, between 30 and 40 per cent of new dwellings will be in new greenfield developments, satellite towns, and rural and coastal towns.
- 2.3 The transport outcomes identified in the Auckland Plan to enable growth include providing better connections, increasing travel choices and maximising safety. To achieve these outcomes, focus areas outlined in the Auckland Plan include:
- targeting new transport investment to the most significant challenges;
  - making walking, cycling and public transport preferred choices for many more Aucklanders; and
  - better integrating land use and transport.

### Managing Auckland-wide growth and rezoning

- 2.4 The high-level spatial pattern of future regional development is represented in the Auckland Plan and by the Future Urban zone in the AUP(OP). The Auckland Plan and the AUP(OP) identify Glenbrook Beach as a rural settlement surrounded by rural production land. The AUP(OP) identifies the Plan Change site as zoned Future Urban, including additional land to its immediate southeast.

### Sequencing growth and aligning with the provision of transport infrastructure and services

- 2.5 The Future Urban Land Supply Strategy 2017 ('FULSS') provides guidance on the sequencing and timing of future urban land identified in the Auckland Plan. This guidance was incorporated into the updated Auckland Plan in 2018. The FULSS sets out the anticipated timeframes for 'development ready' areas over a 30-year period. The FULSS helps to inform infrastructure asset planning and funding priorities, to support development capacity to ideally be provided in a coordinated and cost-efficient way via the release of 'development ready' land.
- 2.6 Plan changes which propose to allow future urban land to be urbanised before the wider staging and delivery of planned transport infrastructure and services has occurred need to be carefully considered. In this case, the Plan Change site is zoned Future Urban and is identified in the FULSS to be 'development ready' between 2023 and 2027. Land is considered development ready once the following four steps are complete:

- Future urban zoned land identified in the Unitary Plan;
- Structure planning completed;
- Land rezoned for urban uses; and
- Bulk infrastructure provided.

- 2.7 Any misalignment between the timing for providing infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is 'development ready'. The matters that need to be carefully considered include:
- Whether the Plan Change requires applicants to mitigate the transport effects associated with their development
  - Whether the Plan Change provisions ensure the transport infrastructure needed to service their development is delivered in time to support the development enabled by the plan change.
- 2.8 Auckland Transport seeks to ensure that any change in land use is aligned with a robust consideration of transport network requirements with an implementation plan that will ensure such network demands will be met. Simply put, Auckland Transport is concerned that suitable precinct provisions are secured that are robustly drafted to ensure that applicants will be required to mitigate the transport effects associated with their development and to provide the transport infrastructure needed to service their development at the appropriate stage of the development.
- 2.9 The need to coordinate urban development with infrastructure planning and funding decisions is highlighted in the objectives of the National Policy Statement on Urban Development 2020 (Updated May 2022) which are quoted below (with emphasis in bold):
- 'Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
- (a) the area is in or near a centre zone or other area with many employment opportunities
  - (b) **the area is well-serviced by existing or planned public transport**
  - (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.'
- 'Objective 6: Local authority decisions on urban development that affect urban environments are:
- (a) **integrated with infrastructure planning and funding decisions;** and
  - (b) strategic over the medium term and long term; and
  - (c) responsive, particularly in relation to proposals that would supply significant development capacity.'
- 2.10 The Regional Policy Statement ('RPS') objectives and policies in the AUP(OP) place similar emphasis on the efficient provision of infrastructure and on the integration of land use and development with infrastructure, including transport infrastructure. Refer, for instance, to Objectives B2.2.1(1)(c) and (5) and B3.3.1(1)(b), and Policies B3.3.2(5)(a) (e.g. Policy B3.3.2(5)(a) is to: *'Improve the integration of land use and transport by... ensuring transport infrastructure is planned, funded and staged to integrate with urban growth'*).



- 2.11 The RPS contains objectives and policies relating to rural and coastal towns<sup>1</sup> and villages. Objective B2.6.1(2) seeks that there is adequate infrastructure. Policy B2.6.2(1)(b) and (g) requires expansion of existing rural and coastal towns and villages to be undertaken in a manner that incorporates adequate provision for infrastructure and provides access to the town or village through a range of transport options including walking and cycling. Policy B2.6.2(3) enables significant expansions of existing rural and coastal towns and villages through the structure planning and Plan Change processes.

### **Assessment and identification of potential adverse transport effects and mitigation**

- 2.12 The National Planning Policy Statement on Urban Development (NPS-UD) has a key focus in objective (1) which seeks to ensure that New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural well-being, and their health and safety, now and into the future.
- 2.13 Policies (1)(c), (1)(e), and (1)(f) of the NPS UD have relevance to the Plan Change area, given the need to ensure New Zealand has well-functioning urban environments. This policy provides direction that planning decisions contribute to well-functioning urban environments which are urban environments that, as a minimum:
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
  - (e) support reductions in greenhouse gas emissions; and
  - (f) are resilient to the likely current and future effects of climate change.
- 2.14 Auckland Transport is of the view that the Plan Change does not fully demonstrate consistency with NPS-UD Objectives 1 and 3 or Policy 1 due the remoteness of Glenbrook Beach. No Public Transport services serve Glenbrook Beach (the nearest bus stop is over 8km away) and there are no plans or funding identified to provide services in the future (nor is there likely to be). This is compounded by the distance between Glenbrook Beach and key attractors such as employment locations which will result in a residential development that will be reliant on the private vehicle as the transport mode, as identified within the applicant's own ITA.
- 2.15 Auckland Transport notes that the Plan Change assessment has limited its assessment of effects to the immediate area and has not considered effects on the wider network nor the cumulative effects of development on the wider network save for identifying some minor safety improvements at the main intersections serving the development.
- 2.16 There is no assessment of future improvements that may be required to the network serving Glenbrook Beach. The Assessment of Environment Effects (AEE) summary (page 26) identifies:

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<sup>1</sup> The rural settlements for the south which are included in the FULSS are Maraetai, Oruarangi, Karaka North, Kingseat, Glenbrook Beach, Patumahoe, Clarks Beach, Clevedon and Clevedon Waterways.

*“Upgrades to the wider road network (i.e. beyond Glenbrook Beach) will be needed to address long-term safety and performance issues. However, as stated in the ITA, the estimated 1,000 daily trips from dwellings within the PPC area can be accommodated by McLarin Road and Glenbrook Road with less than minor effects”.*

- 2.17 Notwithstanding the above Auckland Transport considers that the proposed Plan Change area is relatively small scale and is in a location that has been identified for development through its Future Urban Zoning. Auckland Transport is of the view that provided the identified local mitigation works are secured, the above macro policy considerations do not direct Auckland Transport to outright oppose PPC 91.

**3. Specific parts of the Plan Change that this submission relates to:**

- 3.1 The specific parts of the Plan Change that this submission relates to are set out in **Attachment 1**. In keeping with Auckland Transport's purpose, the matters raised relate to transport, and include ensuring there is adequate provision of transport infrastructure to support the development proposed through this Plan Change and deficiencies in the precinct plan provisions relating to transport matters.

**4. The decisions sought by Auckland Transport are:**

- 4.1 Having regard to the above, Auckland Transport **would not oppose PPC 91** provided that the matters raised within this submission can be adequately addressed. The decisions which Auckland Transport seeks from the Council are set out in **Attachment 1**.
- 4.2 Auckland Transport's primary position at this time is that the Council should require necessary amendments to the precinct plan and provisions to address effects on the transport network and to enable the area to be developed as a well-functioning urban environment as directed by the NPS-UD.
- 4.3 In all cases where amendments to the Plan Change are proposed, Auckland Transport would consider alternative wording or amendments which address the reason for Auckland Transport's submission. Auckland Transport also seeks any further, other, or consequential relief required to respond to the reasons for this submission and/or give effect to the decisions requested.
- 4.4 Auckland Transport is available and willing to work through the matters raised in this submission with the applicant and anticipates that providing amendments are made to address its concerns Auckland Transport may not need to attend a hearing.

**5. Appearance at the hearing:**

- 5.1 Auckland Transport wishes to be heard in support of this submission in the event its submission points are not addressed.
- 5.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

**Name:** Auckland Transport

**Signature:**



Sarah Wilson,  
Manager, Land Use Policy and Planning South

**Date:** 15 May 2023

**Contact person:** Jason Ashby  
Senior Planner, Land Use Policy and Planning South; or

**Email:** Jason.Ashby@at.govt.nz

**Address for service:** Auckland Transport  
Private Bag 92250  
Auckland 1142

**Attachment 1**

The following table provides the reasons supporting Auckland Transport’s primary relief. It also identifies amendments sought to PPC 91 Glenbrook 4 Precinct Provisions.

Topic	Support / Oppose	Reason for submission	Decision / relief sought
Precinct Plan	Support in part	<p>The Precinct Plan submitted with this Plan Change does not reflect the indicative structure plan that is provided within the documents supporting the Plan Change.</p> <p>Auckland Transport requests that the Precinct Plan show a connected network of roads and routes within and connecting to adjoining sites and streets rather than indicative arrows as is currently shown.</p> <p>The Precinct Plan depiction of a network of roads and other routes would provide more certainty of the standards that each road is expected to be constructed to with respect of its function (see Road Standards and Functions table request below) to make it clear which precinct provisions apply to what roads.</p> <p>Furthermore, the precinct plan should also identify which roads are to be public roads and vested to Auckland Council. This is relevant as roads to be vested to Auckland Council need to comply with the Auckland Transport’s code of practice / design standards.</p>	<p>Amend PPC 91 to secure an updated Precinct Plan that provides details of a connected network of roads and walking and cycling routes (active modes) and identifies which roads are to be public roads and vested to Auckland Council.</p> <p>The Precinct Plan should also identify which roads are local and which are collector to enable the requested Road Functions and Standards table (requested to replace road cross sections) to be clearly identified as applicable to the correct road within the precinct plan.</p> <p>Such consequential amendments to precinct provisions to ensure objectives, policies and rules are applicable to the updated Precinct Plan to enable a safe, efficient and effective, interconnected transport network to be secured to serve the development.</p>
Road cross sections	Oppose	<p>Auckland Transport seeks a consistent approach across private plan change precinct provisions outlining the standards to be applied to roads. The desired approach balances the need for flexibility to respond to changing design standards over time and the need for certainty in terms of road width.</p> <p>The proposed precinct provisions include a number of detailed cross section options for collector and two options for local roads at IXXX12. It is not clear which roads will be subject to which cross section. Some of the proposed cross sections would not comply with current Auckland Code of Practice for Land Development and Subdivision (Chapter 3: Transport) and are not of sufficient overall width to accommodate the necessary functional design elements required.</p>	<p>Amend PPC 91 to remove the detailed cross sections provided within the proposed Glenbrook 3 Precinct provisions under IXXX12 and the related standard IXXX7 (2), (2).</p> <p>Amend PPC 91 to include: precinct provisions relating to the appropriate minimum road reserve widths, key design elements and functional requirements of new roads and existing roads which need to be upgraded to applicable urban standards including but not limited to:</p> <ul style="list-style-type: none"> <li>• Carriageway</li> <li>• Role and Function of Road</li> <li>• Pedestrian provision</li> </ul>

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		<p>Auckland Transport seeks the removal of detailed cross sections and associated provisions and seeks the introduction of provisions within the Precinct provisions which indicate overall minimum road reserve widths as well as the functional requirements and key design elements. These should be supported by appropriate activity status, matters for discretion and assessment criteria to provide for instances where these provisions might not feasibly be met. This approach has been accepted in recent plan changes and acceptable provisions including a Road Functions and Design Elements table have been incorporated into Plan Change 76, similar drafting for Plan Change 91 would be acceptable to Auckland Transport.</p> <p>There is also a need to ensure the internal local roads are designed to accommodate traffic speeds of 30km/h or less which also supports cycle use.</p>	<ul style="list-style-type: none"> <li>• Cycleways</li> <li>• Public Transport (geometry etc)</li> <li>• Berm</li> <li>• Frontage</li> <li>• Building Setback</li> <li>• Design Speed with 30km/h provided for on all new local roads.</li> </ul> <p>These should be supported by appropriate activity status, matters for discretion and assessment criteria to provide for instances where these provisions might not feasibly be met.</p>
<p>McLarin Road Frontage upgrade requirements</p>	<p>Support in part</p>	<p>Auckland Transport considers that the upgrade of McLarin Road fronting the Plan Change site to urban standards should occur as part of the initial stage of any development enabled by this Plan Change.</p> <p>Required upgrades would include, without limitation, provision of footpath, kerbs and channels, earthworks to integrate with development levels, cycle facilities, streetlights, berm and street trees as well as carriageway widening/upgrading, any land vesting required to accommodate the above and stormwater treatment and conveyance.</p>	<p>Amendment of PPC 91 to include precinct provisions to require the upgrade of the McLarin Road frontage to urban standard at the initial stage of development.</p> <p>Required upgrades would include, without limitation: provision of footpath, kerbs and channels, earthworks to integrate with development levels, cycle facilities, streetlights, berm and street trees as well as carriageway widening/upgrading, any land vesting required to accommodate the above and stormwater treatment and conveyance.</p>
<p>Intersection serving both the Plan Change area and the land zoned for Business – Neighbourhood Centre Zone</p>	<p>Support in part</p>	<p>Auckland Transport supports the provision of a roundabout as identified at IXXX11 Figure 1, Precinct Plan it will perform an important speed reduction function and help manage the transition from a rural to urban environment.</p> <p>There is need to ensure the design is adequate. Auckland Transport seek amended provisions to ensure that the final intersection design is confirmed with Auckland Transport.</p>	<p>Amend PPC 91 to include special information requirements that require any proposed new road intersections or upgrading of existing road intersections, that are illustrated on the Precinct Plan to be supported by a Transport Design Report and Concept Plans (including forecast transport modelling and land use assumptions), prepared by a suitably qualified Transport Engineer. The information shall confirm that the</p>

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			<p>location and design of any road and its intersection(s) supports the safe and efficient function of the existing and future (ultimate) transport network and can be accommodated within the proposed or available road reserves. This may be included within a transport assessment supporting land use consent or subdivision consents.</p> <p>Amend PPC 91 to include provisions that explicitly require that the intersection upgrade serving both the Plan Change area and the Business – Neighbourhood Centre zone is provided prior to occupation of the first dwelling within this Plan Change.</p>
<p>Pedestrian and active mode connections (Precinct Plan)</p>	<p>Support in part</p>	<p>Auckland Transport acknowledges the indicative pedestrian / cycle link identified in IXXX1 Figure 1 Precinct Plan. Safe crossing facilities should be provided to enable pedestrian and active mode users to cross McLarin Road to/from the land zoned for Business – Neighbourhood Centre Zone, from the Plan Change site.</p> <p>This active mode 'link' needs to enable a safe and efficient access between the Glenbrook Beach Recreation Reserve (open space), through the Plan Change site and across McLarin Road to the land zoned for Business –Neighbourhood Centre Zone. The Precinct Plan should be amended to clearly demonstrate a pedestrian/active mode route through the Plan Change site and across McLarin Road.</p> <p>As noted in the main body of this submission, and acknowledged within the applicants own Integrated transport Assessment (ITA), trips to and from the Plan Change area are anticipated to be made predominantly via private vehicle. Therefore, all endeavours should be made to secure infrastructure that will make local trips via active modes attractive, efficient and safe, to reduce the reliance on the</p>	<p>Amend PPC 91 to include precinct plan and provisions to ensure that subdivision and development is integrated with the delivery of the transport infrastructure and services required to provide for the transport needs of the precinct, connect with the surrounding network and avoid, remedy and/or mitigate adverse effects.</p> <p>Amend precinct plan and provisions to secure the following key pedestrian and cycle connections (infrastructure requirements) to include triggers requiring these to be provided at the earliest stage of development:</p> <ul style="list-style-type: none"> <li>• Safe crossing facilities and connections for pedestrians and active modes across McLarin Road to/from the Plan Change site and the land zoned for Business - Neighbourhood Centre Zone;</li> </ul>

39.5

		<p>private vehicle for short local trips. Providing good quality connections for active mode users and reducing the overall vehicle kilometres travelled resulting from the proposed development are integral to achieving a well-functioning urban environment as directed by the NPS-UD and referenced in paragraph 2.13 of the main body of this submission.</p> <p>Local roads and active mode routes need to be developed so that they provide a safe and convenient connection to and from key local destinations.</p> <p>The proposed precinct provisions are not robust enough to ensure all the infrastructure improvements needed to support the development will be delivered.</p> <p>Safe walking and cycling facilities including crossing facilities to key local destinations should also be identified on the Precinct Plan and their delivery secured from the occupation of the first dwelling.</p>	<ul style="list-style-type: none"> <li>• Pedestrian and cycle connections between the Plan Change site and the Glenbrook Beach Recreation Reserve (to the west);</li> <li>• Pedestrian and cycle connections between the Plan Change site and the FUZ land to the south-east;</li> <li>• Pedestrian and cycle connections between the Plan Change site and McLarin Road to the north-west.</li> </ul> <p>Provisions may include thresholds or triggers (prior to first occupation of any dwelling), or clear assessment and consenting processes, aligned to related objectives and policies. This should include non-complying activity status where staging triggers are not met.</p>
<p>Stormwater Management</p>	<p>Support in Part</p>	<p>A Stormwater Management Plan (SMP) has been provided to support the Plan Change. The SMP provides an assessment of Best Practicable Option (BPO) that includes use of wetlands and ponds but also includes suggested use of vegetated rain gardens and bio-retention swales to capture first flush road runoff and pre-treat before entering wetlands.</p> <p>Whilst the topography of the site suggests in the urban design and geotechnical assessment that development would be restricted above the ridgeline that runs through the middle of the site, and that this is where the road network would remain (indicated by the two vehicle access points shown on the precinct plan and structure plan diagram), Auckland Transport has concerns about the methodology used for the stormwater BPO assessment.</p> <p>Auckland Transport is not satisfied that the best practicable / most cost-effective stormwater management solution has been identified. Auckland Transport has concerns with respect of intentions to utilise raingardens within the public road reserve, particularly if coupled with currently indicated below-width road designs (depicted in cross sections). To maintain ongoing</p>	<p>Amend PPC 91 to include precinct provisions that include objectives, policies, and rules relating to stormwater including to address whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets (as a matter for discretion and policy).</p>

39.6

		<p>effectiveness, raingardens must be suitably sized and regularly maintained or they no longer effectively serve their intended purpose.</p> <p>Auckland Transport seeks stormwater management provisions to be included as part of this Plan Change which require the following to be considered for publicly vested stormwater assets:</p> <ul style="list-style-type: none"> <li>• whole of life costs;</li> <li>• long-term effectiveness; and</li> <li>• the use of communal devices to treat road runoff.</li> </ul>	
<p>Vesting of public assets subject to hazard assessment</p>		<p>Auckland Transport notes that the Plan Change site is subject to overland flow paths and 1% annual exceedance probability flooding plus 1m sea level rise.</p> <p>For any assets (roads or stormwater) intended to be vested with Auckland Transport, a hazard risk assessment (AUPOP: E.36.9) should be undertaken and assets clearly separated from any hazard areas.</p> <p>Whilst a subdivision consent will trigger the need for a hazard assessment given the increasing concerns with respect of maintenance of assets in hazard zones in the context of climate change and the need for infrastructure to be resilient to the changes in climate, it is requested that the precinct provisions be amended to include objectives and policies stipulating that infrastructure intended to be vested with Auckland Council be located outside of any hazard areas and that a hazard assessment inform the location of such infrastructure.</p>	<p>Amend PPC 91 to include precinct provisions (objectives and policies) to make clear that any internal road network or other infrastructure that is intended to be vested to Auckland Council must be located outside of any hazard areas so as to be resilient to the effects of climate change.</p>
<p>Consistency of precinct provisions across private plan changes</p>		<p>Auckland Transport seeks a consistency of approach and drafting across precinct policies and other provisions secured by recent private plan changes, including those in Drury and Pukekohe private, provided that this exercise does not adversely affect the outcomes it is seeking.</p>	<p>Make necessary drafting amendments to PPC 91 as required to achieve consistency and clarity, including in relation to objectives, policies, rules, methods and precinct plans, across private plan changes including those arising from recent decisions applying within Drury and Pukekohe East.</p>

39.7

39.8



RESOURCE MANAGEMENT ACT

PROPOSED PLAN CHANGE 91 (PRIVATE) TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART)

80 MCLARIN ROAD, GLENBROOK

SUBMISSION BY KAHAWAI POINT DEVELOPMENTS LIMITED

**To: Auckland Council**

Plans & Places Department

Private Bag 92300

Auckland 1142

Attention: Planning Technician (by email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz))

**To: HD Project 2 Ltd**

c/- Harrison Grierson

Level 4, Quad 5

4 Leonard Isitt Drive

Auckland Airport

Auckland 2022

Attention: Bryce Powell (by email: [b.powell@harrisingrierson.com](mailto:b.powell@harrisingrierson.com))

**Name of submitter:** Kahawai Point Developments Limited (KPDL)

1. This is a submission on Proposed Plan Change request 91 (Private) (**PC91**) by HD Project 2 Ltd.
2. KPDL is a developer of Kahawai Point, a block of 66ha on the northern portion of Glenbrook Beach fronting both the Taihiki River and Waiuku River. KPDL land effectively comprises the Glenbrook Beach 3 Precinct under the Auckland Unitary Plan. KPDL land is zoned for 800 dwellings. Approximately 30ha of the original 66ha landholding is subdivided and titled, with a further 5ha currently in development.

3. The timing of the KPDL development is limited and related to the availability of potable water and wastewater infrastructure, and transport infrastructure. Watercare has committed to the upgrade of their infrastructure, however this is not yet in place.
4. KPDL is not a trade competitor for the purposes of section 308B of the RMA.

### **The Submission**

5. KPDL supports PC91 in part and opposes it in part.
6. KPDL supports the eventual rezoning and long-term development of housing at Glenbrook Beach.
7. KPDL opposes any development within the PC91 plan change area until such time as the core infrastructure services of roading, wastewater and water are upgraded to service the entire existing and currently zoned Glenbrook Beach area, plus the PC91 area.
8. KPDL requests policies and criteria be added referencing the cultural dimensions of this land and embodying the Te Aranga principles.
9. KPDL **opposes** PC91 on the basis that it, as drafted, it:
  - (a) does not promote sustainable management of natural and physical resources and is not the most appropriate way to achieve the purpose of the Resource Management Act 1991;
  - (b) results in significant actual and potential adverse effects; and
  - (c) creates inconsistency issues within the Auckland Unitary Plan.

40.5

### **Reasons for submission**

10. Without limiting the generality of the above, the specific reasons for KPDL's support and opposition to PC91 are as follows:
  - (a) It is contrary to sound town planning practise to zone land for housing if that land is not capable of being serviced by core infrastructure including water and wastewater. In KPDL's view, development of the PC91 area should occur after the infrastructure is put in place. In its proposed Plan Change 78, Auckland Council has introduced qualifying matters which limit development potential until it is supported by appropriate infrastructure. Whilst dealt with differently, the Glenbook 3 Precinct incorporates the same general limitations.

- (b) On the basis of the above, a deferred zoning is the appropriate method whereby development can proceed after the infrastructure is provided.
- (c) The development of Kahawai Point included a series of upgrades to the road linking Glenbrook Beach and Glenbrook Beach Road. Those upgrades were sufficient to address the existing zoned Glenbrook Beach area plus the Glenbrook Beach 3 Precinct. The Applicant should need to demonstrate, and the Council needs to satisfy itself, that additional roading upgrades are not required to give effect to the PC91. If upgrades are required, then, as for Glenbrook Beach 3, there should be a requirement as a pre-requisite to development for either these upgrades to be completed, or the funding to be placed with Auckland Transport to enable the upgrades to be completed.
- (d) KPDL supports the appropriate development of Glenbrook Beach 4 for a range of housing typologies and densities including offering a significant number of lots at approximately 400m<sup>2</sup>. This enables a greater land efficiency and therefore a range of market affordable homes rather than be constrained on the current default lower densities. However, this support is only after sufficient infrastructure has been provided to remove infrastructure constraints that would otherwise be qualifying matters for development.
- (e) KPDL has a long working relationship with Ngati Te Ata. These lands are of cultural significance to the iwi. The plan change should embrace the Te Aranga principles.

#### Decision requested

11. KPDL would therefore support either:

- (a) a deferred zoning of the land pending the provision of water, wastewater and any necessary transport infrastructure; or 40.1
- (b) specific provisions within PC91 and the Glenbrook Beach 4 Precinct which make any subdivision or development of the Glenbrook Beach 4 proposed precinct a non-complying activity until the necessary water, wastewater and transport upgrades are complete and the notification provisions of the precinct making it clear that any application for a non-complying activity would be publicly notified. 40.2
- (c) In addition to (a) or (b) above, amend clause IXXX7.1.i Infrastructure by adding the text (in red):

- i. be connected to publicly available reticulated water and wastewater networks with sufficient capacity to service the **existing Glenbrook area, Glenbrook 3 Precinct and the Glenbrook 4** proposed development and/or subdivision; OR
- ii. be supported by written confirmation from the infrastructure services provider for the area that planned capital works required to provide connections for water and wastewater **to service the existing Glenbrook area , Glenbrook 3 Precinct and the Glenbrook 4 Precinct** are suitably advanced and capable of servicing proposed subdivision and development; and
- iii. be supported by written confirmation from the infrastructure services provider **for transport** for the area that planned capital works required to provide connections for transport **from Glenbrook Road to service the existing Glenbrook area, Glenbrook 3 Precinct and the Glenbrook 4 Precinct are funded and** suitably advanced and capable of servicing proposed subdivision and development.

(d) Include specific provisions to fund as a prerequisite any additional necessary infrastructure to manage road connections between Glenbrook Beach and Glenbrook Beach Road. | 40.3

(e) The plan change should include the Te Aranga principles in the objectives policies and assessment criteria. | 40.4

12. KPDL wishes to be heard in support of its submission.

13. KPDL will consider presenting a joint case with others making a similar submission.



---

John Duthie

**Director | Tattico**

for and on behalf of Kahawai Point Development Limited

**Address for service:**

Contact person: John Duthie

Electronic address for service: [john.duthie@tattico.co.nz](mailto:john.duthie@tattico.co.nz)

22<sup>nd</sup> June 2023

Plans and Places

Auckland Council

Private Bag 92300

Auckland 1142

Attn: Planning Technician

Email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Re: Further Submission by Auckland Transport on Proposed Private Plan Change 91: 80 McLarin Road, Glenbrook**

Please find attached Auckland Transport's further submission to the submissions lodged on Proposed Private Plan Change 91: 80 McLarin Road, Glenbrook.

If you have any queries in relation to this further submission, please contact Chris Freke, Principal Planner: on either [Chris.Freke@at.govt.nz](mailto:Chris.Freke@at.govt.nz) or 027 466 1119.

Yours sincerely



Chris Freke

**Principal Planner, Land Use Policy and Planning, South**

cc: HD Project 2 Limited

Via email: Bryce Powell (Harrison Grierson) [B.Powell@harrisingrierson.com](mailto:B.Powell@harrisingrierson.com)

Encl: Auckland Transport's further submission on Proposed Private Plan Change 91: 80 McLarin Road, Glenbrook

**Further Submission by Auckland Transport on Proposed Private Plan Change 91: 80 McLarin Road, Glenbrook**

**To:** Auckland Council  
 Private Bag 92300  
 Auckland 1142

**Further submission on:** Submissions to Proposed Private Plan Change 91 from HP Project 2 Limited to rezone approximately 7.897 hectares of land in Glenbrook Beach at 80 McLarin Road from Future Urban zone to Residential – Mixed Housing Suburban zone. The proposed Plan Change also seeks to introduce the Glenbrook 4 Precinct applying to the rezoned land.

The proposal also seeks to apply the Stormwater Management Area – Flow 1 (SMAF1) overlay to 80 McLarin Road and “apply new precinct provisions that modify the standard MHS zone provisions to reflect site characteristics and context and to achieve site development outcomes on this basis”. The precinct includes provisions that relate to transport and refers to the provision of approximately 100 residential units.

**From:** Auckland Transport  
 Private Bag 92250  
 Auckland 1142

**Introduction**

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

**Scope of further submission**

- 3) The specific parts of the submissions supported, opposed or where Auckland Transport has a neutral position providing any transport implications arising from accepting a submission are addressed, and the reasons for Auckland Transport’s position are set out in Attachment 1.
- 4) The decisions which Auckland Transport seeks from the Council in terms of allowing or disallowing submissions are also set out in Attachment 1.

**Appearance at the hearing**

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

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

---

Signed for and on behalf of Auckland Transport



Sarah Wilson  
Manager, Land Use Policy and Planning (South)  
Growth and Urban Planning Integration

Address for service of further submitter:

Chris Freke  
Growth and Urban Planning Integration  
Auckland Transport  
20 Viaduct Harbour Avenue  
Auckland Central  
Auckland 1010

Email: [chris.freke@at.govt.nz](mailto:chris.freke@at.govt.nz)

## Attachment 1

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
Benjamin Ross	3.1	<p>The submitters overall position is that they seek for the Plan Change provisions to be amended.</p> <p>The submitter seeks for 'hardcoding' of triggers within the precinct provisions for this Plan Change for when Auckland Transport must provide transit services to future proof public transport.</p> <p>The submitter notes that triggers could be 1000 residents for an AT Local MaaS type service and 3,000 for feeder services operating every 30minutes using a 20-seater minibus.</p>	Oppose	<p>The submitter seeks that the Plan Change be approved with amendments to precinct provisions to introduce triggers to require Auckland Transport to provide transit services.</p> <p>It would be ultra vires to impose precinct provision triggers to require Auckland Transport to provide a shuttle service. Furthermore, Auckland Transport is of the view that due to the low population size and distance to key destinations this is not a priority location for such a service.</p> <p>Provision of additional or new services must be considered across the whole of the Auckland region through established processes for preparing each subsequent Regional Land Transport Plan</p>	Disallow the submitter's relief to the extent that they seek precinct provisions and triggers to require Auckland Transport to provide transit services to Glenbrook Beach area in an ad-hoc manner rather than through a robust region wide planning process.







Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
				(RLTP) and Regional Public Transport Plan (RPTP) and cannot be introduced in an ad-hoc manner.	
Ben Scott	15.2	<p>Approve the Plan Change subject to amendments to include upgrade of stormwater system (Ronald Avenue).</p> <p>The submission makes notes of the system overflowing with existing cesspits very quickly filling up during heavy rain events.</p>	Support in part	<p>The submitter requests that the Plan Change be approved subject to the amendments requested to address potential flooding.</p> <p>Auckland Transport supports any necessary upgrades to stormwater or road infrastructure which may include culverts so as to mitigate any flooding or stormwater runoff impacts as a result of development at the Plan Change site on Ronald Avenue.</p>	Support the submitters relief to the extent that it seeks any necessary upgrades to infrastructure (in this case it could include culvert upgrades) serving Ronald Avenue to mitigate any adverse stormwater runoff from the Plan Change site on the safe, effective and efficient use and operation of this road.
Suli Palu	31.4	<p>Decline the Plan Change because of potential for flooding.</p> <p>80 McLarin Road and the adjoining farmland on the westerly side of McLarin Road is very susceptible to flooding. This is already impacting on the residents of Ronald Avenue who regularly experience flooding from water runoff from this land.</p>	Support in part	<p>The submitter requests that the Plan Change be declined due to potential flooding.</p> <p>Auckland Transport supports any necessary upgrades to stormwater or road infrastructure which may include culverts so as to mitigate any flooding or stormwater runoff impacts as a result of development at the</p>	Allow the submitters relief to the extent that it seeks any necessary upgrades to infrastructure (in this case this could include culvert upgrades) on Ronald Avenue to mitigate any adverse stormwater runoff from the Plan Change site on the safe, effective and efficient use and operation of this road.



Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
				Plan Change site on the efficient, effective and safe use of Ronald Avenue.	
Mark Olson	35.2	<p>Decline the Plan Change because of a lack of infrastructure [stormwater, public transport].</p> <p>Even with a new stormwater system for the area there will still be flooding in Ronald Avenue.</p>	Support in part	<p>The submitter requests that the Plan Change be declined due to potential flooding.</p> <p>Auckland Transport supports any necessary upgrades to stormwater or road infrastructure which may include culverts so as to mitigate any flooding or stormwater runoff impacts as a result of development at the Plan Change site on Ronald Avenue.</p>	Allow the submitters relief to the extent that it seeks any necessary upgrades to infrastructure (in this case this could include culvert upgrades) on Ronald Avenue to mitigate any adverse stormwater runoff from the Plan Change site on the safe, effective and efficient use and operation of this road.
Kahawai Point Developments Limited c/- Tattico ATTN: John Duthie	40.1	<p>The submitter part supports and part opposes this Plan Change.</p> <p>The submitter opposes any development within the PC91 Plan Change area until such time as the core infrastructure services of roading, wastewater and water are upgraded to service the entire existing and currently zoned Glenbrook Beach area plus the PC91 area.</p> <p>Further to this, the submitter states:</p>	Oppose in part	<p>Auckland Transport expressed concerns in its original submission regarding cumulative effects resulting from growth in the Glenbrook Beach area and wider residential areas and it also requested updated precinct provision drafting (submission summary number 39.8).</p> <p>However, Auckland Transport acknowledges that this Plan Change which would enable the development of up to 200</p>	<p>Disallow the submitters relief to the extent that they ask for Auckland Transport to commit to an agreement that all transport network infrastructure is in place or that funding is in place to deliver all transport infrastructure needed to serve Glenbrook.</p> <p>Allow the submitters relief in the event that they provide further information and evidence to identify and</p>



Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
		<p>In addition to (a) or (b) above, amend clause IXXX7.1.i Infrastructure by adding the text (in red):</p> <p>iii) be supported by written confirmation from the infrastructure services provider for transport for the area that planned capital works required to provide connections for transport from Glenbrook Road to service the existing Glenbrook area, Glenbrook 3 Precinct and the Glenbrook 4 Precinct are funded and suitably advanced and capable of servicing proposed subdivision and development.</p>		<p>residential units is not anticipated to generate a need for mitigation beyond that identified within Auckland Transports submission.</p> <p>For clarity, Auckland Transport has no planned, costed or funded transport infrastructure upgrades nor services planned to support the Glenbrook area, the Glenbrook 3 precinct, this Plan Change nor future possible Plan Changes in this area.</p> <p>The submitter appears to be seeking a confirmation that no future transport network infrastructure is needed to support further growth in this location which is not a conclusion Auckland Transport supports.</p>	<p>justify additional transport network infrastructure needed to mitigate this Plan Change's adverse transport effects.</p> <p>In the event that additional transport infrastructure upgrades are justified as a requirement to mitigate adverse effects from the Plan Change, any requirements are to be provided by developers and Auckland Transport shall have no funding responsibility.</p>
Kahawai Point Developments Limited c/- Tattico ATTN: John Duthie	40.3	The submitter requests amendments to the precinct provisions to include specific provisions to fund as a prerequisite any additional necessary infrastructure to manage road connections between Glenbrook Beach and Glenbrook Beach Road.	Oppose in part	<p>Auckland Transport expressed concerns regarding cumulative effects resulting from growth in the Glenbrook Beach area and wider residential areas.</p> <p>However, Auckland Transport acknowledges that this Plan Change which would enable</p>	It is requested that the submitter justify what transport network infrastructure upgrades or improvements are required to mitigate adverse transport network effects of this Plan Change.



Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
				the development of up to 200 residential units is not anticipated to generate a need for mitigation beyond that identified within Auckland Transports submission.	Any justified requirements need to be fully provided by developers and Auckland Transport is to have no funding responsibility for any identified measures or upgrades.

**From:** [sarah.fisher](#)  
**To:** [Unitary Plan](#)  
**Subject:** Re: Unitary Plan further submission - Plan Change 91 - Sarah Louise Fisher  
**Date:** Thursday, 22 June 2023 8:06:22 pm  
**Attachments:** [image001.png](#)

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Hi Harry

I support the following:

34.1

20.6 and 28.1

26.1

39.6

40.4

Thanks for your patience in this matter

Sarah Fisher

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**From:** Harry Barnes <harry.barnes@aucklandcouncil.govt.nz> on behalf of Unitary Plan <unitaryplan@aucklandcouncil.govt.nz>  
**Sent:** Thursday, June 22, 2023 3:22:03 PM  
**To:** sarah fisher <slfisherot@hotmail.com>  
**Subject:** RE: Unitary Plan further submission - Plan Change 91 - Sarah Louise Fisher

Hi Sarah,

No problem. Just for clarity and records sake, can you please tell me the exact submission point numbers you wish to support and, if applicable, the exact submission point numbers you wish to oppose?

Ngā mihi,  
 Harry

Hei kōna mai i roto i ngā mihi,

**Harry Barnes** ([He/Him](#))  
**Planning Technician | Kaitakawaenga ā Taiao**  
**Plans and Places | Ngā Whakamahere Wāhi**

Auckland Council, Level 24, 135 Albert Street, Auckland 1011

Pae tukutuku: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)




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**From:** sarah fisher <slfisherot@hotmail.com>  
**Sent:** Thursday, June 22, 2023 2:58 PM  
**To:** Unitary Plan <unitaryplan@aucklandcouncil.govt.nz>

**Subject:** Re: Unitary Plan further submission - Plan Change 91 - Sarah Louise Fisher

Thanks Harry for making this clearer.

My goodness; and I have two degrees! Lol

Ok so I would support the cultural aspects as this is something I had not thought about from the awa iwi and also the road width ( support) from the Auckland transport. The rest is the same. I would like to keep my old submission too ( the first one sent).

Sarah Fisher

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**From:** Harry Barnes <[harry.barnes@aucklandcouncil.govt.nz](mailto:harry.barnes@aucklandcouncil.govt.nz)> on behalf of Unitary Plan <[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)>

**Sent:** Thursday, June 22, 2023 2:20:59 PM

**To:** sarah fisher <[slfisherot@hotmail.com](mailto:slfisherot@hotmail.com)>

**Subject:** RE: Unitary Plan further submission - Plan Change 91 - Sarah Louise Fisher

Hi Sarah,

I just tried to call you but couldn't get through.

So, if you are looking to make a submission on the plan change as a whole this is done at the original submission stage, I see that you have made an original submission.

The purpose of the further submission process is for you to look at the other submission that people have made and decide if you want to show your support or opposition to points that other submitters have made.

Please let me know if you wish to withdraw or amend your further submission and if you would like me to call you back to clarify this over the phone.

Ngā mihi,  
Harry

Hei kōna mai i roto i ngā mihi,

**Harry Barnes** ([He/Him](#))

**Planning Technician | Kaitakawaenga ā Taiao  
Plans and Places | Ngā Whakamahere Wāhi**

Auckland Council, Level 24, 135 Albert Street, Auckland 1011

Pae tukutuku: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)




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**From:** sarah fisher <[slfisherot@hotmail.com](mailto:slfisherot@hotmail.com)>

**Sent:** Thursday, June 22, 2023 2:10 PM

**To:** Unitary Plan <[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)>

**Subject:** Re: Unitary Plan further submission - Plan Change 91 - Sarah Louise Fisher

Harry

Thanks for contacting me.

I must be making mistakes; what I want to do is oppose the proposal of 80 Mclarin road. I do not know what number this is.

I thought I had to include the number of my previous submission as well as supporting evidence.

So to clarify I am opposing the 80 Mclarin road proposal whilst it does not have sufficient information. I am happy to go to a hearing giving my reasons.

Please ring me if I am still not clear. Thanks for taking time to get back to me.

Sarah fisher

0212976148

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**From:** Harry Barnes <[harry.barnes@aucklandcouncil.govt.nz](mailto:harry.barnes@aucklandcouncil.govt.nz)> on behalf of Unitary Plan <[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)>

**Sent:** Thursday, June 22, 2023 2:03:40 PM

**To:** [Slfisherot@hotmail.com](mailto:Slfisherot@hotmail.com) <[Slfisherot@hotmail.com](mailto:Slfisherot@hotmail.com)>

**Subject:** RE: Unitary Plan further submission - Plan Change 91 - Sarah Louise Fisher

Hi Sarah,

I have just looked at your further submission and have noted that currently it states that you wish to oppose submission number 38 which is your own submission. I just wanted to double check that this is what you intended to do?

If not, please let me know which submission you wish to support or oppose, and I will update our records.

A further submission is an opportunity to state your support or opposition for original submissions which are detailed in the Summary of Decisions Requested.

Please let me know if you have any questions.

Ngā mihi,

Harry

Hei kōna mai i roto i ngā mihi,

**Harry Barnes** ([He/Him](#))

**Planning Technician | Kaitakawaenga ā Taiao**

**Plans and Places | Ngā Whakamahere Wāhi**

Auckland Council, Level 24, 135 Albert Street, Auckland 1011

Pae tukutuku: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)



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**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
<[UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)>  
**Sent:** Tuesday, June 20, 2023 8:46 PM  
**To:** Unitary Plan <[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)>  
**Subject:** Unitary Plan further submission - Plan Change 91 - Sarah Louise Fisher

The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Sarah Louise Fisher

Organisation name:

Full name of your agent:

Email address: [Slfisherot@hotmail.com](mailto:Slfisherot@hotmail.com)

Contact phone number: 0212976148

Postal address:  
32a Ronald Ave  
Glenbrook Beach  
RD 1  
Waiuku,  
Auckland 2681

### Submission details

**This is a further submission to:**

Plan change number: Plan Change 91

Plan change name: PC 91 (Private): 80 McLarin Road, Glenbrook

### Original submission details

Original submitters name and address:  
Sarah Fisher - 32a Ronald Ave, Glenbrook Beach

Submission number: 38

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

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

Point number 1: lack of roading infrastructure

Point number 2: potential risk of flooding

Point number 3: sewage waste water to be operational first

Point number 4: lack of cultural consultation with Ngati Te Ata

Point number 5: stream maintenance & wetland location not known



The reasons for my or our support or opposition are:

decline the plan change because of: lack of roading infrastructure (no reference to road width size needs to be 20meters minimum) / potential risk of flooding / sewage waste water needs to be operational before any more development occurs/ lack of cultural consultation with Ngati Te Ata on the basic principles of sustainable management and considering the cultural , social and environmental issues/ stream maintenance not discussed and where is the positioning of the wetlands which make up 40 % of the greenland area and should all of these be maintained?

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

Specify the parts of the original submission you want to allow or disallow:

allow the section 4 precinct proposal to be considered via amending the plans including all of the changes being recommended by Watercare , Ngari Te Ata and Auckland Council in their submissions

Submission date: 20 June 2023

## Attend a hearing

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

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

Yes

## Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The new development being proposed is the view I look out from, from my property.

My family home property is positioned on the western side of the section 4 precinct.

The back fence line is adjacent to the wetlands and farmland.

I declare that:

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

[ ]

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## **APPENDIX 4**

### **QUALIFICATIONS AND EXPERIENCE**



### Appendix 3: Relevant work experience of report author

My full name is Katrina Marie David. I am employed as a Senior Policy Planner - Planning Central-South, at Auckland Council.

I hold the qualifications of Bachelor of Arts and a Master of Planning Practice with First Class Honours from the University of Auckland. I am an intermediate member of the New Zealand Planning Institution (NZPI).

I have worked for the Council as a policy planner since 2012, undertaking a variety of statutory and non-statutory planning. Relevant statutory work includes providing evidence for the Council on the Proposed Auckland Unitary Plan, preparing and processing a council-initiated plan change to the Auckland Unitary Plan, processing notices of requirement, and preparation of a section 32 evaluation for Plan Change 78, the council's intensification planning instrument incorporating the medium density residential standards and giving effect to the National Policy Statement on Urban Development.

Most recently I have worked on:

- **Plan Change 78:** prepared the combined section 32/77K/77Q evaluation report on the Business – Heavy Industry, Business – Light Industry and Business – General Business Zones as qualifying matter 77I(i) and 77O(i)
- **Counties Energy Notice of requirement for the Whangapouri Road Substation:** prepared the Section 42A Hearing Report as the council's processing planner
- **Counties Energy Notice of requirement for the Waiiau Pa Substation:** prepared the Section 42A Hearing Report as the council's processing planner.



# **APPENDIX 5**

## **SPECIALIST PEER REVIEWS**





**Memo: Technical specialist report to contribute towards  
Auckland Council section 42A hearing report**

12 October 2023

To: Katrina David  
Senior Policy Planner  
Plans and Places  
Auckland Council

From: Jennifer Esterman  
Senior Urban Designer on behalf of the Tamaki Makaurau Design Ope  
Plans and Places  
Auckland Council

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**Subject: Private Plan Change – PPC91 for 80 McLarin Road, Glenbrook Beach  
Urban Design Review**

## 1. Introduction

- 1.1 This review addresses the urban design effects of the proposed private plan change (**PPC**) by HD Project 2 Ltd (**the applicant**) to rezone approximately 7.9 hectares of land at 80 McLarin Road in Glenbrook Beach from Future Urban Zone (**FUZ**) to Residential – Mixed Housing Suburban (**MHS**) and to introduce a new precinct within the Auckland Unitary Plan – Operative in Part (**AUP**).
- 1.2 I hold the qualifications of Bachelor of Planning (2009) and Master of Urban Design (2014) from the University of Auckland. I am an intermediate member of Te Kokiringa Taumata - the New Zealand Planning Institute and a member of the Urban Design Forum Aotearoa.
- 1.3 I have some 13 years' experience as an urban designer and planner in New Zealand. Prior to working for Mein Urban Design and Planning Limited, I worked as an urban designer for Auckland Council for 7 years and at Palmerston North City Council for 2 years.
- 1.4 Recent relevance experience includes the following:

**Auckland Council, Private Plan Change 69**

Urban design review of Proposed Private Plan Change 69 to the AUP-OP to rezone approximately 52ha of land from Future Urban Zone to Business-Light Industry Zone and introduce a new precinct. Included review of submissions and further submissions and preparation of material for the s42A report.

**Auckland Council, Private Plan Change 86, 2022 - 2023**

Urban Design review of Proposed Private Plan Change 86 to the AUP-OP to rezone approximately 5.2ha of land from Future Urban Zone to Residential-Mixed Housing Urban Zone and introduce a new precinct. Included review of submissions and further submissions and preparation of material for the s42A report.

- 1.5 When the request for a private plan change for 80 McLarin Road was first lodged, Lisa Mein reviewed the material and contributed to a request for further information in accordance with the expectations of Schedule 1, Clause 23 of the RMA. In particular, a neighbourhood design

statement was requested to better understand the surrounding context. A context analysis was subsequently provided.

1.6 In writing this memo, I have reviewed the following documents:

- Assessment of Environmental Effects (including Request for Private Plan Change), by Harrison Grierson Consultants Limited, dated 08 July 2022.
- Urban Design Assessment, prepared by Harrison Grierson Consultants Limited, dated 12 July 2022.
- Structure Plan Document, prepared by Harrison Grierson Consultants Limited, dated 14 July 2022.
- Proposed Changes to AUP(OIP), undated.
- Responses to the RFI, dated 20 October 2022 including:
  - Covering letter, prepared by Harrison Grierson, dated 20 October 2022
  - Amended Assessment of Environmental Effects, prepared by Harrison Grierson, dated 17 October 2022
  - Amended Proposed Plan Change Precinct Provisions, undated
  - Amended s32 Evaluation, prepared by Harrison Grierson, dated 18 October 2022
  - Amended Structure Plan document, prepared by Harrison Grierson, dated 20 October 2022
  - Context Analysis, prepared by Harrison Grierson, dated October 2022
- Submissions and further submissions to the private plan change

## 2. Background

- 2.1 The Plan Change area was rezoned through the development of the Auckland Unitary Plan (AUP) from Coastal with an overlay of Glenbrook Beach Structure Plan Area under the legacy Franklin District Plan to Future Urban. The Future Urban zone (FUZ) is applied to greenfield land that has been identified as suitable for urbanisation. In order for this land to be used for urban activities it is required to be rezoned. The process requires preparation of a structure plan and plan change.
- 2.2 There is currently no Structure Plan available for the wider Glenbrook Beach area. It appears that instead structure plans are being prepared on a piecemeal basis to inform plan changes. For example, a Structure Plan was prepared as part of the development of the Glenbrook 3 Precinct. This is discussed in further detail throughout this assessment. As part of this plan change application, the applicant has prepared a Structure Plan to inform the proposed Precinct Plan provisions. This is included as figure 1 within the proposed Glenbrook 4 Precinct.
- 2.3 Glenbrook Beach is a rural settlement located within the larger southern growth area. The larger area (inclusive of Puhinui, Takanini, Hingaia, Drury-Opāheke, Drury West, Pukekohe-Paerata Oruarangi, Maraetai, Clevedon, Clevedon Waterways, Karaka North, Kingseat, Clarks Beach and Patumahoe) anticipates dwelling capacity of some 50,600 and an anticipated employment capacity of 30,300. The rural settlements contribute to this by providing an area of 1.046 hectares which will provide around 7,500 dwellings.
- 2.4 As described in the Structure Plan documentation, the existing Glenbrook Beach settlement lies on the Waiuku River inlet of the Manukau Harbour. Glenbrook Beach is located at the end of a collector road that links the rural villages and communities with the Franklin Ward of the Auckland Region. This collector road enables good access from the southern motorway interchange at Papakura to Clarks Beach, Waiuku Beach, Waiuku, Patumahoe and Pukekohe.
- 2.5 The site, and the Glenbrook Beach settlement, is located outside of the Rural Urban Boundary (RUB), which identifies land as being potentially suitable for urban development (Part G1 AUP). Glenbrook Beach settlement includes land that is zoned for residential and business purposes, which meets the definition of 'urban area' in Part J of the AUP(OP) and which are excluded from the AUP definition of a 'rural zone' <sup>1</sup>. Glenbrook Beach was identified under the Housing Accords

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<sup>1</sup> Harrison Grierson (2022) Assessment of Environmental Effects, P11

and Special Housing Areas Act 2013 (HASHAA) as an area of future residential growth. The newly developed Kahawai Point, located to the north of the subject site was also established under the HAASHA legislation with a precinct (Glenbrook 3 Precinct) now incorporated into the AUP(OP). The plan change area is located directly across McLarin Road from the Kahawai Point development.

- 2.6 Auckland Council's Future Urban Land Supply Strategy (**FULSS**) identifies the subject site as within Glenbrook Beach 2 rural settlement future urban area. This is anticipated to be ready for development between 2023-2027 and is anticipated to supply 207 dwellings<sup>2</sup>. Development ready means that urban zoning and bulk infrastructure is provided.
- 2.7 The plan change area is depicted in Figure 1 and Figure 2. As described in the AEE, the subject site is an irregular shaped parcel of land, held in single ownership. It is currently used for grazing / agricultural purposes and is bound to the north and east by McLarin Road, while Glenbrook Beach Recreation Reserve and residential properties, within the existing Glenbrook Beach settlement on Ronald Road, adjoin the site to the west.

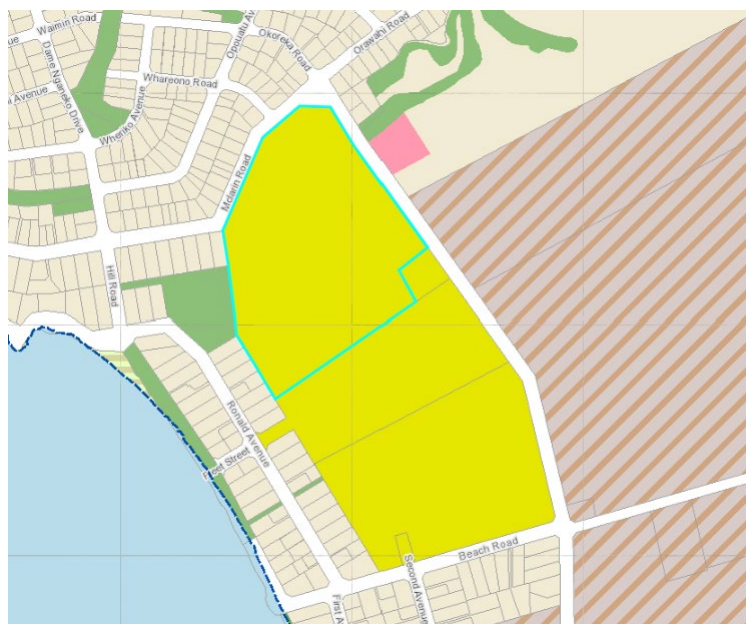


Figure 1: Zoning map to show the subject site and adjoining sites

- 2.8 Access to Glenbrook Beach Recreation Reserve is from Hill Road. As illustrated in figure 1 above this access is zoned Open Space – Informal Recreation. The current use of this accessway appears to be a private road providing access and an area of on-street parking to service 48, 50 and 52 Ronald Avenue. Glenbrook Beach Water Reservoir (Designation 9554) is located at the end of the accessway, within Glenbrook Beach Recreation Reserve. While not currently being offered through the precinct provisions the redevelopment of the PPC land provides an opportunity to improve public access to Glenbrook Beach Recreation Reserve.
- 2.9 Land immediately to the southeast is currently used for pastoral farming but, like the subject site, is zoned FUZ, thus is anticipated to be developed for urban activities in the future. To the east of the site, on the eastern side of McLarin Road, a defined area of land has been zoned Business-Neighbourhood Centre, which would enable development of a small group of neighbourhood shops. At the time of visiting the site (May 2023) earth works were in progress on that site. However, at the time of writing this report no land use resource consent has been lodged for the neighbourhood centre. The live consents relate to earthworks, subdivision, water diversion and discharge. Figure 3 illustrates the approved subdivision plan (Ref: SUB60397335-A). Of note, a new public road is proposed to the south of the neighbourhood centre.

<sup>2</sup> Auckland Council (2017) Auckland Future Urban Land Supply Strategy, P14-19, [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz), accessed 16 05 2023

2.10 The development of the neighbourhood centre will be important to the area as there are currently no local shops or food and beverage or local services available within Glenbrook Beach meaning residents must travel out of the area to access amenities and services such as supermarkets, medical facilities, and education services.



Figure 2: Aerial map to show subject site and existing development to the north and west



Figure 3: Approved subdivision plan for Kahawai Point

- 2.12 The Structure Plan report, prepared for PPC91, describes Glenbrook Beach as comprising two distinct residential areas: the original coastal settlement and a new residential development area to the north of McLarin Road being Kahawai Point (Glenbrook 3 Precinct)<sup>3</sup>. I agree with this description.
- 2.13 A site visit was undertaken on 30 May 2023. Observations from that suggest the original coastal settlement contains older bach style housing that is set back some distance from the street. Lot sizes are generous, approximately 20m wide x 50m long (1,000m<sup>2</sup>). Typical of beach settlements these houses are constructed in a range of materials and styles. The size and depth of the lot has resulted in some properties containing large rear yards while others contain a second dwelling or garage.
- 2.14 In contrast, the new residential area contains modern housing on compact lots. Houses are predominantly single-storey, with some larger two-storey towards the river, weatherboard homes with garages. Lots are typically 20m x 30m in size (600m<sup>2</sup>) with some much narrower and more compact lots scattered throughout the development. Figures 5-9 are images taken on the site visit showing the subject site and wider neighbourhood.
- 2.15 Subdivision and development are underway within the 89ha Kahawai Point development, immediately north of the subject site. When complete, the Kahawai Point development is anticipated to provide approximately 800 additional homes to the Glenbrook Beach area. This area is identified as Glenbrook 3 Precinct within the AUP(OP). Figure 4 below is an extract from the Glenbrook 3 Precinct Plan. The underlying zone of Kahawai Point is primarily Residential – Single House. A defined area to the east of McLarin Road is identified as Business-Neighbourhood Centre zone and several new open spaces are proposed. The northern side of McLarin Road, shown as ‘critical local road’ in the Glenbrook 3 Precinct Plan has recently been upgraded to urban standards and a new roundabout has been constructed at the north-eastern corner of the site. Figure 4 shows the interface the plan change area will have to the north and east with indicative road connections to the coast and key open spaces and the proposed neighbourhood centre.

#### I453.9 Precinct Plan

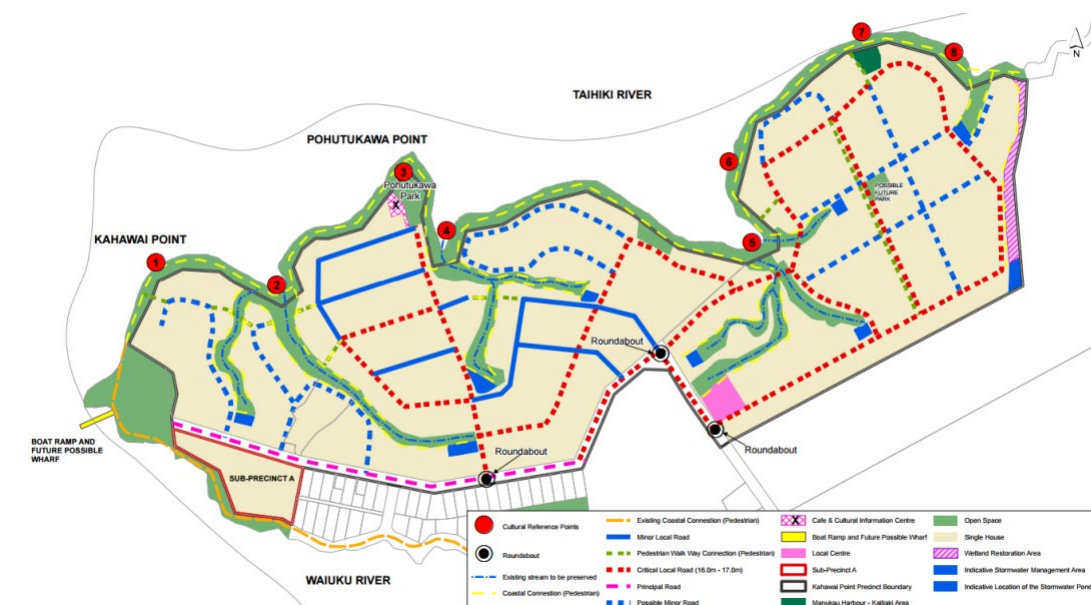


Figure 4: Glenbrook 3 Precinct Plan, showing the interface with the subject site

<sup>3</sup> Harrison Grierson (2022) Structure Plan Document, Section 3.3, P7



Figure 5 Image to show new housing along McLarin Road



Figure 6 Image to show subject site. Looking toward McLarin Road (north)



Figure 7a and b: Images to show Glenbrook Community Centre and boat access. Photo taken by Glenbrook Beach boat ramp at end of McLarin Road



Figure 8: : Typical development within Glenbrook 3 Precinct



Figure 9: Image to show Ronald Avenue, source: Harrison Grierson, Structure Plan Document P7

### 3. Overall zoning response and precinct provisions from an urban design perspective

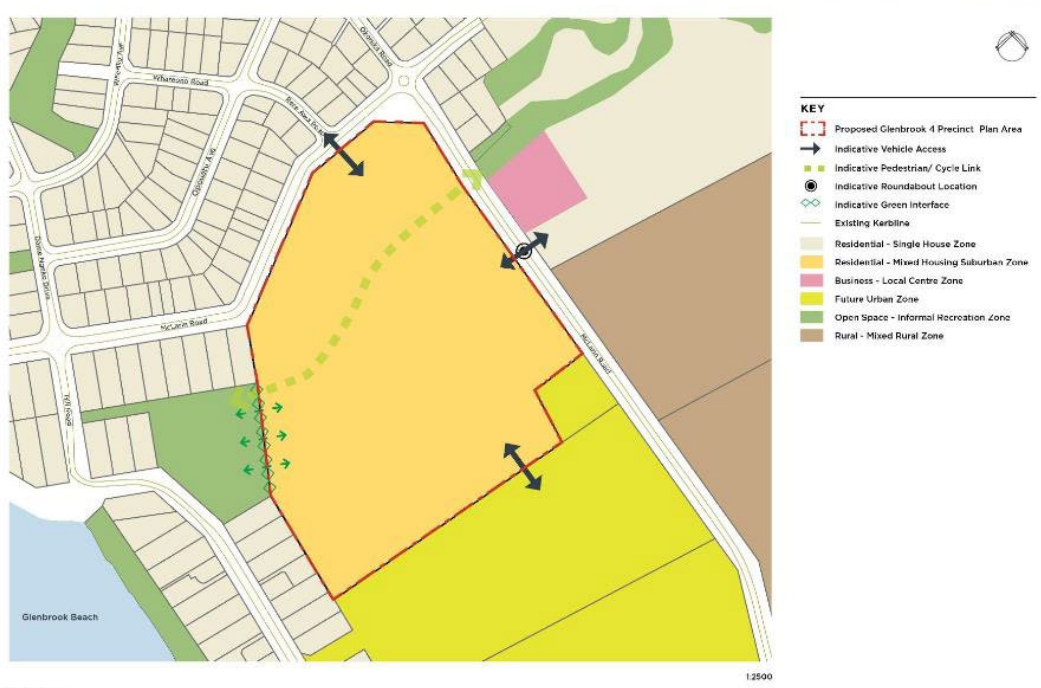
- 3.1 A plan change to the AUP is required to enable residential development at the subject site. As noted in section 2 of this memo, urban development is anticipated for the subject site with the timing of the PPC in line with the FULSS. It is proposed to rezone the site to MHS and provide a new precinct, Glenbrook 4, which includes site-specific provisions for the plan change area.
- 3.2 The provisions within the draft precinct seek to integrate subdivision and development with the established Glenbrook Beach coastal settlement and with Kahawai Point to the north. Walking and cycling connections are sought. These build on the network established and planned within Kahawai Point and connect the existing settlement to the planned neighbourhood centre. From an urban design perspective, it is my opinion that an underlying zoning of MHS with a precinct overlay is a suitable approach to achieve the objectives set out in the urban design assessment<sup>4</sup>.
- 3.3 Following rezoning, a new precinct overlay would apply with an underlying zone of MHS. Any subsequent resource consents would be assessed against those provisions and any other relevant provisions with the AUP. Figure 10 shows the proposed Structure Plan.
- 3.4 PC78 is a proposed plan change for the whole of Auckland with hearings likely to commence in 2024. The subject site is excluded from PC78 due to its location outside the rural urban boundary (RUB). Notwithstanding that, the PC78 amendments to the AUP describe the MHS zone as suitable *“to discrete areas in wastewater serviced rural and coastal towns and settlements with a residential population of less than 5,000 (as determined in the 2018 census).”*<sup>5</sup> Glenbrook can be described as a coastal settlement with a residential population of less than 5000. According to the 2018 census, the residential population of Glenbrook was 2,193<sup>6</sup>. If PC78 is approved next year, a MHS zoning could still be applied to the subject site under PC78 in accordance with that zone description.
- 3.5 As stated elsewhere, the subject site is located opposite the proposed neighbourhood centre zoned land. Development of the PPC area for residential dwellings will support this centre, when developed, contributing to its overall viability in the longer term.
- 3.6 In summary, there are no significant urban design issues for the private plan change as the zoning proposed is consistent with the land use outcomes anticipated by the FUZ and aligns with the sequencing of land development in the FULSS. The inclusion of a precinct plan ensures suitable interfaces with the existing Glenbrook Beach settlement, Kahawai Point development and the adjoining reserve to the west. It also provides for walking and cycling connections to a new local centre for residents and continues the residential streetscape character already established by the Kahawai Point residential development.

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<sup>4</sup> Harrison Grierson (2022) Urban Design Assessment, 4.2.1 – Key Objectives, P13

<sup>5</sup> Auckland Council (2023), [PC 78 Chapter H Zones – Residential, aucklandcouncil.govt.nz](https://www.aucklandcouncil.govt.nz/pc78), accessed online 18 05 2023

<sup>6</sup> Statistics NZ, [www.stats.govt.nz](https://www.stats.govt.nz), accessed 18 05 2023



HARRISON GRIERSON

80 MCLARIN ROAD, GLENBROOK BEACH, AUCKLAND 12.07.2022 01

Figure 10: Proposed Structure Plan, source: Structure Plan document, prepared by Harrison Grierson

4. Applicant’s assessment

- 4.1 An Urban Design Assessment was prepared by Harrison Grierson. This forms Appendix 7 of the PPC material. Section 2 and 3 of the report sets out the site specific, local and neighbourhood context. This includes an overview of the Kahawai Point development, analysis of the existing built form, natural features, topography, access and movement framework.
- 4.2 Section 3 includes an opportunities and constraints assessment and a site context, see Figure 11 below. This assessment identifies a number of opportunities. These include greater housing choice, strong sense of place derived from the surrounding context and ecology, extension of the existing urban development area given the proximity to Kahawai Point development, enhancement of neighbourhood connectivity, connections to open spaces and the waterfront, restoration and enhancement of the natural environment, ecological corridors as amenity and character defining elements of place, integration and enhancement of stormwater management, potential for view shafts to natural features including Manukau Harbour and distant Waitakere Ranges, and connections to the proposed Marine Centre via coastal pathways. The key constraints outlined include streams, wetlands and riparian margins on the subject site, topography resulting in possible no build zones, overland flow paths and possible flooding, limited vehicle access due to streams and steep topography, lack of public transport in the area and the possibility that public infrastructure may need to be upgraded.



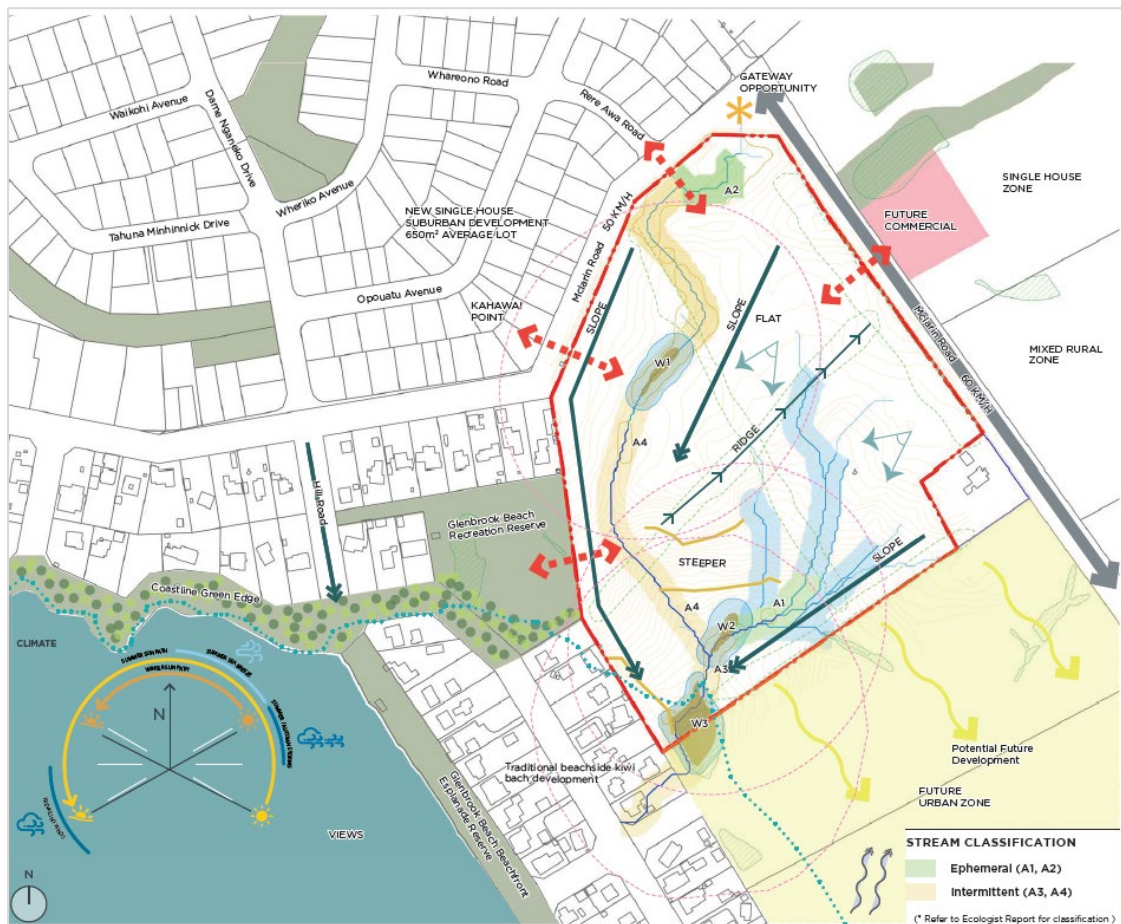


Figure 11: Opportunities and constraints map. Source: Context Analysis RFI response, prepared by Harrison Grierson, dated October 2022

4.3 Section 4 sets out a vision statement and structure plan response which informs the development of what is proposed as the precinct plan. The vision statement is:

*“to create a new residential community at Glenbrook Beach that complements the existing village, provides high quality mixed housing opportunities for all ages and household types, and seamlessly integrates the natural environment of the site with future development.”<sup>7</sup>*

The key strategies, or ‘key moves’ of the structure plan include:

1. Access and connectivity: Vehicular, pedestrian and cycle paths are defined and have clear, logical connection points into the surrounding area.
2. Residential opportunities: To ensure a residential character and appearance which aligns with the character of the existing neighbourhood, while providing housing choice.
3. Site perimeter treatment: To ensure a suitable streetscape interface and interface with adjacent built form and land use.
4. Open space and stormwater treatment. To enable open spaces for site connectivity, provide low impact stormwater treatment and biodiversity and act as a defining element of the character of the place.

4.4 Section 5 sets out the urban design assessment. This considers the urban design aspects of the PPC, Proposed Structure Plan and relevant provisions of the AUP(OP) against best practice urban design principles, in this case: context, connectivity and character. The applicant’s urban designer is of the opinion that the standard Auckland-wide and MHS provisions of the AUP(OP)

<sup>7</sup> Harrison Grierson (2022) Urban Design Assessment, para 4.1

are generally satisfactory to manage the effects of future urban subdivision and development of the site<sup>8</sup>. Specific provisions are proposed within the new Glenbrook 4 Precinct in relation to:

1. Inclusion of a Precinct Plan: The purpose of including the precinct plan is to ensure the indicative connections, pathways and infrastructure specified are implemented. The same or similar road design elements and cross sections as Glenbrook 3 Precinct Plan is proposed.
  2. Riparian Margins and Setbacks: Additional riparian margins and setbacks are proposed to maintain and enhance intermittent streams and natural wetlands within the site.
  3. Fences: Additional provisions are proposed to limit the height of fencing fronting a wetland, intermittent stream or the Glenbrook Recreation Reserve to 1.2m or if they are visually permeable, 1.6m.
- 4.5 In my opinion, a robust methodology was used for the urban design assessment. However, a number of the matters raised in the contextual analysis have not been addressed in the proposed precinct plan and provisions of the Glenbrook 4 Precinct. These are as follows:
- Interface with Glenbrook Beach Recreation Reserve
  - Interface with the existing residential properties at 28-38 Ronald Avenue that back onto the subject site
  - Gateway opportunity at the north-eastern corner of the site
  - Proposed zone, specifically in terms of the intent for higher density development in the northern portion of the site, adjacent the area zoned 'Business- Neighbourhood Centre'.

#### **Interface with Glenbrook Beach Recreation Reserve**

- 4.6 The Structure Plan includes an indicative green interface and indicative pedestrian/cycle link on the western boundary of the site. The achievement of the indicative pedestrian/ cycle link is adequately covered in the proposed precinct provisions (IXXX.2 Objective 1 and 5, IXXX.3 Policies 4 and 6 and IXXX7.1(2)- Precinct Plan.
- 4.7 However, from an urban design perspective, provisions to achieve a suitable interface with Glenbrook Beach Recreation Reserve require strengthening within the proposed Glenbrook 4 Precinct. The matters that need to be addressed relate to:
- Opportunities for housing to overlook the reserve.
  - Achievement of a green interface between the reserve and the PPC site.
- 4.8 As described in the urban design assessment, *“the site perimeter treatment will need to respond to the Glenbrook Beach Reserve.... by providing active street frontages and opportunities for housing to overlook the reserve”*<sup>9</sup>.
- 4.9 An open space objective<sup>10</sup> is also described in the urban design assessment. This seeks to *“form a green interface between the Glenbrook Beach Recreation Reserve and the site that protects the open space amenity of the reserve and connects the reserve with the remainder of the site and surrounding area”*.
- 4.10 The proposed precinct provisions to address the interface with the reserve include a policy (IXXX3.7), standard (IXXX7.1.4.1) and relevant matters of discretion and assessment criteria (RD Activities IXXX8.1 (1) & (2), Assessment Criteria IXXX.9) to ensure new dwellings overlook the reserve. However, a permitted activity would have no requirement to orient a dwelling to overlook

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<sup>8</sup> Harrison Grierson (2022) Urban Design Assessment, 5.5, P19

<sup>9</sup> Ibid 4.3.5 bullet point 5, P 16

<sup>10</sup> Ibid section 4.3.5, P16

the reserve, both in terms of the MHS provisions and the proposed precinct provision. Given there is an intent to provide overlooking from dwellings to Glenbrook Beach Reserve, it is recommended that an additional standard is included within the precinct to achieve this. It is also recommended that the fencing standard be amended to remove reference to passive surveillance, as a fence in and of itself cannot achieve this.

4.11 The relevant provisions with the Glenbrook 4 Precinct Plan are detailed in Appendix 1. The following addition and amendments are suggested:

1. Add an additional clause to Policy IXXX.3(4) to reference the green interface shown on the precinct plan.

4- Require that any subdivision and development within the precinct incorporates the following elements of the precinct plan:

*d. a green interface to Glenbrook Recreation Reserve*

2. Include a new Standard within the precinct provisions to ensure dwellings that adjoin Glenbrook Beach Recreation Reserve overlook the reserve and protect the open space amenity of the Reserve through a planted interface. The suggested wording is shown in italics, this wording is taken from the Glenbrook 3 Precinct for consistency:

IXXX7.1.Land use and subdivision

*5 - Sites adjoining land zoned Open Space*

*Purpose:*

*To enable opportunities for passive surveillance of public open spaces and maintain the amenity of these spaces.*

*1. Where a site or dwelling adjoins land zoned Open Space: Informal Recreation, the following applies:*

- a. the facade of a dwelling or dwellings facing the open space must contain glazing that is cumulatively at least 30 percent of the area of the facade (excluding the garage door).*
- b. Xxm of planting must be provided along the boundary that adjoins the reserve to provide a green interface to protect the amenity of the open space.*

3. Amend IXXX4.1 Activity table 2, A2 and A3:

A2: Development of up to three dwellings that complies with standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), IXXX.7.1.4 (fences) *and IXXX7.1.5 (Sites adjoining land zoned Open Space)*

A3: Development of four or more dwellings that complies with standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), IXXX.7.1.4 (fences) *and IXXX7.1.5 (Sites adjoining land zoned Open Space)*

4. Amend the fence standard to more accurately describe 'passive surveillance' as follows:

IXXX.7.1 Standards

4 - Fences

Purpose:

To promote:

- (i) open space character *and enable opportunities* for passive surveillance of *public open spaces and streets*.
5. Amend IXXX.8.1(2) to include IXXX7.1. Clauses a, d, e and f are sufficient matters of discretion.
6. Add matters of discretion for development that does not comply with standard IXXX.7.1.5:

*Development that does not comply with standard IXXX.7.1.5 (Sites adjoining land zoned Open Space):*

- a. *The amenity of public open space*
  - b. *CPTED principles*
  - c. *Extent of overlook of public open space*
- 4.12 The suggested amendments would ensure that new dwellings, both permitted and those that require resource consent, within the PPC area will overlook the reserve and strengthen the interface. The amendment to the fencing standard more accurately describes passive surveillance, as it needs to be achieved from the interaction between the dwelling, the fence design and the public realm. It is recommended that Councils Landscape Architect provide advice on what width of planting should be provided in relation to IXXX7.1(1)(b).

#### **Interface with the existing residential properties at 28-38 Ronald Avenue**

- 4.13 The proposed Structure Plan does not show any specific interface condition to manage the interface between the existing residential properties that back onto the subject site. The urban design assessment states that one of the objectives is to respond to the Glenbrook Reserve and established single detached housing by providing active street frontages and opportunities for housing to overlook the reserve.
- 4.14 From an urban design perspective, the current standards in the MHS zone in relation to height, outlook, yards and HiRB and the relevant objectives and policies will be adequate to ensure a suitable interface for the adjoining residential sites. It is also recognised that this part of the site has some challenging topography and a wetland that will limit what can be built.

#### **Gateway**

- 4.15 A 'gateway opportunity' is identified on the context analysis map but is not shown on the Structure Plan or referenced within the Glenbrook 4 Precinct Plan. The location of the gateway is outside the site boundary, within the road reserve. Little detail is provided within the urban design assessment and context analysis as to the intent of this gateway feature other than it is assumed the north-western corner can have the highest density enabled by the MHS zone<sup>11</sup>. From an urban design perspective there is nothing to specifically identify this as a gateway location, other than being a key intersection. For this reason, no specific provisions are required to develop this location as a 'gateway'.

#### **Proposed zone**

- 4.16 The urban design assessment identifies an opportunity to "*enable a wider range of house typologies and lot sizes that will cater for the full life cycle population at Glenbrook, including families, couples, single people and retirees*".<sup>12</sup> The MHS zone provisions are considered adequate to provide this variety as two storey detached and attached housing in a variety of types and sizes is anticipated to provide housing choice.

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<sup>11</sup> Harrison Grierson (2022) FRI Response, Possible Density Variations as a response to context

<sup>12</sup> Harrison Grierson (2022) Urban Design Assessment, section 4.33 P15

- 4.17 A possible density variations map was provided in the RFI response, see Figure 12. This shows the greatest density in the north and eastern parts of the site with lower density in the central, western and southern portions of the site due to the presence of wetlands, streams, riparian margins and level changes. However, this information does not inform the overall zoning approach. A blanket MHS zone is proposed for the site with a precinct plan overlay.
- 4.18 The s32 assessment clarifies that “*prescriptive overlays have not been applied to encourage more intensive residential typologies on some parts of the PPC land, such as near the Business-Local Centre land*”<sup>13</sup> The reason is the MHS zone inherently provides for a mixture of housing typologies and densities. I agree with the applicant’s Planner and Urban Designer that the MHS zone provides adequate flexibility to ensure a range of housing typologies can be provided.



Figure 12: Possible density variations as a response to context, source: Harrison Grierson, RFI response, 20.10.2022

<sup>13</sup> Harrison Grierson (2022) Section 32 Evaluation, Section 3.3, P22

## 5. Submissions

- 5.1 A total of 40 submissions and 2 further submissions were received in response to the proposed private plan change. Six submissions are in support (in part) and 32 are in opposition. One submission was withdrawn, and one submission was requesting further information.
- 5.2 Submissions in opposition cite existing infrastructure constraints including roading, public transport, stormwater infrastructure and flooding. These submissions also raise concerns around social infrastructure specifically, the lack of schools, retail and businesses and environmental issues which reference the Auckland Carbon Reduction Plan. Specific submissions of relevance from an urban design perspective raise concerns around the effect on the character or aesthetic of the neighbourhood, the appropriateness of multi-storey development in the area and the impact on the rural area.

### Aesthetic of the neighbourhood

- 5.3 Twelve submissions raise concerns about the proposed MHS zone due to the impact on the aesthetic of the neighbourhood<sup>14</sup>. These submitters are concerned that the MHS zone will alter the character of the area and result in developments that are cramped, noisy, reduce privacy and allow multi-unit developments or apartments. Several of these submissions raise additional concern that this type of development does not fit into the existing area and lifestyle<sup>15</sup>. The submitters generally describe the existing area as a quiet, rural / coastal settlement.
- 5.4 As discussed earlier in this report, Glenbrook has two distinct areas; the original Glenbrook Beach settlement which has a coastal character of baches along Ronald Avenue and the new area of Kahawai Point which has large single detached modern dwellings with urban amenities including footpaths, lighting and fences. The older part of Glenbrook Beach is zoned Single House. The Kahawai Point development also has an underlying zone of Single House with the Glenbrook 3 precinct overlay.
- 5.5 In terms the overall aesthetic of the neighbourhood, the key provisions of relevance relate to front yard setback, height, height in relation to boundary, landscape requirement along the street front and fencing. These provisions create the streetscape character of a particular area. It is notable that the two zones are similar in this regard with the only difference being the additional alternative height in relation to boundary standard in the MHS zone. The Glenbrook 3 Precinct also has specific standards for fencing<sup>16</sup> to ensure a suitable interface with open space: informal recreation zoned land, esplanade reserves, neighbourhood parks, adjoining sites with farming operations and ensuring low fencing fronting the street.
- 5.6 The key difference between the Single House zone and the MHS zone is the number of dwellings allowed per site, as of right. In the Single House zone resource consent as a non-complying activity is required for more than one dwelling per site (other than minor dwellings). In the MHS zone up to three dwellings are permitted as of right subject to compliance with the standards. Four or more dwellings per site require resource consent for a restricted discretionary activity. Table E38.8.3.1.1 of the subdivision section of the AUP(OP) sets out the minimum net site areas for subdivisions involving parent sites of 1 hectare or greater. This is as follows:

Minimum Net Site Area:	320m <sup>2</sup>
Minimum Average:	400m <sup>2</sup>
Maximum Average Net Site area:	480m <sup>2</sup>

- 5.7 The intent of the MHS zone, as described in the AUP is “*development within the zone will generally be two-storey detached and attached housing in a variety of types and sizes to provide housing choice*<sup>17</sup>”. From an urban design perspective, the aesthetic of a neighbourhood is experienced from the public realm. From public streets the MHS zoning will not look materially

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<sup>14</sup> Submission 2, 7, 9, 18, 19, 20, 25, 27, 28, 31, 34, 37

<sup>15</sup> Submission 4,6,18, 25, 27, 28, 31, 33, 34, 37

<sup>16</sup> Glenbrook Precinct 3 I453.5.11 Fences

<sup>17</sup> H4.1 Zone Description

different to the development throughout Kahawai Point given the plan provisions that control yard setback, landscape treatment within front yards and building height. Further to this, the existing Glenbrook Beach area does have some degree of infill development due to the size and shape of the existing lots. I acknowledge that the density within the MHS zone has the potential to be greater, but it also provides an opportunity to create more variety in housing typologies such as duplex houses.

- 5.8 To ensure consistency in streetscape appearance, it is recommended an additional provision for fencing on the front boundary is included in the Glenbrook 4 Precinct, in line with the Glenbrook 3 precinct. The Glenbrook 3 precinct includes a specific provision on this which could be included within the new precinct:

*1453.5.11 (3) Fences on the front boundary must not exceed 1.2m in height and must be at least 50 percent visually permeable.*

I suggest this provision be amended to be an either/or provision:

*“fences on the front boundary must not exceed 1.2m in height and or must 1.8m in height if the fence is at least 50 per cent visually permeable above 1.2m.*

### **Interface with rural zone and adjoining sites**

- 5.9 Submitter 7 and 27, both local residents, raise concern about a lack of privacy for the existing community living to the west (below) this development. This is a matter that would be addressed through detailed design that would be managed at resource consent stage. The MHS zone contains outlook space standards which in part manage visual privacy between buildings on adjacent sites.
- 5.10 Submitter 25 is from a local resident who leases the adjoining FUZ land to the southeast of the PPC area. This land is used for farming operations. The submitter is concerned that the proposed rezoning will cause conflict between the farm operation and PPC land. The submitter managed similar concerns with the Kahawai Point development through agreements backed by covenants between the submitter and the Kahawai Point developers that control and limit the impacts of urban uses on rural operations. From an urban design perspective, interface conditions are important, but these can be managed through covenants (or similar) and will not require amendment to the precinct provisions or proposed structure plan.
- 5.11 A number of other submitters<sup>18</sup> also mention the need for the land covenants and building guidelines that are included in the Kahawai Point development and recommend the PPC area be subject to the same covenants and guidelines.

### **Carbon reduction plan**

- 5.12 Submission 8 from Glenbrook Beach Residents and Ratepayers Association, raises concern that the proposed rezoning is contrary to the carbon emissions reduction plan as car usage is high and travel distances are long from Glenbrook Beach. The travel distance to the southern motorway Papakura on ramp from the centre of Kahawai Point is 33 kms. Submissions 14 and 17 from local residents and Submission 24 from Equal Justice Project; raise the same concern. Submission 14 specifically notes that the PPC undermines the direction towards a Quality Compact Urban Form.
- 5.13 While I agree with these concerns given the Glenbrook Beach area has no public transport and no local services and amenities, I am cognisant of the fact that this land is earmarked for future urban development through its future urban zoning and the timing for rezoning aligns with the FULSS. For this reason, notwithstanding transport and other infrastructure, what is proposed can reasonably be anticipated and considered appropriate for this land, from an urban design

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<sup>18</sup> Submission 7, 12, 20, 27, 28, 31

perspective. If the subject site was rural zoned land, I would not be supportive of additional development in this location due to the lack of social and physical infrastructure.

### **Zone**

- 5.14 A number of submitters<sup>19</sup> raise concern around the rezoning to MHS and consider the Single House zone as more appropriate for a small coastal community. Submitters raise concern around the type of development they envisage in the MHS zone, such as three-storey buildings or multi-unit development. Concern is also raised about the capacity of current infrastructure, loss of rural vision and lack of consistency with Kahawai development if a MHS zone is applied.
- 5.15 The MHS zone allows for suburban housing, typically one to two-storey in attached and detached housing typologies. Apartment typologies or three-storey buildings are not generally expected in the MHS zone. Those higher density developments are provided for within the Mixed Housing Urban zone or Terrace Housing and Apartment Building zone, which is not being proposed in this PPC.
- 5.16 In terms of consistency with Kahawai Point, as discussed in paragraph 5.4, the PPC area will not be materially different from a streetscape perspective, rather the MHS zone provides flexibility in dwelling typologies and potentially a greater intensity per site. Amendments to Glenbrook 4 Precinct are suggested in paragraph 5.5 to ensure consistency from the streetscape perspective. Concerns around infrastructure will be addressed by the relevant Council specialist.

### **Adjoining site at 140 McLarin Road**

- 5.17 Submitter 23, at 140 McLarin Road, request their site be included in the PC area with the same zone. There is no urban design concern about the inclusion of the submitter's property into the PC area but it is my understanding that this is out of scope of this plan change. If this were to be included, IXXX.11 Figure 1- Precinct Plan will need to be amended to show the MHS zone at 140 McLarin Road.

### **Te Aranga Principles**

- 5.18 Submitter 40, Kahawai Point Development Limited, requests objectives, policies and assessment criteria be added to Glenbrook 4 Precinct referencing the cultural dimensions of the land and embodying the Te Aranga principles. The Glenbrook 3 Precinct includes objectives, policies, matters of discretion and assessment criteria which could be included in the Glenbrook 4 Precinct. The relevant provisions are detailed in Appendix 1. Further submission 2 also supports this submission point. I would support the inclusion of Te Aranga provisions but refer to Council's Planner for suitable wording of these provisions.

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<sup>19</sup> Submission 9, 16, 17, 18,19, 20, 21, 22, 27, 28



## **6. Conclusions and recommendations**

- 6.1 Overall PC91 has properly considered the urban design effects of rezoning approximately 7.9 hectares of land at 80 McLarin Road from FUZ to MHS and introducing a new precinct within the AUP. The PPC land is located outside of the RUB. While acknowledging hearings on the proposed plan changes to the AUP to give effect to the NPS-UD are still forthcoming, the description of the MHS within PC78 could be applied to the Glenbrook area.
- 6.2 The underlying zone of MHS with an overlay of the Glenbrook 4 Precinct is considered an efficient use of the land while providing a suitable interface with the Kahawai Point development to the north, Glenbrook Beach Recreation Reserve to the west, adjoining FUZ site to the southeast and the neighbourhood centre to the east. As outlined in paragraph 5.11, there is the possibility to include an additional area of land at 140 McLarin Road into the plan change area if considered within scope and adequate information is provided to assess the merits of including this property. The inclusion of this land could be supported from an urban design perspective as this will ensure integrated planning and development of current FUZ land. The PPC land is earmarked for future urban development through its future urban zoning and the timing of the PPC aligns with the FULSS therefore what is proposed can reasonably be anticipated and considered appropriate for this land. The planned neighbourhood centre within the Kahawai Point development will be an important facility when developed as no other amenities or services are currently provided for within the Glenbrook Beach settlement.
- 6.3 The precinct plan, figure 1 in Glenbrook 4 Precinct provides for an indicative cycle and pedestrian link to enhance connectivity in a west-east direction, provide a green interface to Glenbrook Beach Recreation Reserve and provide an indicative vehicle access points to connect with the existing and planned roading network in the Glenbrook area. These are all important elements to enhance the sense of place within Glenbrook Beach settlement and provide connections through the site to and between key destinations being the Glenbrook Beach Recreation Reserve and planned neighbourhood centre.
- 6.4 A number of amendments to the Glenbrook 4 Precinct are suggested to ensure the intended urban design outcomes are achieved and to retain consistency with recent development at Kahawai Point. These amendments relate to overlooking of Glenbrook Beach Recreation Reserve from dwellings, achievement of the intended green interface with Glenbrook Beach Recreation Reserve, fencing, incorporation of Te Aranga Principles and if considered within scope amending precinct plan 1 to include an adjacent site.

**Jennifer Esterman**

MUrbDes, BPlan, Int. NZPI

# APPENDIX 1

## Provisions that relate to Indicative Green Interface

### Policy IXXX.3.7

Encourage residential development to have a visual connection between the house and the street and/ or public spaces.

### IXXX.7 Standards

#### IXXX7.1.4.1

Purpose:

To promote:

- (i) open space character and passive surveillance of public reserves;
- 1. Fences fronting a wetland, an intermittent stream, or the Glenbrook Recreation Reserve, must not exceed 1.2m in height, except that fences maybe up to 1.6m in height if the fence is at least 60 percent visually permeable.

### IXXX8 Assessment – restricted discretionary activities

#### IXXX.8.1 Matters of discretion

2. Development of four or more dwellings that complies with Standard IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), and IXXX.7.1.4 (Fences):

- a. Relationship to the street and open spaces;
- e. Interface with Glenbrook Beach Recreation Reserve and any other areas of public open space

### IXXX.9 Assessment criteria

2. Development of four or more dwellings that complies with Standard IXXX7.1.1 (Infrastructure), Standard IXXX7.2 (Precinct Plan), Standard IXXX7.1.3 (Riparian Margins and Setbacks) and Standard IXXX7.1.4 (fences):

b. Relationship to the street and open spaces:

i. development should contribute to the visual amenity and safety of streets and open spaces by:

- Maximising frontage orientation, including doors, windows and balconies to the street and open space clearly defining the boundary between the site and the street or open space by planting and/ or fencing;

ii. ground level balconies or patios to a street or open space should be designed to provide privacy for residents while enabling sightlines to the street or open spaces.

## **Te Aranga Provisions in Glenbrook 3 Precinct**

### I453.2 Objectives

9. Development of Glenbrook 3 embraces the Te Aranga principles of mana, whakapapa, taiao, mauri tu, mahi toi, tohu, and ahi ka.

### I453.3 Policies

1. Embody Te Aranga principles throughout the Glenbrook 3 development, taking into account the views of mana whenua. These principles may include Mana (status of iwi and hapu as mana whenua is recognised and respected); Whakapapa (Maori names are celebrated), Taiao (the natural environment is protected, restored and/or enhanced); Mauri tu (environmental health is protected, maintained and/or enhanced); Mahi toi (iwi and hapu narratives are captured and expressed creatively and appropriately); Tohu (mana whenua significant sites and cultural landmarks are acknowledged); and Ahi ka (iwi and hapu have a living and enduring presence and are secure and valued within their rohe).

#### 1453.7.1 Matters of discretion

For development that is a restricted discretionary activity in the Glenbrook 3 precinct, the council will restrict its discretion to the following matters in addition to the matters specified for the relevant restricted discretionary activities in the underlying zones.

1. Subdivision in accordance within the Glenbrook 3 precinct the council will restrict its discretion to those matters listed for subdivision under the Auckland-wide rules, and the following matters:

c. integration of Te Aranga principles;

#### 1453.7.2 Assessment criteria

For development that is a restricted discretionary activity in the Glenbrook 3 precinct, the following assessment criteria apply in addition to the criteria specified for the relevant restricted discretionary activities in the underlying zones.

1. Subdivision in accordance with the Glenbrook 3 precinct

b. The integration of Te Aranga principles:

i. the subdivision embraces Te Aranga principles and in particular:

- The recognition and protection of sites of cultural significance;
- the enhancement of stormwater quality and the successful treatment of stormwater within the subdivision;
- the protection of wetlands;
- street layout and design maximises solar orientation;
- setback from the coastal fringe;
- facilitate a broad network of walkways;
- provision of sediment and erosion controls and other measures to ensure water quality;
- opening up public access to the water's edge.

h. Integration of Te Aranga Principles including mātauranga mana whenua:

i. development should integrate appropriate mātauranga mana whenua into the design of the built environment open space and public works. In determining this, consideration will be given to the expression of Māori values and the type of development proposed, including where appropriate, for example:

- The design, landscaping and management of open spaces;
- The creation of the information centre and the ability to tell the story of Kahawai Point and early Maori occupation of this area and the environmental attributes of the Tahiki and Waiuku river environments;
- The commitment to native re-vegetation and the removal of exotics;
- Importance of the river margins and access to the coastline;
- Retention and enhancement of the wetlands;

- Communal facilities and spaces;
- Relationship between buildings and public access ways e.g. marae atea, wharenui, wharekai and waharoa if present;
- Landscaping which reflect the natural features of the surrounding environment; and
- Awareness of local history and whakapapa through design.

**Memo (technical specialist report to contribute towards Council's section 42A hearing report)**

13/10/2023

To: Katrina David, Senior Policy Advisor

From: Andreas Lilley, Consultant Parks Planner, Parks and Community Facilities, Auckland Council

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**Subject: Private Plan Change – PPC 91 – HD Project 2 Ltd. – 80 McLarin Road, Glenbrook – Parks Planning Assessment**

## **1.0 Introduction**

- 1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to effects relevant to Parks Planning, Parks and Community Facilities (P&CF).
- 1.2 I hold a Master of Planning Practice from the University of Auckland (2001) and a Bachelor of Parks and Recreation Management from Lincoln University (1997).
- 1.3 I have 22 years of experience covering regulatory planning, parks planning, public open space management and parks capital works delivery. I have been contracted by Auckland Council as a consultant to the Parks Planning team since February 2018. During that time, I have gained experience implementing Precinct plans by providing parks specialist input to the subdivision process.
- 1.4 In writing this memo, I have reviewed the application documents including the following clause 23 information response documents:
  - Attachment B – Stormwater Management Plan
  - Attachment C – Infrastructure Memo
  - Attachment D – Traffic Memo
  - Attachment E – Context Analysis
  - Attachment G – Ecology Letter
  - Attachment H – Structure Plan
  - Attachment I – Section 32 Evaluation
  - Attachment J – Assessment of Environmental Effects
  - Attachment K – Amended Glenbrook 4 Precinct Plan Provisions
  - Clause 23 Summary Letter
  - Attachment B – Stormwater Management Plan
  - Attachment B – Stormwater Management Plan
- 1.5 Auckland Council Documents referred to include:
  - Open Space Provision Policy 2016
  - Parks and Open Space Acquisition Policy 2013
- 1.6 I undertook a site visit on 07 September 2023.

## **2.0 Key Parks and Community Facilities Issues**

- 2.1 This assessment covers the open space provision of the precinct with regards to local park provision; riparian reserves to support a greenway network; pedestrian/cycle access to Glenbrook Beach Recreation Reserve through the precinct area; and the interface of the precinct with the Glenbrook Beach Recreation Reserve.
- 2.2 The PC91 plan change area proposes the following rezoning of Future Urban zoned land (FUZ) to:
  - 7.9870 Ha of Residential – Mixed Housing Suburban Zone (MHS).
- 2.3 The proposed 80 McLarin Road Plan Change anticipates a low - medium density development supporting approximately 75-125 new dwellings, set within a wider environment comprising Single

House and Mixed Rural zoned areas and Neighbourhood Centre zoned area opposite on McLarin Road.

2.4 The regulatory framework for Parks, Sport and Recreation assessment is set out within the below regulatory mechanisms, with key points noted:

- The Resource Management Act 1991, which at s229 and 230 requires the provision of esplanade reserves for the purposes of protecting conservation values and enabling public access and recreational use to or along any sea, river, or lake.
- The National Policy Statement Urban Development (NPSUD) 2020 which at Policy 2.2, requires urban environments have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport. This policy statement requires at 3.5 that Local Authorities must be satisfied that the additional infrastructure (including public open space) to service the proposed development capacity will be available.
- The National Policy Statement for Freshwater Management (NPSFM) which, at Policies 6 and 7 require that there is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted, and the loss of river extent and values is avoided to the extent practicable.
- The Auckland Regional Policy Statement, which at B2.7.1 and B2.7.2 requires that recreational needs of people and communities are met through the provision of a range of quality, connected, accessible open spaces and recreation facilities. At B7.3 and B7.4, the RPS requires the maintenance and enhancement of freshwater through integrated management.
- The Auckland Unitary Plan framework, in particular:
  - Open Space Zone – Objective H7.2.(1) Recreational needs are met through the provision of a range of quality open space areas that provide for both passive and active activities and (2) The adverse effects of use and development of open space areas on residents, communities and the environment are avoided, remedied or mitigated.
  - Subdivision Urban - Objective E38.2.3 Land is vested to provide for esplanades reserves, roads, stormwater, infrastructure and other purposes.
  - Subdivision Urban - Policy E38.3(18) which requires that subdivision provides for the recreation and amenity needs of residents by providing for open spaces that are prominent, and appropriately sized to cater for future residents and enable pedestrian and/or cycle linkages.

#### Neighbourhood park provision

2.5 The description of neighbourhood parks in the 'Open Space Provision Policy 2016' is that they offer 'basic informal recreation and social opportunities within a short walk of surrounding residential areas'. Provision targets for neighbourhood parks identified in this policy are that they are available within a 600m walk (a walkable catchment) to residents in low density residential areas i.e., Single House Zone, and a 400m walk to residents in medium density residential areas i.e., Mixed Housing Suburban Zone. As noted in the 'Open Space Provision Policy' new neighbourhood parks are typically between 0.3 to 0.5 hectares. Network principles are embedded in this policy, and directives include to 'Create a connected network of parks, open spaces and streets that delivers a variety of recreation, ecological, transport, stormwater, landscape and health benefits', and that open spaces are linked together so that 'Open space is core infrastructure that people use to get around their community'.

2.6 There is no indicative local neighbourhood park shown in the applicant's proposed precinct plan. The Glenbrook 3 Precinct to the north of the plan change area indicates the location of two neighbourhood parks of 0.3 to 0.5 hectares or more that would be sought by Council via acquisition within that precinct. Governing Body approval has been obtained for the acquisition of these two neighbourhood parks within the Glenbrook 3 Precinct. One of these local neighbourhood parks has been acquired and one is yet to be acquired. Analysis undertaken by council officers in 2015 for the Special Housing Area encompassed by the Glenbrook 3 Precinct confirmed at that time that the existing Glenbrook Beach Recreation Reserve captured the remaining FUZ area (indicated

in yellow below in Figure 1) within a 600m walkable catchment area with the exception of a small area in the south-eastern corner. This was based on the expectation that the FUZ area would be zoned Single House Zone. This advice has been confirmed again by the Property Provision Specialist in August 2023.

The present plan change proposes to zone 80 McLaren Road Residential: Mixed Housing Suburban which leaves a larger area in the southeast corner of the FUZ zone outside the corresponding 400m walkable catchment area of Glenbrook Beach Recreation Reserve. The 600m (SHZ) and 400m (MHS) walkable catchments of Glenbrook Beach Recreation Reserve are represented by blue 450m (SHZ) and red 300m (MHS) radial proxies respectively in Figure 1 below. This is in accordance with the criteria for the provision of neighbourhood parks of the Open Space Provision Policy 2016. The radial proxy is a straight-line distance measured from the centre of the catchment circle and does not represent a walkable alignment. Figure 1 confirms that the red 300m (MHS) radial proxy from the eastern reserve boundary of Glenbrook Beach Recreation Reserve encompasses the whole plan change area which is outlined in black (including most of the property at 140 McLaren Road), and therefore in accordance with the policy no additional open space neighbourhood park provision is required within the plan change area.

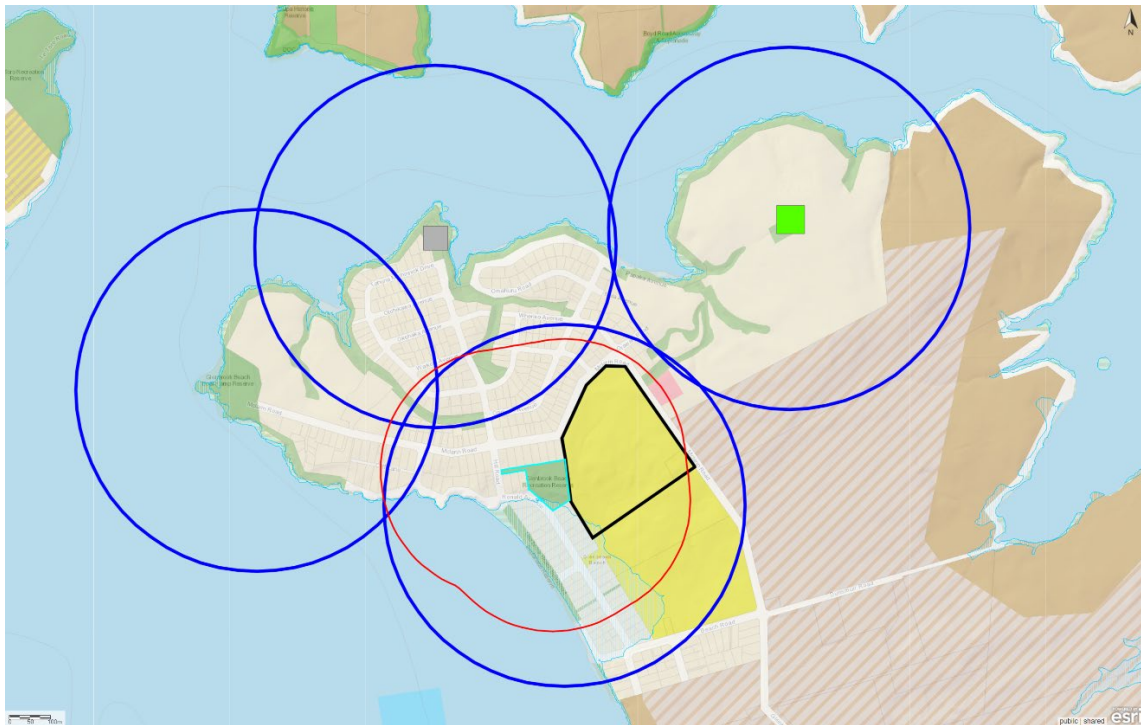


Figure 1: The 600m (SHZ) walkable catchments of the existing and approved open spaces at Glenbrook Beach indicated by blue 450m radial proxies. The 400m (MHS) walkable catchment of Glenbrook Beach Recreation Reserve is indicated by the red 300m proxy as measured from the reserve boundaries and is considered approximate only. The MHS catchment is confirmed to encompass the whole plan change area outlined in black.

- 2.7 As Figure 1 confirms both the 600m (SHZ) and 400m (MHS) catchments encompass the whole plan change area and effectively also 140 McLaren Road, no additional open space is therefore required with the plan change and an under provision of public recreational space is avoided. The intended outcomes of the Open Space Provision Policy are met in regard to provision of neighbourhood park. The matter of consideration of appropriate zoning of the plan change area as either SHZ or MHS in regard to neighbourhood park provision is therefore considered resolved from this perspective. It is noted that the final zoning of the plan change area as SHZ or MHS may result in a wider range of the final number of dwellings, which in turn may generate additional open space demands within the plan change area on Glenbrook Beach Recreation Reserve. As the existing reserve currently does not have good public visibility and currently provides limited informal recreation opportunities, an increased population density delivered through the plan change will potentially lead to more utilisation of the reserve and future council investment which is supported.

#### Interface with Glenbrook Beach Recreation Reserve

- 2.8 The plan change area shares a 102-metre boundary with Glenbrook Beach Recreation Reserve to the west. Residential properties border the northern boundary with a range of fence typologies and hedging forming the interface with the reserve. The reserve is a 1.0378 Ha council owned reserve and is zoned Open Space – Informal Recreation. The reserve is undeveloped with no public amenities or infrastructure and currently provides only an open grassed paddock for informal recreation opportunities in the middle and northern extents. The southern and western extents are covered in mature vegetation on the slopes which steeply descend to the road frontage on Ronald Avenue. The only current public access to the reserve is a sealed vehicle shared access from Hill Road which terminates at a locked gate which provides vehicle access to a Watercare reservoir. The Parks and Community Facilities Department has no current plans for development of the reserve.



*Figure 2: Looking from the reserve entrance to the east and the boundary with 80 McLarin Road plan change area which is delineated by the farm fence.*





*Figure 3: Looking north along the shared boundary of the reserve (left) and 80 McLarin Road (right).*

- 2.9 A clause 23 information request to the applicant from Parks Planning requested consideration of a park edge road or alternatively a private accessway edge within the plan change area with a public pedestrian easement. This would provide a more open entrance along the reserve boundary than the applicant's proposed sole pedestrian/cycle entranceway point indicated on the precinct plan. The Parks information request also covered the matter of avoiding any proposed residential development being built up right to the reserve boundary. The lack of a park edge road and a roading network overall on the proposed precinct plan maps leaves the matter of an appropriate interface with the reserve boundary unresolved. A key consideration for the boundary interface is achieving an activated public entrance to the reserve with open sightlines and effective passive surveillance into the reserve, without undue bulk and dominance effects imposed by the new residential built form. It is noted that council experience shows where developments back on to a reserve space rather than provide a public frontage, the maintenance burden on council can be higher due to increased litter and dumping on the reserve side of rear boundaries. A

recommendation is made below that the precinct plan provide more clarity on providing a park edge road and the overall roading layout within the site.

- 2.10 The applicant's Urban Design Assessment in 4.3.4 states that the west of the plan change site perimeter will need to respond to the Glenbrook Beach Recreation Reserve and established detached housing by providing active street frontages and opportunities for housing to overlook the reserve. Further, under 4.3.5 the assessment notes the precinct objectives for the development include forming a green interface between the Glenbrook Beach Recreation Reserve and the site that protects the open space amenity of the reserve and connects the reserve with the remainder of the site and the surrounding area. The precinct plan provisions are lacking in detail on what this green interface may consist of and how it contributes to the outcomes above. In the situation of a park edge road being provided, a green interface other than one consisting typically of public street trees and grass berms would be unnecessary.
- 2.11 The precinct provisions contain a proposed standard requiring any fences that front the Glenbrook Recreation Reserve to not exceed 1.2m in height, except that fences may be up to 1.6m in height if the fence is at least 60 percent visually permeable. No other standards are proposed to control the interface with the reserve, including there being no standards proposed for the green interface, no specific building setback requirements, no controls on the height and placement of any retaining walls that may be required, and no minimum glazing requirements on facades facing the reserve. The recommended amendments to the precinct plan standards below would control the adverse effects of bulk and dominance imposed by building form theoretically complying with the 1 metre rear yard setback of the residential zone. It is noted that if a park edge road is provided then the requirement for controlling the residential built form of the development on the reserve interface boundary via development standards would not be necessary as the development would be set further away from the reserve boundary.
- 2.12 The lack of design detail around the central cycleway / pedestrian entrance and interface with the reserve also provides uncertainty around the desired activation of the reserve edge. Due to the extensive shared boundary with the reserve indicated in the photos above in Figures 2 and 3, the plan change provides an opportunity to provide a safer and more legible public access to the reserve than through just a single pedestrian / cycle access point. As noted above, this is best achieved by a park edge road located along the eastern boundary of the reserve and this remains my preferred outcome. . A park edge road achieves a well landscaped and visually open connection to the reserve achieving Crime Prevention Through Environmental Design (CPTED) outcomes. Less desirable but still with benefit, would be a pedestrian easement over a private shared access lot along the boundary. This could be combined with an additional short pedestrian connection entering the reserve from McLarin Road and located parallel with the property at number 78 and running the length of the reserve boundary.
- 2.13 The aspect of the plan change proposal relating to the issue of zoning results in no material difference in outcomes controlling passive surveillance and bulk and dominance through the residential / reserve interface. Both the SHZ and MHS zones provide for a 1m rear yard setback for buildings with no height in relation standard applied to the open space boundary as the reserve is over 2000m<sup>2</sup> in area, with the MHS zone also allowing for outlook spaces to extend over public open spaces enabling buildings to be placed close to the boundary. Therefore, both zones under the operative provisions do not provide for a satisfactory interface of residential development with the reserve.
- 2.14 It is my recommendation that the precinct plan and relevant provisions provide for a more integrated interface with the reserve by indicating a park edge road, with specific controls addressing the cycle/pedestrian access and entrance; fencing, landscaping, building setback, and glazing requirements for any lots that do adjoin the Glenbrook Beach Recreation Reserve only in the event that a park edge road is not provided.

#### Esplanade reserve, riparian reserves and accessways

- 2.15 There is no Auckland Council Local Board greenway plan for the Glenbrook Beach area. A greenway plan is a visionary local plan developed by each of Auckland's Local Boards to create and improve walking, cycling, recreational and ecological network connections within their local area. The applicant's stormwater management plan indicates that the intermittent stream network within the plan change area is limited to two short stretches of stream indicated as A3 (100 metres length) and A4 (401 metres length). As the applicant has proposed to undertake 10 metre riparian margin restoration for the two intermittent streams and wetlands located within their site, it would

be desirable that the precinct plan and provisions also provided for a walkway network that ran parallel and outside of the restored 10 metre riparian margins of the intermittent stream network. The proposed location of the pedestrian / cycle east-west link shown on the precinct plan follows a broadly similar alignment to part of stream A4 and could potentially be integrated into running parallel with stream A4 for part of its natural course. The Urban Design Assessment states that the amenity value of the freshwater features does not justify the identification of a pathway alignment in the precinct provisions, and this is best addressed at subdivision and development stage. It is recommended that where feasible, but acknowledging the minor scale and extent of the site's stream network within the overall 7.9ha site, that the applicant identify potential walkway connections adjacent to and outside of the planted riparian margins as part of a wider public connectivity network.



Figure 4: The intermittent streams within the site identified by the applicant and marked in yellow and pink (left), with the proposed pedestrian / cycle east-west link on the precinct plan for 80 McLarin Road identified in yellow (right).

- 2.16 In the applicant's Urban Design Assessment, the treatment of riparian margins will be planted for the 10m riparian yard setback from the top of the bank of intermittent streams and wetlands. Within the proposed precinct provisions, it is indicated that the land may be protected by consent notice, covenant or vested at council's request. This is acceptable that council is provided the discretion to accept or decline public open space land for vesting. Any land accepted for vesting will likely be taken as Local Purpose (Drainage) Reserve if serving a stormwater management purpose and acceptable to Healthy Waters.
- 2.17 The proposed precinct plan provisions require the 10m planted riparian margin to be kept free of buildings and fenced to a maximum 1.2m in height, except that fences may be up to 1.6m in height if the fence is at least 60 percent visually permeable. This is consistent with the Glenbrook 3 Precinct provisions and is acceptable.
- 2.18 Further to item 2.15, Objective B2.7.1(2) of the Auckland Regional Policy Statement requires that public access to and along the coastal marine area, lakes, rivers, streams, and wetlands is maintained and enhanced. The applicant's Section 32 Evaluation notes that the watercourses and natural wetlands within the Glenbrook 4 Precinct do not trigger the requirement for esplanade reserve. Based on the applicant's ecology reports it is not anticipated that esplanade reserve provision will qualify adjacent to any of the water bodies contained within the precinct plan change area, however, an assessment in accordance with s230 RMA will still be required at the time of resource consent.
- 2.19 The proposed Access and Connectivity objectives outlined in section 4.3.2 of the Urban Design Assessment identify the importance of a well-connected development that provides for a choice of transport modes including walking and cycling; and to create a pedestrian / cycle east-west link between Glenbrook Beach Recreation Reserve and the proposed Local Centre on McLarin Road. A general pedestrian / cycle link from McLarin Road to Glenbrook Beach Recreation Reserve is shown on the precinct plans and is supported as it contributes to connectivity within the wider open public open space network, particularly between the Neighbourhood Centre on McLarin Road and through the proposed plan change area to the beachfront reserve at Glenbrook Beach. The application does not confirm whether the pedestrian / cycle link is alongside, within, or separated from a proposed road network. Section 5.3 of the Urban Design Assessment states this connection

would be provided off-road, on-road or a mixture of both subject to future design. The application states that the lack of certainty around the connection's location within the precinct provides the flexibility needed for the connection to be achieved. My recommendation is that the indicative road network is confirmed on the precinct plan to clarify the potential connectivity options that may be achieved and how the pedestrian / cycle link is integrated in to the road network.

### 3.0 Applicant's assessment

- 3.1 In the Section 32 Evaluation the applicant has confirmed the proposed Glenbrook 4 Precinct's objectives closely reflect those of the Glenbrook 3 Precinct, and in the context of Parks Planning's interests, these outcomes include:
- The provision of transportation connections within and through the precinct, including walking and cycling pathways
  - Connectivity with and between existing open spaces, including the coast, with existing community facilities, and with the planned local business centre on McLarin Road
  - Subdivision and development that incorporates and integrates with intermittent streams and natural wetlands
- 3.2 In section 2.1.5 of the Section 32 Evaluation under *c) Residential Amenity* the application notes that the Glenbrook 4 Precinct provides no additional standards to override the MHS standards that pertain to maintaining a reasonable standard of amenity for the owners and occupants of adjacent sites. In relation to the interface with Glenbrook Beach Recreation Reserve the precinct provisions contain only one standard in relation to proposed fence height, and therefore, further standards and controls are required to manage this interface appropriately in the instance that a park edge road or similar is not provided.
- 3.3 The same section of the Section 32 Evaluation acknowledges that provisions are provided that achieve high off-site amenity outcomes in design and layout, including achieving a cycling / walking link between the coast and the Glenbrook Beach Recreation Reserve and the future local centre on McLarin Road, and ensuring the riparian margins of intermittent streams and natural wetlands are planted to establish amenity assets for the community. This is supported, with the view that the outcomes could be strengthened in the precinct plan and provisions with more detail and design controls identifying the areas of riparian planting, public access and connectivity in the plan change area.
- 3.4 In section 2.1.5 of the Section 32 Evaluation under *f) Passive surveillance of public open space and public roads* the application notes the proposed fencing standard overrides the fencing standard that applies to the MHS in H4.16.4. This is supported. In addition, it is noted by the applicant that Objective IXXX.2(2) and Policy IXXX.3(4) seek to encourage development and subdivision that promotes an active interface with the Glenbrook Beach Recreation Reserve, and this is emphasised in Figure 1 of the Glenbrook 4 Precinct Provisions as well as in the proposed matters of discretion and assessment criteria applying to development of either three or less, or four or more dwellings. It is not considered, however, that this provides the level of certainty of outcomes to council at this plan change stage to achieve a consistent boundary interface with the reserve. Specific standards within the precinct provisions are required in the first instance to encourage development in a consistent manner in this location. However, again it is noted that it is preferred that a park edge road is provided rather than controlling the boundary interface with residential development controls.
- 3.5 Likewise, under 2.1.5 of the Section 32 Evaluation, it is noted that the freshwater features within the Glenbrook 4 precinct do not have an amenity value that justifies confirming a pathway alignment in the precinct provisions, and the application suggests the alignment can be locked in at the time of subdivision and development. Given the relatively small overall scale of the plan change area, the known locations and extents of the limited freshwater features within the site, and the proposed location for the east-west pedestrian / cycleway link through the site, it is not understood how easily any pathway alignments can actually be integrated in to the future development layout. Where it is feasible, it is preferred that these pathway alignments and an overall connectivity network are identified in the precinct plan and provisions.

- 3.6 Under item *g) Treatment of riparian margins* the Section 32 Evaluation concludes that as the watercourses and wetlands do not trigger the requirement for esplanade reserve under s230 RMA, then these areas can be located within private residential lots, with a precinct standard allowing riparian margins to be protected by way of consent notice or to be vested to council on request by council. This is an acceptable outcome.
- 3.7 Maintenance and enhancement of the identified intermittent streams is more likely to be achieved on development if the intermittent streams are shown on precinct plans. This helps to implement the RPS B7.3 and 7.4 and other regional provisions of the AUP, and the intermittent streams should be identified on the precinct plan.

#### Review summary

- 3.8 It is my assessment that the plan change provides assurance in part that the outcomes anticipated by the RPS, the National Policy Statement on Urban Development or Auckland Council's policies and plans to provide for a connected and integrated open space network as indicated in the background documents supporting the plan change will be achieved in the implementation stage of the resource consent process. Further clarity could be achieved at the plan change stage by confirming an indicative roading layout that incorporates a park edge road, integration of the east-west pedestrian/cycle route in to the roading layout, and confirms any public connectivity opportunities in conjunction with the restored riparian margins.

#### **4.0 Proposed amendments to Plan Change**

- 4.1 The proposed 80 McLarin Road, Glenbrook Plan Change 91 text is considered in Table 1 below, and recommended additions to the text as shown underlined are suggested.

**Table 1: Proposed Plan Change Text relevant to parks planning**

Reference	Proposed text	Comment / Addition
IXXX.1	Precinct Description	
	<p>The precinct description includes:</p> <p>It is intended that walking and cycling connections will be provided within the Precinct to connect the established Glenbrook Beach coastal settlement to land that is zoned Business – Neighbourhood Local Centre on the eastern side of McLarin Road, and to connect Kahawai Point with the coast and beach. These connections will build upon the network of walkways established and planned for in the Glenbrook Beach 3 precinct.</p>	<p>The wording in the precinct description that addresses walking and cycling connections within the Precinct is supported.</p> <p>No wording is provided in the description in regard to achieving a well-designed interface of the residential development with Glenbrook Beach Recreation Reserve.</p> <p><u>The Glenbrook 3 Precinct seeks to provide a well-designed interface with the Glenbrook Beach Recreation Reserve to provide for convenient public access, effective passive surveillance, and to avoid bulk and dominance effects from residential development on the reserve.</u></p>
IXXX.2	Objectives	
	<p>2. Subdivision and development achieves an attractive, safe and healthy environment for living with good access to the public realm including parks, riparian margins and roads.</p>	<p>There are no objectives in the proposed precinct plan unique to the interface of the development with the Glenbrook Beach Recreation Reserve. It is recommended that an objective providing for this outcome is added:</p> <p><u>(x) Recognising the importance of the interface of subdivision and development with the Glenbrook Beach Recreation Reserve through providing a park edge road to provide for convenient public access, good passive surveillance, and to avoid bulk and dominance effects from residential development on the reserve.</u></p> <p>There is an objective in the proposed precinct plan that partly address public access along the stream network. This could be added to as follows:</p> <p>2. Subdivision and development achieves an attractive, safe and healthy environment for living with good access to the public realm including <u>enhancing the amenity of pedestrians and cyclists who will have access within the precinct through</u> parks, riparian margins and roads.</p>
IXXX.3	Policies	
		<p>Policy 4 ensures that a pedestrian/cycle link is included within the precinct between the Glenbrook Beach Recreation Reserve and</p>

	<p>4. Require that any subdivision and development within the precinct incorporates the following elements of the precinct plan:</p> <p>a. linkages to adjacent land, including a pedestrian/cycle link between the Glenbrook Beach Recreation Reserve and the future local centre on McLarin Road; and</p> <p>b. a roundabout intersection on McLarin Road.</p> <p>6. Encourage residential development to have a visual connection between the house and the street and/ or public spaces.</p>	<p>the future local centre on McLarin Road. However, there are a lack of policies that refer to how the precinct plan enables the integration of pedestrian links with the restored riparian margins.</p> <p><b>Amend policy 4 as follows:</b></p> <p>4. Require that any subdivision and development within the precinct incorporates the following elements of the precinct plan:</p> <p>a. linkages to adjacent land, including a pedestrian/cycle link between the Glenbrook Beach Recreation Reserve and the future local centre on McLarin Road; and</p> <p>b. a roundabout intersection on McLarin Road.</p> <p><u>(c) Pedestrian linkages are provided alongside and adjoining the restored riparian margins which are offered to council for vesting.</u></p> <p>Policy 6 encourages a visual connection between houses and public spaces generally, but does not specifically address the interface with Glenbrook Beach Recreation Reserve.</p> <p><b>Provide a new policy as follows:</b></p> <p><u>(x) Provide a park edge road along the boundary with Glenbrook Beach Recreation Reserve to create a positive frontage to the reserve to encourage passive surveillance and enhance perceptions of safety.</u></p>
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Table IXXX.4.1 Activity table

	<p>(A2) Development of up to three dwellings that complies with standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), and IXXX.7.1.4 (fences)</p> <p>(A3) Development of four or more dwellings that complies with standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), and IXXX.7.1.4 (fences)</p>	<p>The activity table could refer to an additional standard to be inserted concerning development that adjoins land zoned open space:</p> <p>(A2) Development of up to three dwellings that complies with standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), <del>and</del> IXXX.7.1.4 (fences), <u>and IXXX.7.1.5 (Sites adjoining Glenbrook Beach Recreation Reserve)</u></p> <p>(A3) Development of four or more dwellings that complies with standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), <del>and</del> IXXX.7.1.4 (fences), <u>and IXXX.7.1.5 (Sites adjoining Glenbrook Beach Recreation Reserve)</u></p> <p><u>(A6a) Development that does not comply with Standard IXXX.7.1.5 (Sites adjoining Glenbrook Beach Recreation Reserve) RD</u></p>
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IXXX.7 Standards

	<p>2 – Precinct Plan</p> <p>Purpose: To implement the indicative connections, pathways, and infrastructure specified in Figure 1 of the Glenbrook 4 Precinct Plan.</p> <p>1. Development and/ or subdivision shall enable the connections, pathways, and infrastructure (including the roundabout) to be provided as shown in Figure 1 of the Glenbrook 4 Precinct Plan.</p> <p>2. Roads are to be designed in accordance with the road cross sections for this Precinct in Figure 2 of the Glenbrook 4 Precinct Plan.</p> <p>3 - Riparian Margins and Setbacks</p> <p>Purpose: To maintain and enhance intermittent streams and natural wetlands within the Precinct.</p> <p>1. Where development and/ or subdivision provides riparian margins, the development and/or subdivision shall comply with clauses (a) – (c), below:</p> <p>a) A minimum 10m riparian yard setback must be provided between buildings and the top of the bank belonging to any intermittent stream or natural wetland.</p> <p>b) Native planting shall be planted within 10m of any intermittent stream or natural wetland. Planting should be undertaken in</p>	<p><b>Amend Standard 2 as follows:</b></p> <p>Standard 2 – Precinct Plan should be amended to provide for a park edge road adjoining Glenbrook Beach Recreation Reserve as follows:</p> <p>Purpose: To implement the indicative connections, <u>Glenbrook Beach Recreation Reserve park edge road</u>, pathways, and infrastructure specified in Figure 1 of the Glenbrook 4 Precinct Plan.</p> <p>1. Development and/ or subdivision shall enable the connections, <u>park edge road</u>, pathways, and infrastructure (including the roundabout) to be provided as shown in Figure 1 of the Glenbrook 4 Precinct Plan.</p> <p>2. Roads are to be designed in accordance with the road cross sections for this Precinct in Figure 2 of the Glenbrook 4 Precinct Plan.</p> <p><b>Amend Standard 3 as follows:</b></p> <p>3 - Riparian Margins and Setbacks</p> <p>Purpose: To maintain and enhance intermittent streams and natural wetlands within the Precinct <u>and provide for pedestrian linkages alongside these areas that vest to council.</u></p>
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	<p>accordance with Appendix 16 (Guideline for Native Revegetation Plantings) of the AUP(OP), using eco-sourced native vegetation consistent with local biodiversity.</p> <p>c) Riparian margins can be either located within private property and protected by a consent notice or covenant or vested at council's request.</p> <p>4 - Fences Purpose: To promote: (i) open space character and passive surveillance of public reserves; and (ii) the viability of the planted riparian margin to act as and be maintained as a continuous green corridor.</p> <p>1. Fences fronting a wetland, an intermittent stream, or the Glenbrook Recreation Reserve, must not exceed 1.2m in height, except that fences may be up to 1.6m in height if the fence is at least 60 percent visually permeable.</p> <p>2. No fences are permitted within a planted riparian margin or within 10m of a natural wetland or an intermittent stream.</p> <p>3. All other fences must comply with H4.6.14 (Front, side and rear fences and walls in the Residential – Mixed Housing Suburban zone).</p>	<p>1. Where development and/ or subdivision provides riparian margins, the development and/or subdivision shall comply with clauses (a) – (d), below:</p> <p>a) A minimum 10m riparian yard setback must be provided between buildings and the top of the bank belonging to any intermittent stream or natural wetland, <u>or from the centreline of the stream where the bank cannot be physically identified by ground survey.</u></p> <p>b) Native planting shall be planted within 10m of any intermittent stream or natural wetland. Planting should be undertaken in accordance with Appendix 16 (Guideline for Native Revegetation Plantings) of the AUP(OP), using eco-sourced native vegetation consistent with local biodiversity.</p> <p>c) Riparian margins can be either located within private property and protected by a consent notice or covenant, or alternatively the land can be vested at council's request <u>at no cost to council. Where vested, a walkway is to be provided in accordance with the pedestrian connectivity links indicated on the Precinct Plan. This should be on land vested either side of an intermittent stream with at least the first 10m width planted.</u></p> <p>d) <u>Pedestrian paths of a minimum 2 metres formed width must be located adjacent to, and not within the 10m planted strip.</u></p> <p><b>Amend Standard 4 as follows:</b></p> <p>4 - Fences Purpose: To promote: (i) open space character and passive surveillance of public reserves; and (ii) the viability of the planted riparian margin to act as and be maintained as a continuous green corridor.</p> <p>1. Fences fronting a wetland, <u>or an intermittent stream, or the Glenbrook Beach Recreation Reserve</u>, must not exceed 1.2m in height, except that fences may be up to 1.6m in height (inclusive of the height of any retaining structure) if the fence is at least 60 percent visually permeable.</p> <p><u>2. Should additional retained height be required, this shall be stepped back into the property in 1.2m increments so as to comply with a 45° recession plane.</u></p> <p><u>3. No fences are permitted within a planted riparian margin or within 10m of a natural wetland or an intermittent stream.</u></p> <p><u>4. Fences directly adjoining the Glenbrook Beach Recreation Reserve must not exceed 1.2m in height and must be at least 60 percent visually permeable. There is no requirement to install fencing.</u></p> <p>4. All other fences must comply with H4.6.14 (Front, side and rear fences and walls in the Residential – Mixed Housing Suburban zone).</p> <p><b>Provide a new standard as follows:</b></p> <p>To address bulk and dominance effects and provide passive surveillance to Glenbrook Beach Recreation Reserve, the following standard should be added to the Precinct Plan <b><u>in the instance a park edge road is not provided the length of the reserve boundary:</u></b></p> <p><u>IXXX7.1.5 Sites adjoining Glenbrook Beach Recreation Reserve</u></p> <p><u>Purpose: To provide privacy for dwellings while enabling opportunities for passive surveillance of Glenbrook Beach Recreation Reserve while addressing bulk and dominance effects.</u></p> <p><u>(1) Where a site or dwelling directly adjoins the Glenbrook Beach Recreation Reserve, the following must apply:</u></p> <p><u>(a) the façade of a dwelling or dwellings facing the open space must contain glazing that is cumulatively at least 30 per cent of the area of the façade (excluding the garage door).</u></p> <p><u>(b) 1m depth of planting must be provided along the boundary that adjoins the reserve to provide a landscaped interface to protect the amenity of the Glenbrook Beach Recreation Reserve. The planting must reach a mature height no greater</u></p>
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		<p>than 1.2m in height and must remain at least 50% visually permeable.</p> <p>(c) <u>All buildings must be set back a minimum 3m from the boundary with Glenbrook Beach recreation Reserve.</u></p>
IXXX.8 Assessment – restricted discretionary activities		
	IXXX.8.1 Matters of discretion	<p>IXXX.8.1 Matters of discretion</p> <p>The following amendments should be made to the existing matters of discretion:</p> <p>1. For subdivision in accordance with the Glenbrook 4 precinct plan and Standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan) and IXXX.7.1.3 (Riparian Margins and Setbacks), the council will restrict its discretion to the following matters:</p> <p><u>(l) integration of Te Aranga principles;</u></p> <p>2. Development of four or more dwellings that complies with Standard IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), and IXXX.7.1.4 (Fences), <u>and IXXX.7.1.5 Sites adjoining Glenbrook Beach Recreation Reserve</u></p> <p>The following matter of discretion should be added to the Precinct Plan.</p> <p><u>6. Development that does not comply with standard IXXX.7.1.5 (Sites adjoining Glenbrook Beach recreation Reserve);</u></p> <p><u>a. The function of the reserve;</u></p> <p><u>b. Public amenity and character of the reserve;</u></p> <p><u>c. Crime Prevention through Environmental Design (CPTED) principles;</u></p> <p><u>d. impacts on sightlines and opportunities for passive surveillance of the reserve.</u></p>
	IXXX.9 Assessment criteria	IXXX.9 Assessment criteria
	<p>1. Subdivision in accordance with the Glenbrook 4 precinct plan and Standard IXXX.7.1.1 (Infrastructure), Standard IXXX.7.1.2 (Precinct Plan) and Standard IXXX.7.1.3 (Riparian Margins and Setbacks):</p> <p>e. Indicative Pedestrian/Cycle Link:</p> <ul style="list-style-type: none"> <li>Degree of consistency with the indicative alignment shown in Figure 1 of the Precinct Plan and the degree to which any alternative alignment provides a connection between Glenbrook Recreation Reserve and the land zoned Business – Local Centre on the eastern side of McLarin Road;</li> <li>The degree to which the pedestrian/cycle link contributes to the amenity of the Glenbrook Beach community.</li> </ul>	<p>The following amendments should be made to existing assessment criteria:</p> <p>1. Subdivision in accordance with the Glenbrook 4 precinct plan and Standard IXXX.7.1.1 (Infrastructure), Standard IXXX.7.1.2 (Precinct Plan) and Standard IXXX.7.1.3 (Riparian Margins and Setbacks):</p> <p>e. Indicative Pedestrian/Cycle Link:</p> <ul style="list-style-type: none"> <li>Degree of consistency with the indicative alignment shown in Figure 1 of the Precinct Plan and the degree to which any alternative alignment provides a connection between Glenbrook Recreation Reserve and the land zoned Business – Local Centre on the eastern side of McLarin Road;</li> <li>The degree to which the pedestrian/cycle link contributes to the amenity of the Glenbrook Beach community.</li> <li><u>Where the pedestrian / cycle link follows vested roads, the link must be constructed to normal footpath standards as appropriate and to a minimum obstacle free width of 3m;</u></li> </ul> <p>3. Development and subdivision that does not comply with Standard XXX.7.1.3 (Riparian Margins and Setbacks):</p> <ol style="list-style-type: none"> <li>The effect of the proposal on the management of natural hazards and stormwater run-off effects;</li> <li>The timing and appropriateness of planting within the required riparian setback from the wetland and/ or stream;</li> <li>The appropriateness of the measures proposed to maintain planting within the riparian yard;</li> <li>The degree to which the planting enhances the ecological function of the watercourse or wetland and meets the purpose of the standard;</li> <li>Site constraints that would prevent the practical and efficient development of the site and the precinct; and</li> </ol>



		<p>vi. If the purpose of the standard cannot be met with planting at the point of impact, Council may consider planting proposals elsewhere within the precinct to offset the shortfall of riparian planting at the point of impact.</p> <p><u>(vii) effects on:</u></p> <p>i. <u>Where the riparian margin is accepted for vesting by council, the ability to provide for a proposed pathway network outside the 10m wide strip of riparian planting.</u></p> <p>Offset mitigation will be deemed effective if:</p> <ul style="list-style-type: none"> <li>• Adequate measures and agreements are in place to plant, maintain and protect the area(s) of offset planting proposed and at the point of impact; and</li> <li>• The offset planting achieves an equal or better ecological outcome in another part of the precinct than would otherwise be achieved by complying with IXXX.7.1.3 (Riparian Margins and Setbacks):</li> </ul> <p>The following new assessment criteria should be added to the Precinct Plan.</p> <p><u>5. Development that does not comply with standard IXXX.7.1.5 (Sites adjoining Glenbrook Beach Recreation Reserve):</u></p> <p><u>a. The effects on the function of the reserve;</u>  <u>b. the interface between sites and the reserve</u>  <u>c. effects on public amenity and character of the reserve;</u>  <u>d. impacts on sightlines and opportunities for passive surveillance of the reserve.</u></p>
IXXX.10 Special information requirements		
		<p>The below changes should be made to the IXXX.10 Special Information Requirements:</p> <p>The addition of a new subsection (1):</p> <p><u>(1) Riparian Planting and Pathways Plan</u></p> <p><u>An application for land modification, development and subdivision which adjoins an intermittent stream must be accompanied by a riparian planting plan and pedestrian connection plan where the land is proposed for vesting to council, identifying the location of the formed pathway, and the location, species, planter bag size and planting to a density of 10,000 plants per hectare. Plant species should be eco-sourced native vegetation.</u></p> <p><u>(2) Intermittent streams and wetlands</u></p> <p><u>All applications for land modification, development and subdivision must include a plan identifying all intermittent streams and wetlands on the application site.</u></p>
Glenbrook 3 Precinct Plan - Spatial features		
	<p>The precinct plans do not identify the intermittent streams, pedestrian pathway connections, a park edge road adjacent to Glenbrook Beach Recreation Reserve, or an overall roading layout. The Precinct Plan should be updated to show these features.</p> <p>It is requested that a cross section for a park edge road is added to IXXX.12 Figure 2 – Road cross sections, or alternatively included in the road category classification table which has been requested by the Traffic Engineer.</p> <p>It is noted that the pedestrian / cycle link is not labelled on the existing road cross sections with only footpaths nominated at 1.80m wide on the proposed local and collector road cross sections. This width is insufficient for a shared pathway.</p>	

## 5.0 Submissions

5.1 Matters raised within the submissions to the PC91 plan change relevant to Parks and Community Facilities, are summarised and considered in Table 2. No further submissions to the PC91 were relevant for Parks and Community Facilities to comment on.

**Table 2:** Comment on submissions received relevant to parks planning

Sub #	Sub point	Submitter	Summary	Response
2		Pauli Lydia Bosch	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
3	3.2	Benjamin Ross	Accept the plan change subject to amendments to provide for pocket parks to allow for localised green spaces, including amendment for provision of pocket parks of between 200m2 and 500m2 one pocket park for each 50 properties to allow localised Green Spaces.	<b>Oppose</b> , as the proposal for pocket parks would not comply with the criteria of the Open Space Provision Policy 2016 which does not support locating pocket parks within medium density residential areas (Mixed Housing Suburban). The criteria of the policy for neighbourhood park provision is met and the plan change proposal is not required to provide any additional neighbourhood park due to the proximity of Glenbrook Beach Recreation Reserve.  The Open Space Provision Policy 2016 outlines the requirements for pocket parks, i.e., <ul style="list-style-type: none"> <li>• typically, between 0.1 to 0.15 hectares.</li> <li>• Located in urban centres or high-density residential areas.</li> <li>• Must be located on a public street and not an internalised space within a development block.</li> <li>• Not to be located within 100m of other open space.</li> </ul>
5		Alvin Changamire	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
6	6.1	Lania Gribben	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
7	7.3	Robert Hughes	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
8	8.1	Glenbrook Beach Residents & Ratepayers Association	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
9	9.3	Emma Ford	Opposed to the proposed mixed housing zone as the current H3 Residential Single House Zoning is more appropriate with the current infrastructure.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
11	11.1	Kiri Bull	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
12	12.1	Olivia Jackson	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.

13	13.1	Nadin Rathgeber	Opposed to the proposed mixed housing zone as the current H3 Residential Single House Zoning is more appropriate with the current infrastructure.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
	13.2	Nadin Rathgeber	Decline the plan change because of lack of facilities. There are NO facilities such as a playground.	<b>Neither support nor oppose</b> , but note that a playground is located at Glenbrook Beach Esplanade Reserve within a walkable distance of approximately 330 metres from the boundary of Glenbrook Beach Recreation Reserve and the plan change area. Playgrounds in local parks are delivered and funded by the local board. The style and design of the playground is based on the particular need for the area.
18		Ellen-May Meharry	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
19	19.1	Michael MacAulay	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
20	20.1	Dianne Bradford	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
22	22.1	Wibke Yorke	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
23	23.1	Aaron and Elizabeth Yorke	Supports the proposed plan change and seeks the inclusion of 140 McLarin Road to be included in the plan change area.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area inclusive of 140 McLarin Road.
25	25.5	Owen Yorke	Opposed to the proposed mixed housing zone as this will have an impact on the available infrastructure within the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area inclusive of 140 McLarin Road.
27	27.2	Anton Tyers	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
28	28.5	Shane Bradford	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.

31	31.5	Suli Palu	Opposed to the proposed mixed housing zone as this will have an impact on the aesthetic of the neighbourhood.	<b>Neither support nor oppose</b> , but note that Parks and Community Facilities has assessed the Parks and Open Space Provision Policy is met with regard to the existing open space provision in Glenbrook Beach and the proposed MHS zoning for the plan change area.
34	34.2	Tui Kaihu Trust ATTN: Victoria Lee McAnulty	Decline the plan change because of a lack of amenities [play areas].	<b>Neither support nor oppose</b> , but note that an existing playground is located at Glenbrook Beach Esplanade Reserve within a walkable distance of approximately 330 metres from the boundary of Glenbrook Beach Recreation Reserve and the plan change area. The plan change is providing for new public access points to Glenbrook Beach Recreation Reserve which have not previously existed and which will benefit the wider community. Playgrounds in local parks are delivered and funded by the local board. The style and design of the playground is based on the particular need for the area.
39	39.5	Auckland Transport	Support in part including requiring the precinct plan provisions to include triggers requiring these to be provided at the earliest stage of development: <ul style="list-style-type: none"> <li>• Safe crossing facilities and connections for pedestrians and active modes across McLarin Road to/from the Plan Change site and the land zoned for Business - Neighbourhood Centre Zone.</li> <li>• Pedestrian and cycle connections between the Plan Change site and the Glenbrook Beach Recreation Reserve (to the west).</li> </ul>	<b>Support</b>

## 6.0 Conclusions and recommendations

- 6.1 It is my conclusion that the assessment provided by the applicant goes some way to address the outcomes anticipated by the RPS, AUP and associated Auckland Council policies and plans through the provision of a pedestrian / cycle link from McLarin Road to Glenbrook Beach Recreation Reserve. The proposal is consistent with the Open Space Provision Policy 2016 and is not required to provide additional public open space in the form of a neighbourhood park due to the proximity of Glenbrook Beach Recreation Reserve. Therefore, the proposal is considered to be consistent with the Regional Policy Statement and the AUP which require that open spaces are provided for the recreation and amenity needs of residents, (RPS Objective B2.7.1, B2.7.2, AUP Subdivision Policy E38.3).
- 6.2 It is recommended that any opportunities for pedestrian pathways which could follow the alignments of the restored riparian margins and intermittent streams are identified on the precinct plan, and that the creation and development of these areas is consistent with Policy B2.7.2 (1) of the Regional Policy Statement.
- 6.3 It is recommended that no wording is added to the proposed plan change that implies (and potentially creates a legitimate expectation) that any of the indicative Glenbrook 4 Precinct Plan riparian margins must be acquired by the Council.
- 6.4 Comment is provided above in relation to submissions and further submission to the proposed plan change.
- 6.5 The private plan change is therefore supported in part. The primary focus is the interface with the Glenbrook Beach Recreation Reserve, and in this regard a park edge road is preferred. To be fully supported the plan change must include a precinct plan outlining an indicative roading layout including the park edge road and arrangements for the pedestrian / cycle link. This would address the need for an appropriate interface with Glenbrook Beach Recreation Reserve. The effects of the plan change that have not been fully resolved relate to providing an activated and visually open entrance along the reserve boundary that provides effective passive surveillance and a legible public access. This is considered a superior outcome to the sole pedestrian/cycle entranceway point currently indicated on the precinct plan. Further design outcomes for this key linkage could

also be outlined in the precinct provisions. In the absence of a park edge road (or similar arrangement) being included in the precinct provisions, the issue of concern is managing the effects of any proposed residential development built right to the reserve boundary in accordance with the permitted standards of the SHZ and MHS zones. This will create adverse bulk and dominance effects from new residential built form on the amenity and character of the existing spacious nature of the reserve. A recommendation is made for amended and new precinct provisions to soften the bulk and location of residential development adjoining the reserve boundary. This could be achieved by standards addressing building setback, glazing, fencing, and planting, and would be supported.

30 August 2023

To: Katrina David Planner, Auckland Council  
From: David Russell Senior Development Engineer South

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**Subject: Private Plan Change – PC91 80 McLarin Rd– Water wastewater Assessment**

The application proposes to connect to the existing Watercare networks for both water and wastewater

## **1.0 Introduction**

1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to water and wastewater infrastructure effects.

I hold a Bachelor of Engineering (Cant) degree, graduating in 1976. I am a full member of IPENZ. I have 33 years' experience in development engineering roles within Council and a consultancy specialising in land development.

1.2 In writing this memo, I have reviewed the following documents:

- Infrastructure reports submitted with the application
- Supplementary information relating to water and wastewater supplied with the submissions.
- Watercare submission to the application

## **2.0 Key infrastructure Issues**

Watercare has not identified any issues with the supply of water for this area that would adversely effect the ability for the land to develop

Watercare have identified an issue with the wastewater system. While there is a system it does not have capacity to accept new areas presently.

## **3.0 Applicant's assessment**

The applicant has assessed the water supply as adequate. They have advised that there is likely to be some off site works such as upgrading the treatment site storage tanks etc.

The applicant acknowledges that the wastewater system will not cope with the development now. They have acknowledged that the system is being upgraded. They have suggested that it may be possible to start the development ahead of the system upgrade being completed

## **4.0 Assessment of Water, Wastewater effects and management methods**

Watercare and the developer agree on water supply issues. It is likely that the water treatment facility will need to be upgraded for storage. It is also likely that there will need to be treatment upgrades also. At present the parties are in discussion, and do appear to be in agreement as to the requirements for off site works. The developer is required to meet all the on site costs and acknowledges that requirement.

Again both parties are in agreement that connections cannot be made yet. Considering the process that the other two significant developers on the Clarks Beach Wastewater treatment plant are going through I doubt that this developer will be able to get a Watercare approval until the new treatment plant and associated works have been completed. At present they have bought the site, but have not completed design works. I am of the understanding that the works are not due for completion until late 2026 (so 3 years away)

## **5.0 Submissions**

Watercare have submitted. The findings on the issues in that submission, are summarised above. They reference the proposed precinct rules are satisfactory. It does indicate that the developments can only proceed with adequate services availability. There is no reference to the fact that this could be 3 years away, or the need for the provision of a letter from Watercare indicating that the services are available when the first application is lodged.

There is a number of submissions that indicate that the water and wastewater networks are not able to cope with the present demand and request the plan change be declined. This is effectively confirmed by Watercare and the applicant.

## 6.0 Conclusions and recommendations

- The applicant has addressed the water and wastewater issues. Watercare has agreed with the finding.
- There is nothing to indicate when the wastewater plant will be on line. It is agreed that no development can occur until this has occurred.
- The developer is likely to be required to carry out some water upgrades at the treatment site. This will probably be conditioned as part of the first consent
- While the plan change can proceed it should be noted that the applicant will need to resolve water and wastewater issues ahead of the first application to give the processing planner and development Engineer confidence that the development can proceed.
- **overall recommendation**
  - That Watercare and the developers need to work together to ensure the infrastructure necessary to service the plan change area are adequately met by the developers in accordance with the Watercare CoP
  - That given the above *“Watercare considers that satisfactory water and wastewater servicing options can be arrived at and do not present a reason to decline the Plan Change.”*
  - That the plan change include a requirement that the first development that creates a residential section or dwelling be required to provide a letter or equivalent from Watercare confirming that the connections for water and wastewater are available, or will be available by a set date.
  - That based on the above water and wastewater infrastructure matters do not provide a reason to decline this plan change.
  - It is essential that all parties work together to resolve the issues above.

David Russell

Senior Development Engineer (south)

**Final Memo (technical specialist report to contribute towards Council's section 42A hearing report)**

30 August 2023

To: Katrina David – Senior Policy Planner, Auckland Council

And to: Susan Andrews – Principal Planner, Auckland Council Healthy Waters

From: Kelly Seekup – Consultant Planner (on behalf of Auckland Council Healthy Waters)  
Sarah Basheer – Consultant Engineer (on behalf of Auckland Council Healthy Waters)

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**Subject: Private Plan Change (PPC) 91 – 80 McLarin Road, Glenbrook (the site) – Stormwater Assessment**

## **1.0 Introduction**

This memo has been written between Kelly Seekup, Principal Planner at Jacobs and Sarah Basheer, Senior Water Engineer at Tonkin and Taylor.

Kelly Seekup has recently joined Jacobs as a consultant planner for Healthy Waters, previously working at Auckland Transport since 2019 and prior to that for 19 years as a Planner in consultancy and Council. Ms Seekup holds a Master of Planning Practice (Hons) degree from the University of Auckland and has been a full member of the New Zealand Planning Institute since 2005.

Sarah Basheer has a Bachelor of Engineering Degree from the University of Waikato. Ms Basheer works as a Senior Water Engineer at Tonkin and Taylor and has been seconded as a Senior Healthy Waters Specialist in the catchment planning team of Healthy Waters on several occasions since 2016 and has 18 years of experience in infrastructure and catchment planning, mainly in the field of stormwater and flood hazard management.

We (Ms Seekup and Ms Basheer) have assessed the Stormwater Management Plan (SMP) submitted as part of PPC 91, on behalf of Auckland Council Healthy Waters, in relation to stormwater effects against the plan change requirements. Comments have also been provided in relation to the Auckland Council Healthy Waters' Regionwide Network Discharge Consent (NDC).

In writing this memo, we have reviewed the following documents:

- Stormwater Management Plan by Harrison Grierson dated December 2022 (final);
- Amended precinct provisions;
- Covering letter dated 20 October 2022;
- Minutes of meeting with Healthy Waters 30 August 2022;
- Amended Assessment of Effects dated 17 October 2022; and
- Submissions received raising stormwater related issues.

The following sections are provided to assist the reporting planner's consideration of the plan change proposal in terms of stormwater effects.

The PPC 91 Applicant has indicated that it wishes its stormwater discharges to be covered by the NDC and intends to vest stormwater assets with Auckland Council. The Healthy Waters' NDC authorisation and SMP adoption process will be discussed.

## **2.0 Key Stormwater Issues**



PPC 91 seeks to rezone approximately 7.987 hectares of land at Glenbrook Beach from Future Urban Zone under the Auckland Unitary Plan – Operative in Part 2016 (AUP(OP)) to Residential – Mixed Housing Suburban. The Stormwater Management Area – Flow 1 (SMAF1) overlay and a new Precinct (Glenbrook 4) is proposed.

PPC 91 will enable greenfield development on the site and result in new stormwater discharges and diversions of stormwater flows. The primary stormwater management issues associated with PPC 91 are:

- Water quality – stormwater runoff from the watercourses converging in the southwestern corner of the site currently drain into the Waiuku River inlet of the Manukau Harbour to the west of the site, via an existing dry detention pond outlet, an underground discharge pipe network and a stormwater outfall at Glenbrook Beach. The Waiuku River inlet is identified as a Significant Ecological Area (SEA) under the AUP(OP). Appropriate treatment of stormwater is therefore required onsite prior to its discharge in order to avoid and/or mitigate water quality effects.
- Stream hydrology – development increases imperviousness and will therefore increase the flow rate and volume of runoff into the stream network and existing wetlands on the site while reducing ground infiltration unless mitigated. The Stormwater Management Area Flow 1 (SMAF1) hydrology mitigation is required to retain base flow and reduce the risk of scouring the wetland features.
- Flood management within the PPC 91 area – both primary and secondary stormwater systems shall be designed as per the Auckland Council Stormwater Code of Practice (SWCoP) and the proposed development lots shall be free from flooding.
- Flood hazard assessment and peak flow attenuation – flood risks associated with increased peak runoff being discharged from the PPC 91 area onto the downstream properties shall be mitigated.
- Precinct provisions shall be included to ensure the implementation of the proposed SMP and mitigation measures.

### **3.0 Applicant's Assessment**

Section 6 of the SMP sets out the stormwater management proposed by the Applicant. The proposed management in relation to water quality and stormwater treatment, hydrology mitigation, stormwater network and flooding are summarised below.

#### **Water quality – stormwater treatment**

Table 8 of the SMP recommended the Best Practical Option treatment train approach with treatment of stormwater runoff being provided at source and a second stage of treatment being provided prior to discharge.

As stated in Section 6.2.4 of the SMP, runoff from private impervious areas is to receive treatment through the use of rainwater tanks, permeable pavement and small-scale bioretention devices.

The SMP discusses rainwater tanks being the preferred solution for managing stormwater effects at source within private lots to provide retention (through non-potable reuse) and detention of runoff prior to discharge into the public stormwater network. However, little information is provided on stormwater quality treatment for private access ways and parking areas.

As proposed in Section 6.2.5 of the SMP, runoff from public roads and other public impervious areas are to receive water quality treatment through potential options such as treatment swales and raingardens within the road reserve.

The use of communal basins is proposed as an option in Section 6.2.5 of the SMP to provide for a second stage of treatment. Attenuation basins will be used for pre-treatment of run-off before entering the natural wetlands (a concept design is provided showing 3 attenuation basins in Appendix 1 and the sizing and design will be updated following submission of the masterplan). It is noted that 4 attenuation basins are mentioned in the text of the SMP. This needs to be clarified by the Applicant. The SMP states that all stormwater devices/assets on public land, the dry pond, and attenuation basins will be vested with Council. However, no information on the practicality or feasibility of the solutions/options proposed has been provided. No assessment of the costs and feasibility to operate and maintain the proposed stormwater devices from a lifecycle costing perspective has been provided.

SMAF retention and detention options provided in Table 8 include bioretention swales, rain gardens, tree pits and rainwater tanks. There is no preferred option provided in the SMP.

#### **Hydrology mitigation – stormwater detention and retention**

The Applicant proposes to provide the equivalent of SMAF1 hydrology mitigation (i.e., E10 of the AUP(OP) by way of introducing the SMAF1 overlay for the plan change area). This comprises retention (5mm runoff to be removed from the discharge through reuse and/or infiltration) and detention (discharge of the 95<sup>th</sup> percentile rainfall event over a 24-hour period).

#### **Flood management within the PPC 91 area**

A new pipe network is proposed to be constructed within the site to convey runoff from roads, other public areas and future development lots. The proposed network will have capacity for the 10% AEP storm events. Overland flow paths (OLFP) will be managed within engineered swales, rain gardens and wetlands. Minimum finished floor levels for new buildings are proposed to be established as per the SWCoP and the New Zealand Building code (NZBC).

#### **Flood hazard assessment and peak flow attenuation**

Hydraulic models for the pre and post development scenarios were developed by the Applicant using InfoWorks ICM v11 software to identify flood risks associated with the potential land development within the PPC 91 area. The SMP states (Section 7.3) that results of the modelling indicate a small number of properties neighbouring the subject site will experience an increased flood depth of between 2 and 10mm resulting from the development. It is noted that the attenuation ponds proposed for mitigation do not appear to have been included in the modelling. No information has been provided to demonstrate that adverse effects on these properties will be avoided or mitigated. This is discussed further in Section 4 of the memo below.

### **4.0 Assessment of Stormwater Effects**

Based on the discussion in Section 3 above, the assessment of stormwater effects of PPC 91 are summarised as follows:

- Water quality – We agree that the stormwater management options proposed in the Applicant's SMP could provide an appropriate level of stormwater treatment for the proposed public roads and other public impervious areas. However, limited information is provided on how treatment of runoff from private impervious areas will be catered for and the SMP relies on the provision of a masterplan in the future for specific recommendations.

No preferred options are provided in the SMP for any of the stormwater treatment. The practicality or feasibility of the solutions/options proposed has not been assessed and it is unclear at this stage how the proposed stormwater management will avoid or mitigate any actual and potential water quality effects from these areas. The Applicant's assessment needs to be updated to address this and provide more certainty for mitigation of adverse effects.

In order for PPC 91 to avoid or mitigate any actual and potential water quality effects on the sensitive receiving environment (i.e. Waiuku River inlet being an SEA) and to give effects to the National Policy Statement for Freshwater Management – Amended 2020 (NPS-FM), the

Regional Policy Statement (RPS) provisions for water quality<sup>1</sup> and integrated management objectives and policies in Chapter E1 of the AUP(OP), precinct provisions as recommended and outlined in **Attachment A** (as a minimum with additional provisions, objectives and policies and standards to be provided by the applicant to ensure certainty of mitigation at a catchment level) should be required. More discussion on the need for precinct provisions are provided in Section 6 below.

- Stream Hydrology – Ms Basheer considers that the introduction of the SMAF1 overlay for the plan change area will provide appropriate hydrology mitigation.
- Stormwater Devices – The SMP proposes options for rain gardens, swales and attenuation basins for peak flow attenuation and treatment proposes.

Stormwater devices can have multiple functions covering water quality treatment, retention and detention for hydrology mitigation, as well as flood attenuation. Therefore, the Applicant's SMP needs to clearly state the target performance requirements and intended catchment areas to be serviced by the proposed basins, rain gardens and swales, in addition to the costs and feasibility to operate and maintain the proposed stormwater devices from a lifecycle costing perspective, as raised by Auckland Transport in their submission, to ensure that effects will be able to be practically mitigated.

- Flood risks – Flooding and potential stormwater runoff effects on the downstream properties has not been fully assessed in the SMP, future assessment and modelling is recommended in the report when the detail is known. A revised flood hazard assessment by the Applicant is deemed necessary as part of the Plan Change process for the reasons outlined below.

Assessment under Chapter E36 of the AUP (OP) alone will not address these matters raised. The applicant needs to address these robustly at the Plan Change level when the full effects of the enabled growth and mitigation required are being considered, taking into consideration the concerns raised by submitters in terms of flooding.

Pre-notification, Healthy Waters asked for the baseline condition of the hydraulic modelling to be established and justified to allow impact assessment of all development scenarios (e.g. what ED scenario was used for the comparison in Figure 15 results). The SMP states that further hydraulic modelling is recommended to be undertaken at a later stage to better quantify the impacts of the proposed development once a proposed layout and design earthworks surface is known.

It is worth noting that Figures 17-20 of the flood hazard assessment show that the Post development scenario is 15mm to 100mm higher than the pre development scenario (not as reported to be 2-10mm higher) at the downstream property. The mitigation of this increase in flood depth needs to be demonstrated by the proposed options as part of this plan change process.

The applicant has discussed in the SMP how they will address effects through attenuation basins but has not demonstrated how (e.g. it appears that the models do not include the new attenuation basins, is it 3 or 4 basins and are they practical) therefore effects are not shown to be mitigated.

In order to safeguard the downstream properties and address the concerns raised by submissions, a revised assessment as part of this plan change process is required to demonstrate that the post development peak flow discharges from the PPC 91 area will result in no more than minor effects from flooding to the downstream properties.

We need to see the following in the flood hazard assessment as part of this plan change process:

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<sup>1</sup> Chapters B7.3 and B7.4 of the AUP(OP).

- The applicant needs to either demonstrate that their proposed solutions will work (causing a net 0 increase in flood level downstream); or
- Demonstrate in the report how the current increase in flood level (of up to 100mm) will not adversely affect the downstream properties (e.g. new and existing floor levels will be sufficiently above flood levels, no new flooding is anticipated); and
- Confirmation of the feasibility of the proposed attenuation mitigation measures for the full plan change enabled growth and the modelled flood depth anticipated (are 3 basins needed or 4) and confirmation of how the precinct provisions will ensure that these will be provided as part of the resource consent process.

## **5.0 Network Discharge Consent and Stormwater Management Plan**

Auckland Council Healthy Waters holds a region wide NDC for stormwater which commenced on 30 October 2019. Diversions and discharges of stormwater through the public network are permitted by the NDC provided that the discharges and network are authorised by an SMP, and impervious area is lawfully established. This includes a privately built network that wants to connect.

The NDC authorisation applies through the adoption of SMPs into Schedule 10 of the NDC. If an SMP is adopted, then no other discharge consent is needed. If no SMP is adopted or Healthy Waters does not accept developer-built stormwater devices for vesting in Council, then a private discharge consent is required. Necessary approvals to connect to the public stormwater network are still covered by the Stormwater Bylaw 2015 and infrastructure must meet the Stormwater Code of Practice.

The PPC 91 Applicant has indicated that it wishes its stormwater discharges to be covered by the NDC and intends to vest stormwater assets with Auckland Council.

For greenfield developments discharging to a SEA, including PPC 91, it is a requirement of the NDC that an SMP is notified with the plan change documents and meets the NDC's requirements.

The SMP must be consistent with the NDC's Schedule 2 (which sets out the NDC's strategic objectives, outcomes, and targets) and Schedule 4 (the performance requirements).

If an SMP is to be adopted following the approval of a notified plan change, the SMP must have been prepared to support the notified plan change and the plan change must be consistent with the SMP. The requirement that the plan change must be consistent with the SMP is to ensure that the precinct provisions are adequate to implement the management methods and mitigation measures set out in the SMP.

## **6.0 Need For Precinct Provisions**

The NDC is a discharge consent and cannot, on its own, require the implementation of necessary measures identified in an SMP. While SMPs are useful to inform the land development process, they cannot be enforced on their own as they are neither a rule nor a regulation. In addition, the suite of AUP(OP) Auckland-wide rules that relate to stormwater management are not by themselves sufficient for new greenfield development. For example, the only rules in the AUP(OP) relating to water quality are in Chapter E9 – Stormwater Quality – High contaminant generating car parks and high use roads.

Therefore, appropriate precinct plan provisions are necessary to ensure the SMP is implemented to manage stormwater discharges and associated effects (including water quality effects) in subsequent land development processes. The Applicant's SMP proposes a number of stormwater management measures (including stormwater quality treatment) which need to be supported by precinct plan provisions.

Based on the above, a suite of objectives, policies, standards and associated assessment criteria (with recommended amendments to the Applicant's proposed provisions and with additional provisions, objectives and policies and standards to be provided by the applicant to ensure certainty of mitigation at a catchment level), as outlined in **Attachment A**, is considered necessary to be included as precinct provisions within PPC 91. This is to ensure the implementation of the Applicant's SMP and mitigation of stormwater effects on the receiving environment, as well as to achieve the NDC's outcomes via appropriate land development controls.

It is noted that currently, the precinct provisions as recommended are focused on compliance with an agreed SMP and are based on provisions for other greenfield sites within Auckland. The SMP ensures mitigation of the full growth area as the only time that is done is at the plan change level; at the Resource Consent stage the development is likely to be broken up into smaller parts so there is no control over the full site/no certainty over the solutions to mitigate the full plan change enabled development.

Should the Applicant not be able to amend the SMP, the Applicant needs to propose appropriately robust precinct provisions (objectives, policies, standards) to ensure that downstream flood impacts will be avoided and or mitigated at the Resource Consent/development stage, addressing the full plan enabled development and effects to ensure certainty of mitigation at a catchment level.

## **7.0 Submissions**

The submissions received on PPC 91 which raised stormwater related issues are summarised in Table 1 in **Attachment B**. The submissions that address the same issues have been grouped under the following topic headings followed by our comments and recommendations.

### **A. Stormwater infrastructure needs**

A number of submissions (Submissions 15.2, 16.2, 29.3, 39.6) raised concerns in relation to the need for infrastructure upgrade including stormwater infrastructure.

Stormwater infrastructure to manage water quality and quantity effects of PPC 91 has been proposed by the Applicant. However, as discussed in Sections 3 and 4 above, limited information is provided in the SMP on how water quality treatment for private impervious areas will be catered for. The SMP relies on the provision of a masterplan and provides options not specific recommendations. The practicality or feasibility of the solutions/options proposed has therefore not been assessed.

A revised flood hazard assessment and amendments to the Applicant's precinct provisions is therefore recommended to ensure that future developments enabled by PPC 91 will avoid or mitigate any actual and potential water quality effects on the sensitive receiving environment.

In addition, the Applicant's flood hazard assessment with the hydraulic modelling undertaken to date does not confirm effects on downstream properties will be mitigated. A revised flood hazard assessment by the Applicant is therefore deemed necessary.

### **B. Flooding, coastal inundation and stormwater runoff**

The majority of submissions raised issues in relation to flooding and stormwater runoff.

The Applicant's SMP has stated that a new pipe network is proposed to be constructed within the site to convey runoff from roads, other public areas and future development lots. The proposed network will have capacity for the 10% AEP storm events. OLFP will be managed within attenuation basins, with details on sizing and location to come when the masterplan is developed. Minimum finished floor levels for new buildings will be established as per the SWCoP and NZBC. Therefore, developments within the PPC 91 area will in general avoid low lying

flooding areas. However, little information has been given in the SMP on any proposed earthworks and areas that may be flooded in the post development scenario.

Submissions 29.3, 31.4 and 38.1 described existing flooding on their properties and are concerned about the impact of the proposed plan change and use of the wetlands.

As discussed in Section 4 above, the potential flooding and stormwater runoff effects on the downstream properties need to be demonstrated and a revised flood hazard assessment to demonstrate effects will be mitigated by the Applicant is deemed necessary.

Submission 39.6 by Auckland Transport raises concerns with utilisation of raingardens within the public road reserve, particularly if coupled with currently indicated below-width road designs and have requested precinct provisions to be added to include objectives, policies, and rules relating to stormwater including to address whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets.

Auckland Transport have also requested precinct provisions to address maintenance, whole of life costs and climate change resilience.

This approach is supported.

### **C. Water sensitive design, water quality and stormwater treatment**

Submission 38.1 addressed issues in relation to water sensitive design, water quality and stormwater treatment.

Water sensitive design is proposed in the Applicant's SMP with the proposed use of bioretention swales, raingardens and wetlands as stormwater devices to provide a treatment train including hydrological mitigation, treatment and peak flow attenuation for stormwater runoff generated within the PPC 91 area. The introduction of the SMAF 1 overlay and the recommended precinct plan provisions on water quality have the potential to provide appropriate stormwater treatment to protect the receiving environment.

### **D. Stormwater devices proposed by the Applicant**

A number of submissions addressed the need for suitable stormwater devices.

The SMP needs to consider the costs and feasibility to operate and maintain the proposed stormwater devices from a lifecycle costing perspective to meet NDC requirements. From an effects perspective, the SMP needs to provide practical solutions that demonstrate that they would mitigate adverse effects on downstream properties and the receiving environment. This includes the inclusion of robust precinct provisions to ensure that these mitigation measures will be provided as part of the RC process.

Auckland Transport has also requested the consideration of whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets. Our recommended amendments to the Applicant's proposed precinct provisions have considered and accepted Auckland Transport's request (refer to **Attachment A** below).

## **8.0 SMP Adoption under the Regionwide NDC**

The SMP submitted and notified with PPC 91 does not adequately demonstrate how the actual and potential flood effects will be avoided or mitigated and how the NDC's outcomes and performance requirements will be met. On this basis, the SMP as currently drafted is not acceptable in accordance with Healthy Waters' NDC requirements. Key areas of concern are:

- Significant site features and hydrology is one of the key elements that is required to be addressed to support proposed land development in SMPs prepared under Healthy Waters' NDC process. As the current hydraulic modelling assessment has not demonstrated or justified the baseline condition to be established to allow the impact assessment of all development scenarios, it does not demonstrate the mitigation required

to support the proposed private plan change, it is considered that the SMP in its current form does not meet the performance requirements in Schedule 4 of the NDC.

- Based on the hydraulic modelling undertaken by the Applicant to date the SMP does not demonstrate that flood risks to the downstream properties posed by the proposed plan change could be mitigated.
- The SMP needs to identify a preferred stormwater management solution for development, that includes the practicality or feasibility of the solutions/options proposed, with precinct provisions to ensure that these measures will be provided as part of the development of the site.

## 9.0 Conclusions and Recommendations

The stormwater management options proposed in the Applicant's SMP, **subject to the recommended amendments to the precinct provisions as outlined in Attachment A**, could provide an appropriate level of stormwater treatment, however the SMP relies on the provision of a masterplan in the future for specific recommendations and additional precinct provisions, objectives and policies and standards need to be provided by the applicant to address downstream flood impacts and attenuation requirements and to ensure certainty of mitigation required at a catchment level.

It is noted that currently, the precinct provisions as recommended are focused on compliance with an agreed SMP. The SMP ensures mitigation of the full growth area as the only time that is done is at the plan change level; at the Resource Consent stage the development is likely to be broken up into smaller parts so there is no control over the full site/no certainty over the solutions to mitigate the full plan change enabled development.

The Applicant's SMP does not include a preferred option for mitigation and there is inconsistency with the number of attenuation basins required. The SMP needs to clearly state the target performance requirements and intended catchment areas to be serviced by the proposed basins/wetlands, rain gardens and swales, in addition to the practicality of how the proposed stormwater devices will be able to be provided as part of the Resource Consent process. This is to ensure that future developments enabled by PPC 91 will potentially avoid or mitigate any actual and potential effects on the sensitive receiving environment and concerns of submitters are satisfactorily addressed.

The introduction of the SMAF1 overlay for the plan change area is required to ensure hydrology mitigation.

In order to confirm any adverse flooding effects, any mitigation required and address the concerns raised by submissions, a revised flood hazard assessment is required to demonstrate that the post development peak flow discharges from the PPC 91 area will result in no more than minor effects from flooding to the downstream properties.

The potential flooding and stormwater runoff effects from future developments enabled by PPC 91 on the downstream properties need to be mitigated. Based on our assessment and the submissions received, until a revised flood hazard assessment with sufficient information is provided to demonstrate that any potential flooding and stormwater runoff effects will be avoided or appropriately mitigated, to safeguard the downstream properties and the SEA, we do not support PPC 91 from a stormwater and flooding perspective.

To resolve our concerns we need to see the following in the SMP/flood hazard assessment as part of this plan change process:

Option 1:

- The applicant needs to either demonstrate that their proposed solutions will work (causing a net 0 increase in flood level downstream); or

- Demonstrate in the report how the current increase in flood level (of up to 100mm) will not adversely affect the downstream properties (e.g. new and existing floor levels are way above flood levels, no new flooding is anticipated);
- Confirmation of the feasibility of the proposed attenuation mitigation measures for the full plan change enabled growth and the modelled flood depth anticipated (are 3 basins needed or 4) and confirmation of how the precinct provisions will ensure that these will be provided as part of the resource consent process.

Option 2:

Should the Applicant not be able to provide a revised SMP/flood hazard assessment, the Applicant needs to propose appropriately robust precinct provisions (objectives, policies, standards) to ensure that downstream flood impacts and adverse effects on the receiving environment will be avoided and or mitigated at the Resource Consent/development stage, addressing the full plan enabled development and effects to ensure certainty of attenuation/mitigation at a catchment level.



## Attachment A – Recommended Precinct Provisions:

1. The below new objective is recommended to be added:

### **Objective**

*Stormwater quality and quantity is managed to maintain the health and well-being of the receiving environment where it is excellent or good and is enhanced over time in degraded areas.*

2. The below new policy is recommended to replace Policies 7, 9-10 proposed by the Applicant:

### **Policy**

*Require subdivision and development to be consistent with any approved stormwater management plan including in particular:*

*(a) Requiring management of runoff from all impervious surfaces to enhance water quality and protect the health of the receiving environment, requiring appropriate design/sizing and location of stormwater outfalls/outlets;*

*(b) Stormwater is managed at-source and by applying water sensitive principles prior to the discharge of stormwater to existing watercourses and wetlands to achieve water quality and hydrology mitigation;*

*(c) Stormwater is attenuated to manage downstream flood effects in a manner that integrates stormwater management with subdivision and development to make efficient use of the land; and*

*(d) Contribute to improvements to water quality, and habitat and biodiversity values, including by providing riparian planting of the margins of natural wetlands, permanent and intermittent streams\*.*

3. The below new standard and associated assessment criteria are recommended:

### **Standard**

#### **(1) Water Quality**

*(a) Stormwater runoff from all impervious areas other than roofs must be either:*

*i. treated at-source by a stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or*

*ii. treated by a communal stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)' that is designed and authorised to accommodate and treat stormwater from the site.*

*(b) Stormwater runoff from roofs must be:*

*i. From inert building materials and directed to an approved stormwater management device.*

### **Assessment Criteria**

*(a) Assessment criteria E9.8.2(1) apply.*


*(b) Whether development and/or subdivision is in accordance with an approved Stormwater Management Plan and policies E1.3(1) – (14).*

- (c) *Whether a treatment train approach is implemented to treat runoff so that all contaminant generating surfaces are treated, including cumulative effects of lower contaminant generating surfaces.*
- (d) *The design and efficiency of infrastructure and devices (including communal devices) with consideration given to the likely effectiveness, whole lifecycle costs, ease of access, operation and maintenance and integration with the built and natural environment.*

\* Original wording proposed by the Applicant.

**Attachment B – Submissions Table**

<b>Sub. No.</b>	<b>Name of Submitter</b>	<b>Relevant stormwater issues raised by the Submitter</b>
7.7	Robert Hughes	From our current observation 80 McLarin Road appears to be susceptible to some flooding and I am concerned about how that will be moved if developed.
15.2	Ben Scott 26 Ronald Ave, Glenbrook Beach	<p>The stormwater system on Ronald Ave is hopelessly inadequate, When the last Cyclone/ Large downpour happened the system over flowed and many houses were under water. Obviously, this was a rear event, however any heavy rain the cesspits out front fill up very quickly and the water has nowhere to go, it struggles in normal rain events. It needs a pump station or the like to mechanically transfer the water over to the beach? I am afraid of more captured water coming down from the subdivision further making this issue worse. I have pictures of the street under water etc and am happy to share.</p> <p>Approve the plan change with the amendments I requested: thorough upgrade and effective stormwater plan. The floods highlighted where the water wanted to go. It made a channel over to the beach eventually. Make it easy for it to go there? And or upgrade the retention/pumpstation tanks for it to accommodate.</p>
16.2	Catherine Thompson	Stormwater provision needs upgrading as high-density housing will mean that the houses on the beach will again be overrun with the amount of water coming off the new development. The area at 80 McLarin Rd also even from your maps appear be subject to flooding, is this a good thing? The water will then wash down on the houses below on Ronald Ave.
17.6	Ian Smith	80 McLarin Road, with its land sloping towards the Glenbrook Beach residents, is already contributing to potential flooding and adding more buildings is a future safety hazard. Glenbrook Beach Road is already flood-damaged with recent rainfall, with some houses already impacted.
19.5	Michael Wayne MacAulay	With recent weather events I have noticed that 80 McLarin Rd is susceptible to flooding and these weather events have become more frequent in recent years and are expected to continue if not worsen in the future.
20.6	Ian Smith	80 McLarin Road, Glenbrook, looks to be susceptible to flooding.
28.1	Shane Bradford	80 McLarin Road is susceptible to flooding and there is no immediate access to emergency services.
29.3	Chelsea Fay Smith 26 Ronald Ave, Glenbrook Beach	We want an environmentally conscious, safe secure area that embraces and promotes its natural environment and currently we have been susceptible to 2 bouts of severe flooding on our property due to poor infrastructure. We have invested in drainage on the property a few years ago and where the drains have been filled at the front of our property the water rushed back from the road. Having

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		more homes behind us will not fix this issue it will add to it, by creating an overrun concrete jungle behind us. 80 McLarin Road and its neighbouring properties are all susceptible to flooding.
31.4	Suli Palu	Our observations are that 80 McLarin Road and the adjoining farmland on the westerly side of McLarin Road is very susceptible to flooding. This is already impacting on the residents of Ronald Ave who regularly experience flooding from water runoff from this land.
34.1	Tui Kaihu Trust	The coastline is susceptible to coastal inundation, more recently severe flooding and with recent extreme weather events risks being cut off from other communities without ability to self-sustain.
35.2	Mark Olson	Even with a new stormwater system for the area there will still be flooding in the Ronald Ave. High rainfall, high tides, westerly winds and low atmospheric pressure has in the past resulted in Ronald Ave being part of the harbour.
38.1	Sarah Fisher  32a Ronald Ave, Glenbrook Beach	<p>Bryce and Powell in their amended report Oct 2022, page 8 mentions storm water is suitably managed by applying water sensitive principles “offline” of water courses and wetlands.</p> <p>What does this actually mean? I am very keen to work alongside the planners and ecologists to get a win-win situation for all. I need to have a dry section and reduce the water flow under my house. With the changing weather in the last two years I have not seen the pond forming on the fence line get dry. This is why I want you all to be aware that this area certainly is a wetland area. I have tried to drain the water via a trench to the neighbour’s fence but you can see that this is not draining away and has had no benefit. I really concerned with more housing will there be an increased risk of flooding for myself and my neighbours on Ronald Ave? Is keeping my fence line as wetlands the answer?</p> 

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		 <p>The top photograph shows a small pond or water feature surrounded by dense, tall grasses and other vegetation. A wire mesh fence runs across the foreground, supported by a wooden post. The water in the pond is dark and still. The bottom photograph shows a muddy, overgrown area with a fence line. A palm tree is visible in the background under a blue sky with scattered clouds. The ground is dark and appears to be a mix of mud and grass.</p>

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		
39.6	Auckland Transport	<p>A Stormwater Management Plan (SMP) has been provided to support the Plan Change. The SMP provides an assessment of Best Practicable Option (BPO) that includes use of wetlands and ponds but also includes suggested use of vegetated rain gardens and bio-retention swales to capture first flush road runoff and pre-treat before entering wetlands.</p> <p>Whilst the topography of the site suggests in the urban design and geotechnical assessment that development would be restricted above the ridgeline that runs through the middle of the site, and that this is where the road network would remain (indicated by the two vehicle access points shown on the precinct plan and structure plan diagram), Auckland Transport</p>

Sub. No.	Name of Submitter	Relevant stormwater issues raised by the Submitter
		<p>has concerns about the methodology used for the stormwater BPO assessment.</p> <p>Auckland Transport is not satisfied that the best practicable / most cost-effective stormwater management solution has been identified. Auckland Transport has concerns with respect of intentions to utilise raingardens within the public road reserve, particularly if coupled with currently indicated below-width road designs (depicted in cross sections). To maintain ongoing effectiveness, raingardens must be suitably sized and regularly maintained or they no longer effectively serve their intended purpose. Auckland Transport seeks stormwater management provisions to be included as part of this Plan Change which require the following to be considered for publicly vested stormwater assets:</p> <ul style="list-style-type: none"> <li>• whole of life costs;</li> <li>• long-term effectiveness; and</li> <li>• the use of communal devices to treat road runoff.</li> </ul> <p>Amend PPC 91 to include precinct provisions that include objectives, policies, and rules relating to stormwater including to address whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets (as a matter for discretion and policy).</p>
39.7	Auckland Transport	<p>Auckland Transport notes that the Plan Change site is subject to overland flow paths and 1% annual exceedance probability flooding plus 1m sea level rise.</p> <p>For any assets (roads or stormwater) intended to be vested with Auckland Transport, a hazard risk assessment (AUPOP: E.36.9) should be undertaken and assets clearly separated from any hazard areas.</p> <p>Whilst a subdivision consent will trigger the need for a hazard assessment given the increasing concerns with respect of maintenance of assets in hazard zones in the context of climate change and the need for infrastructure to be resilient to the changes in climate, it is requested that the precinct provisions be amended to include objectives and policies stipulating that infrastructure intended to be vested with Auckland Council be located outside of any hazard areas and that a hazard assessment inform the location of such infrastructure.</p> <p>Amend PPC 91 to include precinct provisions (objectives and policies) to make clear that any internal road network or other infrastructure that is intended to be vested to Auckland Council must be located outside of any hazard areas so as to be resilient to the effects of climate change.</p>

11 October 2023

To: Katrina David, Policy Planner, Auckland Council, Reporting Planner

From: Wes Edwards, Arrive Limited, Technical Specialist - Transport

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**Subject: Private Plan Change – PC91 80 McLarin Road, Glenbrook – Transport Assessment**

## **1 Executive Summary**

- 1.1 Glenbrook Beach is a coastal village. The Glenbrook 3 Precinct Special Housing Area adjoins the older part of the village and both are zoned Residential – Single House (R-SH) zone. There are no employers, community services or retail activities in the village, although a future Neighbourhood Centre<sup>1</sup> is provided for. There is no public transport, and all travel is by private vehicle along Glenbrook Beach Road and other connecting roads.
- 1.2 Private Plan Change 91 80 McLarin Road, Glenbrook (PC91) proposes to rezone eight hectares of land at Glenbrook Beach from Future Urban Zone (FUZ) to Residential – Mixed Housing Suburban (R-MHS) zone and introduces the Glenbrook 4 Precinct.
- 1.3 The transport assessment provided in support of PC91 concludes that the surrounding transport environment would perform well in providing for development enabled by the plan change. In my view the assessment has some inadequacies. I have undertaken alternate analysis as part of my review of transport matters. From that analysis I have determined that additional transport infrastructure would be required to support development of the plan change land.
- 1.4 The assessment of effects of the plan change considers PC91 against the relevant planning framework, but in my view the assessment is not complete. My assessment of the plan change shows it is not consistent with the planning framework.
- 1.5 In my view the plan change provides for too much intensity and is premature. For those reasons my overall recommendation is that the plan change be declined.

## **2 Introduction**

- 2.1 At the request of Auckland Council I have undertaken a review of PC91 in relation to transport effects.

### **Qualifications and Experience**

- 2.2 I hold a New Zealand Certificate in Civil Engineering, and a Bachelor's degree in Civil Engineering. I am a Chartered Professional Engineer and an International Professional (APEC) Engineer.
- 2.3 I am an Engineering New Zealand Fellow, a Chartered Member of Engineering New Zealand, and a Professional Member of the Institute of Transportation Engineers.
- 2.4 I am a road safety auditor, am accredited by KiwiRail as a Level Crossing Safety Impact Assessor, have former experience as a collision investigator, and have formerly been

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<sup>1</sup> The Auckland Unitary Plan – Operative in Part Planning Maps show the centre zoned as Business – Neighbourhood Centre. The I453 Glenbrook 3 Precinct Plan and the Notified PC91 Precinct Plan both show the centre zoned as Business – Local Centre, but the Glenbrook 3 Precinct text refers to Neighbourhood Centre. In this report I assume the land is zoned Business - Neighbourhood Centre.



accredited by Waka Kotahi New Zealand Transport Agency (WK-NZTA) as a Traffic Controller, Inspector, and Site Traffic Management Specialist.

- 2.5 I was formerly accredited by the Ministry for the Environment as a Resource Management Act Hearings Commissioner.
- 2.6 I have over 38 years engineering experience, with 32 of those years as a traffic specialist based in Auckland. My current role is Transportation Advisor and Director of Arrive Limited, a company which I founded in 2002.
- 2.7 I have experience in traffic matters associated with resource management, including:
- a) resource consents, structure plans and plan changes, and notices of requirement for road and rail infrastructure, and for schools;
  - b) the design of traffic infrastructure and facilities such as roads, intersections, bus facilities, and parking facilities;
  - c) road safety engineering, street design, computer analysis and modelling of roads and intersections; and
  - d) providing specialist opinions on traffic and transport matters as an expert witness in council hearings, District Court, Environment Court, Land Valuation Tribunal, Environmental Protection Agency Board of Inquiry, and High Court hearings.
- 2.8 My work experience relevant to this matter includes:
- a) Advising Auckland Council on several private plan changes, with some enabling significant growth and proposing significant transport infrastructure, and/ or in a rural area, including:
    - i) PC55 Patumahoe South, 2019-22;
    - ii) PC61 Waipupuke (Drury West), 2020-21; and
    - iii) PC88 Beachlands South, 2022-.
  - b) Advising a number of councils on Notices of Requirement (NoRs) for schools, rail, and arterial road infrastructure projects including:
    - i) NoRs for widening of State Highway One in Whangarei, 2010-18;
    - ii) NoRs for Drury West station and interchange, 2021-; and
    - iii) NoRs for Pukekohe Arterials, 2023-;
  - c) Advising private clients on numerous resource consents, plan changes and NoRs including:
    - i) Pokeno Village, 2007-22;
    - ii) Kingseat Village, 2009-2010; and
    - iii) Paerata Rise (Wesley College Special Housing Area, Franklin 2 Precinct), 2016-20;

#### **Involvement in this Matter**

- 2.9 I was engaged by Council in November 2021 to advise on this plan change following the receipt of draft pre-lodgement documentation. I visited the road network around the site in November 2021.
- 2.10 In writing this memo, I have reviewed the following documents relating to the Plan Change:

- a) private plan change request and the Assessment of Environmental Effects (AEE);
- b) Integrated Transport Assessment (ITA);
- c) further information responses relating to transport (October 2022 and January 2023);
- d) submissions and further submissions; and
- e) comments made by the Franklin Local Board.

### **Exclusions**

- 2.11 The consideration of some matters is outside the scope of this report or my expertise. I do not consider:
- a) Matters relating to noise, dust, or light spill generated by vehicle movements;
  - b) Matters relating to stormwater runoff, including from roads or parking areas;
  - c) the effects of traffic on amenity, except in the general context of street design;

### **Outline**

- 2.12 This report includes the following sections:
- a) an overview of the key transport issues for this plan change (Section 3);
  - b) a summary of the applicant's transport assessment (Section 4);
  - c) my assessment of transport effects and management methods (Section 5);
  - d) a review of the proposed plan change provisions (Section 6);
  - e) my assessment of the planning and strategy framework (Section 7);
  - f) a review of transport matters raised in submissions (Section 8);
  - g) a review of comments made by the Local Board (Section 9); and
  - h) conclusions and recommendations (Section 10).

### **Effect of Covid-19 Health Orders**

- 2.13 Prior to 2020 traffic volumes on most roads in the Auckland Region tended to experience growth at reasonably consistent rates.
- 2.14 Based on research and traffic counts in the Auckland region travel patterns and behaviour were significantly altered by the Covid-19 Health Orders. The changes were most significant under the higher levels of the Alert system and Protection Framework.
- 2.15 Traffic volumes and public transport use appear to be slowly recovering but have not returned to pre-Covid levels in many areas. The long-term extent of changed travel behaviours and traffic volumes is unknown, as is the length of time any recovery may take, and this is complicated by the effects of the current economic recession.

- 2.16 A discussion paper published by the New Zealand Institute of Economic Research suggests that some increases in working from home may be permanent, but that traffic volumes are expected to return to 2019 levels<sup>2</sup>.
- 2.17 The ITA analysis is informed by intersection traffic surveys undertaken on the 5<sup>th</sup> and 6<sup>th</sup> of July 2021 when Auckland was at Covid-19 Health Orders Alert System Level 1 (since 7 March 2021).
- 2.18 This report is prepared on the assumption that traffic growth rates experienced prior to 2020 are likely to resume in the short-term and continue for the medium to long term.

### **3 Key Transport Issues**

- 3.1 The proposed change seeks to rezone land from Future Urban Zone (FUZ) to Residential – Mixed Housing Suburban (R-MHS) zone to provide for urban development that would enable the provision of residential dwellings.
- 3.2 The applicant’s transport assessment is based on an Indicative Masterplan that shows how 100 residential lots could be developed under the proposed zoning. The AEE refers to that development scenario as “hypothetical”<sup>3</sup>.
- 3.3 The key transport issue for this plan change is the increase in private motor vehicle travel on high-speed rural roads that would be generated by development enabled by the plan change, and the effects of that additional travel on road safety, the performance of a key intersection, and consistency with planning policies.

### **4 Applicant’s Assessment**

- 4.1 The proposal involves rezoning eight hectares of land currently zoned Future Urban that is located at 80 McLarin Road, Glenbrook Beach. The land is bounded to the north and east by McLarin Road.
- 4.2 The ITA has provided a summary of surrounding development, the existing transport environment, the development expected to occur on the PC91 land, and assessed the impact of development enabled by PC91 on the surrounding road network.
- 4.3 On request, additional information was supplied about several matters including recent improvements to roads in the area and when they were implemented together with an updated assessment of the crash history. Information about the local speed environment and sight distances at proposed intersection locations was also added.

#### **Transport Environment**

- 4.4 The ITA describes features and characteristics of the existing transport environment.

#### Active Modes

- 4.5 The ITA notes footpaths are provided along the northern side of McLarin Road to the north of the PC91 land only and no cyclist facilities are present.
- 4.6 The ITA provides an assessment of walking and cycling accessibility including isochrones (lines of equal travel time) shown in Figure 8. The ITA adopts maximum walking and cycling distances of 1km and 5km respectively, which are then referred to as “desirable”. The ITA

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<sup>2</sup> Dunn, T., D. Hamill and Z. Song. 2023. Unmasking COVID-19’s economic impact. NZIER Working paper 2023/01. Available at [nzier.org.nz](https://nzier.org.nz)

<sup>3</sup> Pg 12 AEE

concludes the site is within “desirable walking distance” of key locations such beachfronts at Glenbrook Beach and Kahawai Point.

#### Public Transport

- 4.7 The ITA notes there is no public transport at Glenbrook Beach.

#### Road Network

- 4.8 The ITA describes the local existing road network including McLarin Road and Glenbrook Beach Road. McLarin Road has a 50km/h speed limit on the northern frontage of the land and the northern end of the eastern frontage, and a 60km/h limit for the remainder of the eastern frontage.

#### *Traffic Volumes*

- 4.9 The ITA provides 2021 traffic count data from Auckland Transport’s (ATs) database and from surveys of turning movements at several intersections undertaken in July 2021. As noted above this data is subject to effects from the Covid-19 Health Orders. The most recent data is provided later in this report.

#### *Road Safety*

- 4.10 The ITA considered the road safety record of the area for the standard five-year reporting period of 2016 to 2020. The ITA notes the study period encompassed the introduction of improvements intended to improve road safety and concluded the crash history would suggest there is no traffic safety problem that would be exacerbated by development enabled by PC91.
- 4.11 That analysis was updated in the 2022 additional information to cover more recent data and broken into two periods before and after the implementation of improvements made in the 2019-20 summer. The updated analysis uses a five-year “before” period of July 2014 – June 2019 and a two-year “after” period of July 2020 to June 2022.
- 4.12 The additional information notes that while the after period is of short duration it appears the improvements together with reduced travel resulting from the Health Orders may have contributed to a reduction in crashes. The additional information concludes *“the proposed plan change at 80 McLarin Road is not expected to contribute towards any new adverse safety effects on the adjoining road network”*<sup>4</sup>.

#### Future Environment

##### *Public Transport*

- 4.13 The ITA notes an expectation that public transport services between Glenbrook Beach and Waiuku are expected to be provided (by AT) as the population grows. The 2022 additional information notes there are no confirmed plans for a bus service.

##### *Traffic Volumes*

- 4.14 The ITA forecasts 2030 traffic volumes based on a background growth rate plus forecast trip generation of future development of live-zoned land in the Glenbrook Beach area.
- 4.15 The background growth rate used is 3% per year which is relatively common in the Auckland Region in lower-growth areas, although lower growth rates can be experienced during peak periods in areas subject to traffic congestion. As the forecast accounts for new development growth separately and the area is not congested this assumption is reasonable.
- 4.16 This forecast is based on the expected development timeframe for the Kahawai Point Special Housing Area with development over a ten-year period which is expected to be completed by

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<sup>4</sup> Pg 5, October 2022 Additional Information Attachment D

2030. When the July 2021 traffic surveys were undertaken the ITA states that 155 dwellings had been completed, and it assumes those dwellings were occupied and contributing to the counted traffic volumes.

## **Proposed Plan Change**

### Zoning and Development

- 4.17 The ITA provides an image showing an Indicative Masterplan that shows how 100 lots, roads, and active mode connections could be provided. The Geotechnical report appends a *Concept Masterplan Options Study*, and the AEE describes the masterplan as hypothetical. The ITA assumes that each lot would have one dwelling, and all analysis is based on 100 dwellings being provided.
- 4.18 A yield of 100 lots over 8 hectares is an average yield of 12.5 dwelling units per hectare (du/ha). It is not uncommon for medium-density residential areas zoned R-MHS to yield in the order of 20 to 30 du/ha on flat land with few constraints.
- 4.19 As outlined in the PC91 Structure Plan document the site has a number of constraints on development as a result of water features and steeper slopes. The *Concept Masterplan Options Study* includes four options with the number of lots ranging from 55 to 100, so I consider 100 lots to be a reasonable basis for assessment, while noting the proposed provisions enable three dwellings per lot.
- 4.20 As noted in the AEE the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 requires Auckland Council to implement Medium Density Residential Standards (MRDS) into the AUP to increase residential yields. The AEE expects the MDRS to change the R-MHS zone provisions which would then apply to the PC91 area. The Auckland-wide changes to the R-MHS zone are expected to provide for up to three dwellings on each lot.
- 4.21 PC78 Intensification which incorporates the MDRS into the AUP was notified on 18 August 2022, after PC91 was lodged on 13 July 2022, but before PC91 was notified on 14 April 2023. Decisions on PC78 are not expected to precede the PC91 hearing.
- 4.22 The MDRS is not required to be applied to land in urban areas with a population of fewer than 5000 people. PC78 as notified excludes the land north of PC91 as it is a Special Housing Area Precinct, excludes the PC91 land as it is "Outside Urban Environment" and proposes no change to the Residential – Single House zoning in the remainder of Glenbrook Beach due to Qualifying Matters (Coastal Inundation and Flood Plain).

### Transport Network

- 4.23 The ITA assumes that the speed limit on McLarin Road would be reviewed as development of that area progresses, and expects that Auckland Transport (AT) would reduce the speed limit along the eastern frontage to 50km/h. That is a reasonable expectation, but it would be desirable to ensure that any new intersections could operate safely under the existing speed limit in case AT takes some time to reduce the speed limit, or elects not to lower the speed limit, noting changes to speed limits are subject to consultation.

## **Proposed Transport Infrastructure**

### Road Design

- 4.24 The ITA notes the road design for PC91 is proposed to be consistent with that in the Glenbrook 3 Precinct. It describes three road types (A, B, and C) and where each is proposed to be used.
- 4.25 This includes the Type C Minor Local Road with a 14m wide reserve which is narrower than the current minimum road reserve width usually accepted by Auckland Transport. In my view the proposed road designs are not appropriate for reasons I address later in this report.

- 4.26 The October 2022 additional information confirms McLarin Road adjacent to the site is intended to function as a Principal Road.

### Intersections

#### *Locations*

- 4.27 The ITA notes one road accessing the PC91 land is to be located at the site of a future roundabout on McLarin Road expected to be constructed as land to the east is developed. Other road locations for development of the PC91 land have not yet been determined, and the ITA assesses the possible locations shown on the masterplan, which are also shown on the proposed Precinct Plan.

#### *Sight Distances*

- 4.28 The ITA considers the sight distances available at each possible intersection location, and this is important to consider ensuring that safe and practicable options for developing the land are available.
- 4.29 Sight distances are related to the operating speed of the road which is typically higher than the posted speed limit. When evaluating the sight distances the ITA adopted speeds of 20, 30, and 60km/h obtained from driving a vehicle along the roads. The January 2023 additional information provides the results of speed surveys undertaken at two locations which produced operating speeds of 46 and 48 km/h on the northern frontage and speeds of 60 and 64 km/h on the eastern frontage.
- 4.30 The potential intersection location on the northern edge of the land could have adequate sight distances provided vegetation along the site frontage is removed. The three potential intersection locations on the eastern frontage have adequate sight distances.

#### *Form*

- 4.31 The ITA considers the traffic volumes on McLarin Road and expected roads accessing the PC91 land. The central location on the eastern frontage is to be at the proposed future roundabout. The ITA notes that widening of McLarin Road would be required to accommodate auxiliary lanes (right turn bays) at each of the other intersections. This is achievable without requiring additional land to be vested as road.

### **Traffic Effects**

#### Trip Generation

- 4.32 The ITA estimates the traffic generated by the development based on the assumed development scenario with 100 dwellings, and peak-hour trip generation rates obtained from New Zealand research.
- 4.33 The assumed trip generation rates are 8 to 10 vehicle movements<sup>5</sup> per dwelling per day and 1 vehicle movement per dwelling per hour in peak periods. I consider these trip generation rates to be reasonable, or possibly a little pessimistic (high) for this location.
- 4.34 Taken together, the estimate of residential lots and the adopted trip generation rates are likely to produce a reasonable conservative estimate, providing the enablement of up to three dwellings per lot does not apply.
- 4.35 The ITA estimates 100 dwellings would generate 800 to 1000 vehicle movements per day (v/d) with 100 vehicle movements per hour (v/h) in peak periods.

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<sup>5</sup> In the ITA and this report a vehicle movement is a one-way movement, so one vehicle arriving at a house and then departing would generate two movements.

## Trip Distribution

### *Directional Distribution*

- 4.36 The ITA assumes that 25% of traffic generated by the development would be entering the PC91 land in the a.m. peak hour, and 65% in the p.m. peak hour.
- 4.37 Those assumptions are a little more optimistic (balanced) than typically found in suburban areas. The traffic count at the Glenbrook Beach Road / Brookside Road intersection showed 31% of traffic travelling towards Glenbrook Beach in the a.m. peak hour and 56% in the p.m. peak hour, so it appears local conditions had more balanced travel, at least in July 2021. On that basis the ITA assumptions about directional traffic distribution appear reasonable.

### *Spatial Distribution*

- 4.38 The ITA analysis assumes that in the a.m. peak hour 73% of departing traffic and 74% of arriving traffic travels to and from the east (towards Paerata) via Brookside Road, and the remainder travels to and from the west (towards Waiuku) via Mission Bush Road.
- 4.39 As this is based on 2021 traffic counts these assumptions are considered to be reasonable for the short-term. In the longer-term additional employment to the east coupled with the provision of a rail station at Paerata could result in the eastern proportion increasing over time.

### Intersection Analysis

- 4.40 Section 5 of the ITA summarises analysis of several intersections in the area based on surveyed 2021 volumes and forecast 2030 volumes without PC91 (baseline) and 2030 volumes including the traffic estimated to be produced by development of the PC91 land (development).
- 4.41 A summary of the analysis results is contained in the following table.
- 4.42 The table summarises Level of Service (LOS), which is a qualitative measure of performance ranging from LOS A to LOS F. LOS A represents good conditions. LOS E is considered to represent capacity and LOS F generally represents poor over-capacity conditions. For intersections LOS is based on a quantitative average delay per vehicle. For intersection design, an overall intersection LOS C is a typical target in off-peak periods, or LOS D in peak periods. There may be a small number of movements at the intersection with slightly worse performance (LOS D or E). Other metrics such as the Degree of Saturation (ratio of demand to capacity), Average Delay, and Queue Length are provided in the ITA.

*Table 1: Summary of ITA Intersection Level of Service - Overall (Worst Movement)*

Intersection	No PC91 2021		No PC91 2030		PC91 2030	
	a.m.	p.m.	a.m.	p.m.	a.m.	p.m.
Glenbrook Beach Rd / Brookside Rd	A (A)	A (A)	A (A)	A (B)	A (A)	A (B)
Brookside Rd / Mission Bush Rd	A (A)	A (A)	A (A)	A (A)	A (A)	A (B)
Mission Bush Rd / Glenbrook-Waiuku Rd	A (A)	A (A)	A (B)	A (A)	A (A)	A (B)
Glenbrook Rd / Brookside Rd	A (A)	A (A)	A (B)	A (A)	A (B)	A (B)

A, B: Good Performance. C, D: Moderate Performance. E, F: Poor Performance.

- 4.43 The modelling results show all of the intersections analysed are expected to have good performance; however my own modelling shows significantly different results as summarised later in this report. No assessment of effects on the wider network (Glenbrook Road and beyond) is provided, and I recommend the applicant address this in evidence.

### Mid-Block Analysis

- 4.44 No analysis of the effects of development enabled by PC91 on mid-block sections of road is provided by the applicant. I provide some analysis below.

## Integration with Transport Policy

- 4.45 The ITA summarises expected growth in South Auckland, including sequencing of growth at Glenbrook Beach. It notes that the Auckland Plan 2050 Development Strategy identified Glenbrook Beach as a “Rural Settlement”, and that Glenbrook Beach is identified in the Future Urban Land Supply Strategy (FULSS) 2017.
- 4.46 The Glenbrook 3 Precinct of the Auckland Unitary Plan – Operative in Part was introduced as a Special Housing Area, and the ITA notes development of those areas is in progress to the north and east of the PC91 land.
- 4.47 The ITA notes the PC91 land is zoned Future Urban and includes the description of that zone as land identified as suitable for urbanisation. A fuller assessment of PC91 against transport policy is contained in the AEE.

### Statutory Documents

#### *National Policy Statements*

- 4.48 The AEE considers the National Policy Statement on Urban Development 2020 (NPS-UD) and considers PC91 is within an “urban environment” for the purposes of that document. The AEE acknowledges the land is not within a walkable catchment of a major centre or rapid transit stop, but is within the walkable catchment of a planned local centre, so considers the proposed development density to be appropriate. The AEE does not consider the NPS-UD requirements for land to be development ready but does note the proposed rezoning accords with FULSS. The AEE considers the proposal is aligned with the objectives of the Medium Density Residential Standards (MDRS) as it enables development.

#### *Regional Policy Statement*

- 4.49 The AEE evaluates the proposal against several parts of the Auckland Regional Policy Statement (RPS). The AEE considers PC91 is aligned with B2 Urban Growth and Form “because it will encourage residential development to locate within close proximity to the existing public open space and a future neighbourhood centre”, “enable a variety of housing types”, and “result in a quality built environment”<sup>6</sup>.
- 4.50 With respect to transport matters, the AEE considers PC91 is consistent with B3 Infrastructure Transport and Energy because it will not trigger any upgrades of the wider road network.

### Non-Statutory Documents

- 4.51 The AEE considers the Auckland Plan 2050, noting this led to FULSS. The AEE notes that FULSS indicating the PC91 land (in Glenbrook Beach 2) was prioritised to be development ready in 2023-27 and expected to deliver in the order of 207 dwellings.

## ITA Conclusions

- 4.52 The ITA concludes:
- a) key intersections that connect Glenbrook Beach with the wider area will continue to operate with adequate capacity;
  - b) the road network is expected to continue to function safely and development enabled by PC91 is not expected to contribute towards any new adverse safety effects;
  - c) the traffic effect of activities enabled by PC1 can be accommodated on the road network without compromising its function, capacity or safety.

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<sup>6</sup> Pg 14, AEE



## Proposed Provisions

- 4.53 The plan change proposes a new Glenbrook 4 Precinct and a number of transport-related provisions. No development restrictions connected with the provision of transport infrastructure are proposed.
- 4.54 The Precinct Description includes a statement that walking and cycling connections are intended within the precinct and to connect with the Neighbourhood Centre and the coast.
- 4.55 Eleven objectives are proposed, with most relating to transport either through the intended provision of connections, or through establishing the pattern of subdivision and development.
- 4.56 Ten policies are proposed including (emphasis added):
- ...
3. **Avoid subdivision, use and development prior to the availability of** bulk water, wastewater and **roading infrastructure** to service development in the Glenbrook 4 precinct.
  4. **Require that any subdivision and development** within the precinct **incorporates** the following elements of the precinct plan:
    - a. **linkages to adjacent land**, including a pedestrian/cycle link between the Glenbrook Beach Recreation Reserve and the future local centre on McLarin Road; and
    - b. **a roundabout intersection on McLarin Road.**
  5. **Ensure that subdivision and land use** activities establish a transport network that **provides for the safe and efficient movement** of motor vehicles, pedestrians and cyclists.
- ...
- 4.57 The Land Use Activity Table provides for development of up to three dwellings (per lot) as a Permitted Activity (A2).
- 4.58 For reference, the Auckland-Wide R-MHS zone standards also provide for three dwellings per site as a Permitted Activity (H4.4.1 (A3)). Other zones that could potentially be applied to the land such as Residential – Single House Zone, Residential – Large Lot Zone, and Residential – Rural and Coastal Settlement Zone all provide for larger sites and fewer dwellings per site.
- 4.59 Subdivision in general accordance with the precinct provisions is proposed to be a Restricted Discretionary Activity (18). Subdivision not in accordance with the Precinct Plan is Discretionary (A9), and subdivision not in accordance with an infrastructure standard is proposed to be Non-Complying. The proposed infrastructure standard has no transport elements.
- 4.60 Standard 2 – Precinct Plan requires development to enable the indicative infrastructure shown on the Precinct Plan and requires that roads be designed in general accordance with road cross-sections in Figure 2.
- 4.61 The Precinct Plan shows a roundabout on McLarin Road, which is referenced in Policy I.3.4.b, and Standard I.2.1. Subdivision or development not in accordance with the Precinct Plan are proposed to be Discretionary activities, so the Council would have discretion to decline a consent application if the roundabout had not been provided if it considered the effects to be adverse.
- 4.62 Matters of Discretion for subdivision are proposed including consistency with the Precinct Plan, connections to neighbouring land, road design and layout, access arrangements, cycleways and pathways, and the interface with McLarin Road.

- 4.63 The related Assessment Criteria for transport include the provision of an interconnected roading network, low-speed road design, the consistency of road cross-sections with those in Figure 2, and the design of the network connections.
- 4.64 The Precinct Plan includes three indicative vehicle access points, one opposite Rere Awa Road, one at the proposed roundabout adjacent to the Neighbourhood Centre, and one across the southern boundary. An indicative pedestrian/ cycle link is shown through the land to connect the reserves east and west of the site.
- 4.65 Cross-sections for roads are provided in Figure 2 for Type A Principal Road with 20m reserve, a Collector Road with 17m reserve, Type C Minor Local Road with 14m reserve, and a cross-section through the proposed roundabout. The dimensions on the roundabout cross-section contained in the AEE as notified are not legible; however, I recommend this diagram be deleted.

## **Review**

### Trip Generation

- 4.66 I consider the ITA estimate of traffic generation is appropriate for a hypothetical scenario with 100 dwellings.
- 4.67 An issue with the transport assessment is that three dwellings could be provided on one lot as a permitted activity, so the theoretical capacity of the land could be over 300 dwellings. I consider it unlikely that every lot would contain three dwellings, but I consider that an overall yield of 200 dwellings may not be fanciful. A yield of 200 dwellings is somewhat arbitrary as based on the masterplan options a yield of 100 lots is likely to involve some smaller lots for terraced housing which are less able to accommodate three dwellings. I recommend the applicant provide evidence on an appropriate likely upper limit on the number of dwellings that could be enabled by the proposed provisions.

### Intersection Analysis

- 4.68 The modelling of intersections undertaken to inform the ITA assessment has a number of potential issues. These issues were discovered in my review of the material for this report and were not identified prior to notification. I recommend the applicant address, and correct if necessary, the issues I have identified, which are set out below.

### *No Heavy Vehicles*

- 4.69 None of the intersection models include heavy vehicles. As the proportion of heavy vehicles in the area near the New Zealand Steel site at Mission Bush is high, and those vehicles can have a significant impact on intersection performance, the performance of the intersection reported in the ITA could be overly optimistic. The ITA modelling could be correct if heavy vehicles have been converted into passenger-car-equivalents (PCUs) where each heavy vehicle is counted as equivalent to two or three cars. That cannot be determined from the information provided and I recommend the applicant provide traffic count data in evidence.

### *Different Volumes*

- 4.70 Some of the intersection models and diagrams in the ITA have different volumes for some movements for the 2030 With-PC91 scenario. For example, the left turn out of Brookside Road into Glenbrook Road in the a.m. peak is shown as 488 + 55 (543 v/d) in Figure 35, 458 + 55 (513v/h) in the Attachment 2 drawing, and 513v/h in the model results. These differences are most likely to be a result of typographical or data-entry errors.

### *Model Parameters*

- 4.71 The Sidra Intersection software used to model the intersections is widely used and respected. When creating a model the software provides a number of default values based on research

that are typically reasonable assumptions, but where site-specific calibration data has been collected the parameters can be adjusted to better reflect the calibration data.

- 4.72 Some of the intersection models appear to use non-default parameters or other unusual settings, but no calibration data or methodology description is provided in the material.
- 4.73 For example, at the Glenbrook Road/ Brookside Road intersection, the model results appended to the ITA compare with my own model using the volumes from the ITA diagrams as shown in the following table.

*Table 2: Modelling Results for Glenbrook/ Brookside for 2031 with PC91, average delay, LOS*

Approach	Movement	a.m. peak		p.m. peak	
		ITA	Review	ITA	Review
Glenbrook	Through	3.4 A	0.1 A	3.5 A	0.2 A
	Right	13.8 B	7.3 A	10.4 B	5.8 A
Brookside	Left	8.7 A	12.3 B	5.7 A	6.3 A
	Right	7.7 A	23.5 C	7.0 A	57.6 F
Glenbrook-Waiuku	Left	4.5 A	6.7 A	4.5 A	7.8 A
	Through	0.1 A	0.1 A	0.0 A	0.1 A
Intersection		6.1 A	5.8 A	5.2 A	3.0 A

- 4.74 My results show better performance for the Glenbrook Road approach, slightly poorer performance for the Glenbrook-Waiuku approach, and significantly poorer performance for the Brookside Road approach. While the ITA models may have been calibrated to match observed conditions, that has not been stated. It is also possible the intersection has been incorrectly represented in the models leading to overly optimistic results. I recommend the applicant provide evidence on the nature and calibration of this and the other intersection models.

Other Matters

- 4.75 I consider that it is possible to provide for safe and efficient road and active mode access to the land compatible with the proposed zoning.
- 4.76 I do not accept the assessment of accessibility by walking and cycling as I consider it is overly optimistic for the reasons set out below, but I do not consider this has a material impact on the overall assessment.
- 4.77 I do not accept the view that development enabled by PC91 would not have adverse effects on road safety for reasons I set out below.
- 4.78 The ITA has not considered the impact of the plan change on the wider transport environment, such as travel along Glenbrook Road, State Highway 22, or the Southern Motorway. I do note however, that the land is zoned Future Urban and that development of the land has been considered in the planning for bulk transport infrastructure such as the Pukekohe Arterials, but those projects are not expected to be implemented for several decades.
- 4.79 In my view the assessment of transport related policy and other documents in the AEE is incomplete and I do not agree with some of the assessment for the reasons I set out below.
- 4.80 The proposed provisions allow for some subdivision to be a Restricted Discretionary activity. None of the proposed matters of discretion address road safety. As proposed, the Council may be unable to refuse consent for a subdivision proposal with an intersection in an unsafe location as long as the other three intersection locations shown on the Precinct Plan were not precluded.
- 4.81 In my view the road cross-sections provided and the requirement to use them are inappropriate.

## 5 Assessment of Transport Effects and Management Methods

### Receiving Environment

- 5.1 Development in Glenbrook Beach can be characterised as older dwellings and newer development within the Glenbrook 3 Precinct (I453) introduced as a Special Housing Area.
- 5.2 All of the live-zoned land in the existing Glenbrook Beach area has a zoning of either Residential – Single House (R-SH) zone or Business – Neighbourhood Centre (B-NC) zone.
- 5.3 The older areas are subject to a Subdivision Variation Control that limits the minimum lot size to 800m<sup>2</sup>, rather than the 480m<sup>2</sup> minimum that applies elsewhere in the R-SH zone.
- 5.4 The Glenbrook 3 Precinct (I453) applies to the live-zoned land north of the PC91 land. The Glenbrook Precinct provisions include the I453.2 Maximum Density standard which provides for an average maximum of 550m<sup>2</sup> per dwelling, except for up to 20% of affordable housing.

### Travel Patterns

#### Active Modes

- 5.5 In this report Active Modes refers to travel by walking, skateboarding, scooting, and cycling.
- 5.6 As noted above, the ITA states maximum walking and cycling distances which are then referred to as desirable. I agree with the ITA that a walking distance of 1km is an appropriate maximum for analysis, but not that a 1km walking distance is desirable, or that a 5km cycling distance is desirable.
- 5.7 The assessment of walking catchments is typically focussed on walking distances of 400m and 800m, which on level ground is generally equivalent to walking times of five and ten minutes respectively. Some people are willing to walk further distances, and others are unwilling or unable to walk those distances.
- 5.8 The Auckland Council Planning Committee has endorsed a definition of “walkable catchment” as including, among other things, development within 800m walking distance of a metropolitan centre or a rapid transit stop, considering terrain and other matters. This definition is consistent with other documents such as Ministry for the Environment (MfE) guidance on the topic.
- 5.9 Some of the PC91 land has steeper grades, particularly when accessing the coast, and these grades would reduce the area accessible within a five- or ten-minute walk.
- 5.10 The ITA suggests that large parts of the wider rural area around the site are within a desirable walking or cycling distance but does not recognise that there are currently no walking or cycling facilities on any of the roads accessing those areas, or assess the safety impacts of active mode users on those roads.

#### Public Transport

- 5.11 There is currently no public transport available, and no improvements are planned or funded.

#### Development Pattern

- 5.12 With respect to the integration of development density with accessibility I consider the land has poor access to employment and services, other than relatively lengthy travel by private car. For those reasons the land is best suited to lower-density development.

## Traffic Volumes

- 5.13 The most recent traffic volumes before and after Covid-19 are summarised in the following table.

*Table 3: Recent Auckland Transport Traffic Count Data*

Road	Date	Daily		Peak Hour			% HCV
		Weekdays	7 Days	a.m.	midday	p.m.	
McLarin	Feb 2020	357	353	39	49	41	13
	Apr 2021	467	464	49	68	56	6
Glenbrook Beach	Feb 2020	1,678	1,561	160	142	158	14
	Apr 2021	1,724	1,624	174	158	178	15
Brookside	Feb 2020	2,767	2,331	307	222	264	22
	Apr 2021	2,388	2,070	311	196	280	20
	Mar 2022	2,453	2,100	269	183	252	23
Mission Bush	Feb 2020	2,625	2,214	379	169	278	12
	Apr 2021	1,854	1,607	287	117	253	12
Glenbrook-Waiuku	Feb 2020	8,820	8,151	743	660	845	6
	Apr 2021	8,606	7,798	727	674	811	5
	Feb 2022	8,534	8,203	739	640	817	9
Glenbrook	Feb 2020	11,107	10,103	1,027	803	1,033	10
	Apr 2021	9,937	9,087	896	795	997	10
	May 2022	10,029	9,123	1,036	706	978	10

## Trip Generation

### Number of dwellings

- 5.14 The ITA assumes that the live-zoned area would provide 100 dwellings and analyses the efficiency of the local road network on that basis. The actual number of residential lots that will be provided is yet to be determined through the subdivision and development process, but I expect it could be higher than 100 lots.
- 5.15 For assessing the possible effects of the R-MHS zoning proposed by PC91 I have assumed 200 dwellings could be developed as three dwellings per lot is proposed to be a permitted activity. The basis for this somewhat arbitrary value is provided above, and I consider this to be a reasonable upper value for assessment. The ITA provides an assessment of 100 dwellings which could also be a reasonable mid-range value for assessment.
- 5.16 For reference, 200 dwellings is similar to the figure of 207 dwellings assumed in FULSS to be provided by the Glenbrook 2 growth area, despite the PC91 land forming a small part of that area. As a result it appears that FULSS analysis may have assumed a less-intensive zoning such as the R-SH zone that applies to the surrounding areas would apply to the Future Urban land.
- 5.17 For comparison, the R-SH zone lot size standards would on average produce two-thirds the number of lots and allow one dwelling per lot. For this land, that may result in around 70 dwellings. If the provisions of the Glenbrook 3 Precinct were applied to the site around 60 dwellings might be provided.

### Trip generation rate

- 5.18 As noted earlier the ITA residential trip generation rates are considered to be reasonable, if not a little conservative (high). There is some evidence that residential dwellings in rural fringe areas have lower trip generation than suburban locations as residents are more likely to combine multiple destinations and purposes into a single trip, and because peak-period travel is more likely to be spread over a longer duration.
- 5.19 For assessing the possible effects of PC91 I have assumed each dwelling would generate 7 vehicle movements per day and 0.8 movements per hour.

## Traffic Volumes

- 5.20 The following table summarises the traffic volumes on key roads in 2021-22 and in 2030 with and without PC91.

*Table 4: Forecast changes in 2030 traffic volumes on local road network*

Road	Without PC 91		With PC 91 – Review 200 dwellings			
	a.m.	p.m.	a.m.		p.m.	
Glenbrook Beach	760	911	920	+21%	1,071	+18%
Brookside	762	761	880	+15%	879	+16%
Mission Bush	367	370	409	+11%	411	+11%
Glenbrook-Waiuku	1,185	1,351	1,227	+4%	1,393	+3%
Glenbrook	1,490	1,720	1,608	+8%	1,838	+7%

- 5.21 The ITA estimates development of 100 dwellings would generate 800 to 1,000 v/d. I estimate the proposed precinct provisions could result in 200 dwellings with a trip generation of 1,400 v/d. The ITA estimates 100 dwellings would generate an additional 100 v/h in the peak periods. I estimate the peak-hour trip generation could be around 160 v/h.

## Intersection Analysis

- 5.22 As there may be some issues with the modelling informing the ITA, and as I expect the precinct provisions as proposed would enable more development, I have undertaken my own modelling using:

- the most recent version of the same software (Sidra Intersection 9.1);
- intersection geometry from aerial photographs;
- daily average heavy vehicle proportions from the most recent AT counts;
- default model parameters; and
- traffic volumes shown in ITA Appendix 2, but with PC91 traffic volumes multiplied by 1.6 to represent 200 dwellings;

- 5.23 My model results may not be as accurate as models based on more information such as heavy vehicle volumes on a per-hour and per-movement basis. The model results are summarised in the following tables with more detailed results appended. The tables provide Level of Service (LOS) values which are described earlier. As a reminder, LOS A and LOS B represent short delays, LOS C and D represent moderate delays, and LOS E and F represent long delays.

*Table 5: Summary of Arrive Modelling Results for Glenbrook Beach/ Brookside (LOS)<sup>7</sup>*

Approach	Movement	2030 Without PC91		2030 With PC91 – 200 du	
		a.m.	p.m.	a.m.	p.m.
Brookside E	Through	A	A	A	A
	Right	A	A	A	A
Glenbrook Beach	Left	A	A	A	A
	Right	A	A	A	A
Brookside W	Left	A	B	B	B
	Through	C	C	C	D
Intersection		A	A	A	A

<sup>7</sup> See 4.42 for a description of the Level of Service (LOS) measure. LOS E is coloured red, LOS F is coloured dark red.

**Table 6: Summary of Arrive Modelling Results for Brookside/ Mission Bush (LOS)**

Approach	Movement	2030 Without PC91		2030 With PC91 – 200 du	
		a.m.	p.m.	a.m.	p.m.
Mission Bush	Left	A	A	A	A
	Right	A	A	A	A
Brookside E	Left	A	A	A	A
	Right	A	A	A	A
Brookside W	Left	A	A	A	A
	Right	A	B	A	B
Intersection		A	A	A	A

**Table 7: Summary of Arrive Modelling Results for Mission Bush/ Glenbrook-Waiuku (LOS)**

Approach	Movement	2030 Without PC91		2030 With PC91 – 200 du	
		a.m.	p.m.	a.m.	p.m.
Glenbrook-Waiuku S	Left	A	A	A	A
	Through	A	A	A	A
Glenbrook-Waiuku N	Through	A	A	A	A
	Right	A	A	A	A
Mission Bush	Left	A	A	A	A
	Right	E	F	F	F
Intersection		A	D	B	F

**Table 8: Summary of Arrive Modelling Results for Glenbrook/ Brookside (LOS)**

Approach	Movement	2030 Without PC91		2030 With PC91 – 200 du	
		a.m.	p.m.	a.m.	p.m.
Glenbrook	Through	A	A	A	A
	Right	A	A	A	A
Brookside	Left	B	A	B	A
	Right	C	F	C	F
Glenbrook-Waiuku	Left	A	A	A	A
	Through	A	A	A	A
Intersection		A	A	A	A

**Table 9: Summary of Arrive Modelling Results – Level of Service Overall (Worst Movement)**

Approach	2030 Without PC91		2030 With PC91 – 200 du	
	a.m.	p.m.	a.m.	p.m.
Glenbrook Beach/ Brookside	A (C)	A (C)	A (C)	A (D)
Brookside Rd/ Mission Bush	A (A)	A (B)	A (A)	A (B)
Mission Bush/ Glenbrook-Waiuku	A (E)	D (F)	B (F)	F (F)
Glenbrook/ Brookside	A (C)	A (F)	A (C)	A (F)

- 5.24 My modelling results for 200 dwellings show little change in performance as a result of PC91 development at the Glenbrook Beach Road/ Brookside Road, Brookside Road/ Mission Bush Road, and Glenbrook Road/ Brookside Road intersections, and all three intersections are expected to operate satisfactorily. The right turn movement out of Brookside Road has long delays and Level of Service F, but this is moderated by the low volumes making that movement, although PC91 may result in a small increase in that movement as the local primary school is located just south of the intersection.
- 5.25 The intersection of Mission Bush Road and Glenbrook-Waiuku Road is shown by my modelling to be operating poorly by around 2030 without PC91.
- 5.26 In the 2030 a.m. peak hour the intersection is expected to be operating at LOS A overall in 2030 without PC91, with the right turn out of Mission Bush Road operating at LOS E with moderate delays and queues. The addition of PC91 traffic results in the performance deteriorating to LOS B overall with the right turn out of Mission Bush Road deteriorating to LOS F with moderate delays and queues.
- 5.27 In the 2030 p.m. peak hour the intersection is shown to be operating poorly without PC91. The right turn movement out of Mission Bush Road is predicted to be operating with long delays (4.5 minutes per vehicle) and a 199m long queue. I would expect that these delays would

result in drivers taking smaller gaps with an increased risk of collision, and that some would detour via Brookside Road resulting in poorer performance and increased crash risk at that intersection.

- 5.28 The addition of the PC91 traffic to this intersection results in the performance deteriorating further with the Mission Bush Road right turn movement having average delays of 6.5 minutes and a 284m long queue for 200 dwellings. The additional traffic would exacerbate the issues at this intersection.
- 5.29 I have modelled a roundabout at this intersection based on the minimum design dimensions, which is a little smaller than the Glenbrook Road/ Kingseat Road roundabout. A concept design of the above roundabout shows that third-party land acquisition would be required for a roundabout to be implemented at this intersection.
- 5.30 A roundabout at this intersection would operate at LOS A overall with the worst movement (right turn out of Mission Bush Road) operating at LOS B in the a.m. peak and LOS A in p.m. peak with 200 dwellings.
- 5.31 To my knowledge Auckland Transport have not identified this intersection as likely to have poor performance in the future, and I am not aware of any plans to upgrade it.
- 5.32 Based on these results I recommend that development of the PC91 land be conditional on a roundabout being provided at the Mission Bush Road/ Glenbrook-Waiuku Road intersection.
- 5.33 As noted above, I recommend the applicant provide evidence for the hearing that addresses these matters and provides updated modelling results if necessary.

### Mid-Block Analysis

- 5.34 Austroads, an organisation of state road controlling authorities including WK-NZTA, publishes guidelines that are widely used in New Zealand. The relevant guideline<sup>8</sup> provides a method for calculating the capacity of a two-way two-lane rural road like Glenbrook Road using the North American *Highway Capacity Manual 2016* (HCM) which provides formulae based on extensive research.
- 5.35 The HCM provides a Level of Service (LOS) metric<sup>9</sup> which deteriorates as volumes increase due to speed reductions from following slower vehicles. I have used software to calculate the HCM formulae for Glenbrook Road using the forecast 2030 traffic volumes with and without PC91 with the results are summarised in the following table.

*Table 10: Performance of Glenbrook Road in peak direction 2030*

Location	a.m. northbound		p.m. southbound	
	% of capacity	LOS	% of capacity	LOS
2030 – Without PC91	57%	E	69%	E
2030 – With PC91 – 200 dwellings	63%	E	73%	E

Analysis based on uninterrupted flow, Class I road, rolling terrain, 10% heavy vehicles, 3.3m wide lanes, 1.3m shoulders, 6.7 accesses per kilometre, no passing lanes, 80km/h free speed, peak hour factors of 0.95.

- 5.36 This analysis shows that the development of the PC91 land as proposed would result in Glenbrook Road and other roads in the vicinity remaining within their practical capacity and with a similar level of service compared with the forecast conditions without PC91.

### Road Safety

- 5.37 Road safety research in New Zealand has led to the development of mathematical models for calculating the typical number of crashes on different types of road and at different types of

<sup>8</sup> Guide to Traffic Management – Part 3 – Traffic Study and Analysis Methods, Austroads, 2020.

<sup>9</sup> Level of Service (LOS) is a measure of performance, with LOS A representing good conditions and LOS F representing poor conditions and a facility that is over-capacity. For intersections LOS is determined from average delay, and LOS D is a typical design target for peak-periods.



intersection. For lengths of road between intersections the number of crashes is directly proportional to the traffic volume.

- 5.38 With an additional 200 dwellings traffic volumes on the nearby road network are expected to increase by 11% to 21% during peak periods, and I expect the increase would be a similar percentage through other parts of the day.
- 5.39 The traffic volume on Glenbrook Beach Road is expected to increase by around 20%, so I would expect a 20% increase in the number of crashes on that road as a result of the development of PC91 as proposed. With 100 dwellings the volumes and crashes would increase by around 10%. Other roads would experience slightly lower increases in crashes.
- 5.40 The mid-block sections of these routes have recently had safety improvements made in conjunction with other development at Glenbrook Beach, so I expect the crash rate would be relatively low, although as these are unlit high-speed rural roads I expect the crash rates and crash severities would be higher than for urban streets.
- 5.41 As noted earlier significant increases in delay are forecast at the Mission Bush Road / Glenbrook-Waiuku Road intersection as a result of development in live-zoned areas which would be exacerbated by PC91. That increase in delay is likely to result in an increase in the crash rate at that intersection, which could result in significant adverse effects unless the intersection is controlled by a roundabout.

## **6 Review of Plan Change Provisions**

### **Activity Tables**

- 6.1 The Land Use Activity Table provides for development of up to three dwellings (per lot) as a Permitted Activity (A2). As noted earlier the ITA has not considered the impact of that provision. I have reviewed the potential traffic effects of that provision and determined that it would exacerbate traffic issues at the Mission Bush Road / Glenbrook-Waiuku Road intersection, but that would occur even with only one dwelling per lot. Provided that intersection is upgraded this level of development could be accommodated by the local road network.
- 6.2 Subdivision in general accordance with the Precinct provisions is proposed to be a Restricted Discretionary Activity (18).
- 6.3 In my view the proposed provisions do not provide sufficient control over the location of roads. To address this, subdivision in accordance with the Precinct provisions should either be made a Discretionary activity, or additional matters of discretion and assessment criteria should be added. My recommendations adopt the latter approach.
- 6.4 Subdivision not in accordance with the Precinct Plan is Discretionary (A9). Subdivision not in accordance with an infrastructure standard is proposed to be Non-Complying, but as proposed that standard has no transport elements. As noted below, I recommend that a transport element be added.

### **Standards**

#### Standard 1 – Infrastructure

- 6.5 As proposed this standard contains no transport elements. Due to the issues at the Mission Bush Road / Glenbrook-Waiuku Road intersection I recommend the installation of a roundabout at that location be added to the provisions.

## Standard 2 – Precinct Plan

- 6.6 The standard requires development to enable the indicative infrastructure shown on Precinct Plan Figure 1 and requires that roads be designed in general accordance with road cross-sections in Figure 2.
- 6.7 I do not support the requirement to design the roads in accordance with the provided cross-sections. While the cross-sections may be consistent with those in the neighbouring precinct, they do not reflect current AT design requirements. In addition, there is no key or description of which cross-section applies to which road in the provision.
- 6.8 Later in this report I recommend other changes to the Precinct Plan to provide better alignment with the planning framework.

### **Assessment – Restricted Discretionary Activities**

- 6.9 Matters of Discretion for subdivision are proposed including consistency with the Precinct Plan, connections to neighbouring land, road design and layout, access arrangements, cycleways and pathways, and the interface with McLarin Road.
- 6.10 The related Assessment Criteria for transport include the provision of an interconnected roading network, low-speed road design, the consistency of road cross-sections with those in Figure 2, and the design of the network connections.
- 6.11 As noted above, I do not support the requirement to design roads in accordance with Figure 2. In my view the assessment criteria should explicitly refer to the provision of adequate sight distances and intersection controls at new intersections.

## **7 Planning and Strategy Framework**

- 7.1 As a plan change, I understand the primary documents for consideration are National or Government Policy Statements and the Regional Policy Statement. There are other documents that may also be relevant to consider.

### **Government Policy Statement on Land Transport 2021**

- 7.2 The Government Policy Statement on land transport (GPS-LT) sets the Government’s priorities for land transport investment over the next 10-year period. It also sets out how money from the National Land Transport Fund (NLTF) is spent on activities such as public transport, state highway improvements, local roads, and road safety. WK-NZTA, the Council and Auckland Transport need to ensure spend on transport reflects Government priorities outlined by the GPS. The Ministry of Transport updates the GPS-LT every 3 years. At the time of writing the current version of the GPS-LT is the 2021 version. The 2024 draft was released for consultation on 7 August and the final version will take effect from 1 July 2024. The four strategic priorities of the GPS-LT 2021 are assessed below.

#### Safety

- 7.3 The GPS safety priority is developing a transport system where nobody is killed or seriously injured.
- 7.4 The ITA does not assess this GPS priority, other than stating that development enabled by PC91 “*is not expected to contribute towards any new adverse safety effects*”<sup>10</sup>. In my view PC91 would contribute to an increase in the number of crashes on the surrounding road network. As a result of safety improvements undertaken within the past few years the adverse effect on the majority of the network is likely to be minor, with the exception of the Mission Bush

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<sup>10</sup> Pg 5, October 2022 additional information - transport

Road / Glenbrook-Waiuku Road intersection where the adverse effects would be more significant.

#### Better Travel Options

- 7.5 This priority is summarised as providing people with better transport options to access social and economic opportunities.
- 7.6 While PC91 proposes to provide active mode connections to surrounding land, few social and economic opportunities are available at Glenbrook Beach. Accessing those opportunities requires travel by private vehicle.

#### Climate Change

- 7.7 The GPS seeks to develop low carbon transport systems that support reductions in carbon emissions while improving safety and inclusive access.
- 7.8 PC91 proposes active mode connections, but these are unlikely to make a material difference to emissions.

#### Summary

- 7.9 In my view PC91 is not well-aligned with the GPS-LT.

### **National Policy Statement on Urban Development 2021**

- 7.10 The NPS-UD is not assessed in the ITA but is assessed in part in the s32 analysis.
- 7.11 The NPS-UD sets out several objectives and policies and obliges Council to take several matters into account when deciding to zone land.

#### Well-Functioning Urban Environments

*Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- ...
- (c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*

- 7.12 The PC91 land has good accessibility between housing and natural and open spaces by way of active transport. It has no accessibility to jobs or community services by public or active transport, so I consider it is not consistent with Policy 1 c).

#### Infrastructure Readiness

*Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.*

- 7.13 NPS-UD Policy 2 requires Council to provide sufficient development capacity for housing and business land, and that development capacity must be "infrastructure ready".
- 7.14 Council must also be satisfied that additional infrastructure (not controlled by Council) to service the development capacity is likely to be available. With respect to transport this could include the provision of arterial road and public transport infrastructure by AT, state highway infrastructure by WK-NZTA, or rail infrastructure by KiwiRail.
- 7.15 The NPS-UD has infrastructure requirements for short term (3 years), medium term (3 to 10 years), and long term (10 to 30 years). The short and medium terms are within the 10-year planning horizon of the AUP and are more relevant to the zoning of land for development, with the long-term period being of greater relevance to FUZ land.

- 7.16 With respect to the short term, development capacity is infrastructure-ready if there is adequate existing development infrastructure. The local existing transport infrastructure is adequate, with the exception of the intersection of Mission Bush Road and Glenbrook-Waiuku Road.
- 7.17 For medium-term capacity, which is most relevant for this plan change, existing infrastructure must be adequate or funding for adequate infrastructure is to be identified in a long-term plan. The required Mission Bush Road / Glenbrook-Waiuku Road roundabout is not funded or identified in a long-term plan.
- 7.18 I consider that PC91 is not consistent with Policy 2 with respect to transport infrastructure.

### Density

*Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:*

...

- (d) *in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:*
- (i) *the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
  - (ii) *relative demand for housing and business use in that location.*

- 7.19 As Glenbrook Beach forms part of the Auckland tier 1 urban environment, I consider the poor level of accessibility by public transport to only be compatible with lower density development, so I consider PC91 to be inconsistent with Policy 3.
- 7.20 The PC91 land has no accessibility by public transport so in my view is only compatible with lower-density development. Medium-density development is proposed, so I consider PC91 is not consistent with Policy 3.

### Parking

*Policy 11: In relation to car parking:*

- (a) *the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and*
- (b) *tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.*

- 7.21 There is no parking management plan for this area.
- 7.22 To summarise, in my view the plan change is only partially consistent with the NPS-UD.

## **Regional Policy Statement**

- 7.23 Relevant objectives and policies that are relevant to transport are identified below.

### B2 Urban Growth and Form

- 7.24 This section identifies a number of issues and states:

*Growth needs to be provided for in a way that does all of the following:*

- (1) *enhances the quality of life for individuals and communities;*
- (2) *supports integrated planning of land use, infrastructure and development;*
- ...
- (5) *enables provision and use of infrastructure in a way that is efficient, effective and timely;*
- (6) *maintains and enhances the quality of the environment, both natural and built;*
- ...

7.25 As noted earlier, based on my analysis a roundabout is required at the intersection of Mission Bush Road and Glenbrook-Waiuku Road. If the development of PC91 is linked to the provision of that roundabout I consider it would be consistent with requirement (5).

7.26 The B2 issues are reflected in a number of Objectives including:

*Objective B2.2.1 (1)*

*A quality compact urban form that enables all of the following:*

...

*(c) better use of existing infrastructure and efficient provision of new infrastructure;*

*(d) improved and more effective public transport;*

...

*(g) reduced adverse environmental effects.*

7.27 In my view development enabled by PC91 would make better use of existing transport infrastructure, although it would also require the provision of new infrastructure (Mission Bush roundabout). It would not provide improved public transport. In my view PC91 would not result in reduced adverse environmental effects.

*Objective B2.2.1 (5)*

*The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.*

7.28 In my view development enabled by PC91 would need to be integrated with the provision of the Mission Bush roundabout.

*B2.2.2 Policies*

*(4) Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, and avoid urbanisation outside these areas.*

*(5) Enable higher residential intensification:*

*(a) in and around centres;*

*(b) along identified corridors; and*

*(c) close to public transport, social facilities (including open space) and employment opportunities.*

7.29 PC91 proposes to live-zone land zoned FUZ which is an identified growth area so is consistent with Policy 4. In my view PC91 should not enable higher residential intensification as it is not around a major centre, along an identified corridor, or close to any facilities other than open space. PC91 proposes medium intensification.

B2.3 A Quality Built Environment

*B2.3.2. Policies*

*(1) Manage the form and design of subdivision, use and development so that it does all of the following:*

...

*(b) contributes to the safety of the site, street and neighbourhood;*

*(c) develops street networks and block patterns that provide good access and enable a range of travel options;*

*(d) achieves a high level of amenity and safety for pedestrians and cyclists;*

...

*(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:*

- (a) *providing access for people of all ages and abilities;*
- (b) *enabling walking, cycling and public transport and minimising vehicle movements;*
- and*

...

7.30 I expect the form and design of development within the PC91 area and the immediate surrounds would be consistent with these policies.

#### B2.4. Residential Growth

##### *B2.4.2 Policies – Residential Intensification*

- (2) *Enable higher residential intensities in areas closest to centres, the public transport network, large social facilities, education facilities, tertiary education facilities, healthcare facilities and existing or proposed open space.*
- (3) *Provide for medium residential intensities in area that are within moderate walking distance to centres, public transport, social facilities and open space.*
- (4) *Provide for lower residential intensity in areas:*
  - (a) *that are not close to centres and public transport;*
  - (b) *that are subject to high environmental constraints;*
  - (c) *where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; and*
  - (d) *where there is a suburban area with an existing neighbourhood character.*

7.31 In my view PC91 should only enable lower residential intensities as it is not close to centres, public transport or other listed items. With respect to the RPS, it should only provide for lower residential intensity as it is not close to public transport. As a result, in my view PC91 should only provide lower intensity development.

- (6) *Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.*

7.32 In my view the provision of a roundabout at Mission Bush is required prior to development for PC91 to be consistent with the RPS.

#### B2.6 Rural and coastal towns and villages

##### *B2.6.1 Objective (2)*

*Rural and coastal towns and villages have adequate infrastructure.*

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

- (1) *Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following:*
  - ...
  - (b) *incorporates adequate provision for infrastructure;*
  - ...
  - (g) *provides access to the town or village through a range of transport options including walking and cycling.*

7.33 In my view the provision of a roundabout at Mission Bush is required prior to development for PC91 to be consistent with this objective and policy.

### B3.3 Transport

#### *Objective B3.3.1*

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

7.34 In my view, while PC91 enables growth, it does not provide access and mobility for all sectors of the community as no public transport is available. In addition I consider the provision of the Mission Bush roundabout is also required to fulfil this objective, which would be better aligned with lower intensity development.

#### *B3.3.2 Policies*

- (1) *Enable the effective, efficient and safe development, operation, maintenance and upgrading of all modes of an integrated transport system.*
- ...
- (4) *Ensure that transport infrastructure is designed, located and managed to:*
  - (a) *integrate with adjacent land uses, taking into account their current and planned use, intensity, scale, character and amenity; and*
  - (b) *provide effective pedestrian and cycle connections. ...*

7.35 The transport infrastructure proposed to be provided is expected to be compatible with these policies.

- (5) *Improve the integration of land use and transport by:*
  - (a) *ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;*
  - (b) *encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods;*
  - (c) *locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement surrounding activities by supporting accessibility to a range of transport modes;*
  - (d) *requiring proposals for high trip-generating activities which are not located in centres or on corridors or at public transport nodes to avoid, remedy or mitigate adverse effects on the transport network;*
  - (e) *enabling the supply of parking and associated activities to reflect the demand while taking into account any adverse effects on the transport system; and*
  - (f) *requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure.*

7.36 As noted above, I consider the development of PC91 must be integrated with the provision of a roundabout at Mission Bush, but that infrastructure is currently not planned or funded.

7.37 In my view PC91 is inconsistent with Policy 5 b).

7.38 To summarise, in my view the proposal is not entirely consistent with the RPS. It is consistent with some transport-related aspects of the RPS as it is within an area identified for some growth. It is inconsistent with other aspects as there is no public transport, and the provision of a roundabout is required that is not planned or funded. In my view consistency with the RPS would be greater with less intensive development.

## Auckland Plan 2050

7.39 The RPS describes the Auckland Plan as:

*The Auckland Plan, being the spatial plan required to be prepared and adopted under sections 79 and 80 of the Local Government (Auckland Council) Act 2009 as a comprehensive and effective long-term (20- to 30-year) strategy for Auckland's growth and development, is a relevant statutory planning document for the preparation of the regional policy statement.*

7.40 The NPS-UD requires the Council to prepare a Future Development Strategy. The Auckland Plan states the Development Strategy included within it serves as that strategy. The Auckland Plan states, "*The Development Strategy describes how and where growth can occur over the next 30 years ...*". It is informed by the Future Urban Land Supply Strategy (FULSS).

7.41 The Auckland Plan 2050 (AP) identifies six Outcomes, one of which is Transport and Access, which has three Directions and seven Focus Areas.

7.42 The AP notes:

*Our car-focused transport system is put under significant strain by:*

- *Auckland's continued population growth*
- *our challenging natural setting and urban form.*

*These factors cause harm to people and the environment.*

### Direction 1: Maximise safety, environmental protection and emissions reduction

7.43 The AP notes that in 2020, Auckland Transport adopted Vision Zero which follows the Safe System approach.

7.44 In my view PC91 would result in an increase in crashes due to additional travel. While that would be true for new dwellings almost anywhere, compared with urban or suburban locations, PC91 requires relatively long-distance travel on lower-standard rural roads with higher crash rates and higher crash severities. For that reason PC91 does not maximise safety.

7.45 Emissions are discussed below.

### Direction 2: Better connect people, places, goods and services

7.46 This direction includes the statement:

*To make [economic productivity and prosperity] possible, it is important that land use change enables people to easily access services and amenities close to where they live. This helps encourage shorter, cheaper and less emission-heavy journeys.*

7.47 PC91 is not close to services and amenities and would result in longer, more expensive and more emission-heavy journeys so is contrary to this direction.

### Direction 3: Increase genuine travel choices for a healthy, vibrant and equitable Auckland

7.48 PC91 does not increase travel choices.

#### Focus area 1: Make better use of existing transport networks

7.49 This focus area discusses the expense of widening roads, and making the most efficient use of the roads we have by changing the demands we put on them. The focus area proposes encouraging greater use of public transport and active modes.

7.50 The roads in the area, with the exception of the Mission Bush Road/ Glenbrook-Waiuku Road intersection have spare capacity, so PC91 could be considered as making better use of the existing transport network. PC91 would not encourage greater use of public transport.



#### Focus area 2: Target new transport investment to the most significant challenges

- 7.51 This focus area discusses the importance of strategic planning to make the best use of transport funding.
- 7.52 In my view development of PC91 would require the provision of a new roundabout at Mission Bush. That would require transport investment that could potentially provide more benefit if spent elsewhere. It is noted that provision of the roundabout is recommended without PC91, but PC91 increases the need for it.

#### Focus area 4: Make walking, cycling and public transport preferred choices for many more Aucklanders

- 7.53 This focus area states, “*Reducing congestion and emissions will only be possible if more Aucklanders walk, cycle and use public transport*” and “*Rural areas may require a different approach due to their dispersed development patterns and long trip distances*”
- 7.54 In my view PC91 is in a rural area with long trip distances, and PC91 would not make walking, cycling, or public transport a preferred choice for most travel purposes.

#### Focus area 5: Better integrate land-use and transport

- 7.55 This focus area is also relevant, and it states (emphasis added):

*Transport infrastructure and services are important for enabling and supporting residential and commercial growth in new and existing urban areas. **The location of growth also affects how well the transport system performs.** Because transport and land use are so strongly connected, all decisions need to consider their impact on the other.*

*Inefficient land use patterns lead to longer travel times, increased car dependency and more transport emissions. To address these issues, we need to encourage housing and employment growth to occur in areas that allow the use of better travel options.*

*Encouraging **growth to be concentrated in areas with better travel choices** will result in more use of public transport, walking and cycling. This will ease some of the pressure growth places on our transport system and contribute to reducing transport emissions.*

*Integrating land use and transport is particularly important for rapid transit. The speed and reliability of rapid transit improves the accessibility of an area, making it more attractive for redevelopment.*

*Unlocking **growth around rapid transit corridors and stations is essential** to address Auckland’s housing and transport challenges. It will also maximise the benefits from the large investment required to build and operate rapid transit.*

- 7.56 With respect to this focus area, PC91 would result in longer travel times, increases car dependency, and more emissions, so is contrary to this focus area.

#### Focus area 6: Move to a safe transport network free from death and serious injury

- 7.57 This focus area discusses the goal of reducing death and injury caused by travel on the road network. Development of PC91 does not contribute to this focus area.

#### Focus area 7: Develop a sustainable and resilient transport system

- 7.58 This focus area discusses the need to improve the resilience of or transport system in response to disruption, including disruption from accidents or incidents, weather events, or other changes.
- 7.59 PC91 is accessible by a single road, albeit one that is not particularly susceptible to natural hazards.

## Summary

7.60 In my view, PC91 is poorly aligned with the transport outcomes sought by the Auckland Plan.

## **Development Strategies**

### Future Urban Land Supply Strategy

- 7.61 The Auckland Future Urban Land Supply Strategy 2017 (FULSS) is a non-statutory planning document intended to identify the sequencing and timing of future urban land for development readiness over 30 years, principally based on the ability to provide supporting bulk infrastructure. The purpose is to allow infrastructure providers to plan for growth and indicate when various areas are expected to have bulk infrastructure provided so that growth is enabled.
- 7.62 FULSS identifies the Glenbrook 2 area PC91 is located in as a growth area which is prioritised for the provision of bulk infrastructure for the 2023-27 period. It is not known if the FULSS analysis considered the need for the Mission Bush roundabout.
- 7.63 The AEE considers PC91 is compatible with FULSS as the land would be ready for development in a similar timeframe for when the provision of bulk infrastructure was planned.

### Draft Future Development Strategy

- 7.64 In June 2023 the Council released the Draft Auckland Future Development Strategy 2023-2053 (FDS) for consultation. When finalised the FDS will replace the Auckland Plan 2050 Development Strategy and the Future Urban Land Supply Strategy. The Council expects to adopt the final FDS in late 2023.
- 7.65 The draft document is subject to change and currently has little to no weight. An evaluation of the draft is appended for information.

## **Te Tāruke-ā-Tāwhiri - Auckland Climate Plan**

- 7.66 The climate plan is a document related to the Auckland Plan. The RMA requires the Council to make any changes to the Unitary Plan in accordance with emissions reduction plans<sup>11</sup>.
- 7.67 The plan has eight priorities including Built Environment and Transport.

### Built Environment

- 7.68 This priority is focused on the delivery of buildings and the design of local communities, and it also describes the approach to planning and growth which includes maintaining and upholding a quality compact urban form approach.

### Transport

- 7.69 The plan seeks to reduce emissions from transport. It states (emphasis added):

*While there are many potential pathways to our goal, we need to make significant changes to:*

- *how and where we live*
- *how we conduct and power our personal travel*
- *how we transport our freight*
- *how much we travel*
- *how we grow as a region.*

- 7.70 It also states:

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<sup>11</sup> Resource Management Act: s66 (2) f regional plans, s74(2) d district plans,

*The highest priority is reducing emissions generated by light passenger vehicles and commercial vehicles, given these generate about 80 per cent of on-road emissions.*

7.71 This priority has some Action Areas.

*Action area T1. Changing the way we all travel*

- *Encourage the use of public transport, walking and micro-mobility devices, rather than driving.*
- *Shorten private vehicle trips, and fulfil several travel needs at once including for business purposes.*
- *Choose lower emissions vehicles when purchasing, sharing, or leasing.*
- *Reduce private vehicle travel and encourage lower emissions travel options by introducing pricing and parking measures.*

7.72 PC91 is located in a rural coastal village. Public transport is not available and few employment opportunities, education facilities, or other services are available within the walkable catchment. The location would increase private vehicle travel. For that reason I consider PC91 is inconsistent with the climate plan, although I acknowledge that some private vehicle travel would provide benefits and enable people and communities to provide for their social, economic and cultural well-being and for their health and safety.

### **Transport Emissions Reduction Pathway**

7.73 This document (TERP) is intended to give effect to the climate plan. It describes eleven transformation areas and provides an implementation pathway.

#### Reduce Travel

7.74 The TERP seeks to reduce travel where possible and appropriate. One measure is “*restricting road expansion that induces light vehicle travel.*” This is based on the hypothesis that road expansion projects can stimulate additional travel, which could undermine the goal.

7.75 PC91 does not involve the expansion of roads, but it would increase travel rather than reducing it.

#### Build Up Not Out

7.76 One of the transformations in the area of reducing reliance on cars, is “*6 Build up not out*” which includes planning for an increase in sustainable modes, a reduction in light vehicle kilometres travelled (VKT), reducing the scale of urban expansion, and locating more intensive development in areas with good access to opportunities. The pathway includes upzoning around areas of high access.

7.77 The TERP states (emphasis added):

*Auckland needs most future growth to be accommodated through intensification in the existing urban area, particularly **locations with shorter average trip lengths and access to good quality transport options, rather than continued expansion into greenfield and rural areas.***

*People who live within the existing urban area close to good public and active transport tend to drive less and travel more via sustainable modes than those who live in greenfield developments in formerly rural areas.*

*The pathway requires:*

*Planning that supports an increase in access via sustainable modes and a **reduction in light vehicle VKT.** Helping Aucklanders drive less and make more sustainable transport choices must be central to our planning framework. This requires access via sustainable modes and a **reduction in car dependency** to be clearly signalled in planning documents and **prioritised in land use planning decisions** – including revisions of strategic land use planning documents, consenting decisions, and **consideration of potential plan changes.** Cities around the globe have recognised the essential role land use planning must play in reducing*

transport emissions and upholding their climate commitments. Achieving this requires action from both government and the council.

*Reducing the scale of planned urban expansion. Current growth plans envisage significant urban expansion over the next three decades, and the NPS-UD requires councils to be 'responsive' to private plan changes. Both drive expectations of opportunities for future greenfield growth. **Research shows a strong correlation between transport emissions and the distance between a development and the city centre, even when accounting for differences in density and PT provision. Minimising future urban expansion is imperative to reducing transport emissions.***

*Growth in greenfields areas comes at a cost of growth within the existing urban area, where residents have easier access to more sustainable transport options and typically travel shorter distances. It means the lower density areas which could benefit from more community members and more PT ridership do not receive the intensification needed. However, where greenfield growth does occur, travel patterns of new communities must be shaped in a positive way by providing them with sustainable transport options right from the outset and designing streets that give priority access to walking, cycling and PT ahead of car access. This will involve costs, however, and it is important that the majority of the cost of sustainable growth in new urban areas is incorporated into the cost of development, rather than being reliant on funding from public sources.*

*More intensive development around places with good access to opportunities. Auckland is a rapidly growing city, and its population growth is projected to continue. To minimise transport emissions, **much more growth needs to occur near existing and emerging employment hubs** and in areas with good access to jobs, services and amenities, so that it is easier for people to access these opportunities via sustainable modes of transport. It is **also easier and more cost-effective to deliver sustainable transport options in higher density areas.***

*More growth is also needed in locations which are best served by PT. While recent government driven changes have set a minimum level of density that councils must permit **around rapid transit stations**, council and the government must do more to support mixed-use urban renewal **around PT stations** in the near term. While quality development in an area can incentivise further development other cities are more explicitly incentivising development **within the walkable catchment** of their **rapid transit networks**, and some have set explicit targets for the proportion of new dwellings that should be located within these catchments.*

- 7.78 I consider vehicle kilometres travelled (VKT) to be poor proxy for transport emissions. It is difficult to measure, does not account for different types of vehicles, the number of passengers, the purpose of the trip, or the travel speed. In addition, all development produces additional travel. Nevertheless, given the location of PC91 and the poor availability of local services and employment I consider development enabled by PC91 would be contrary to the TERP.

## 8 Submissions

- 8.1 This section summarises the transport matters raised in submissions. Several submissions were made, and many of the submissions had transport concerns. In some cases transport concerns were expressed generally, and other submissions provided more detail. I have addressed these matters topic by topic noting that several of the topics are inter-related and overlap.

### Intensity of Development

- 8.2 Multiple submitters [5.1, 7.3, 8.1, 9.3, 11.1, 12.3, 17.1, 18.1, 19.7, 20.3, 21.1, 22.1, 27.3, 28.3, 31.3] request a less intensive zone such as R-SH (contained in AUP Chapter H3) be applied to the land if it is zoned for development. A variety of reasons for this request are given, with transport-related reasons including many of those addressed separately below.

- 8.3 With respect to transport matters a less intensive zone such as R-SH would reduce all of the adverse transport effects and provide greater consistency with the planning framework. For that reason, and others set out below, I support these submission points.

### **Active Mode Infrastructure**

- 8.4 Some submissions [28.2, 39.1, 39.3] expressed the view that active mode connections were inadequate, particularly a lack of paths on Glenbrook Beach Road and McLarin Road or sought that paths be provided along parts of roads fronting the land as it is developed.
- 8.5 A submission point [39.5] requested the Precinct Plan be amended to include an active mode route through the PC91 land and a crossing facility on McLarin Road near the Neighbourhood Centre, and that these be provided before the occupation of the first dwelling.
- 8.6 An active mode route is already shown on the Precinct Plan as notified, and paths are shown on the proposed road cross-sections. I support the request for these paths to be provided, and for a crossing facility on McLarin Rd.

### **Public Transport**

- 8.7 Several submitters [6.1, 7.8, 8.4, 9.1, 10.2, 12.4, 13.1, 15.1, 17.3, 18.4, 20.5, 25.5, 27.6, 28.4, 31.1, 34.2, 35.2, 37.2] have noted, there is no public transport available and request the plan change be declined on that basis. Some submitters provide no further detail, but others note that the combination of a lack of local services and amenities combined with the lack of public transport would result in additional travel on roads result in adverse effects on the road network and additional emissions; and result in more cars parked on roads, increasing the likelihood of roads being impassible by emergency services.
- 8.8 The provision of local services and amenities such as shops, schools and emergency service providers is outside the scope of this report, except where the lack of services results in more travel.
- 8.9 Parking is addressed below.
- 8.10 The lack of public transport has been factored into the ITA analysis and my review set out earlier.
- 8.11 Submission point [3.1] requests the plan change be approved if amended to include triggers for when Auckland Transport must provide public transport, including the provision of a local Mobility as a Service<sup>12</sup> (MaaS) service at 1000 residents, and the provision of a Local bus service (every 30 minutes) at 3,000 residents. This point is opposed by [FS01] as it would be ultra vires and Glenbrook Beach is not a priority location for provision of public transport services due to the low population and long distances.
- 8.12 It is Auckland Transport's responsibility to provide public transport services in the Auckland Region as they see fit when considering the costs and benefits of providing services. The precinct provisions cannot require AT to provide any infrastructure or service, and for that reason I do not support that submission point.

### **Existing Roads and Intersections**

#### General Adequacy and Efficiency

- 8.13 Several submitters [2.1, 7.6, 13.2, 15.1, 16.4, 17.5, 18.3, 19.6, 25.3, 36.1, 37.2] raised general concerns about a lack of roading infrastructure, that the roads can't cope with the existing traffic, that the developer should be required to improve the roads, or PC91 would increase the use of local roads that would impact the roads negatively.

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<sup>12</sup> Definitions of MaaS vary, but it commonly refers to the ability to access a variety of transport options (public transport, car sharing, bike sharing, taxis and other on-demand options) on a single digital platform or app.

- 8.14 With the exception of the Mission Bush Road / Glenbrook-Waiuku Road intersection the surrounding local road network has sufficient capacity to accommodate the additional traffic generated by development enabled by PC91. The wider network beyond the local area has constraints, particularly in peak periods which are planned to be addressed by the provision of new arterial roads in the longer term and passenger rail services in the shorter term.

#### Road Safety

- 8.15 Some submitters [6.3, 19.6, 20.5, 25.3, 28.2, 34.1] were concerned specifically with the impact of PC91 on road safety, including in relation to more people walking or cycling on roads without active mode facilities (addressed above), in relation to increased parking demand (addressed below), or general road safety concerns.
- 8.16 The additional traffic resulting from PC91 would increase the number of crashes; however, the recent safety improvements to the roads appear to have resulted in a reduction in the crash rate which would also reduce the number of crashes that might otherwise have resulted from PC91. Provided the Mission Bush/ Glenbrook-Waiuku intersection is addressed, and appropriate active mode facilities are provided locally, I consider general road safety effects are likely to be moderate but would be reduced with a less-intensive zoning.

#### Resiliency

- 8.17 Several submitters [6.3, 7.6, 8.0, 9.1, 12.4, 17.4, 19.6, 20.5, 25.5, 27.6,] raised concerns about there being only one road providing access to Glenbrook Beach and the PC91 land, and that access was vulnerable to being interrupted by weather events or road closures due to crashes or road maintenance.
- 8.18 Such closures can be inconvenient for many, but if they prevent emergency vehicle access the impacts can be more significant. For that reason providing development in areas with better access is preferred, but I note that the Council has identified this area for future development.

#### Road Maintenance

- 8.19 Some submitters [3.1, 7.6, 12.4, 18.3, 19.6, 34.1] were concerned that local roads are in poor condition and that the additional travel generated by PC91, particularly given the lack of public transport, would increase wear and tear on the roads.
- 8.20 Maintenance of existing roads is the responsibility of Auckland Transport, with funding available from a variety of sources including from fuel excise duty (FED) and road user charges (RUCs) via the Land Transport Fund. Increased travel as the result of development enabled by PC91 would generate additional revenue.
- 8.21 This matter has previously been considered by the Environment Court<sup>13</sup> in the context of additional road maintenance required as a result of a land-fill activity and rejected a request for the applicant to contribute to road maintenance.
- 8.22 I do not support amendments to the planning provisions to address road maintenance.

#### **Travel Demand and Emissions**

- 8.23 Several submitters [34.2] raised concerns about the remote location, lack of local employment and services, together with a lack of public transport (addressed above) increasing the demand for travel, with all of that travel needing to be by private vehicle. Several submitters linked the additional demand for travel with increased emissions or were otherwise concerned about PC91 being contrary to plans and strategies to reduce CO<sub>2</sub> emissions [7.9, 8.5, 14.1, 17.5, 19.3, 24.1, 27.6].
- 8.24 The additional travel demand and consistency with plans and strategies have been addressed earlier. Provisions enabling less intensive development would produce less additional travel and more consistency with plans and strategies.

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<sup>13</sup> Norsho Bulc Ltd vs Auckland Council (ENV-2016-AKL-000168), Decision 2017 NZ EnvC 109.

## **Parking**

- 8.25 Several submitters [8.4, 12.4, 18.4, 19.6, 20.5, 28.2, 31.1] raised concerns that development enabled by PC91 would increase the demand for on-street parking, that the supply of on-street parking would be inadequate, and /or that the additional on-street parking could result in adverse road safety outcomes or prevent the passage of emergency vehicles.
- 8.26 Some submitters expressed the view that the larger lots enabled by the R-SH zone would provide greater opportunities for on-site parking and reduce the demand for on-street parking. I agree with that view.
- 8.27 From my research, including surveying the demand for on-street parking in medium-density residential areas, the demand for on-street parking exceeds the supply in most modern Auckland medium-density residential subdivisions. This typically results in cars being parked illegally across footpaths, on reserves, and in on-street areas where they make movement difficult and/ or unsafe.
- 8.28 There is no Unitary Plan or other subdivision requirement for on-street parking to be provided within new streets. The NPS-UD prevents the Unitary Plan from having a minimum parking requirement standard for activities. While the Unitary Plan has maximum parking standards for some activities such as offices, for the most part the provision of parking is now a decision made by developers, subject to the Council sometimes considering effects arising from the provision of too few or too many parking spaces.
- 8.29 Due to the NPS-UD not allowing a Plan to contain a minimum parking standard for activities, there is no ability to impose a minimum parking requirement in the precinct provisions.
- 8.30 There is, however, ability for an appropriate supply of parking to be referenced in the Objectives, Policies, as a matter of discretion, and in assessment criteria for subdivision. I do not however support the inclusion of parking in those parts of the precinct provisions as I consider this is most appropriately dealt with in the Auckland-wide provisions. There is an ability to provide for less intensive development, such as the R-SH zone provisions, or provisions similar to those in the neighbouring Glenbrook 3 Precinct that would assist in reducing parking-related effects.

## **Change of Extents**

- 8.31 One submitter [23.1] opposes the plan change, but in the event it is granted requests the adjoining property at 140 McLarin Road be rezoned and included in the Precinct.
- 8.32 No evidence has yet been provided to demonstrate that the additional dwellings that would be enabled could be accommodated by the transport environment; however, due to the relatively small scale of the property I consider the few additional dwellings could be accommodated, subject to the same transport infrastructure requirements being imposed.

## **New or Upgraded Transport Infrastructure**

### Roads and Intersections

#### *General*

- 8.33 As noted above several submitters are of the view the existing roads are inadequate to support additional development and some requested non-specific upgrades.

#### *New Roads within the Precinct*

- 8.34 Submitter [3.1] notes the adjacent Glenbrook 3 Precinct fronts the same roads as the proposed Glenbrook 4 Precinct. Glenbrook 3 Precinct Policy 9 c) requires the design of subdivision or development to “*Futureproof for public transport links on key roads*”. The submitter requests the same provision should apply to the proposed precinct.

- 8.35 Submitter [39.2] requests the road cross section figures are deleted and replaced by a table setting out the road requirements; appropriate amendments to Standard 2; and an appropriate activity status.
- 8.36 I support the request to replace the figures with a table for a number of reasons, including consistency with recent precincts.

#### *Frontage Roads*

- 8.37 One submitter [39.3] specifically requests that upgrading of the roads fronting the PC91 land be a requirement as part of the initial stage of development. The submitter requests the upgrading include provision of a footpath, kerb and channel, cycle facilities, street lighting, a berm and street trees, stormwater conveyance and treatment in addition to carriageway widening and/ or upgrading.
- 8.38 It is common practice for such upgrading to be undertaken as part of subdivision and development, although the legal precedent for requiring such upgrading could be enhanced by a precinct provision. As that work is normally undertaken in any case, I support the request for provisions to require upgrading of the road frontage, but in my view it is not necessary to upgrade the entire frontage as part of the initial stage.

#### *Design of Intersections*

- 8.39 Submitter [39.4] also requests that the design of the required roundabout on McLarin Road, and any new or upgraded intersections, be subject to Auckland Transport approval, and be supported by a Transport Design Report including particular information, noting the design report could form part of any transport assessment submitted with a resource consent application.
- 8.40 As Auckland Transport is the Road Controlling Authority, any work within the road requires AT's approval, and AT are also consulted when Council considers requests for Engineering Plan Approval as part of any subdivision infrastructure works. As a result, I consider AT has ample opportunity to consider the design of any new or upgraded intersection, so am neutral with respect to a precinct provision requiring design approval. The AUP provides the Council with the ability to require any proposal which affects the transport network to include a transport assessment [E27.9(4)]. The neighbouring Glenbrook 3 Precinct, and many other precincts, do not have a similar provision, so I do not see the need for a design report provision in this precinct.

#### *Provision of Transport Infrastructure*

- 8.41 The same submitter [39.4] requests that the roundabout on McLarin Road be provided prior to occupation of the first dwelling within the precinct. In my view the roundabout is only required to provide adequate safety for the proposed crossroads intersection. It is possible the first dwellings in the Precinct could be accessed via other intersections and in that event the roundabout would not be required immediately. For that reason I support this submission point in part only.
- 8.42 Two submitters [39.5, 40.1] also request the provisions are amended to ensure that any required transport infrastructure (and services) is completed or funded as a pre-requisite for development.
- 8.43 I have identified that the provision of a roundabout will be necessary at the intersection of Mission Bush Road and Glenbrook-Waiuku Road. I have not identified any transport services required, other than public services which are the responsibility of AT.
- 8.44 With respect to the timing of the Mission Bush roundabout, the roundabout would be required before development of this and surrounding precincts is completed. In my view it would also be required at some point in the future because of other development, even in the absence of PC91 development. For that reason the provision of the roundabout could be required before, or together with, any development in the PC91 precinct; however, that could result in the



roundabout being implemented before it is needed. While that may be seen as desirable, in the context of funding constraints the necessary diversion of funds from other projects could be undesirable. For economic reasons, it may also be more feasible for the roundabout to be funded once some initial development has been completed and sold. On balance, I consider a provision requiring the roundabout to be in place before any more than 25 lots are provided is warranted. The figure of 25 lots is entirely arbitrary. If a non-arbitrary threshold is required, the evidence would support the provision of the roundabout prior to any development occurring.

#### Active Mode Facilities

- 8.45 That submitter [39.5] also requests that safe walking and cycling facilities be provided at the earliest stage of development, or from occupation of the first dwelling. The submitter requests an activity status of Non-Complying for any proposal where these facilities are not provided. The submitter requests these facilities include:
- a) a crossing on McLarin Road near the Neighbourhood Centre;
  - b) active mode connections between the precinct and the Glenbrook Beach Recreation Reserve to the west;
  - c) active mode connections between the precinct and FUZ land to the south-east; and
  - d) active mode connections between the precinct and McLarin Rd to the north-west.
- 8.46 A resident of any dwelling the precinct may walk around the area and cross McLarin Rd, irrespective of where roads accessing their property are located, however, it may not be practicable to upgrade the entire road frontage of the precinct, or to develop other parts of the precinct, to provide footpaths and crossing points to all of those locations as part of the first stage of development.
- 8.47 On balance, I support the provision of the crossing facility as part of the first stage, leaving the provision of other paths and connections to be provided as development of the land progresses. I do not support Non-Complying activity status for a development that does not provide such connections.

#### Funding

- 8.48 A submitter [40.2, 40.3] requests that the precinct provisions be amended to require confirmation that any required transport infrastructure is funded and suitably advanced to accommodate development. I consider that this can be addressed by amended provisions linking development with infrastructure.

#### **Other Precinct Provisions**

- 8.49 A submitter requests changes to Figure 1 Precinct Plan to:
- a) show a connected network of roads and routes within the Precinct and connecting to adjoining sites and streets [39.1];
  - b) identify the classification of roads [39.1];
  - c) identify which roads are to be vested [39.1];
- 8.50 Submitter [39.2] requests the road cross section figures are deleted and replaced by a table setting out the road requirements, similar to that incorporated in the recently introduced I453 Pukekohe East-Central Precinct
- 8.51 I support both submission points, except for the request to identify which roads are to be vested. In my view that can appropriately be determined at the time of subdivision, which is when the design of any roads is evaluated.

## 9 Local Board Comments

9.1 The Franklin Local Board has provided their views on the plan change consisting of seven comments. I address each of the five comments with relevance to transport below.

### Development Intensity

9.2 The Board feedback includes:

- i) express concern about the development impact on a coastal area site and consider a lower housing density approach is better suited in this coastal settlement.*

9.3 This comment may or may not be intended to include the impact of development on the local transport network, but it is similar to several submission points that raise a similar concern with direct reference to transport, and that matter is addressed above.

### Roading Standards

9.4 The board is concerned about the width of roads, parking, and the possibility that parked vehicles could block roads, similar to concerns raised in some submissions:

- iii) express concern applying urban standards to a coastal settlement with narrow roading and lack of parking, leading to problems for large vehicles, including waste collection and more alarmingly emergency vehicles, who are unable to safely traverse the roads when cars are parked either legally or illegally.*

9.5 In my view there is nothing unique about a coastal settlement with respect to road design, and the concerns expressed are relevant to road design across the region.

9.6 In my experience some narrow residential streets have no issues with parked vehicles blocking access, and other streets with the same width have regular issues. The distinguishing factor appears to be the supply and demand of on-street parking. In areas where the supply of on-street parking does not meet the demand vehicles are more likely to be parked in inappropriate locations.

9.7 As development intensifies coupled with an absence of minimum parking provision standards for subdivision and the removal of parking minimums for land use activities, I consider this situation is likely to deteriorate Auckland-wide. I expect that Auckland Transport may adapt its road design standards over time to address this, which is why I recommend the Precinct Provisions require roads to be designed with reference to AT standards rather than embedding fixed road design standards into the Precinct.

### Active Mode Connections

9.8 The Boards says:

- iv) request that greater planning and provision for creation of adequate pedestrian and cycling connections to existing pathways be required as part of the plan change area to access the business zone area, and recommend that footpaths are provided by the developer to connect to current pathways.*

9.9 The business zone area is the Neighbourhood Centre on the opposite side of McLarin Road. The proposed Precinct Plan shows an indicative route through the PC91 land. As discussed above, I consider it appropriate for developers of the land to upgrade the road frontages including the provision of paths, and provision of a pedestrian crossing facility near the Neighbourhood Centre land.

9.10 If the road frontages of the PC91 land were upgraded to include footpaths, that would complete the path network on both sides of McLarin Road north of the site, and provide a footpath on the western side of McLarin Road east of the site. There is currently a path on the eastern side of McLarin Road for the 100m south of the Okareka Road roundabout (to the centre land). I consider that would be appropriate.

## Public Transport

9.11 The Board notes there is no public transport. This matter is addressed earlier.

- v) *note that there is no current or planned public transport for this area, despite it being a Special Housing Area.*

## Ronald Avenue Reserve Connection

9.12 The Board notes:

- vii) *note that further planning and provision is required on the connection road from the existing reserve on Ronald Avenue.*

9.13 The Glenbrook Beach Recreation Reserve is adjacent to the western boundary of the PC91 land. The reserve has frontage to Ronald Avenue and Hill Road. Vehicle and pedestrian access to the reserve is via a driveway on Hill Road which also provides access to three residential properties. There are no paths on that driveway. The need for the Council Parks Department and/ or AT to consider the provision of paths along that access is noted.

## **10 Conclusions and Recommendations**

### **Conclusions**

#### Adequacy of Assessment

- 10.1 The Integrated Transport Assessment (ITA) and additional transport information supplied with the plan change have used common methodologies. The primary issues with the assessment are that it has not considered the provision that enables up to three dwellings per lot, and that the modelling of some intersections is not robust. Because of those issues I consider the assessment is not adequate.
- 10.2 I have undertaken an alternative assessment. I recommend the applicant provide an updated assessment for the hearing, but in the absence of such evidence, it is my view that the installation of a roundabout at the Mission Bush Road / Glenbrook-Waiuku Road should be a prerequisite for development of PC91.

#### Planning Framework

10.3 The following table summarises my assessment of the plan change against the planning framework.

*Table 11: Summary of Transport Planning Framework Assessment*

Document	Assessment
Government Policy Statement on Land Transport 2020/21	Not well aligned
National Policy Statement on Urban Development 2021	Partially consistent
Auckland Regional Policy Statement	Partially consistent
Auckland Plan 2050	Poorly aligned
Future Urban Land Supply Strategy 2017	Compatible
Draft Future Development Strategy 2023-2053	Poorly aligned and premature
Te Tāruke-ā-Tāwhiri - Auckland Climate Plan	Inconsistent
Transport Emissions Reduction Pathway	Contrary

10.4 In my view the private plan change is only partially consistent with the provisions of Resource Management Act, National Policy Statements, or Auckland Unitary Plan including the Regional Policy Statement. In addition, the plan change is not consistent with some other relevant documents including the Auckland Plan, Climate Plan, and Development Strategy.

- 10.5 These inconsistencies are tempered by the fact the land is identified as a future urban growth area and is zoned Future Urban, albeit that the Draft FDS now expects bulk infrastructure to support development in this growth area to be provided some time after 2030.
- 10.6 For that reason, my summary is the proposal is partly consistent with the planning framework and, depending on the final form of the FDS, may be premature. Provisions enabling less-intensive development, such as those applying to the Glenbrook 3 Precinct, would provide greater consistency, but could still be premature.

#### Additional Methods

- 10.7 In my view there are no additional methods that would solve the inconsistency issues arising from the more remote location of the land and the absence of local employment, amenities and services.
- 10.8 The provision of additional transport infrastructure, namely a roundabout at the intersection of Mission Bush Road and Glenbrook-Waiuku Road, together with funding for its construction, would address some of the other issues. Amendment of the proposed precinct provisions would assist in addressing some other issues.

#### Additional Information

- 10.9 As noted above, I have identified several potential issues with the ITA and the modelling work informing the intersection analysis in the transport assessment. These are summarised in the following table.

*Table 12: Summary of ITA issues and recommendations*

Issue	Recommendation
Insufficient basis for assuming 100 lots	Provide sound basis for number of lots/ dwellings
No assessment of more than 100 dwellings	Applicant may wish to repeat my assessment for 200 dwellings or use a different number
No assessment of effects on strategic (arterial) network – i.e. Glenbrook Road, SH22 etc.	Consider current capacity, cumulative effects, and expected upgrade timeframes
Apparent modelling errors:	
<ul style="list-style-type: none"> <li>heavy vehicles apparently not included</li> </ul>	Provide traffic counts and/or information on how heavy vehicles are represented and/or updated modelling results
<ul style="list-style-type: none"> <li>discrepancies between diagrams and model results</li> </ul>	Provide confirmation of correct numbers and provision of updated diagrams and/ or updated model results
<ul style="list-style-type: none"> <li>results obtained using default parameters quite different to ITA results</li> </ul>	Provide information describing how the intersections are represented in the models and how they have been calibrated and/ or provide updated modelling results
<ul style="list-style-type: none"> <li>Mission Bush intersection operating poorly</li> </ul>	Updated modelling invited

- 10.10 I recommend the applicant provide additional information on these points.

#### Areas of Significant Concern

##### *Mission Bush Roundabout*

- 10.11 As noted above, a roundabout is required at the Mission Bush intersection, and provided development in the PC91 precinct is dependent on the provision of that roundabout, that concern would be addressed.

##### *Additional Travel*

- 10.12 The other significant transport concern is that additional development at Glenbrook Beach would result in significant additional travel.

- 10.13 That additional travel must be made by private vehicle on high-speed rural roads in the local area. That travel exposes the public to some increase in crash risk and would produce additional emissions compared with development in other locations closer to employment and services.
- 10.14 That concern must however be viewed in the context of the Council identifying the land as a future growth area (in the longer term).
- 10.15 The additional travel also adds pressure on transport infrastructure in the wider South Auckland Area. While the transport infrastructure agencies are currently planning to implement additional transport infrastructure (including the Pukekohe Arterials and widening of the Southern Motorway between Papakura and Bombay) that infrastructure is not expected to be provided until well after 2030.
- 10.16 In my view, given the area is identified for urban growth, the land is most suitable for lower-intensity residential development, such as that enabled by the Glenbrook 3 Precinct provisions.

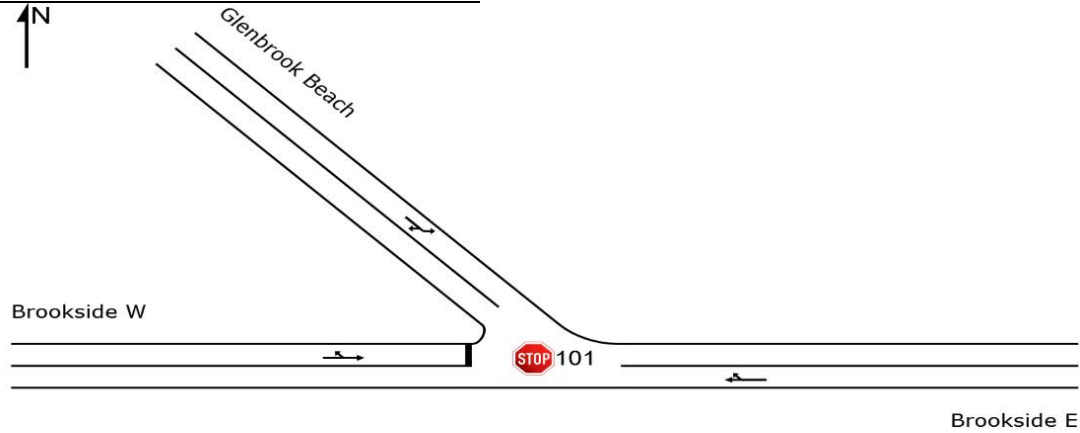
### **Recommendations**

- 10.17 My overall conclusion is that the plan change could be supported with some modifications including a reduction in development intensity, but that it is premature with respect to the expected provision of bulk transport infrastructure in the wider South Auckland sub-region. For that reason my overall recommendation is that the plan change be declined.
- 10.18 Should the plan change be approved, I set out in Appendix D a set of precinct provisions with possible amendments that could assist in partly managing some of the adverse effects on the transport environment.

# Appendix A: Intersection Modelling Results

## 2030 Without PC91

### Glenbrook Beach Road/ Brookside Road



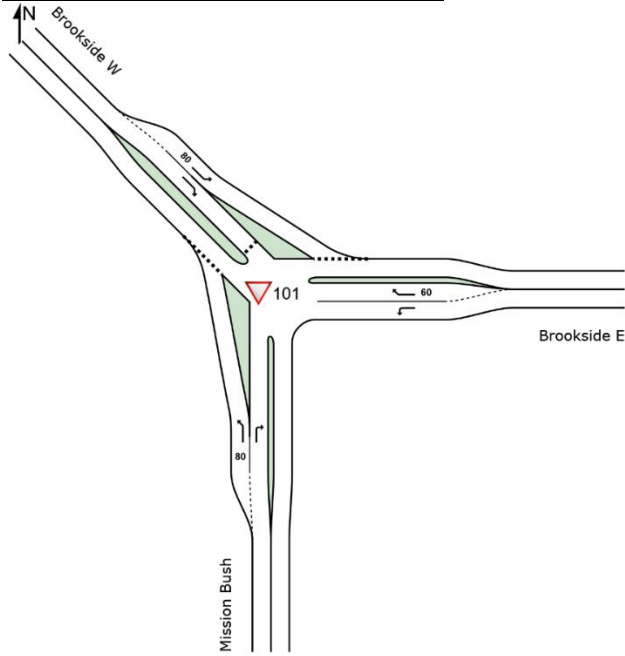
a.m. peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
East: Brookside E															
5	T1	All MCs	18	10.0	18	10.0	0.161	0.0	LOS A	0.8	6.6	0.02	0.45	0.02	47.8
6a	R1	All MCs	252	15.0	252	15.0	0.161	3.7	LOS A	0.8	6.6	0.02	0.45	0.02	46.6
Approach			269	14.7	269	14.7	0.161	3.5	NA	0.8	6.6	0.02	0.45	0.02	46.7
NorthWest: Glenbrook Beach															
27a	L1	All MCs	548	15.0	548	15.0	0.318	4.6	LOS A	0.0	0.1	0.00	0.55	0.00	45.6
29b	R3	All MCs	1	10.0	1	10.0	0.318	5.3	LOS A	0.0	0.1	0.00	0.55	0.00	45.5
Approach			549	15.0	549	15.0	0.318	4.6	NA	0.0	0.1	0.00	0.55	0.00	45.6
West: Brookside W															
10b	L3	All MCs	1	10.0	1	10.0	0.043	9.8	LOS A	0.1	1.0	0.67	1.02	0.67	40.8
11	T1	All MCs	14	10.0	14	10.0	0.043	16.8	LOS C	0.1	1.0	0.67	1.02	0.67	40.8
Approach			15	10.0	15	10.0	0.043	16.3	LOS C	0.1	1.0	0.67	1.02	0.67	40.8
All Vehicles			834	14.8	834	14.8	0.318	4.4	NA	0.8	6.6	0.02	0.53	0.02	45.8

p.m. peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
East: Brookside E															
5	T1	All MCs	1	10.0	1	10.0	0.350	0.0	LOS A	2.3	17.9	0.02	0.48	0.02	47.6
6a	R1	All MCs	585	15.0	585	15.0	0.350	3.7	LOS A	2.3	17.9	0.02	0.48	0.02	46.4
Approach			586	15.0	586	15.0	0.350	3.7	NA	2.3	17.9	0.02	0.48	0.02	46.4
NorthWest: Glenbrook Beach															
27a	L1	All MCs	374	15.0	374	15.0	0.217	4.6	LOS A	0.0	0.1	0.00	0.55	0.00	45.6
29b	R3	All MCs	1	10.0	1	10.0	0.217	5.3	LOS A	0.0	0.1	0.00	0.55	0.00	45.5
Approach			375	15.0	375	15.0	0.217	4.6	NA	0.0	0.1	0.00	0.55	0.00	45.6
West: Brookside W															
10b	L3	All MCs	1	10.0	1	10.0	0.054	12.8	LOS B	0.2	1.2	0.77	1.03	0.77	39.2
11	T1	All MCs	13	10.0	13	10.0	0.054	20.9	LOS C	0.2	1.2	0.77	1.03	0.77	39.2
Approach			14	10.0	14	10.0	0.054	20.3	LOS C	0.2	1.2	0.77	1.03	0.77	39.2
All Vehicles			975	14.9	975	14.9	0.350	4.3	NA	2.3	17.9	0.02	0.52	0.02	46.0

**Brookside Road / Mission Bush Road**



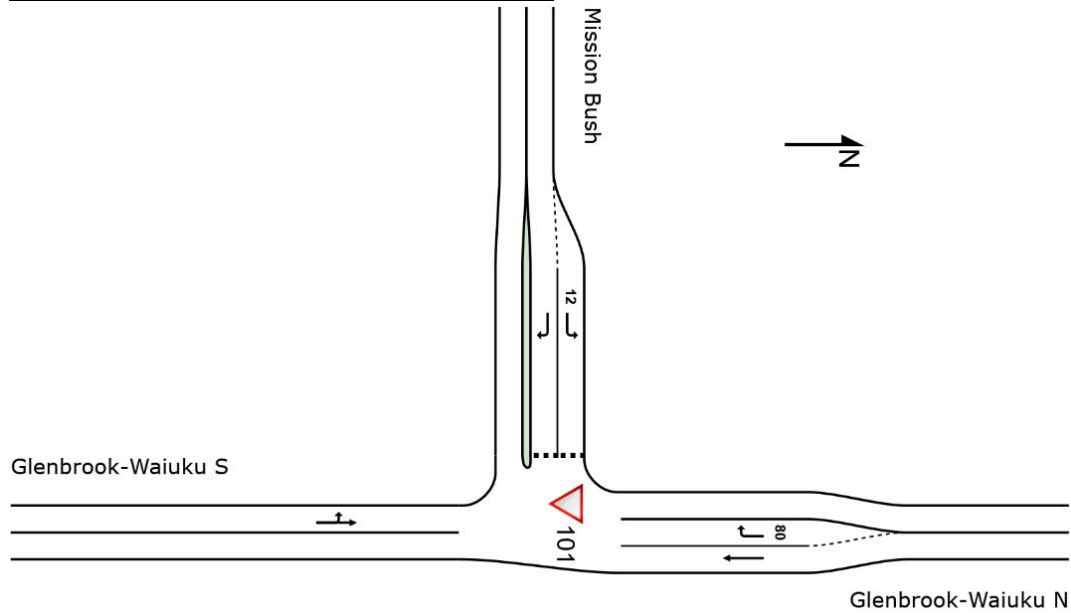
*a.m. peak hour*

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows [ Total HV ]		Arrival Flows [ Total HV ]		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue [ Veh. Dist ]		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Mission Bush															
1a	L1	All MCs	71	12.0	71	12.0	0.056	4.8	LOSA	0.2	1.7	0.31	0.53	0.31	45.5
3	R2	All MCs	13	23.0	13	23.0	0.010	5.6	LOSA	0.0	0.4	0.33	0.51	0.33	44.9
Approach			83	13.7	83	13.7	0.056	4.9	LOSA	0.2	1.7	0.31	0.53	0.31	45.4
East: Brookside E															
4	L2	All MCs	139	23.0	139	23.0	0.087	4.8	LOSA	0.0	0.0	0.00	0.52	0.00	45.6
6a	R1	All MCs	202	12.0	202	12.0	0.115	3.8	LOSA	0.0	0.0	0.00	0.50	0.00	46.4
Approach			341	16.5	341	16.5	0.115	4.2	NA	0.0	0.0	0.00	0.51	0.00	46.1
NorthWest: Brookside W															
27a	L1	All MCs	497	12.0	497	12.0	0.326	4.1	LOSA	1.8	13.8	0.08	0.49	0.08	45.9
29a	R1	All MCs	183	12.0	183	12.0	0.278	7.8	LOSA	1.2	9.5	0.56	0.72	0.58	44.1
Approach			680	12.0	680	12.0	0.326	5.1	LOSA	1.8	13.8	0.21	0.56	0.22	45.4
All Vehicles			1104	13.5	1104	13.5	0.326	4.8	NA	1.8	13.8	0.15	0.54	0.16	45.6

*p.m. peak hour*

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows [ Total HV ]		Arrival Flows [ Total HV ]		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue [ Veh. Dist ]		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Mission Bush															
1a	L1	All MCs	160	12.0	160	12.0	0.166	6.1	LOSA	0.7	5.1	0.49	0.67	0.49	45.0
3	R2	All MCs	86	23.0	86	23.0	0.090	7.1	LOSA	0.4	3.1	0.51	0.66	0.51	44.3
Approach			246	15.9	246	15.9	0.166	6.5	LOSA	0.7	5.1	0.49	0.67	0.49	44.7
East: Brookside E															
4	L2	All MCs	6	23.0	6	23.0	0.004	4.8	LOSA	0.0	0.0	0.00	0.52	0.00	45.6
6a	R1	All MCs	418	12.0	418	12.0	0.237	3.8	LOSA	0.0	0.0	0.00	0.50	0.00	46.4
Approach			424	12.2	424	12.2	0.237	3.8	NA	0.0	0.0	0.00	0.50	0.00	46.3
NorthWest: Brookside W															
27a	L1	All MCs	292	12.0	292	12.0	0.206	4.5	LOSA	1.0	7.4	0.22	0.51	0.22	45.6
29a	R1	All MCs	88	12.0	88	12.0	0.189	10.3	LOS B	0.7	5.3	0.62	0.81	0.62	42.8
Approach			380	12.0	380	12.0	0.206	5.8	LOSA	1.0	7.4	0.31	0.58	0.31	44.9
All Vehicles			1051	13.0	1051	13.0	0.237	5.2	NA	1.0	7.4	0.23	0.57	0.23	45.4

Mission Bush Road / Glenbrook-Waiuku Road



a.m. peak hour

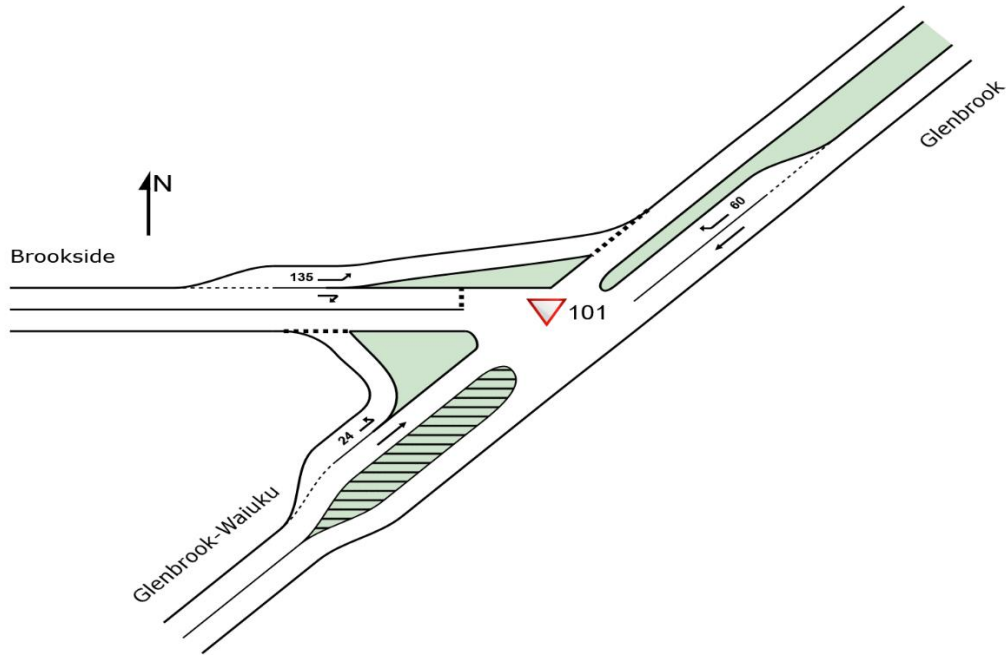
Vehicle Movement Performance													
Mov ID	Turn	Mov Class	Demand Flows [ Total HV ] veh/h %	Arrival Flows [ Total HV ] veh/h %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [ Veh. veh ]	Dist [ m ]	Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed km/h
South: Glenbrook-Waiuku S													
1	L2	All MCs	174 9.0	174 9.0	0.402	4.8	LOS A	0.0	0.0	0.00	0.13	0.00	47.7
2	T1	All MCs	558 9.0	558 9.0	0.402	0.2	LOS A	0.0	0.0	0.00	0.13	0.00	49.0
Approach			732 9.0	732 9.0	0.402	1.3	NA	0.0	0.0	0.00	0.13	0.00	48.7
North: Glenbrook-Waiuku N													
8	T1	All MCs	333 9.0	333 9.0	0.181	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
9	R2	All MCs	14 9.0	14 9.0	0.021	9.0	LOS A	0.1	0.6	0.61	0.72	0.61	43.4
Approach			346 9.0	346 9.0	0.181	0.4	NA	0.1	0.6	0.02	0.03	0.02	49.6
West: Mission Bush													
10	L2	All MCs	16 9.0	16 9.0	0.019	7.3	LOS A	0.1	0.5	0.51	0.65	0.51	44.3
12	R2	All MCs	183 9.0	183 9.0	0.816	42.9	LOS E	5.0	37.9	0.95	1.41	2.34	30.8
Approach			199 9.0	199 9.0	0.816	40.1	LOS E	5.0	37.9	0.92	1.35	2.19	31.6
All Vehicles			1277 9.0	1277 9.0	0.816	7.1	NA	5.0	37.9	0.15	0.29	0.35	45.2

p.m. peak hour

Vehicle Movement Performance													
Mov ID	Turn	Mov Class	Demand Flows [ Total HV ] veh/h %	Arrival Flows [ Total HV ] veh/h %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [ Veh. veh ]	Dist [ m ]	Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed km/h
South: Glenbrook-Waiuku S													
1	L2	All MCs	177 9.0	177 9.0	0.274	4.7	LOS A	0.0	0.0	0.00	0.19	0.00	47.5
2	T1	All MCs	318 9.0	318 9.0	0.274	0.1	LOS A	0.0	0.0	0.00	0.19	0.00	48.8
Approach			495 9.0	495 9.0	0.274	1.8	NA	0.0	0.0	0.00	0.19	0.00	48.3
North: Glenbrook-Waiuku N													
8	T1	All MCs	746 9.0	746 9.0	0.405	0.2	LOS A	0.0	0.0	0.00	0.00	0.00	49.8
9	R2	All MCs	19 9.0	19 9.0	0.020	6.9	LOS A	0.1	0.6	0.51	0.62	0.51	44.5
Approach			765 9.0	765 9.0	0.405	0.3	NA	0.1	0.6	0.01	0.02	0.01	49.6
West: Mission Bush													
10	L2	All MCs	13 9.0	13 9.0	0.011	5.8	LOS A	0.0	0.3	0.38	0.54	0.38	45.0
12	R2	All MCs	181 9.0	181 9.0	1.237	271.0	LOS F	26.4	199.0	1.00	3.20	8.49	10.5
Approach			194 9.0	194 9.0	1.237	253.7	LOS F	26.4	199.0	0.96	3.03	7.96	11.1
All Vehicles			1454 9.0	1454 9.0	1.237	34.6	NA	26.4	199.0	0.13	0.48	1.07	33.7



Glenbrook Road / Brookside Road



a.m. peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. veh	Dist ] m				
NorthEast: Glenbrook															
25	T1	All MCs	314	10.0	314	10.0	0.171	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
26a	R1	All MCs	284	23.0	284	23.0	0.327	7.1	LOS A	1.7	14.4	0.61	0.74	0.71	45.0
Approach			598	16.2	598	16.2	0.327	3.4	NA	1.7	14.4	0.29	0.35	0.34	47.4
West: Brookside															
10a	L1	All MCs	514	23.0	514	23.0	0.639	11.0	LOS B	5.4	45.5	0.72	1.09	1.31	42.3
12b	R3	All MCs	23	9.0	23	9.0	0.115	22.8	LOS C	0.3	2.6	0.83	0.93	0.83	37.4
Approach			537	22.4	537	22.4	0.639	11.5	LOS B	5.4	45.5	0.72	1.08	1.29	42.1
SouthWest: Glenbrook-Waiuku															
30b	L3	All MCs	13	9.0	13	9.0	0.011	6.6	LOS A	0.0	0.3	0.37	0.54	0.37	44.7
31	T1	All MCs	488	9.0	488	9.0	0.265	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
Approach			501	9.0	501	9.0	0.265	0.3	LOS A	0.0	0.3	0.01	0.01	0.01	49.7
All Vehicles			1636	16.0	1636	16.0	0.639	5.1	NA	5.4	45.5	0.35	0.49	0.55	46.1

p.m. peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. veh	Dist ] m				
NorthEast: Glenbrook															
25	T1	All MCs	740	10.0	740	10.0	0.404	0.2	LOS A	0.0	0.0	0.00	0.00	0.00	49.8
26a	R1	All MCs	428	23.0	428	23.0	0.377	5.5	LOS A	2.3	19.1	0.53	0.60	0.57	45.6
Approach			1168	14.8	1168	14.8	0.404	2.1	NA	2.3	19.1	0.19	0.22	0.21	48.2
West: Brookside															
10a	L1	All MCs	359	23.0	359	23.0	0.344	6.2	LOS A	1.7	14.5	0.49	0.65	0.51	44.9
12b	R3	All MCs	7	9.0	7	9.0	0.099	51.7	LOS F	0.2	1.8	0.93	0.97	0.93	28.9
Approach			366	22.7	366	22.7	0.344	7.1	LOS A	1.7	14.5	0.49	0.65	0.52	44.4
SouthWest: Glenbrook-Waiuku															
30b	L3	All MCs	6	9.0	6	9.0	0.007	7.5	LOS A	0.0	0.2	0.46	0.58	0.46	44.5
31	T1	All MCs	304	9.0	304	9.0	0.165	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
Approach			311	9.0	311	9.0	0.165	0.2	LOS A	0.0	0.2	0.01	0.01	0.01	49.8
All Vehicles			1845	15.4	1845	15.4	0.404	2.8	NA	2.3	19.1	0.22	0.27	0.24	47.6

## 2030 With PC91 - 200 dwellings

### Glenbrook Beach Road/ Brookside Road

a.m. peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
East: Brookside E															
5	T1	All MCs	18	10.0	18	10.0	0.186	0.0	LOS A	1.0	7.8	0.02	0.46	0.02	47.7
6a	R1	All MCs	294	15.0	294	15.0	0.186	3.7	LOS A	1.0	7.8	0.02	0.46	0.02	46.6
Approach			312	14.7	312	14.7	0.186	3.5	NA	1.0	7.8	0.02	0.46	0.02	46.6
NorthWest: Glenbrook Beach															
27a	L1	All MCs	675	15.0	675	15.0	0.391	4.6	LOS A	0.0	0.1	0.00	0.55	0.00	45.6
29b	R3	All MCs	1	10.0	1	10.0	0.391	5.3	LOS A	0.0	0.1	0.00	0.55	0.00	45.5
Approach			676	15.0	676	15.0	0.391	4.6	NA	0.0	0.1	0.00	0.55	0.00	45.6
West: Brookside W															
10b	L3	All MCs	1	10.0	1	10.0	0.063	10.1	LOS B	0.2	1.4	0.77	1.03	0.77	38.7
11	T1	All MCs	14	10.0	14	10.0	0.063	22.3	LOS C	0.2	1.4	0.77	1.03	0.77	38.7
Approach			15	10.0	15	10.0	0.063	21.5	LOS C	0.2	1.4	0.77	1.03	0.77	38.7
All Vehicles			1002	14.8	1002	14.8	0.391	4.5	NA	1.0	7.8	0.02	0.53	0.02	45.8

p.m. peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
East: Brookside E															
5	T1	All MCs	1	10.0	1	10.0	0.414	0.0	LOS A	2.9	23.0	0.02	0.48	0.02	47.6
6a	R1	All MCs	692	15.0	692	15.0	0.414	3.7	LOS A	2.9	23.0	0.02	0.48	0.02	46.4
Approach			693	15.0	693	15.0	0.414	3.7	NA	2.9	23.0	0.02	0.48	0.02	46.4
NorthWest: Glenbrook Beach															
27a	L1	All MCs	436	15.0	436	15.0	0.253	4.6	LOS A	0.0	0.1	0.00	0.55	0.00	45.6
29b	R3	All MCs	1	10.0	1	10.0	0.253	5.3	LOS A	0.0	0.1	0.00	0.55	0.00	45.5
Approach			437	15.0	437	15.0	0.253	4.6	NA	0.0	0.1	0.00	0.55	0.00	45.6
West: Brookside W															
10b	L3	All MCs	1	10.0	1	10.0	0.082	14.5	LOS B	0.2	1.7	0.85	1.02	0.85	36.4
11	T1	All MCs	13	10.0	13	10.0	0.082	28.8	LOS D	0.2	1.7	0.85	1.02	0.85	36.4
Approach			14	10.0	14	10.0	0.082	27.7	LOS D	0.2	1.7	0.85	1.02	0.85	36.4
All Vehicles			1143	14.9	1143	14.9	0.414	4.3	NA	2.9	23.0	0.02	0.51	0.02	46.0

Brookside Road / Mission Bush Road

*a.m. peak hour*

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. veh	Dist ] m				
South: Mission Bush															
1a	L1	All MCs	81	12.0	81	12.0	0.067	4.9	LOS A	0.3	2.0	0.34	0.55	0.34	45.5
3	R2	All MCs	13	23.0	13	23.0	0.010	5.7	LOS A	0.0	0.4	0.35	0.52	0.35	44.8
Approach			94	13.5	94	13.5	0.067	5.0	LOS A	0.3	2.0	0.34	0.54	0.34	45.4
East: Brookside E															
4	L2	All MCs	139	23.0	139	23.0	0.087	4.8	LOS A	0.0	0.0	0.00	0.52	0.00	45.6
6a	R1	All MCs	234	12.0	234	12.0	0.132	3.8	LOS A	0.0	0.0	0.00	0.50	0.00	46.4
Approach			373	16.1	373	16.1	0.132	4.2	NA	0.0	0.0	0.00	0.51	0.00	46.1
NorthWest: Brookside W															
27a	L1	All MCs	589	12.0	589	12.0	0.387	4.1	LOS A	2.3	17.8	0.09	0.49	0.09	45.9
29a	R1	All MCs	217	12.0	217	12.0	0.349	9.0	LOS A	1.8	13.6	0.60	0.80	0.73	43.5
Approach			806	12.0	806	12.0	0.387	5.4	LOS A	2.3	17.8	0.23	0.58	0.26	45.2
All Vehicles			1273	13.3	1273	13.3	0.387	5.0	NA	2.3	17.8	0.17	0.55	0.19	45.5

*p.m. peak hour*

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. veh	Dist ] m				
South: Mission Bush															
1a	L1	All MCs	188	12.0	188	12.0	0.218	6.9	LOS A	0.9	6.7	0.55	0.72	0.55	44.6
3	R2	All MCs	86	23.0	86	23.0	0.102	7.8	LOS A	0.4	3.4	0.55	0.71	0.55	44.0
Approach			275	15.5	275	15.5	0.218	7.1	LOS A	0.9	6.7	0.55	0.72	0.55	44.4
East: Brookside E															
4	L2	All MCs	6	23.0	6	23.0	0.004	4.8	LOS A	0.0	0.0	0.00	0.52	0.00	45.6
6a	R1	All MCs	496	12.0	496	12.0	0.281	3.8	LOS A	0.0	0.0	0.00	0.50	0.00	46.3
Approach			502	12.1	502	12.1	0.281	3.9	NA	0.0	0.0	0.00	0.50	0.00	46.3
NorthWest: Brookside W															
27a	L1	All MCs	339	12.0	339	12.0	0.240	4.5	LOS A	1.2	8.9	0.23	0.51	0.23	45.6
29a	R1	All MCs	103	12.0	103	12.0	0.263	13.0	LOS B	1.0	7.9	0.70	0.89	0.80	41.5
Approach			442	12.0	442	12.0	0.263	6.5	LOS A	1.2	8.9	0.34	0.59	0.36	44.6
All Vehicles			1219	12.8	1219	12.8	0.281	5.6	NA	1.2	8.9	0.25	0.58	0.25	45.2

Mission Bush Road / Glenbrook-Waiuku Road – Existing Layout

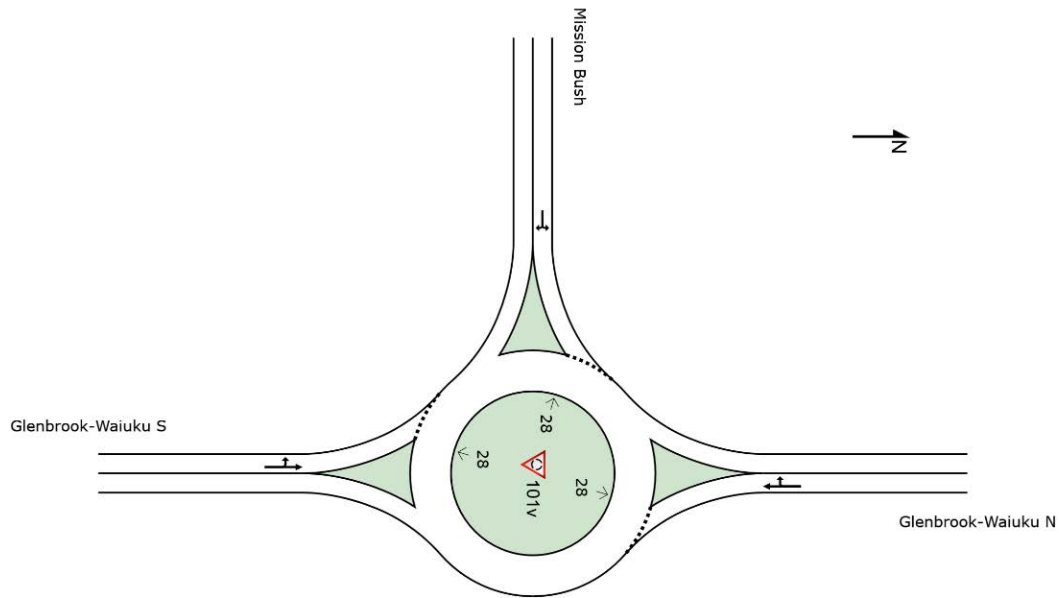
a.m. peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
South: Glenbrook-Waiuku S															
1	L2	All MCs	184	9.0	184	9.0	0.408	4.8	LOS A	0.0	0.0	0.00	0.13	0.00	47.7
2	T1	All MCs	558	9.0	558	9.0	0.408	0.2	LOS A	0.0	0.0	0.00	0.13	0.00	49.0
Approach			742	9.0	742	9.0	0.408	1.3	NA	0.0	0.0	0.00	0.13	0.00	48.7
North: Glenbrook-Waiuku N															
8	T1	All MCs	333	9.0	333	9.0	0.181	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
9	R2	All MCs	14	9.0	14	9.0	0.021	9.2	LOS A	0.1	0.6	0.62	0.73	0.62	43.3
Approach			346	9.0	346	9.0	0.181	0.4	NA	0.1	0.6	0.02	0.03	0.02	49.6
West: Mission Bush															
10	L2	All MCs	16	9.0	16	9.0	0.019	7.3	LOS A	0.1	0.5	0.51	0.65	0.51	44.3
12	R2	All MCs	217	9.0	217	9.0	0.978	78.8	LOS F	10.8	81.7	0.99	2.02	4.28	23.7
Approach			233	9.0	233	9.0	0.978	74.0	LOS F	10.8	81.7	0.96	1.93	4.02	24.4
All Vehicles			1321	9.0	1321	9.0	0.978	13.9	NA	10.8	81.7	0.18	0.42	0.71	41.6

p.m. peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
South: Glenbrook-Waiuku S															
1	L2	All MCs	205	9.0	205	9.0	0.290	4.7	LOS A	0.0	0.0	0.00	0.21	0.00	47.4
2	T1	All MCs	318	9.0	318	9.0	0.290	0.1	LOS A	0.0	0.0	0.00	0.21	0.00	48.7
Approach			523	9.0	523	9.0	0.290	1.9	NA	0.0	0.0	0.00	0.21	0.00	48.2
North: Glenbrook-Waiuku N															
8	T1	All MCs	746	9.0	746	9.0	0.405	0.2	LOS A	0.0	0.0	0.00	0.00	0.00	49.8
9	R2	All MCs	19	9.0	19	9.0	0.020	7.1	LOS A	0.1	0.6	0.53	0.63	0.53	44.4
Approach			765	9.0	765	9.0	0.405	0.3	NA	0.1	0.6	0.01	0.02	0.01	49.6
West: Mission Bush															
10	L2	All MCs	13	9.0	13	9.0	0.011	5.8	LOS A	0.0	0.3	0.38	0.54	0.38	45.0
12	R2	All MCs	196	9.0	196	9.0	1.379	391.7	LOS F	37.7	284.2	1.00	3.88	10.81	7.8
Approach			208	9.0	208	9.0	1.379	368.4	LOS F	37.7	284.2	0.96	3.68	10.18	8.2
All Vehicles			1497	9.0	1497	9.0	1.379	52.1	NA	37.7	284.2	0.14	0.59	1.42	29.0

Mission Bush Road / Glenbrook-Waiuku Road – Minimum Size Roundabout Option



*a.m. peak hour*

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
South: Glenbrook-Waiuku S															
1	L2	All MCs	184	9.0	184	9.0	0.460	2.5	LOS A	4.7	35.2	0.15	0.26	0.15	47.6
2	T1	All MCs	558	9.0	558	9.0	0.460	2.2	LOS A	4.7	35.2	0.15	0.26	0.15	47.8
Approach			742	9.0	742	9.0	0.460	2.2	LOS A	4.7	35.2	0.15	0.26	0.15	47.8
North: Glenbrook-Waiuku N															
8	T1	All MCs	333	9.0	333	9.0	0.321	3.8	LOS A	2.4	18.2	0.57	0.45	0.57	46.2
9	R2	All MCs	14	9.0	14	9.0	0.321	9.2	LOS A	2.4	18.2	0.57	0.45	0.57	45.6
Approach			346	9.0	346	9.0	0.321	4.0	LOS A	2.4	18.2	0.57	0.45	0.57	46.2
West: Mission Bush															
10	L2	All MCs	16	9.0	16	9.0	0.287	6.9	LOS A	1.8	13.9	0.72	0.71	0.72	43.0
12	R2	All MCs	217	9.0	217	9.0	0.287	12.0	LOS B	1.8	13.9	0.72	0.71	0.72	42.7
Approach			233	9.0	233	9.0	0.287	11.6	LOS B	1.8	13.9	0.72	0.71	0.72	42.7
All Vehicles			1321	9.0	1321	9.0	0.460	4.4	LOS A	4.7	35.2	0.36	0.39	0.36	46.4

*p.m. peak hour*

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
South: Glenbrook-Waiuku S															
1	L2	All MCs	205	9.0	205	9.0	0.335	2.5	LOS A	3.0	22.5	0.16	0.28	0.16	47.5
2	T1	All MCs	318	9.0	318	9.0	0.335	2.2	LOS A	3.0	22.5	0.16	0.28	0.16	47.8
Approach			523	9.0	523	9.0	0.335	2.3	LOS A	3.0	22.5	0.16	0.28	0.16	47.7
North: Glenbrook-Waiuku N															
8	T1	All MCs	746	9.0	746	9.0	0.654	4.3	LOS A	7.0	53.1	0.74	0.51	0.74	45.7
9	R2	All MCs	19	9.0	19	9.0	0.654	9.8	LOS A	7.0	53.1	0.74	0.51	0.74	45.0
Approach			765	9.0	765	9.0	0.654	4.5	LOS A	7.0	53.1	0.74	0.51	0.74	45.6
West: Mission Bush															
10	L2	All MCs	13	9.0	13	9.0	0.208	4.7	LOS A	1.3	9.6	0.55	0.62	0.55	44.0
12	R2	All MCs	196	9.0	196	9.0	0.208	9.8	LOS A	1.3	9.6	0.55	0.62	0.55	43.6
Approach			208	9.0	208	9.0	0.208	9.5	LOS A	1.3	9.6	0.55	0.62	0.55	43.6
All Vehicles			1497	9.0	1497	9.0	0.654	4.4	LOS A	7.0	53.1	0.51	0.45	0.51	46.0

**Glenbrook Road / Brookside Road**

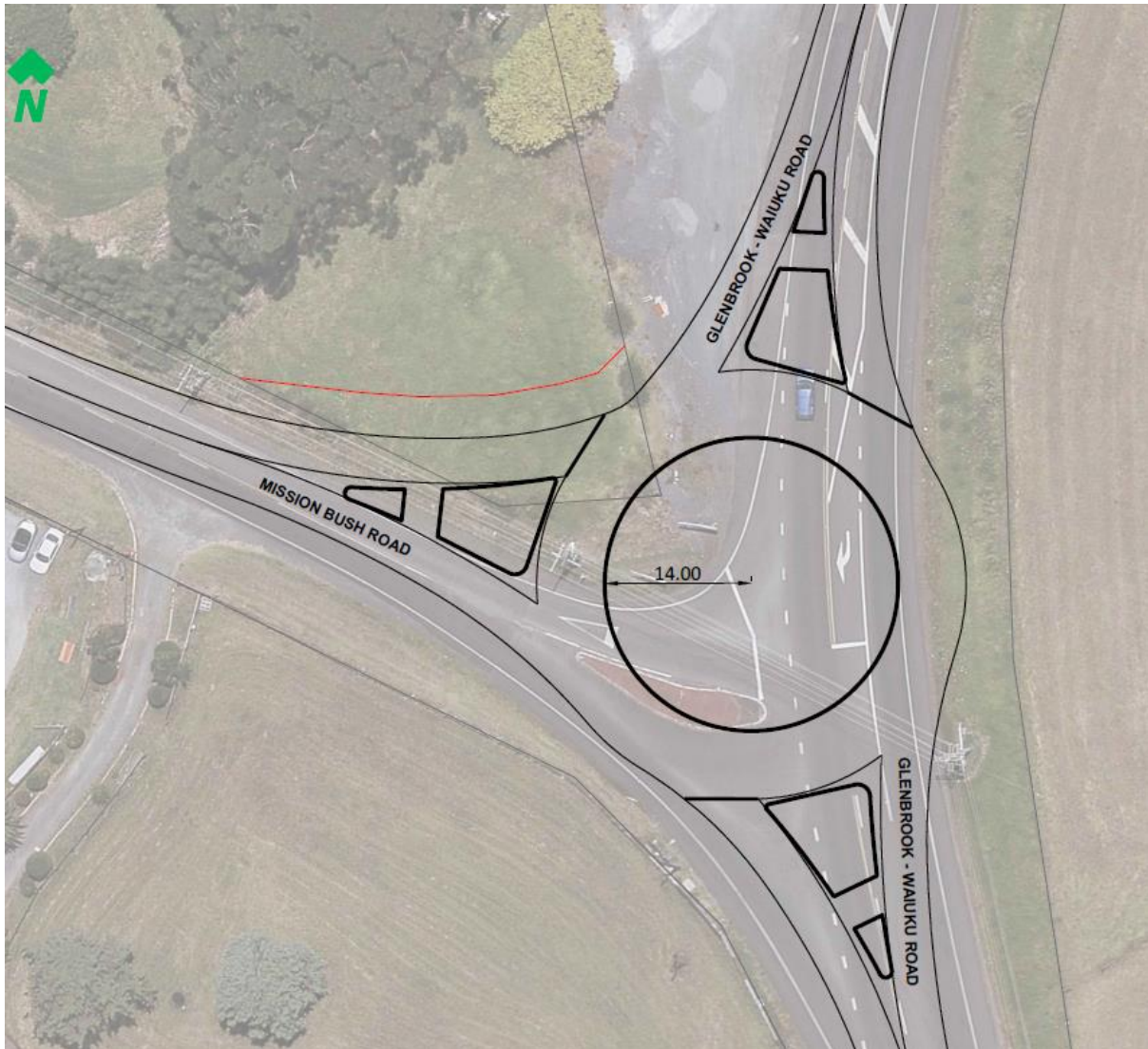
*a.m. peak hour*

<b>Vehicle Movement Performance</b>															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
<b>NorthEast: Glenbrook</b>															
25	T1	All MCs	314	10.0	314	10.0	0.171	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
26a	R1	All MCs	316	23.0	316	23.0	0.363	7.4	LOS A	2.1	17.2	0.63	0.77	0.77	44.8
Approach			629	16.5	629	16.5	0.363	3.7	NA	2.1	17.2	0.31	0.39	0.38	47.2
<b>West: Brookside</b>															
10a	L1	All MCs	606	23.0	606	23.0	0.754	13.3	LOS B	8.4	70.3	0.79	1.30	1.77	41.2
12b	R3	All MCs	23	9.0	23	9.0	0.122	24.0	LOS C	0.4	2.7	0.84	0.93	0.84	36.9
Approach			629	22.5	629	22.5	0.754	13.7	LOS B	8.4	70.3	0.79	1.29	1.74	41.0
<b>SouthWest: Glenbrook-Waiuku</b>															
30b	L3	All MCs	13	9.0	13	9.0	0.011	6.8	LOS A	0.0	0.3	0.39	0.56	0.39	44.7
31	T1	All MCs	488	9.0	488	9.0	0.265	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
Approach			501	9.0	501	9.0	0.265	0.3	LOS A	0.0	0.3	0.01	0.01	0.01	49.7
All Vehicles			1760	16.5	1760	16.5	0.754	6.3	NA	8.4	70.3	0.40	0.60	0.76	45.4

*p.m. peak hour*

<b>Vehicle Movement Performance</b>															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[ Total HV ] veh/h	%	[ Total HV ] veh/h	%				[ Veh. ] veh	[ Dist ] m				
<b>NorthEast: Glenbrook</b>															
25	T1	All MCs	740	10.0	740	10.0	0.404	0.2	LOS A	0.0	0.0	0.00	0.00	0.00	49.8
26a	R1	All MCs	506	23.0	506	23.0	0.445	6.0	LOS A	3.3	27.5	0.56	0.66	0.67	45.6
Approach			1246	15.3	1246	15.3	0.445	2.5	NA	3.3	27.5	0.23	0.27	0.27	48.0
<b>West: Brookside</b>															
10a	L1	All MCs	406	23.0	406	23.0	0.389	6.4	LOS A	2.2	18.8	0.50	0.67	0.57	44.7
12b	R3	All MCs	7	9.0	7	9.0	0.121	61.6	LOS F	0.3	2.1	0.94	0.97	0.94	26.8
Approach			414	22.8	414	22.8	0.389	7.4	LOS A	2.2	18.8	0.51	0.68	0.58	44.2
<b>SouthWest: Glenbrook-Waiuku</b>															
30b	L3	All MCs	6	9.0	6	9.0	0.008	8.0	LOS A	0.0	0.2	0.50	0.61	0.50	44.3
31	T1	All MCs	304	9.0	304	9.0	0.165	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
Approach			311	9.0	311	9.0	0.165	0.2	LOS A	0.0	0.2	0.01	0.01	0.01	49.8
All Vehicles			1971	15.9	1971	15.9	0.445	3.2	NA	3.3	27.5	0.25	0.31	0.29	47.4

## Appendix B: Mission Bush Rd/ Glenbrook-Waiuku Rd Concept Design



Red line shows suggested new boundary.

## Appendix C: Assessment against Draft Future Development Strategy

- C.1 The Draft FDS contains a section discussing the provision of infrastructure:

### *2.3.4 Investing in infrastructure in a financially constrained environment*

*As the population of Tāmaki Makaurau continues to grow, there is demand for new infrastructure alongside the on-going need to look after existing infrastructure networks and services. The Auckland Unitary Plan and more recent land use planning changes have enabled a greater level of intensification across the existing urban area which will increase the requirement for upgraded and new infrastructure. There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years.*

*Infrastructure is costly, and the council's capacity to provide infrastructure is not unlimited. Funding and financing of bulk infrastructure is complex, and it is essential to ensure developers pay an appropriate share of the infrastructure investment that they contribute to the need for and will benefit from. The challenge is therefore one of understanding what is required, what is affordable, who will pay and how to get the best value from the investments council decides to make.*

*Reducing emissions, adapting to natural hazards and increasing accessibility, all drive the need to reconsider where and how to invest in infrastructure. This means that previously planned and prioritised infrastructure may no longer be appropriate or provide the best value for money. As priorities change, trade-offs need to be made (and re-made) to ensure Aucklanders are getting the best value for money from infrastructure investment.*

- C.2 The Draft FDS has five principles. Those most relevant to transport are summarised below.

#### Principle 1: Support greenhouse gas emission reduction

- C.3 A compact urban form is seen as a critical requirement, as it reduces car dependency and vehicle kilometres travelled (VKT).
- C.4 While the PC91 provisions may enable a compact urban form within the Precinct, when viewed at the wider scale it does not promote a compact urban form for Auckland. It would not reduce car dependency or travel.

#### Principle 3: Make efficient and equitable infrastructure investments

- C.5 Principle 3(a) is "Take a regional view to infrastructure investment and costs". The draft FDS says (emphasis added):

*Infrastructure to support growth will always require significant investment, which is difficult when finances are constrained.*

*At a regional scale infrastructure servicing urban intensification varies in cost depending on its location. Development in existing urban areas typically costs less when compared with development in future urban areas. Adding **additional growth at the fringes of our existing networks is the least cost-effective investment** in infrastructure to support growth. The best return on investment is closer to the centre.*

***We will prioritise growth and infrastructure investment closer to the city centre and sub-regional nodes*** within the existing urban area, to assist the council's financial management and value for money for Aucklanders, while also addressing disparities in infrastructure and service provision.

***We will take a regional and whole of society view of the costs and benefits when making long-term decisions, and we will take those costs and benefits into consideration when land use planning decisions are made.***



- C.6 The proposed plan change is located at or beyond the fringe of the existing transport networks, so with respect to the Draft FDS this area should not be prioritised over other areas.

Principle 5: Enable sufficient capacity for growth in the right place and at the right time

- C.7 This principle includes (emphasis added):

*The council cannot fund all infrastructure needed to serve growth which is now enabled across much of Tāmaki Makaurau. The council must make choices about how it allocates limited funding across Tāmaki Makaurau. The council will proactively invest in a limited number of places at a time to achieve the greatest benefits, across multiple outcomes, and support development capacity in those areas to be realised. This means **investing primarily in existing urban areas**, with a strong focus on aligning land use and infrastructure. This is also a way to support projects which have city-shaping potential.*

- C.8 In preparing the Draft FDS, the Council considered some scenarios, and derived some themes from evaluating them. One theme was:

*Land use and infrastructure integration, particularly transport, is fundamental to spatial outcomes*

*Scenarios that **focused growth within the existing urban area and specifically within the walkable catchments of the planned RTN/FTN<sup>14</sup>** performed better against transport criteria specifically but also environmental, social, cultural and economic criteria.*

*Compact urban forms perform better in terms of least monetary cost of infrastructure over time, as they result in more efficient use of existing services and new infrastructure. More expansive urban forms require the greatest amount of new infrastructure with the most significant costs.*

- C.9 The Draft FDS contains a section (4.2.2) on future urban areas (FUAs) and discusses how “private plan changes severely undermine coordination.” It also provides updated timing for readiness of identified FUAs, including the removal of some areas previously identified in FULSS.
- C.10 The Draft FDS retains Glenbrook 2 as a FUA but has delayed the timing of infrastructure provision to 2030+. It is not known if the FDS analysis considered the need for the Mission Bush roundabout.
- C.11 Given the delay in the timing of infrastructure indicated by the Draft FDS, the live-zoning of the PC91 would be premature if the final FDS is similar to the Draft.

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<sup>14</sup> RTN = Rapid Transit Network (rail and busway). FTN = Frequent Transit Network (typically high-frequency buses in bus lanes)

## Appendix D: Recommended Changes to Provisions

- D.1 If Plan Change 91 is approved, I recommend the following changes are made to the provisions.
- D.2 I have provided submission point numbers against recommended changes where appropriate, but in order to save space and improve legibility in some cases only one representative submission point reference from many applicable points is used.

### IXXX.1 Precinct Description

The underlying zoning of land within this precinct is Residential – [Mixed Housing Suburban Single-House](#) [5.1, 7.3, and others]. Refer to the planning maps for the location and extent of the precinct.

The Glenbrook 4 Precinct is located landward of the adjacent Glenbrook Beach coastal settlement. The Precinct will enable a range of housing typologies to be provided that will meet the full generational housing needs of the local community. ~~Precinct standards will integrate subdivision and development within the Precinct with the established Glenbrook Beach coastal settlement, and with Kahawai Point to the north.~~ [39.2, 39.8]

It is intended that walking and cycling connections will be provided within the Precinct to connect the established Glenbrook Beach coastal settlement to land that is zoned Business – Neighbourhood [Local Centre](#) on the eastern side of McLarin Road, and to connect Kahawai Point with the coast and beach. These connections will build upon the network of walkways established and planned for in the Glenbrook Beach 3 precinct.

Subdivision and development will incorporate natural drainage patterns, including natural wetlands and watercourses. Native planting is encouraged to enhance freshwater values. Stormwater will be managed to mitigate adverse effects on freshwater values using the Auckland-wide stormwater provisions of the AUP(OP) and the Stormwater Management Area – Flow 1 overlay provisions.

The objectives and policies of the Auckland-wide sections, and of the underlying Residential - Mixed Housing Suburban zone, apply in the Glenbrook 4 Precinct except as specified below.

### IXXX.2 Objectives

1. Subdivision and development are undertaken in general accordance with the precinct plan.
2. Subdivision and development achieves an attractive, safe and healthy environment for living with good access to the public realm including parks, riparian margins and roads.
3. Subdivision and development occurs in a manner that achieves the coordination and delivery of infrastructure including [active mode facilities](#), [39.5] roading, wastewater, water supply and stormwater services.
4. The precinct is supported by a well-connected, safe, efficient, and legible movement network with low-speed internal streets and appropriate connections to existing and future urban areas surrounding the precinct.
5. Subdivision and development encourages a choice of transport modes including walking and cycling, and provides strong, legible connections within and through the precinct.
- ...
8. ~~Subdivision and development achieves integration of built form within the precinct, with the existing Glenbrook Beach settlement, and with the Kahawai Point Special Housing Area.~~ [39.2, 39.8]
- ...

### IXXX.3 Policies

...

3. Avoid subdivision, use and development prior to the availability of bulk water, wastewater and roading infrastructure to service development in the Glenbrook 4 precinct.
4. Require that any subdivision and development within the precinct incorporates the following elements of the precinct plan:
  - a. linkages to adjacent land, including a pedestrian/cycle link between the Glenbrook Beach Recreation Reserve and the ~~future local~~ neighbourhood centre on McLarin Road; ~~and~~
  - b. a pedestrian crossing facility on McLarin Road near the neighbourhood centre; and  
[39.5]
  - c. a roundabout intersection on McLarin Road.
5. Ensure that subdivision and land use activities establish a transport network that provides for the safe and efficient movement of motor vehicles, pedestrians and cyclists.

...

11. Provide a generally low intensity of development appropriate to a coastal settlement.  
[5.1, 7.3, and others]
12. Require that any subdivision and development within the precinct only occur after, or in parallel with, the provision of transport infrastructure including:
  - a. the upgrading of road frontages to an urban form in accordance with Table X; and  
[39.2, 39.3]
  - b. a roundabout at the intersection of Mission Bush Road and Glenbrook-Waiuku Road.

### IXXX.4 Land Use Activity Table

The provisions of the relevant zone, overlays and the Auckland-wide activity tables apply unless otherwise specified below.

Table IXXX.4.1 Activity table (Tables 1 and 2) specifies the activity status of land use and development activities in the Glenbrook 4 precinct pursuant to section 9(3) of the Resource Management Act 1991.

#### IXXX.4.1 Activity table

Activity Table 1 – Glenbrook 4 precinct		
Activity		Activity status
<b>Rural</b>		
A1	Grazing of livestock on sites greater than 2,000m <sup>2</sup> net site area	P

Activity Table 2 – Glenbrook 4 precinct		
Activity		Activity status
<b>Residential</b>		
A2	Development of <del>up to three dwellings</del> that complies with standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), <del>and</del> IXXX.7.1.4 (fences) <u>and IXXX.7.1.5 Maximum Density</u> [5.1, 7.3, and others]	P
A3	<del>Development of four or more dwellings that complies with standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), and IXXX.7.1.4 (fences)</del> [5.1, 7.3, and others]	RD

<a href="#">A4</a> <a href="#">A3</a>	Development that does not comply with standard IXXX.7.1.3 (Riparian margins and setbacks)	RD
<a href="#">A5</a> <a href="#">A4</a>	Development that does not comply with standard IXXX.7.1.4. (Fences)	RD
<a href="#">A5</a>	<a href="#">Development that does not comply with standard IXXX.7.1.5 Maximum Density</a> [5.1, 7.3, and others]	<a href="#">D</a>
A6	Development that does not comply with Standard IXXX.7.1.1 (Infrastructure)	NC
A7	Development not in general accordance with Development Standard IXXX.7.1.2 (Figure 1 – Precinct Plan).	D

### IXXX.5 Subdivision Activity Table

The controls in [E38 Subdivision](#) shall apply within the Glenbrook 4 Precinct unless specified in the following provisions:

Table IXXX5.1 Activity Table – [E38.4.1](#) and [E38.4.2](#) apply in Glenbrook 4 Precinct, except as specified in Activity Table 3 below.

<b>Activity Table 3 – Glenbrook 4 precinct</b>		
<b>Activity</b>		<b>Activity status</b>
<b>Subdivision and associated development activity</b>		
A8	Subdivision in general accordance with standard IXXX7.1.1 (Infrastructure), standard IXXX.7.1.2 (Precinct Plan) <del>and</del> IXXX.7.1.3 (Riparian margins and setbacks) <a href="#">and IXXX.7.1.5 Maximum Density</a> [5.1, 7.3, and others]	RD
A9	Subdivision not in general accordance with the Precinct Plan (standard IXXX.7.1.2).	D
A10	Subdivision not in accordance with standard IXXX.7.1.3 (Riparian margins and setbacks)	RD
A11	Subdivision not in accordance with standard IXXX.7.1.1 (Infrastructure)	NC
<a href="#">A12</a>	<a href="#">Subdivision not in accordance with standard IXXX.7.1.5 Maximum Density</a> [5.1, 7.3, and others]	<a href="#">D</a>

...

### IXXX.7 Standards

The standards of the relevant zone, overlays and the Auckland-wide provisions apply unless otherwise specified below.

#### IXXX7.1 Land use and subdivision

##### *IXXX.7.1.1 - Infrastructure*

Purpose:

To ensure that development and subdivision within the Glenbrook 4 precinct is serviced by publicly available [transport](#) reticulated water and wastewater networks.

1. Development and subdivision in the Glenbrook 4 precinct must either:
  - (a) be connected to publicly available reticulated water and wastewater networks with sufficient capacity to service the proposed development and/or subdivision, OR

- (b) be supported by written confirmation from the infrastructure services provider for the area that planned capital works required to provide connections for water and wastewater are suitably advanced and capable of servicing proposed subdivision and development.

**2. The number of dwellings within the precinct may not exceed 25 until such time that:**

- (a) a roundabout at the intersection of Mission Bush Road and Glenbrook-Waiuku Road has been constructed or a contract of works for the full project has been let; or**  
[40.1]
- (b) written confirmation is provided from Auckland Transport that planned capital works for the delivery of a roundabout at the intersection of Mission Bush Road and Glenbrook-Waiuku Road are suitably advanced and capable of servicing proposed subdivision and development.** [40.2]

*2 – Precinct Plan*

Purpose:

To implement the indicative connections, pathways, and infrastructure specified in Figure 1 of the Glenbrook 4 Precinct Plan.

1. Development and/ or subdivision shall enable the connections, pathways, and infrastructure (including the roundabout **on McLarin Road**) to be provided as shown in Figure 1 of the Glenbrook 4 Precinct Plan.
2. Roads are to be designed in accordance with ~~the road cross sections for this Precinct in Figure 2 of the Glenbrook 4 Precinct Plan~~ **Appendix 1**. [39.2]

...

**IXXX.7.5 Maximum Density** [5.1, 7.3, and others]

**1. The maximum number of dwellings on a site must not exceed:**

- a. one dwelling per 550m<sup>2</sup>, or**
- b. one dwelling per 550m<sup>2</sup> average net site area, with no sites smaller than 500m<sup>2</sup> net site area.**

**2. Site sizes for proposed sites must comply with the following minimum net site areas:**

- a. 550m<sup>2</sup>, or**
- b. one dwelling per 550m<sup>2</sup> average net site area, with no sites smaller than 500m<sup>2</sup> net site area.**

**IXXX.8 Assessment – restricted discretionary activities**

**IXXX.8.1 Matters of discretion**

For development and subdivision that is a restricted discretionary activity in the Glenbrook 4 precinct, the council will restrict its discretion to the following matters in addition to the matters specified for the relevant restricted discretionary activities in the underlying Residential – Mixed Housing Suburban zone.

1. For subdivision in accordance with the Glenbrook 4 precinct plan and Standards IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), ~~and~~ IXXX.7.1.3 (Riparian Margins and Setbacks), **and IXXX.7.5 (Maximum Density)** [5.1, 7.3, and others] the council will restrict its discretion to the following matters:
  - a. consistency with the Glenbrook 4 precinct plan in Figure 1;
  - b. connections to neighbouring land;

- c. infrastructure and servicing;
- d. stormwater management;
- e. road design and layout **including the provision of adequate sight distances**;
- f. access arrangements;
- g. formation, alignment and location of cycleways and pathways;
- h. Crime Prevention through Environmental Design (CPTED) principles;
- i. interface with McLarin Road;
- j. interface with the Glenbrook Recreation Reserve; and
- k. measures applied to protect, enhance, and maintain riparian margins alongside streams and wetlands.

~~2. Development of four or more dwellings that complies with Standard IXXX.7.1.1 (Infrastructure), IXXX.7.1.2 (Precinct Plan), IXXX.7.1.3 (Riparian Margins and Setbacks), and IXXX.7.1.4 (Fences):~~

- ~~a. Relationship to the street and open spaces;~~
- ~~b. Design of parking and access;~~
- ~~c. Layout and design of roads and pathways;~~
- ~~d. Interface with McLarin Road;~~
- ~~e. Interface with Glenbrook Beach Recreation Reserve and any other areas of public open space;~~
- ~~f. Crime Prevention through Environmental Design (CPTED) principles;~~
- ~~g. access arrangements;~~
- ~~h. measures applied to protect, enhance, and maintain riparian margins alongside streams and wetlands;~~
- ~~i. Interface of residential properties with riparian margins;~~
- ~~j. Infrastructure and servicing; and~~
- ~~k. Stormwater management. [5.1, 7.3, and others]~~

...

### **IXXX.98.2 Assessment criteria**

For development that is a restricted discretionary activity in the Glenbrook 4 precinct, the following assessment criteria apply in addition to the criteria specified for the relevant restricted discretionary activities in the underlying zones.

- 1. Subdivision in accordance with the Glenbrook 4 precinct plan and Standard IXXX7.1.1 (Infrastructure), Standard IXXX7.1.2 (Precinct Plan) ~~and~~ Standard IXXX7.1.3 (Riparian Margins and Setbacks) **and IXXX.7.5 (Maximum Density)** [5.1, 7.3, and others]:
  - a. the Glenbrook 4 precinct plan:

- i. the subdivision is consistent with and gives effect to the key elements in the Glenbrook 4 precinct plan including:
  - Roads, their locations, purpose and cross-sections;
  - The location, formation and alignment of walkways and cycleways;
  - The provision of a pedestrian crossing facility on McLarin Road near the neighbourhood centre;
  - The provision of a roundabout on McLarin Road near the neighbourhood centre; and
  - Subdivision will provide for an appropriate interface between lots and open spaces.

...

c. transport:

- i. provision of an interconnected roading network;
- ii. road design promotes a low-speed network suitable for pedestrians, cyclists, and vehicles-;
- iii. the cross-sections of the roads are consistent with the cross-sections for different road types set out in the Precinct Plan (Figure 1) and Appendix 1;
- iv. the design of a network which connects to McLarin Road and the wider neighbourhood that includes future urban land and the land zoned for Business – Local Neighbourhood Centre-; and

v. provision of a roundabout at the Mission Bush Road/ Glenbrook-Waiuku Road intersection.

...

e. Indicative Pedestrian/Cycle Link:

- i. Degree of consistency with the indicative alignment shown in Figure 1 of the Precinct Plan and the degree to which any alternative alignment provides a connection between Glenbrook Recreation Reserve and the land zoned Business – Local Centre on the eastern side of McLarin Road; and
- ii. The degree to which the pedestrian/cycle link contributes to the amenity of the Glenbrook Beach community.

~~2. Development of four or more dwellings that complies with Standard IXXX7.1.1 (Infrastructure), Standard IXXX7.1.2 (Precinct Plan), Standard IXXX7.1.3 (Riparian Margins and Setbacks) and Standard IXXX7.1.4 (fences):~~

~~a. The development is consistent with the key elements of the Glenbrook 4 precinct plan (Figure 1)~~

~~b. Relationship to the street and open spaces:~~

~~i. development should contribute to the visual amenity and safety of streets and open spaces by:~~

- ~~• Maximising frontage orientation, including doors, windows and balconies to the street and open space clearly defining the boundary between the site and the street or open space by planting and/ or fencing;~~

- ~~• Ensuring dwellings closest to the street each have direct and clearly defined pedestrian access from the street;~~
- ~~• Providing soft landscaping within the front yard that balances outlook and privacy for dwellings at ground floor level and provides visual interest along the street.~~
- ii. ~~ground level balconies or patios to a street or open space should be designed to provide privacy for residents while enabling sightlines to the street or open space.~~

~~ef.~~ design of parking and access:

*Connections to the neighbourhood*

- i. ~~where practicable and appropriate,~~ developments on larger sites should extend and connect road, pedestrian, and cycle links through the site as much as practicable;

*Location and design of parking*

- ii. parking areas and garages should be designed and located to minimise the number of vehicle crossings at the street frontage;

*Location and design of vehicle and pedestrian access*

- iii. vehicle access ways should be designed to reduce vehicle speed and moderate the visual effects of long driveways and large areas of hard paving with landscaping;
- iv. vehicle crossings and access ways should be clearly separated from pedestrian access or integrated where designed as a shared space with pedestrian priority to ensure a safe pedestrian environment; and
- v. accessways and routes within the site should be clear and logical, enhance way-finding and safety and contribute to the quality of open spaces through the development.

~~d. infrastructure and servicing:~~

- ~~i. there should be adequate capacity in the existing stormwater and public reticulated water supply and wastewater networks to service proposed development. All service connections and on site infrastructure must be located within the boundary of the proposed site it serves or have access to the public network by an appropriate legal mechanism.~~
- ~~ii. required infrastructure should integrate into the design of the site. This includes low impact stormwater design devices, overland flow paths/floodplains, wastewater systems, and water supply.~~
- ~~iii. Policy IXXX.3(2)~~
- ~~iv. Policy IXXX.3(3)~~
- ~~v. Policy IXXX.3(7)~~
- ~~vi. Policy IXXX.3(8)~~
- ~~vii. Policy IXXX.3(9)~~
- ~~viii. Policy IXXX.3(10)~~

...

**IXXX.10 Special information requirements**

There are no special information requirements in this precinct.



IXXX.11 Figure 1— [Glenbrook 4: Precinct Plan](#)



[Indicative Vehicle Access—Road Connection \(Indicative Location\)](#)

[Indicative Pedestrian Cycle Link and Crossing Facility on McLarin Road \(Indicative Location\)](#)

[Indicative Roundabout Location](#)

[Residential—Mixed Housing Suburban Zone](#)

IXXX.12 Figure 2— [Road cross-sections](#)

[Appendix 1: Glenbrook 4 Precinct, Road Design and Cross Section Details](#)

Figures Deleted

<b>Road Function and Required Design Elements</b>									
<u>Road Name</u>	<u>Role and Function</u>	<u>Min. Road Reserve<sup>1</sup></u>	<u>Design Speed</u>	<u>Access Restrictions</u>	<u>Median</u>	<u>Bus Provision<sup>2</sup></u>	<u>On Street Parking</u>	<u>Cycle Provision</u>	<u>Pedestrian Provision</u>
<u>McLarin Road</u>	<u>Secondary Collector</u>	<u>20m</u>	<u>40</u>	<u>No</u>	<u>Optional</u>	<u>Yes</u>	<u>Yes</u>	<u>Shared path on both sides</u>	<u>Shared path on both sides</u>
<u>Local Street</u>	<u>Local</u>	<u>16m</u>	<u>30</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>Both sides</u>

**Note 1: Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements.**

**Note 2: Carriageway and intersection geometry capable of accommodating buses.**

**Note 3: Any interim, hybrid, constrained or ultimate upgrades must be designed and constructed to include a new road pavement and be sealed to the appropriate standard in accordance with the Role and Function of the road.**

**Note 4: Width of local roads where they adjoin open space may be modified.**

**Memorandum (technical specialist report to contribute towards Council’s section 42A hearing report)**

14 August 2023

To: Katrina David, Senior Policy Planner, Auckland Council

From: Jason Smith, Consultant Ecologist

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**Subject: Private Plan Change – PC91 80 McLarin Road, Glenbrook – Ecology Assessment**

**1.0 Introduction**

- 1.1 My name is Jason Graham Smith, and I am a Senior Environmental Scientist at Morphem Environmental Limited.
- 1.2 I hold the qualification of Bachelor of Science (Hons.) – Geography (2011) from the University of Auckland.
- 1.3 I have 11 years’ experience as a professional Environmental Scientist, including 8 specialising in ecology.
- 1.4 In my current role I regularly provide advice to Auckland Council, as well as several other district and regional Councils, in relation to earthworks, streamworks and ecology.
- 1.5 This advice includes for the processing of resource consents, plan changes and notice of requirements, as well as compliance monitoring and enforcement.
- 1.6 Prior to my employment with Morphem, I was employed by Auckland Council as an Earthworks and Streamworks Specialist in a similar role primarily providing technical input primarily on resource consent applications.
- 1.7 I have completed the Ministry for the Environment ‘Making Good Decisions Course’.
- 1.8 I am a member of the New Zealand Freshwater Science Society, and the International Erosion Control Association.
- 1.9 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

**Scope**

1.10 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to ecological effects, both terrestrial and freshwater.

1.11 In writing this assessment, I have reviewed the following documents:

Notified Application Material:

- ‘80 McLarin Road, Glenbrook Beach Assessment of Environmental Effects’, report prepared by Harrison Grierson, dated 08/07/2022. [superceded]
- ‘80 McLarin Road, Glenbrook Beach – Glenbrook 4 Precinct Section 32 Evaluation’, report prepared by Harrison Grierson, dated 08/07/2022. [superceded]
- The proposed precinct plan titled: IXXX Glenbrook 4. [superceded]

- '80 McLarin Road, Glenbrook – Rezoning Stormwater Management Plan', report prepared by Harrison Grierson, dated 08/07/2022.
- 'Ecological Feasibility Assessment 80 McLarin Road, Glenbrook', report prepared by Pattle Delamore Partners Limited, dated November 2020 (hereon **Feasibility Assessment**)
- 'Detailed Ecological Assessments 80 McLarin Road, Glenbrook', report prepared by Pattle Delamore Partners Limited, dated 8 December 2021 (hereon **EclA**).
- 'Wetland Hydrology Assessment 80 McLarin Road, Glenbrook', report prepared by Pattle Delamore Partners Limited, dated December 2021.
- 'Additional Wetland Investigations', report prepared by Pattle Delamore Partners Limited, dated 5 April 2022.
- 'Proposed Rezoning 80 McLarin Road, Glenbrook Beach Urban Design Assessment', report prepared by Harrison Grierson, dated 12/07/2022.
- 'Ngati Te Ata Waiohua Cultural Impact Assessment (Overview)', report prepared by Ngati Te Ata, dated November 2021.
- '80 McLarin Road, Glenbrook Beach – Proposed Rezoning Civil Engineering Report', report prepared by Harrison Grierson, dated 02/05/2022.
- '80 McLarin Road, Glenbrook Beach – Proposed Rezoning Structure Plan Document,' report prepared by Harrison Grierson, dated 14/07/2022. [superceded]

Clause 23 Response:

- 'Response to Clause 23 Request for Further Information HG REF: A2010091.01 – 80 McLarin Road, Glenbrook – ReZoning', memorandum prepared by Harrison Grierson, dated 20 October 2022 (hereon **Covering Letter**).
- '80 McLarin Road, Glenbrook Beach Assessment of Environmental Effects', report prepared by Harrison Grierson, dated 17/10/2022.
- The proposed precinct plan titled: IXXX Glenbrook 4 (hereon **Precinct Plan**).
- '80 McLarin Road, Glenbrook Beach – Glenbrook 4 Precinct Section 32 Evaluation', report prepared by Harrison Grierson, dated 18/10/2022.
- '80 McLarin Road, Glenbrook Beach – Proposed Rezoning Structure Plan Document,' report prepared by Harrison Grierson, dated 20/10/2022.
- 'Clause 23 Request for Further Information, 80 McLarin Rd Private Plan Change', memorandum prepared by Pattle Delamore Partners LTD, dated 30 September 2022 (**Cl. 23 Response**).

1.12 I undertook a site visit on 19 January 2022.

1.13 At the time of preparing this evidence I have not participated in any expert witness conferencing.

1.14 The assessment in this technical memorandum does not cover stormwater or flooding matters.

## 2.0 Key Ecology Issues

2.1 The plan change seeks:

- 2.1.1 To rezone 7.987 ha of Future Urban Zone (**FUZ**) land at 80 McLarin Road, Glenbrook (**site**) to Residential – Mixed Housing Suburban (**MHS**).

- 2.1.2 To create a precinct over the site, referred to as “Glenbrook 4 Precinct”.
- 2.2 As it relates to ecological matters, in effect the plan change seeks to rezone the land from a rural and urban land use.
- 2.3 The implication of rezoning, within the scope of this technical assessment, is that there is a lesser activity status for certain activities:
- 2.3.1 There would also be a reduction in the riparian yard, from 20 m in the FUZ, to 10 m in the MHS.
- 2.3.2 As it would relate to urban development there would be a consenting pathway for any wetland reclamation, and a lesser activity status for other activities, that may be proposed under the National Environmental Standards for Freshwater (**NES:FW**). Such activities would then be captured under Regulation 45C, as a restricted discretionary activity; as opposed to a non-complying activity under Regulation 52 or Regulation 54 or prohibited under Regulation 53.
- 2.4 Glenbrook 4 Precinct would also introduce additional place-specific provisions that impact on ecological matters, including objectives, policies, standards and assessment criteria.
- 2.5 No other changes are proposed to the provisions of the Auckland Unitary Plan (**AUP**). No new rules are proposed that would supercede the region-wide rules of the AUP, notable chapters E3 (Lakes, rivers, streams and wetlands), E11 (Land disturbance – Regional), and E15 (Vegetation management and biodiversity).
- 2.6 Through the soft-lodgement and clause 23 processes the applicant has been requested to amend the precinct plan with a map updated to show all of the freshwater watercourses.
- 2.7 These points are explored further below.

### **3.0 Applicant’s Assessment**

- 3.1 The applicant has undertaken a series of investigations in regard to the site’s ecological values.
- 3.2 Ecological values were first investigated through the Feasibility Assessment.
- 3.3 I consider that the methodologies, standards and guidelines used to assess ecological values are appropriate (although it is noted that further information and additional assessment were requested).
- 3.4 The Feasibility Assessment considered the terrestrial ecological values to be ‘low’, hence these have not been considered further in the ecological reporting.
- 3.5 The Feasibility Assessment identified wetlands and streams on-site and these have been investigated further through the Wetland Hydrology Assessment, EclA, Additional Wetland Assessment and the Cl.23 Response.
- 3.6 I consider that the effort expended in the site investigations is appropriate for the nature of the plan change and potential effects.
- 3.7 I consider the reported results (as of September 2022, the date of the Cl.23 Response) to be a fair representation of the on-site values.
- 3.8 A point to note is that since the application material that relates to ecological matters has been submitted, there have been changes to both National Policy Statement for Freshwater Management (NPS:FM) and the National Environmental Standard: Freshwater (**NES:FW**) which will have a way in which any wetlands are considered in the future.

## **Management Methods**

- 3.9 The EclA does not directly consider any potential effects from the plan change, nor does it directly propose any measure to manage effects.
- 3.10 The EclA does include as section 5 'Mitigation of Effects and Recommendations'.
- 3.11 Section 5 of the EclA identifies the policy provisions of the NPS:FM that seek to avoid the further loss of freshwater values and extent, as well as, promote the improvement of degraded water bodies.
- 3.12 Section 5 of the EclA goes onto recommended that such improvements, and improvements to terrestrial ecological values, can be realised through riparian planting.
- 3.13 This recommendation is given effect through the precinct, with standard 3 requiring development and subdivision to provide a 10 m riparian yard setback, and for this to be planted in accordance with best practice, and protected in perpetuity.
- 3.14 It is considered that this addresses improvements in degraded water bodies.

## **4.0 Additional Matters**

### **Riparian Yard**

- 4.1 Not considered in the application material is the potential effect of the reduction in the riparian yard from 20 m in the FUZ to 10 m in the MHS.
- 4.2 Whilst the yard in the FUZ is a greater width, there is no mechanism that requires any enhancement under the existing planning provisions that apply to the site. Therefore, the site could be left as pasture grass and grazed.
- 4.3 Accordingly, a 10 m width, with the requirement for this to be planted is seen as an adequate mechanism to address any ecological impact that could result from the reduction in the width of the riparian yard.

### **Mapping**

- 4.4 It has also been requested that the precinct be updated with a map showing all of the freshwater watercourses.
- 4.5 The Covering letter (point 7.0) states the position of the applicant's planners; that this is not proposed and is not considered necessary.
- 4.6 The basis of the applicant's position is the (current) values of the watercourses, and that the region wide provisions of the AUP contain sufficient provision to address such matters.
- 4.7 There was also changes anticipated to the definition of wetland in the NPS:FM at the time this response was prepared.
- 4.8 Mapping of freshwater watercourse(s) and the inclusion of those watercourses within Precinct maps is now considered standard practice.
- 4.9 The mapping of freshwater watercourses provides guidance for future developments of both opportunities (such as the enhancement of freshwater systems as sought by RPS Objective B7.3.1(1)) and constraints for developments to respond to.
- 4.10 It would also assist given the wetland assessments are spread out over several documents.
- 4.11 The request for a precinct map to show all waterbodies, would also help to realise the outcomes sought by the proposed precinct plan.

4.11.1 The precinct description includes: *subdivision and development will incorporate natural drainage patterns, including natural wetlands and watercourses. Native planting is encouraged to enhance freshwater values.*

4.11.2 Objectives include:

Objective 6: *Subdivision and development maintains and enhances the freshwater values of intermittent streams and the natural wetlands within the precinct,*

Objective 9: *Freshwater is protected, with the effects of stormwater runoff on the receiving environment and freshwater systems avoided to the extent practical or otherwise mitigated using water sensitive design principles.*

Objective 10: *Freshwater, sediment quality and biodiversity is enhanced.*

4.11.3 Policies include:

Policy 7: *Stormwater is managed at-source and by applying water sensitive principles prior to the discharge of stormwater to existing watercourses and wetlands.*

Policy 9: *Contribute to improvements to water quality, and habitat and biodiversity values, including by providing riparian planting of the margins of natural wetlands and intermittent streams.*

4.12 The NPS:FM 2020 Clause 3.24 *Rivers* arguably increases the need to identify and accurately map rivers and streams.

4.13 NPS:FM Clause 3.24 contain provisions for Regional Council's that relate to the mapping and monitoring of freshwater watercourses. The starting point for this work would be the accurate identification and mapping of such watercourses.

4.14 The plan change process provides an opportunity for this work to be undertaken and incorporated into the regional plan, in advance of the change of land use and the pressures that may impact on the ecological values (such as water quality and habitat provision), as well as, the spatial extent of these watercourses.

4.15 Through the CI.23 Response (response 2.1), the applicant's ecologist agrees with this and notes that this has been undertaken in the adjacent Glenbrook 3 Precinct. The applicant's ecologist also identified that this definition of a wetland (and therefore the mapping requirement) could change, pending the then anticipated changes to the NPS:FM (now operative).

4.16 Based on my review of Table 1 of the Wetland Assessment, the site visit, the current guidance from The Ministry for the Environment<sup>1</sup> there would be no reason to suspect that there would be any further changes to the watercourse classifications.

4.17 It is also noted that there is currently no single map provided that accurately depicts all wetlands. The latest ecological reporting in this regard is in the Additional Wetland Investigation. The Additional Wetland Investigation identified points 1 and 2 (to the north) as meeting the definition of the natural inland wetland, which on the basis of material reviewed, is accurate. However, these points have not been shown on a map.

4.18 The relief sought, remains to include all freshwater watercourses (both wetlands and streams), within a precinct map. Accurate delineation is required for wetlands to included them within any precinct map.

## **NES:FW**

4.19 The NES:FW offers a specific consenting pathway under Regulation 45C for a range of activities that relate to urban development and that could impact on wetlands.

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<sup>1</sup> Ministry for the Environment. 2022. Wetland delineation protocols. Wellington: Ministry for the Environment.

- 4.20 An outcome of the plan change would be that this consenting pathway is open, by virtue of having had the land rezoned for urban land use.
- 4.21 Regulation 45C allows for these activities as a restricted discretionary activity, whereas the equivalent provisions for non-urban development would be a non-complying activity under Regulations 52 (for drainage of a natural wetland) and/or Regulation 54; or a prohibited activity under Regulation 53.
- 4.22 Regulation 45C(6) provides a framework of statutory tests that must be met before any resource consent is granted, including, as Regulation 45C(6)(c), that the effects management hierarchy is applied.
- 4.23 It is therefore considered that the Regulation 45C pathway contains sufficient provision should there be any future need to apply for such consents, and no further effects management is required to assess this potential outcome from the plan change.
- 4.24 Note that these activities, may also require consents under the AUP.

## **5.0 Submissions and Further Submissions**

- 5.1 Plan Change 91 has been publicly notified and a series submissions have been received.
- 5.2 A number of submissions reference ecological matters, and I have provided commentary on these in Appendix 1.
- 5.3 None of the submission raise any new matters that have not otherwise been considered in the assessment above.
- 5.4 Two further submissions have also been received, none of which relate to ecological matters.

## **6.0 Conclusions and Recommendations**

- 6.1 I consider that, with the exception of the matter regarding a precinct map showing freshwater features, the private plan change adequately addresses potential ecological impacts.
- 6.2 The outcomes sought by the Precinct, the AUP and the NPS:FM could be given effect to, to a greater degree than currently proposed, through the inclusions of a precinct plan that maps all freshwater watercourses (both wetlands and streams).
- 6.3 Accordingly, I support the private plan change with the modification of the precinct plan.



## Appendix 1: Submissions and Further Submissions Analysis

Submitter Number and Name	Submission Point	Submission	Assessment
1: Ngati Te ata	1.1	The applicants have not indicated in any way how they propose to actually respect, protect and recognise the cultural, social and environmental issues we raised in the report.	This submission is made from a cultural perspective, and I acknowledge and respect the concerns raised. However, I recognise that mana whenua are best placed to identify cultural values and cultural effects. I am not mana whenua and it is not within my area of expertise. Therefore, having regard to the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note, I do not provide further comment on this topic.
18: Ellan Meharry	18.6	What will happen to the local wildlife?	The plan change would not impact on any reasons for consent under the AUP for any activity that could result in the potential impacts recognised in these submissions points.  It is considered that the standard region-wide provisions of the AUP contain sufficient provision to address any potential effect that may result at the time of resource consenting.  The provisions of the Wildlife Act (1953) would also remain in place to address any effect on native fauna.
19: Michael MacAulay	19.9	I hold concerns for the local wildlife such as the nesting Herons, King Fisher, Tui, Pheasants and other wildlife that reside in the land area designated as 80 McLarin Road.	
20: Dianne Bradford	20.4	I am concerned for the environment and the existing trees and I would like to know what will happen to them.	
34: Tui Kahu Trust	34.4	On-going civil works in the Kahawai Point development have stripped natural contours, native plantings and impacted coastal birdlife.	
23: Aaron and Elizabeth Yorke	23.1	Include 140 McLarin Rd in the plan change.	This assessment is neutral on this submission. There are no specific ecological constraints or opportunities identified in regard to this property and hence there is no specific concern regarding the extension on the plan change to include this specific property.
38 Sarah Fisher	38.1	Recommend wetlands to be 20 meters wide and that it is not at the councils cost to plant.  .... I am unclear from all the literature that I have read for this change in proposal whether the area on my fence line (Lot 71) is considered a wetland or not.  If the council is not responsible for the cost of the riparian planting – how do I as a house owner hold the developers accountable?	This submission asks a number of specific questions. By way of a response: <ul style="list-style-type: none"> <li>• Whilst it is recognised that 20 m riparian planting would provide for greater degree of ecological benefit to the freshwater watercourses on-site, this is a higher standard than applied elsewhere in the AUP.</li> <li>• The Precinct Plan would require riparian planting at the time of development/subdivision (standards 3) and hence the onus on providing the planting would be on the consent holder (or consent would be required to breach this standard). Standard resource consent application processing and subsequent compliance monitoring is considered sufficient to ensure that this is the case.</li> </ul>

Submitter Number and Name	Submission Point	Submission	Assessment
			<ul style="list-style-type: none"> <li data-bbox="1384 258 2033 445">The site, and the neighboring property to the southeast (Lot 3), do feature stormwater management devices. These are identified in Auckland Council's Geo Maps (24/07/20203) as private stormwater treatment ponds or wetlands and would be excluded from the definition of a natural wetland in the NPS:FM and Resource Management Act.</li> </ul>

## Memo (technical specialist report to contribute towards Council's section 42A hearing report)

31 July 2023

To: Katrina David – Senior Policy Planner, Central & South Planning, Plans and Places  
From: Rebecca Ramsay – Senior Specialist: Heritage, Heritage Unit, Plans and Places Department

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**Subject: Proposed Private Plan Change – PC 91, 80 McLarin Road, Glenbrook – Historic Heritage Assessment**

### 1.0 Introduction

- 1.1 I have undertaken a review of the proposed private plan change (PC 91), on behalf of Auckland Council in relation to historic heritage effects.
- 1.2 My review has not addressed effects on mana whenua cultural values other than in relation to information gaps. The cultural and other values that mana whenua place on the area may differ from its historic heritage values and are to be determined by mana whenua. It is the applicants' responsibility to consult with mana whenua to determine mana whenua values.
- 1.3 I have a Master of Arts degree with first class honours in anthropology (archaeology) specialising in New Zealand archaeology. I have worked in the field of historic heritage management for nearly 8 years. My experience spans archaeology (including landscape archaeology) and heritage policy and planning.
- 1.4 In writing this memo, I have reviewed the following documents:
  - Assessment of Environmental Effects (AEE): 80 McLarin Road, Glenbrook Beach. Prepared by Harrison Grierson for HD Project 2 Ltd. (8 July 2022).
  - Structure Plan: 80 McLarin Road, Glenbrook Beach, Proposed Rezoning. Prepared by Harrison Grierson for HD Project 2 Ltd. (14 July 2022).
  - Section 32 Evaluation: 80 McLarin Road, Glenbrook Beach, Proposed Rezoning. Prepared by Harrison Grierson for HD Project 2 Ltd. (8 July 2022).
  - PC 91 - Proposed Changes to AUP(OIP)
    - Appendix 1: Archaeological Assessment. Trilford, D. 9 August 2021. 80 McLarin Road proposed private plan change: archaeological assessment. Prepared by CFG Heritage for Harrison Grierson.
    - Appendix 9: Ngati Te Ata Waiohua Cultural Impact Assessment (Overview). November 2021.
  - Clause 23 – Request for Further Information
    - Response To Clause 23 Request for Further Information. 20 October 2022.
      - Attachment H: Amended structure plan
      - Attachment I: Amended section 32 analysis
      - Attachment J: Amended assessment of environmental effects
      - Attachment K: Amended proposed plan change/precinct provisions.

### 2 Key Historic Heritage Issues

- 2.1 The key issue in relation to historic heritage is whether the application has sufficiently assessed and addressed actual or potential effects on historic heritage.

### 3 Applicant's assessment of historic heritage values, adverse effects and mitigation methods

- 3.1 In relation to historic heritage the applicant has provided an archaeological assessment by Danielle Trilford of CFG Heritage, (Appendix 1 - 2021).

- 3.2 The archaeological assessment provides a historical and archaeological background summary of the plan change area and wider heritage context through desktop research and field survey.
- 3.3 No historic heritage places (built and archaeological places) were recorded prior to, or through the 2021 assessment and field survey. The archaeological assessment concludes that no archaeological or heritage constraints are identified within the plan change area.
- 3.4 However, there remains a risk for potentially unrecorded archaeological deposits within the plan change area due to the proximity to the coast, key toānga waka (portages) and wider Māori and European settlement and occupation within the Glenbrook area and former Kahawai Block<sup>1</sup>. Historical research also indicates the graves of John Kent and Te Wherowhero's children are located within the Kahawai Block. Further research is required to narrow down the location of the graves, which should be undertaken as part of an assessment to support an archaeological authority application to HNZPT<sup>2</sup>.
- 3.5 In my opinion, the historic heritage assessment provides a sufficient level of detail in relation to historic heritage for the purposes of the proposed plan change.

#### **4 Submissions**

- 4.1 No submissions were received in relation to historic heritage matters.

#### **5 Conclusions and recommendations**

- 5.1 The archaeological assessment provides a full description of the heritage sites and values<sup>3</sup> within the plan change area.
- 5.2 Any heritage effects associated to the plan change can be appropriately managed through the existing provisions in the AUP and under the Heritage New Zealand Pouhere Taonga Act (2014).
- 5.3 Overall, I agree with the assessment's identification of potential impacts on historic heritage, and I can support the private plan change.

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<sup>1</sup> Appendix 1: Archaeological Assessment. 2021 p. 12. AEE 2022 p. 28-30.

<sup>2</sup> Appendix 1: Archaeological Assessment. 2021 p. 14.

<sup>3</sup> AUP - B5. Ngā rawa tuku iho me te āhua – Historic heritage and special character

## **APPENDIX 6**

### **RELEVANT STATUTORY AND POLICY FRAMEWORK – ADDITIONAL ASSESSMENT**



## Appendix 5: Relevant statutory and policy framework – additional assessment

### National Policy Statement on Urban Development

NPS-UD Objectives	Comment
<p><b>Objective 1:</b> New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p>	<p><b>Partially consistent</b>, noting that a well-functioning urban environment (as set out in Policy 1) includes:</p> <ul style="list-style-type: none"> <li>• good accessibility for all people between housing, job, community services, natural and open spaces (clause (1)(c))</li> <li>• supporting reduction of greenhouse gas emissions (clause (1)(e)).</li> </ul> <p>Location of plan change area may have reasonable accessibility within the Glenbrook Beach but not to employment areas and community services. There is currently no public transport servicing Glenbrook Beach and none is planned or funded. Therefore, the greater uptake of EVs notwithstanding emissions from private vehicles are unlikely to be reduced.</p>
<p><b>Objective 2:</b> Planning decisions improve housing affordability by supporting competitive land and development markets.</p>	<p><b>Neutral – consistent</b></p>
<p><b>Objective 3:</b> Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</p> <ul style="list-style-type: none"> <li>(a) the area is in or near a centre zone or other area with many employment opportunities</li> <li>(b) the area is well-serviced by existing or planned public transport</li> <li>(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</li> </ul>	<p><b>Consistent as meets 3(a)</b>, noting only one clause is required to be met.</p> <p>PC91 is located near a centre, but not necessarily near employment opportunities (in terms of walkable catchment)</p> <p>PC91 is not well serviced by public transport (existing or planned)</p> <p>Unclear if there is a high demand for housing in Glenbrook Beach, relative to other areas within the urban environment, but unlikely, noting that the market will determine this.</p>
<p><b>Objective 4:</b> New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p>	<p><b>Consistent</b></p>

<p><b>Objective 5:</b> Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p>	<p><b>Neutral – consistent</b></p>
<p><b>Objective 6:</b> Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> <li>(a) integrated with infrastructure planning and funding decisions; and</li> <li>(b) strategic over the medium term and long term; and</li> <li>(c) responsive, particularly in relation to proposals that would supply significant development capacity.</li> </ul>	<p><b>Partially consistent</b></p> <p>PC91 area is identified as suitable for future urbanisation, by virtue of being zoned FUZ.</p> <p>PC91 is generally aligned with the sequencing identified in the current FULSS.</p> <p>PC91 development is generally consistent with the timing and capacity of water supply and wastewater infrastructure, noting proposed precinct provisions.</p> <p>PC91 is not aligned with transport planning/funding.</p> <p>PC91 will not supply significant development capacity.</p>
<p><b>Objective 7:</b> Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.</p>	<p>NA</p>
<p><b>Objective 8:</b> New Zealand’s urban environments:</p> <ul style="list-style-type: none"> <li>(a) support reductions in greenhouse gas emissions; and</li> <li>(a) are resilient to the current and future effects of climate change.</li> </ul>	<p><b>Partially consistent, with appropriate info and precinct amendments</b></p> <p>The greater uptake of EVs notwithstanding, PC91 may not support reductions in emissions.</p> <p>PC91 future development could be resilient to future effects of climate change dependant on further analysis/information by applicant and additional precinct provisions.</p>

NPS-UD Policies	Comment
<p><b>Policy 1:</b> Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> <li>(a) have or enable a variety of homes that: <ul style="list-style-type: none"> <li>(i) meet the needs, in terms of type, price, and location, of different households; and</li> <li>(ii) enable Māori to express their cultural traditions and norms; and</li> </ul> </li> <li>(b) have or enable a variety of sites that are suitable for different business</li> </ul>	<p><b>Partially consistent</b></p> <p>PC91 consistent with (a)(i) and could be consistent with (a)(ii), dependant on precinct provisions</p> <p>PC91 partially consistent with (c)</p> <p>PC91 not consistent with (e)</p> <p>PC91 could be consistent with (f)</p>



<p>sectors in terms of location and site size; and</p> <p>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</p> <p>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</p> <p>(e) support reductions in greenhouse gas emissions; and</p> <p>(f) are resilient to the likely current and future effects of climate change.</p>	<p>(b) and (d) NA</p>
<p><b>Policy 2</b></p>	<p>NA</p>
<p><b>Policy 3:</b> In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <p>(a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and</p> <p>(b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and</p> <p>(c) building heights of at least 6 storeys within at least a walkable catchment of the following:</p> <p>(i) existing and planned rapid transit stops</p> <p>(ii) the edge of city centre zones</p> <p>(iii) the edge of metropolitan centre zones; and</p> <p>(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.</p>	<p><b>Likely to be consistent</b></p> <p>(a), (b) and (c) NA</p> <p>PC91 likely to be consistent with (d) in the future. However currently these are no commercial activities or community services within the Neighbourhood Centre Zone</p>
<p><b>Policy 4:</b> Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.</p>	<p>No QMs proposed</p>
<p><b>Policy 5</b></p>	<p>NA</p>

<p><b>Policy 6:</b> When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <ul style="list-style-type: none"> <li>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</li> <li>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: <ul style="list-style-type: none"> <li>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</li> <li>(ii) are not, of themselves, an adverse effect</li> </ul> </li> <li>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</li> <li>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</li> <li>(e) the likely current and future effects of climate change.</li> </ul>	<p>Neutral</p>
<p><b>Policy 7</b></p> <p><b>Policy 8:</b> Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</p> <ul style="list-style-type: none"> <li>(a) unanticipated by RMA planning documents; or</li> <li>(b) out-of-sequence with planned land release.</li> </ul>	<p>NA</p> <p>PC91 is not unanticipated – i.e. FUZ, and currently not out of sequence with FULSS</p>
<p><b>Policy 9:</b> Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:</p> <ul style="list-style-type: none"> <li>(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective</li> </ul>	<p><b>Consistent</b></p> <p>PC91 has followed RMA Schedule 1 process, providing iwi and hapū opportunity to be involved. Iwi were also asked by council if they wanted commissioners with Te Ao Māori knowledge and experience in tikanga etc.</p>

<p>consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and</p> <p>(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</p> <p>(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and</p> <p>(d) operate in a way that is consistent with iwi participation legislation.</p>	
<p><b>Policies 10 and 11</b></p>	<p>NA</p>

Auckland Plan 2050 – relevant sections

Outcome	Matters	Comment
<p>Development strategy</p>	<p>Managed expansion into future urban areas</p> <p>Anticipated growth – where and when – links to FULSS.</p>	<p>As mentioned above the plan change area is identified as a future urban area and is expected to be development ready 2023 – 2027. The plan change generally aligns with this timing, noting the plan change process is not likely to be completed until at least 2024.</p> <p>The Auckland Plan identifies the funding, timing and delivery of infrastructure as a key challenge for new urban areas, especially greenfield areas.</p> <p>The proposed plan change contains provisions that limit development until adequate water supply and wastewater infrastructure are available. This approach is generally supported by Watercare (Submitter 26). Opinions differ on the delivery of transport infrastructure.</p>
<p>Homes and Places</p>	<p>Direction 1: Develop a compact urban form to accommodate Auckland’s growth and support a low carbon future</p> <p>Direction 2: Accelerate the construction of quality homes that meet</p>	<p>The Auckland Plan identifies that a key component of a ‘quality compact approach’ to growth is about enabling more houses to be built in locations that have good access to jobs, services and amenities; thereby</p>

Outcome	Matters	Comment
	Aucklanders' changing needs and preferences	<p>reducing the distance people need to travel, reducing emissions, and reducing travel costs. These houses also need to include a broader mix of housing types, sizes and price points.</p> <p>The plan change is located in a coastal settlement that currently has very limited local amenities and services. Waiuku is the nearest town, approximately 14-15km away and there is no access to public transport.</p> <p>The AEE highlights the proposed MHS Zone will provide for a more compact form and wider range of housing choices than currently available in Glenbrook Beach, and that this will cater to those seeking lifestyle choices.</p>
Transport and Access	<p>Direction 1: Maximise safety, environmental protection and emissions reduction</p> <p>Direction 2: Better connect people, places, goods and services</p> <p>Direction 3: Increase genuine travel choices for a healthy, vibrant and equitable Auckland</p> <p>Focus area 4: Make walking, cycling and public transport preferred choices for many more Aucklanders</p> <p>Focus area 5: Better integrate land-use and transport</p>	<p>A key priority of Direction 1 is to reduce carbon emissions by reducing reliance on cars and to support people to walk, cycle and use public transport. Improving safety for all road users is also a priority. The adverse effects of road infrastructure on the environment is noted e.g. run-off from paved/sealed surfaces and pollutants and particulate emissions from vehicle exhaust.</p> <p>The proposed plan change seeks to encourage walking and cycling within the plan change area and the Glenbrook Beach settlement. However the relatively isolated location of the settlement, compared to access to social and community facilities and retail centres is a matter of some concern.</p>

Outcome	Matters	Comment
Environment and cultural heritage	<p>Direction 1: Ensure Auckland’s natural environment and cultural heritage is valued and cared for</p> <p>Direction 2: Apply a Māori world view to treasure and protect our natural environment (taonga tuku iho)</p> <p>Direction 3: Use Auckland’s growth and development to protect and enhance the natural environment</p> <p>Direction 4: Ensure Auckland’s infrastructure is future-proofed</p> <p>Focus area 2: Focus on restoring environments as Auckland grows</p> <p>Focus area 3: Account fully for the past and future impacts of growth</p> <p>Focus area 5: Adapt to a changing water future</p> <p>Focus area 6: Use green infrastructure to deliver greater resilience, long-term cost savings and quality environmental outcomes</p>	<p>Focus area 2 highlights that as growth and redevelopment occurs this is an opportunity to restore ecosystems and a degraded natural environment. This can be done by:</p> <ul style="list-style-type: none"> <li>• <i>identify natural ecosystems and areas that can be restored or enhanced around or near new developments, and incorporate them into green spaces for residents and communities</i></li> <li>• <i>collaborate with mana whenua to ensure protection and story-telling opportunities for sites of cultural significance</i></li> <li>• <i>identify and include nature-based solutions to help minimise the impacts of climate change</i></li> <li>• <i>set minimum expectations for new developments and the contribution they have to make</i></li> </ul> <p>The plan change area has degraded ecological values. The proposed plan change seeks to improve freshwater quality and biodiversity by requiring a planted 10m riparian margin along intermittent streams and natural wetlands.</p> <p>Ngati Te Ata (submitter 1) do not support the plan change as proposed.</p> <p>The management of stormwater runoff is a matter of concern although further information and amended precinct provisions could resolve this.</p>



# **APPENDIX 7**

## **RECOMMENDED PRECINCT PROVISIONS**





## Appendix 7: Recommended precinct provisions

Amendments are shown with text to be deleted as ~~struck through~~ and text to be added as underlined.

Comment boxes include submission numbers for specific changes. Note – this does not necessarily identify all relevant submission numbers.

### IXXX Glenbrook 4

#### IXXX.1 Precinct Description

The underlying zoning of land within this precinct is Residential – Mixed Housing Suburban. Refer to the planning maps for the location and extent of the precinct.

The Glenbrook 4 Precinct is located landward of the adjacent Glenbrook Beach coastal settlement. The Precinct will enable a range of housing typologies to be provided that will meet the full generational housing needs of the local community. Precinct standards will integrate subdivision and development within the Precinct with the established Glenbrook Beach coastal settlement, and with the Glenbrook 3 Precinct/Kahawai Point to the north.

It is intended that walking and cycling connections will be provided within the Precinct to connect the established Glenbrook Beach coastal settlement to land that is zoned Business – Neighbourhood ~~Local~~ Centre on the eastern side of McLarin Road, and to connect the Glenbrook 3 Precinct/Kahawai Point with the coast and beach. These connections will build upon the network of walkways established and planned for in the Glenbrook Beach 3 precinct.

Subdivision and development will incorporate natural drainage patterns, including natural wetlands and watercourses. Native planting is encouraged to enhance freshwater values. Stormwater will be managed to mitigate adverse effects on freshwater values using precinct and the Auckland-wide stormwater provisions ~~of the AUP(OP)~~ and the Stormwater Management Area – Flow 1 Control ~~overlay~~ provisions.

The Glenbrook 4 Precinct will integrate subdivision and development with the delivery of infrastructure, including water supply, wastewater, transport and stormwater.

The objectives and policies of the Auckland-wide sections, and of the underlying Residential – Mixed Housing Suburban zone, apply in the Glenbrook 4 Precinct except as specified below.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

#### IXXX.2 Objectives

1. Subdivision and development are undertaken in general accordance with the precinct plan.
2. Subdivision and development achieves an attractive, safe and healthy environment for living with good access to the public realm including parks, riparian margins and roads.
3. Subdivision and development occurs in a manner that achieves the coordination and delivery of infrastructure including active mode facilities, roading, wastewater, water supply and stormwater services.
4. The precinct is supported by a well-connected, safe, efficient, and legible movement network with low-speed internal streets and appropriate connections to existing and future urban areas surrounding the precinct.

5. Subdivision and development encourages a choice of transport modes including walking and cycling, and provides strong, legible connections within and through the precinct.
6. Subdivision and development maintains and enhances the freshwater values of intermittent streams and the natural wetlands within the precinct.
7. Subdivision and development achieves attractive and well-designed residential developments that support a range of housing densities and typologies that increase variety and housing choice.
8. Subdivision and development achieves integration of built form within the precinct, with the existing Glenbrook Beach settlement, and with the Glenbrook 3 Precinct/Kahawai Point-Special Housing Area.
9. Freshwater is protected, with the effects of stormwater runoff on the receiving environment and freshwater systems avoided to the extent practical or otherwise mitigated using water sensitive design principles.
10. Freshwater, sediment quality and biodiversity is enhanced.
11. ~~Stormwater is attenuated to manage downstream flooding and in a manner that integrates with subdivision and development to make efficient use of the land.~~
12. Subdivision and development manages downstream flooding effects so that the risks to people and property (including infrastructure) are not increased in a flood event.
13. Stormwater quality and quantity is managed to maintain the health and wellbeing of the receiving environment where it is excellent or good, and it is enhanced overtime where the receiving environment is degraded. [rp/dp]
14. Subdivision and development respects Mana Whenua values.

The overlay, Auckland-wide and zone objectives apply in this precinct, in addition to those specified above.

### IXXX.3 Policies

1. Provide for a range of lot sizes and housing typologies that support lifestyle and housing choice at a variety of densities.
2. Require publicly reticulated wastewater and water supply network to be available to service any subdivision or development within the precinct.
3. Avoid subdivision, use and development prior to the availability of bulk water, wastewater and roading infrastructure to service development in the Glenbrook 4 p-Precinct.
- 3A. Avoid, remedy or mitigate adverse effects on the safe and efficient operation of the transport network, including by:
  - a. limiting subdivision, use or development within the precinct until the intersection of Mission Bush Road and Glenbrook-Waiuku Road is upgraded; and
  - b. requiring the road frontages on McLarin Road to be upgraded to an urban form in accordance with IXXX.12 Appendix 1.
4. Require that any subdivision and development within the precinct incorporates the following elements of the precinct plan:
  - a. linkages to adjacent land, including a pedestrian/cycle link between the Glenbrook Beach Recreation Reserve and the future local land zoned Business - Neighbourhood eCentre Zone

- on McLarin Road; ~~and~~
- ~~b. c. a roundabout intersection on McLarin Road; and~~
- d. a pedestrian crossing facility on McLarin Road near the neighbourhood centre.

5. ~~Ensure~~ Require that subdivision and land use activities establish a transport network that provides for the safe and efficient movement of motor vehicles, pedestrians and cyclists.
6. Encourage residential development to have a visual connection between the house and the street and/ or public spaces.
- ~~7. Stormwater is managed at source and by applying water sensitive principles prior to the discharge of stormwater to existing watercourses and wetlands.~~
8. Stormwater is managed in a manner that integrates with development to make efficient use of land and where possible, contributes to the amenity and character of the Glenbrook 4 Precinct.
9. Contribute to improvements to water quality, habitat and biodiversity, including by planting on the riparian margins of ~~permanent~~ wetlands and intermittent streams.
- ~~10. Stormwater is attenuated to manage downstream flood effects in a manner that integrates stormwater management with subdivision and development to make efficient use of the land.~~
11. Require subdivision and development to be consistent with any approved stormwater management plan including:
  - a. requiring the management of runoff from all impervious surfaces to enhance water quality and protect the health of the receiving environment, requiring appropriate design/sizing and location of stormwater outfalls/outlets;
  - b. requiring stormwater to be managed at source and by applying water sensitive principles prior to the discharge of stormwater to existing watercourses and wetlands to achieve water quality and hydrology mitigation; and
  - c. attenuating stormwater to manage downstream flood effects to that of pre-development levels in a manner that integrates stormwater management with subdivision and development to make efficient use of land. [rp/dp]
12. Encourage subdivision and development to incorporate Te Aranga principles, including the principles of Mana, Whakapapa, Taiao, Mauri tu, Mahi toi, Tohu and Ahi ka.
13. Avoid or mitigate adverse effects on Mana Whenua values by:
  - a. taking an integrated approach to stormwater management in the Glenbrook 4 Precinct;
  - b. maintaining and enhancing the mauri of intermittent streams and wetlands; and
  - c. protecting the mauri of Waiuku Awa (River) and Manukau Harbour.

All relevant overlay, Auckland-wide and zone policies apply in this Precinct in addition to those specified above.

#### **IXXX.4 Land Use Activity Table**

The provisions of the relevant zone, overlays and the Auckland-wide activity tables apply unless otherwise specified below.

Table IXXX.4.1 Activity table (~~Tables 1 and 2~~) specifies the activity status of land use and development activities in the Glenbrook 4 ~~p~~-Precinct pursuant to section 9(3), and the activity status for subdivision pursuant to section 11 of the Resource Management Act 1991.

### IXXX.4.1 Activity table

Activity Table 1 – Glenbrook 4 precinct		
	Activity	Activity status
	<b>Rural</b>	
A1	Grazing of livestock on sites greater than 2,000m <sup>2</sup> net site area	P

Activity Table 2 – Glenbrook 4 precinct		
	Activity	Activity status
	<b>Residential</b>	
(A2)	Development of up to three dwellings that complies with standards IXXX.7.1.46.1 (Water supply and wastewater infrastructure), IXXX.7.1.26.2 (Precinct Plan), IXXX.7.1.36.3 (Riparian Margins and Setbacks), and IXXX.7.1.46.4 (Fences), IXXX.6.5 (Stormwater quality), IXXX.6.6 (Staging of subdivision and development with transport upgrades) and IXXX.6.7 (Road design and upgrade of existing rural roads)	P
(A3)	Development of four or more dwellings that complies with standards IXXX.7.1.46.1 (Water supply and wastewater infrastructure), IXXX.6.2 (Transport infrastructure), IXXX.7.1.26.3 (Precinct Plan), IXXX.7.1.36.4 (Riparian Margins and Setbacks), and IXXX.7.1.46.5 (Fences), IXXX.6.5 (Stormwater quality), IXXX.6.6 (Staging of subdivision and development with transport upgrades) and IXXX.6.7 (Road design and upgrade of existing rural roads)	RD
(A4)	Development that does not comply with Standard IXXX.7.1.36.3 (Riparian margins and setbacks)	RD
(A5)	Development that does not comply with Standard IXXX.7.1.4.6.4 (Fences)	RD
(A6)	Development that does not comply with Standard IXXX.7.1.46.1 (Water supply and wastewater infrastructure)	NC
(A7)	<del>Development not in general accordance that does not comply with Development Standard IXXX.7.1.26.2 (Figure 1 – Precinct Plan).</del>	D
(A10) [rp/dp]	Development that does not comply with Standard IXXX.6.5 (Stormwater quality)	RD
(A8)	Development that does not comply with Standard IXXX.6.6 (Staging of subdivision and development with upgrades)	D
(A11)	Development that does not comply with Standard IXXX.6.7 (Road design and upgrade of existing rural roads)	RD

### IXXX.5 Subdivision Activity Table

The controls in [E38 Subdivision](#) shall apply within the Glenbrook 4 Precinct unless specified in the following provisions:

Table IXXX.4.1 Activity Table 3 – [E38.4.1](#) and [E38.4.2](#) apply in Glenbrook 4 Precinct, except as specified in Activity Table 3 below.

Activity Table 3 – Glenbrook 4 precinct		
	Activity	Activity status
	<b>Subdivision and associated development activity</b>	
A8(A12)	Subdivision that complies in general accordance with standards IXXX.7.1.46.1 (Water supply and wastewater infrastructure), standard IXXX.7.1.26.2 (Precinct Plan), and IXXX.7.1.36.3 (Riparian margins and setbacks), IXXX.6.5 (Stormwater quality), IXXX.6.6 (Staging of subdivision and development with transport upgrades) and IXXX.6.7 (Road design and upgrade of existing rural roads)	RD
A9 (A13)	Subdivision that does not comply not in general accordance with the Precinct Plan (s-Standard IXXX.7.1.26.2 (Precinct Plan).	D
A10 (A14)	Subdivision that does not comply not in accordance with s Standard IXXX.7.1.36.3 (Riparian margins and setbacks)	RD
A14 (A15)	Subdivision that does not comply not in accordance with s Standard IXXX.7.1.46.1 (Water supply and wastewater infrastructure)	NC
(A16)	Subdivision that does not comply with Standard IXXX.6.5 (Staging of subdivision and development with upgrades)	D
(A17)	Subdivision that does not comply with Standard IXXX.6.8 (Road design and upgrade of existing rural roads)	RD

### IXXX.65 Notification

- (1) Any application for resource consent for the following activities will be considered without public or limited notification or the need to obtain written approval from affected parties unless Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991:
  - (a) four or more dwellings per site that comply with standards IXXX.7.1.46.1 (Water supply and wastewater infrastructure), IXXX.7.1.26.2 (Precinct Plan), IXXX.7.1.36.3 (Riparian Margins and Setbacks), IXXX.6.5 (Stormwater quality), IXXX.6.6 (Staging of subdivision and development with transport upgrades) and IXXX.6.7 (Road design and upgrade of existing rural roads); or
  - (b) development which does not comply with Standard IXXX.7.1.46.4 (Fences).
- (2) Any application for resource or subdivision consent for an activity listed in IXXX.4.1 Activity table and which is not listed in IXXX.5(1) above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (3) 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).

### IXXX.76 Standards

The standards of the relevant zone, overlays and the Auckland-wide provisions apply unless otherwise specified below.

#### IXXX7.1 Land use and subdivision

#### IXXX.6.1– Water supply and wastewater infrastructure

Purpose:

- To ensure that development and subdivision within the Glenbrook 4 precinct is serviced by publicly available reticulated water and wastewater networks.
- To achieve the integration of land use and water supply and wastewater infrastructure.

1. Development and subdivision in the Glenbrook 4 p-Precinct must either:
  - (a) be connected to publicly available reticulated water and wastewater networks with sufficient capacity to service the proposed development and/or subdivision; ~~OR or~~
  - (b) be supported by written confirmation from the infrastructure services provider for the area that planned capital works required to provide connections for water and wastewater are suitably advanced and capable of servicing proposed subdivision and development.

### IXXX.6.2— Precinct Plan

Purpose:

- To implement the indicative connections, pathways, and infrastructure specified in ~~Figure 1~~ of the Glenbrook 4 Precinct Plan (IXXX.11).
  - ~~To XXX~~
1. ~~Development and/ or subdivision shall enable~~ must provide the connections, and pathways, and infrastructure (including the roundabout) to be provided as shown in ~~Figure 1~~ of the Glenbrook 4 Precinct Plan (IXXX.11).
  2. ~~Roads are to be designed in accordance with the road cross sections for this Precinct in Figure 2 of the Glenbrook 4 Precinct Plan.~~
  2. Development and/or subdivision fronting McLarin Road south of the intersection with Okoreka Road and Orawahi Road, must not occur until the roundabout and pedestrian crossing facility shown on the Glenbrook 4 Precinct Plan (IXXX.11) have been provided.

### IXXX.6.3— Riparian Margins and Setbacks

Purpose:

To maintain and enhance biodiversity, ecosystem health, freshwater quality and intermittent streams and natural wetlands within the Precinct.

1. Where development and/ or subdivision provides riparian margins, the development and/or subdivision shall comply with clauses (a) – (c), below:
  - a) A minimum 10m riparian yard setback must be provided between buildings and the top of the bank belonging to any intermittent stream or natural wetland.
  - b) Native planting shall be planted within 10m of any intermittent stream or wetland. Planting should be undertaken at a density of 20,000 plants per hectare, using eco-sourced native vegetation consistent with local biodiversity.
  - c) Riparian margins can be either located within private property and protected by a consent notice or covenant or vested at council's request.

### IXXX.6.4— Fences

Purpose:

To promote:

- open space character and enable opportunities for passive surveillance of public open spaces and streets reserves; and
- the viability of the planted riparian margin to act as and be maintained as a continuous green corridor.

1. Fences fronting a wetland, an intermittent stream, or the Glenbrook Beach Recreation Reserve, must not exceed 1.2m in height, except that fences may be up to 1.6m in height if the fence is at least 60 percent visually permeable.
2. No fences are permitted within a planted riparian margin or within 10m of a wetland or an intermittent stream.
- (3) Fences on the front boundary must not exceed 1.2m in height or 1.8m in height if the fence is at least 50 per cent visually permeable above 1.2m.
- 3-(4) All other fences must comply with H4.6.14 (Front, side and rear fences and walls in the Residential – Mixed Housing Suburban zone).

### IXXX.6.5 Stormwater quality

Purpose:

- Contribute to improvements to freshwater and coastal water quality
- Protect and enhance Mana Whenua values

- (1) Stormwater runoff from all impervious areas other than roofs must be either:
  - (a) treated at-source by a stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or
  - (b) treated by a communal stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)' that is designed and authorised to accommodate and treat stormwater from the site.
- (2) Stormwater runoff from roofs must be:
  - (a) from inert building materials and directed to an approved stormwater management device.

### IXXX.6.6 Staging of subdivision and development with transport infrastructure upgrades

Purpose:

- To mitigate the adverse effects of traffic generation on the surrounding local and wider network.
  - To achieve the integration of land use and transport infrastructure
1. The number of dwellings within the precinct may not exceed 25 until such time that:
    - (a) a roundabout at the intersection of Mission Bush Road and Glenbrook-Waiuku Road has been constructed or a contract of works for the full project has been let; or
    - (b) written confirmation is provided from Auckland Transport that planned capital works for the delivery of a roundabout at the intersection of Mission Bush Road and Glenbrook-Waiuku Road are suitably advanced and capable of servicing proposed subdivision and development.

### IXXX.6.7 Road design and upgrade of existing rural roads

Purpose: To ensure:

- any activity, development and/or subdivision complies with Appendix 1: Minimum road width, function and required design elements
- existing rural roads are progressively upgraded to an urban standard.

- (1) Any development and/or subdivision that includes the construction of new roads, or the upgrade of  
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existing roads, must comply with IXXX.12 Appendix 1: Minimum road width, function and required design elements as applicable.

- (2) Existing rural roads adjoining the Glenbrook 4 Precinct must be upgraded to the urban standard specified in IXXX.12 Appendix 1 where any new activity, development and/or subdivision proposes vehicle access (including by road) to or from these roads, or where the development and/or subdivision has frontage to these roads, and where the upgrade has not already occurred.

### IXXX.7 Assessment – controlled activities

There are no controlled activities in this precinct.

### IXXX.8 Assessment – restricted discretionary activities

#### IXXX.8.1 Matters of discretion

For development and subdivision that is a restricted discretionary activity in the Glenbrook 4 precinct, the council will restrict its discretion to the following matters in addition to the matters specified for the relevant restricted discretionary activities in the underlying Residential – Mixed Housing Suburban zZone.

1. For subdivision that complies with in accordance with the Glenbrook 4 precinct plan and Standards IXXX.7.1.16.1 (Water supply and wastewater infrastructure), IXXX.7.1.26.2 (Precinct Plan), and IXXX.7.1.36.3 (Riparian Margins and Setbacks), 6.5 (Stormwater quality), IXXX.6.6 (Staging of subdivision and development with transport upgrades) and IXXX.6.7 (Road design and upgrade of existing rural roads) the council will restrict its discretion to the following matters:
  - a. consistency with the Glenbrook 4 precinct plan ~~in Figure 4~~;
  - b. connections to neighbouring land;
  - c. infrastructure and servicing;
  - d. stormwater management;
  - e. road design and layout including the provision of adequate site distances;
  - f. access arrangements;
  - g. formation, alignment and location of cycleways and pathways;
  - h. Crime Prevention through Environmental Design (CPTED) principles;
  - i. interface with McLarin Road;
  - j. access to and interface with the Glenbrook Beach Recreation Reserve; ~~and~~
  - k. measures applied to protect, enhance, and maintain riparian margins alongside streams and wetlands-
  - l. effects on Mana whenua values and integration of Te Aranga principles.
  - m. effects on the safe movement of pedestrians, cyclists and vehicles.

2. Development of four or more dwellings that complies with Standards IXXX.7.1.16.1 (Water  
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supply and wastewater infrastructure), IXXX.7.4.26.2 (Precinct Plan), IXXX.7.4.36.3 (Riparian Margins and Setbacks), ~~and~~ IXXX.7.4.46.4 (Fences), 6.5 (Stormwater quality), IXXX.6.6 (Staging of subdivision and development with transport upgrades) and IXXX.6.7 (Road design and upgrade of existing rural roads):

- a. Relationship to the street and open spaces;
- b. Design of parking and access;
- c. Layout and design of roads and pathways;
- d. Interface with McLarin Road;
- e. Access to and ~~l~~-interface with Glenbrook Beach Recreation Reserve and any other areas of public open space;
- f. Crime Prevention through Environmental Design (CPTED) principles;
- g. access arrangements;
- h. measures applied to protect, enhance, and maintain riparian margins alongside streams and wetlands;
- i. Interface of residential properties with riparian margins alongside streams and wetlands;
- j. Infrastructure and servicing; ~~and~~
- k. Stormwater management.

l. Effects on Mana whenua values and integration of Te Aranga principles; and

m. effects on the safe movement of pedestrians, cyclists and vehicles.

3. Subdivision and development of three dwellings or less that does not comply with standard IXXX.7.4.36.4 (Riparian Setbacks and Margins):
  - a. Effects on the function of the yard;
  - b. Effects on natural hazards;
  - c. Effects on amenity and character values;
  - d. Public access (if relevant);
  - e. Stormwater management;
  - f. Degree to which the riparian setback and planting enhances biodiversity, ecosystem health, freshwater quality and ecological values; and
  - g. Degree to which the riparian planting can either be self-sustaining or maintained by the property owner; and
  - h. Effects of Mana Whenua values and integration of Te Aranga principles.
4. Subdivision and development of four or more dwellings (or residential lots) that does not comply with IXXX.7.4.36.3 (Riparian Setbacks and Margins):

- a. Effects on the function of the yard;

- b. Effects on natural hazards;
- c. Effects on amenity, landscape and character values;
- d. Public access (if relevant);
- e. Stormwater management;
- f. Degree to which the riparian setback and planting enhances biodiversity, ecosystem health freshwater quality and ecological values;
- g. Degree to which the riparian planting can either be self-sustaining or maintained by the property owner;
- h. The effect that providing a compliant riparian margin may have on urban form and on the efficient development of the precinct;
- i. Any special or unusual characteristic of the site that would make providing a compliant riparian margin; ~~and~~
- j. Where it is not practicable to provide a planted riparian margin at the point of impact, the beneficial ecological effects of planting provided elsewhere within the precinct to offset the effect of not providing a compliant riparian margin at the point of impact; and
- k. Effects of Mana Whenua values and integration of Te Aranga principles.

5. Development that does not comply with standard IXXX.7.1.46.4 (Fences):

- a. Neighbourhood character;
- b. The function and amenity of the open space;
- c. Crime Prevention through Environmental Design (CPTED) principles;
- d. Stormwater/ overland flow;
- e. Planting/ greenway function; and
- f. The amenity provided for future residents on site.

6. Development that does not comply with Standard IXXX.6.7 (Stormwater quality)

- (a) Matters of discretion in E9.8.1(1) apply

7. Subdivision and development that does not comply with Standard IXXX.6.8 (Road design and upgrade of existing rural roads)

- (a) The purpose of the standard
- (b) The effects of the infringement of the standard
- (c) The design of the road and associated road reserve and whether it achieves Policies IXXX.3(3), (4), (5) and (14)
- (d) Design constraints

(e) Interface design treatment at property boundaries, particularly for pedestrians and cyclists.

### **IXXX.98.2 Assessment criteria**

For development and subdivision that is a restricted discretionary activity in the Glenbrook 4 p Precinct, the following assessment criteria apply in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlay, Auckland-wide or underlying zones provisions.

1. Subdivision in accordance with the Glenbrook 4 precinct plan and Standards IXXX7.4.6.1 (Water supply and wastewater infrastructure), Standard IXXX7.4.6.2 (Precinct Plan) and Standard IXXX7.4.6.3 (Riparian Setbacks and Margins), 6.5 (Stormwater quality), IXXX.6.6 (Staging of subdivision and development with transport upgrades) and IXXX.6.7 (Road design and upgrade of existing rural roads):
  - a. the Glenbrook 4 precinct plan:
    - i. the subdivision is consistent with and gives effect to the key elements in the Glenbrook4 precinct plan including:
      - Roads, their locations, and purpose and cross-sections;
      - The location, formation and alignment of walkways and cycleways; and
      - The provision of a pedestrian crossing facility on McLarin Road near the neighbourhood centre;
      - The provision of a roundabout on McLarin Road near the neighbourhood centre; and
      - Subdivision will provide for an appropriate interface between lots and open spaces.
  - b. Riparian margins:
    - i. The timing and appropriateness of planting within the required riparian setback from the wetland and/ or stream.
    - ii. The appropriateness of the measures proposed to maintain planting within the riparian yard.
  - c. transport:
    - i. provision of an interconnected roading network;
    - ii. road design promotes a low-speed network suitable for pedestrians, cyclists, and vehicles.
    - iii. the cross-sections of the function and design of roads are consistent with the cross-sections for different road types set out in the Precinct Plan (Figure 1) Appendix 1; and
    - iv. the design of a network which connects to McLarin Road and the wider neighbourhood that includes future urban land and the land zoned Future Urban and for Business – Local Neighbourhood Centre zones.
  - d. Stormwater management

- i. Policy IXXX.3(8).
  - ii. Policy IXXX.3(9).
  - iii. Policy IXXX.3(4013).
  - iv. Policy IXXX.3(11).
  - v. For communal stormwater devices:
    - The extent to which the device can be accommodated adjacent to the stream corridors to allow efficient operation and maintenance, and appropriate amenity; and
    - Whether the use of communal devices achieves the best practicable alternative to on-site management.
- e. Indicative Pedestrian/Cycle Link:
- i. Degree of consistency with the indicative alignment shown in Figure 4 of the Precinct Plan and the degree to which any alternative alignment provides a connection between Glenbrook Beach Recreation Reserve and the land zoned Business – Local Neighbourhood Centre on the eastern side of McLarin Road; and
  - ii. The degree to which the pedestrian/cycle link contributes to the amenity of the Glenbrook Beach community.
  - iii. The degree to which the link provides for the safe movement of pedestrians, cyclists and vehicles.
2. Development of four or more dwellings that complies with Standard IXXX7.4.4.6.1 (Infrastructure), Standard IXXX7.6.2 (Precinct Plan), Standard IXXX7.4.6.3 (Riparian Margins and Setbacks) and Standard IXXX7.4.6.4 (fences): 6.5 (Stormwater quality), IXXX.6.6 (Staging of subdivision and development with transport upgrades) and IXXX.6.7 (Road design and upgrade of existing rural roads)
- a. The development is consistent with the key elements of the Glenbrook 4 precinct plan (Figure 4)
  - b. Relationship to the street and open spaces:
    - i. development should contribute to the visual amenity and safety of streets and open spaces by:
      - Maximising frontage orientation, including doors, windows and balconies to the street and open space clearly defining the boundary between the site and the street or open space by planting and/ or fencing;
      - Ensuring dwellings closest to the street each have direct and clearly defined pedestrian access from the street;
      - Providing soft landscaping within the front yard that balances outlook and privacy for dwellings at ground floor level and provides visual interest along the street.
    - ii. ground level balconies or patios to a street or open space should be designed to provide privacy for residents while enabling sightlines to the street or open space.
  - c. design of parking and access:

*Connections to the neighbourhood*

- i. where practicable and appropriate, developments on larger sites should extend and connect road, pedestrian, and cycle links through the site.

*Location and design of parking*

- ii. parking areas and garages should be designed and located to minimise the number of vehicle crossings at the street frontage.

*Location and design of vehicle and pedestrian access*

- iii. vehicle access ways should be designed to reduce vehicle speed and moderate the visual effects of long driveways and large areas of hard paving with landscaping.
- iv. vehicle crossings and access ways should be clearly separated from pedestrian access or integrated where designed as a shared space with pedestrian priority to ensure a safe pedestrian environment; and
- v. accessways and routes within the site should be clear and logical, enhance way-finding and safety and contribute to the quality of open spaces through the development.

d. infrastructure and servicing:

- i. there should be adequate capacity in the existing stormwater and public reticulated water supply and wastewater networks to service proposed development. All service connections and on site infrastructure must be located within the boundary of the proposed site it serves or have access to the public network by an appropriate legal mechanism.
- ii. required infrastructure should integrate into the design of the site. This includes low impact stormwater design devices, overland flow paths/floodplains, wastewater systems, and water supply.
- iii. Policy IXXX.3(2)
- iv. Policy IXXX.3(3)
- v. Policy IXXX.3(8)
- vi. Policy IXXX.3(9)
- vii. Policy IXXX.3(4013)
- viii. Policy IXXX.3(11)

3. Development and subdivision that does not comply with Standard XXX7-4.6.3 (Riparian Margins and Setbacks):

- i. The effect of the proposal on the management of natural hazards and stormwater run-off effects;
- ii. The timing and appropriateness of planting within the required riparian setback from the wetland and/ or stream;
- iii. The appropriateness of the measures proposed to maintain planting within the riparian

- yard;
- iv. The degree to which the planting enhances the ecological function of the watercourse or wetland and meets the purpose of the standard;
- v. Site constraints that would prevent the practical and efficient development of the site and the precinct; and
- vi. If the purpose of the standard cannot be met with the planting at the point of impact, Council may consider planting proposals elsewhere within the precinct to offset the shortfall of riparian planting at the point of impact..

Offset mitigation will be deemed effective if:

- Adequate measures and agreements are in place to plant, maintain and protect the area(s) of offset planting proposed and at the point of impact; and
- The offset planting achieves an equal or better ecological outcome in another part of the precinct than would otherwise be achieved by complying with IXXX.7.46.3 (Riparian Setbacks and Margins):

4. Development that does not comply with standard IXXX.7.46.4 (Fences):

Fence

- a. the amenity values and character of the open space, public road or riparian area;
- b. the interface between sites and the open space, public or riparian area;
- c. effects on streetscape amenity; and
- d. impacts on sightlines and opportunities for passive surveillance of pedestrian walkways or public spaces.

5. Development that does not comply with standard IXXX6.7 (Stormwater quality)

(a) Assessment criteria E9.8.2(1) apply.

(b) Whether development and/or subdivision is in accordance with an approved Stormwater Management Plan and policies E1.3(1) – (14).

(c) Whether a treatment train approach is implemented to treat runoff so that all contaminant generating surfaces are treated, including cumulative effects of lower contaminant generating surfaces.

(d) The design and efficiency of infrastructure and devices (including communal devices) with consideration given to the likely effectiveness, whole lifecycle costs, ease of access, operation and maintenance and integration with the built and natural environment.

6. Subdivision and development that does not comply with Standard IXXX.6.8 (Road design and upgrade of existing rural roads)

(a) Whether there are constraints or other factors present which make it impractical to comply with the required standards.

(b) Whether the design of the road, and associated road reserve achieves Policies IXXX.3(3), (4), (5) and (14)

(c) Whether the proposed design and road reserve:

- (i) incorporates measures to achieve the required design speeds;
- (ii) can safely accommodate required vehicle movements;

(iii) can appropriately accommodate all proposed infrastructure and roading elements including utilities and/or any stormwater treatment;

(iv) assesses the feasibility of upgrading any interim design or road reserve to the ultimate required standard.

(d) Whether there is an appropriate interface design treatment at property boundaries, particularly for pedestrians and cyclists.

### **IXXX.10 Special information requirements**

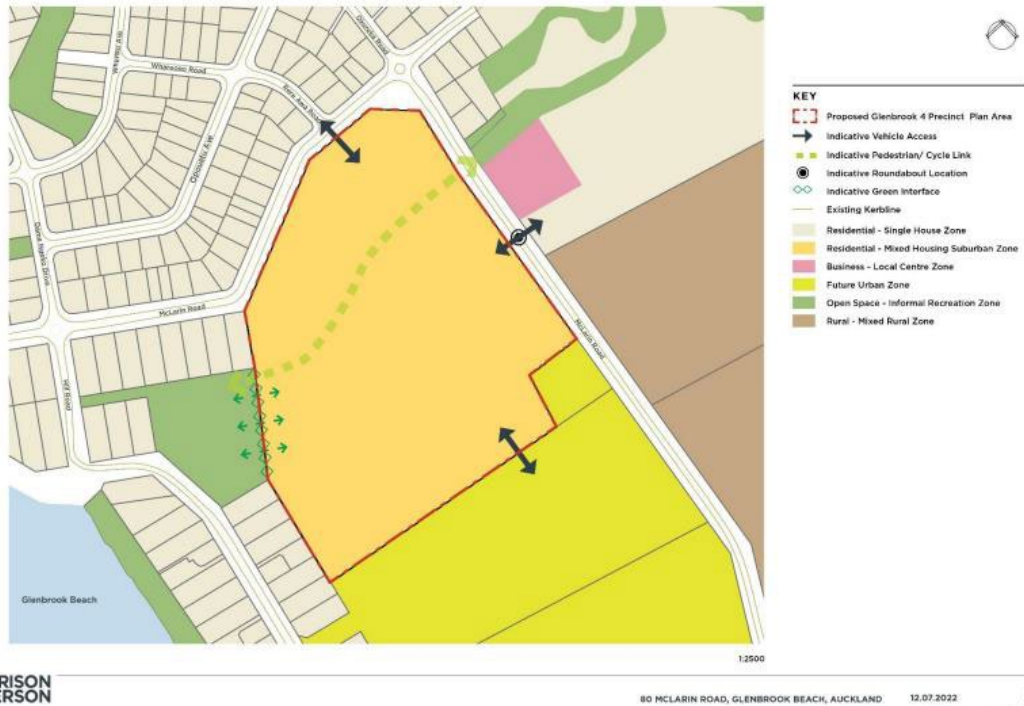
~~There are no special information requirements in this precinct.~~

#### **IXXX.10.1 Traffic assessment**

(1) An application that does not comply with Standard IXXX.6.6 must be accompanied by an integrated transport assessment prepared by a suitably qualified transport planner or traffic engineer prepared in accordance with the Auckland Transport Integrated Transport Assessment Guidelines in force at the time of the application.

The integrated transport assessment must include an assessment of effects (including cumulative effects and the forecast future environment) on the safety and efficiency of the road network and in particular addresses the need for any upgrade of the Mission Bush Road/Glenbrook-Waiuku Road intersection.

IXXX.11 Figure 4– Precinct Plan



Amend precinct plan as follows:

- remove zoning
- Add indicative pedestrian/cycling crossing facility on McLarin Road to map and key. A symbol on the map to be added on McLarin Road where the indicative pedestrian/cycle link joins McLarin Road
- Amend key
  - Indicative Road Connection ~~Vehicle Access~~
  - Indicative Pedestrian/ Cycle Link
  - Indicative pedestrian/cycle crossing facility
  - ~~Indicative Roundabout Location~~
  - Indicative Green Interface



<u>Road Function and Required Design Elements</u>									
<u>Road Name</u>	<u>Role and Function</u>	<u>Min. Road Reserve<sup>1</sup></u>	<u>Design Speed</u>	<u>Access Restrictions</u>	<u>Median</u>	<u>Bus Provision<sup>2</sup></u>	<u>On Street Parking</u>	<u>Cycle Provision</u>	<u>Pedestrian Provision</u>
<u>McLarin Road</u>	<u>Secondary Collector</u>	<u>20m</u>	<u>40</u>	<u>No</u>	<u>Optional</u>	<u>Yes</u>	<u>Yes</u>	<u>Shared path on both sides</u>	<u>Shared path on both sides</u>
<u>Local Street</u>	<u>Local</u>	<u>16m</u>	<u>30</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>Both sides</u>

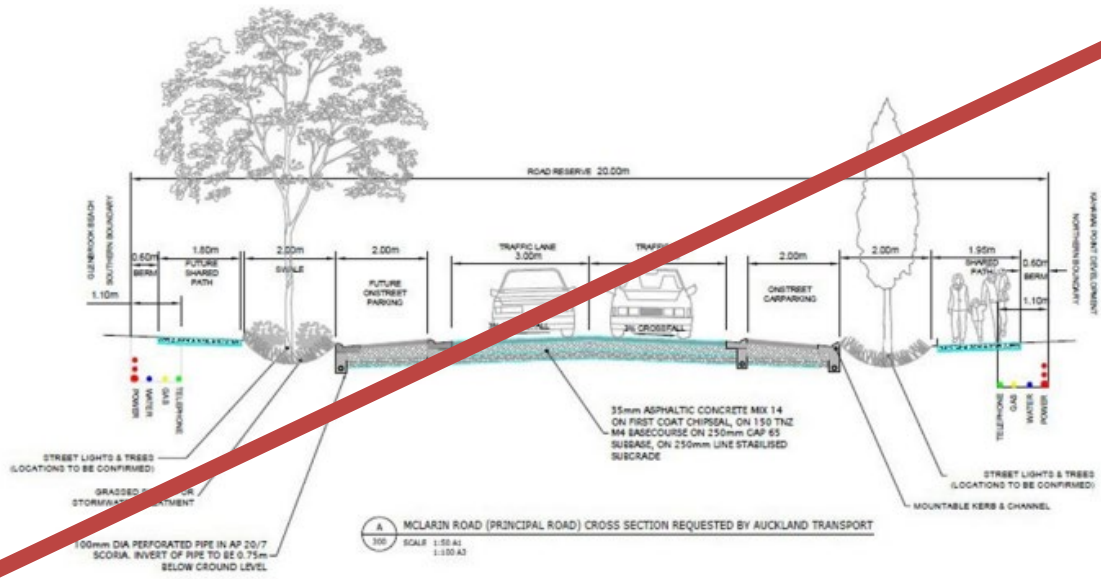
Note 1: Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements.

Note 2: Carriageway and intersection geometry capable of accommodating buses.

Note 3: Any interim, hybrid, constrained or ultimate upgrades must be designed and constructed to include a new road pavement and be sealed to the appropriate standard in accordance with the Role and Function of the road.

Note 4: The width and required design elements of local roads where they adjoin open space may be modified.

Figure 1: Type A Principal Road



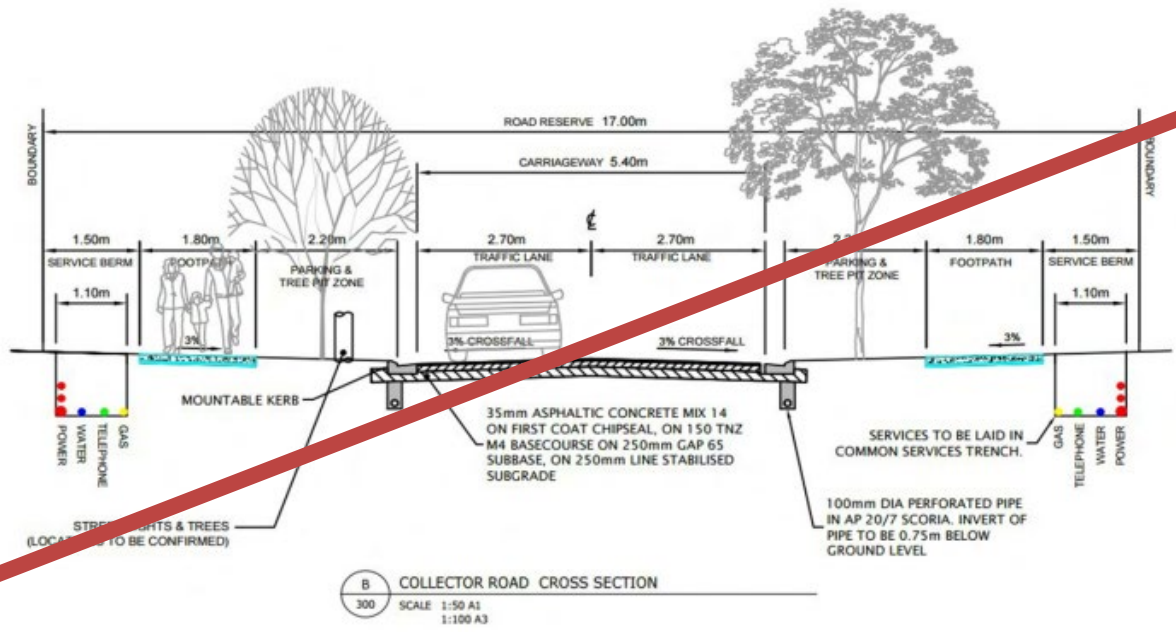
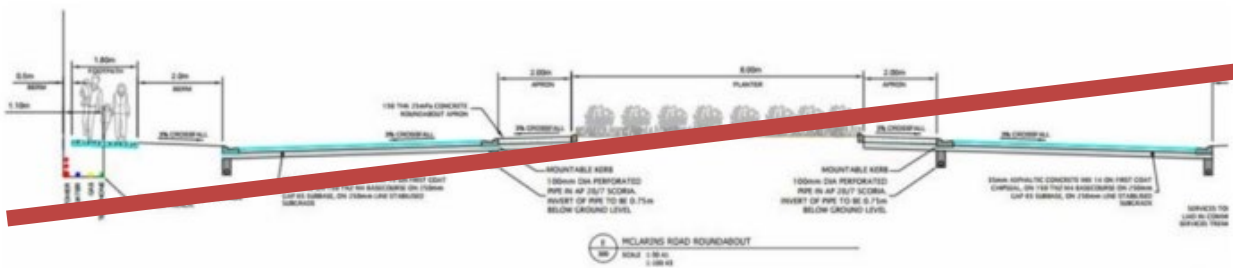
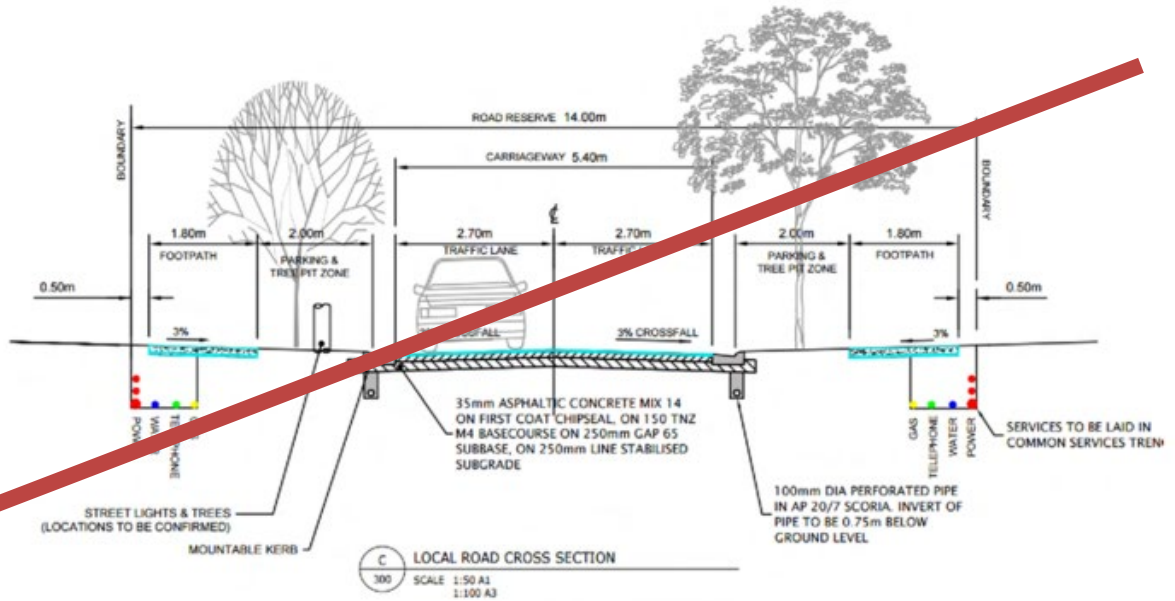
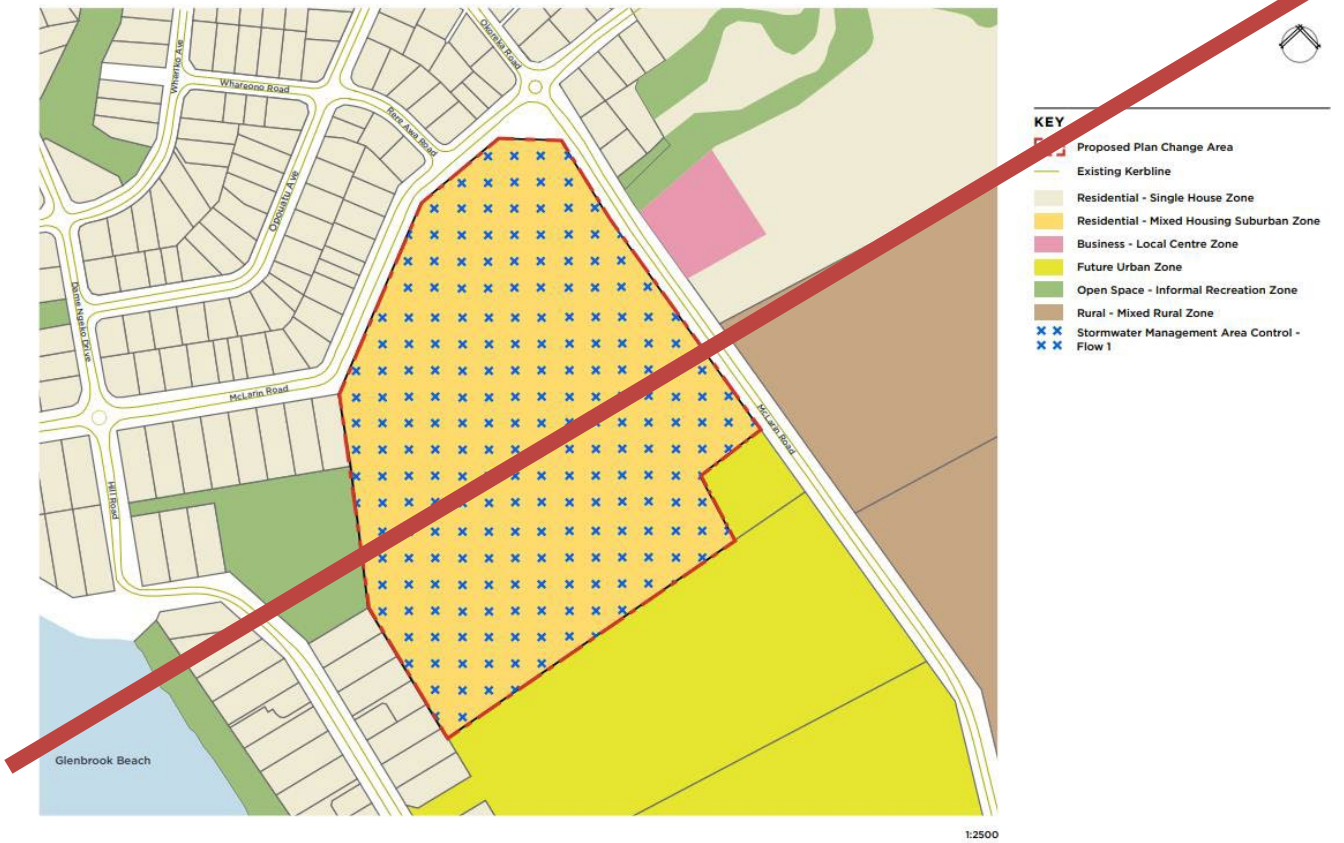


Figure 3: Type C Minor Local Road



Glenbrook 4 Precinct – Zoning Map



Glenbrook 4 Zoning Map – Mixed Housing Suburban zone and SMAF 1 (stormwater) overlay

## **APPENDIX 8**

### **SINGLE HOUSE ZONE AND MHS ZONE OBJECTIVES AND STANDARDS**



## Appendix 8: Single House Zone (SHZ) and Mixed Housing Suburban Zone (MHSZ) objectives and standards

SHZ Objectives	MHSZ Objectives
(1) Development maintains and is in keeping with the amenity values of established residential neighbourhoods including those based on special character informed by the past, spacious sites with some large trees, a coastal setting, or other factors such as established neighbourhood character.	(1) Housing capacity, intensity and choice in the zone are increased.
(2) Development is in keeping with the neighbourhood's existing or planned suburban built character of predominantly one to two storeys buildings.	(2) Development is in keeping with the neighbourhood's planned suburban built character of predominantly two storey buildings, in a variety of forms (attached and detached).
(3) Development provides quality on-site residential amenities for residents and adjoining sites and the street.	
(4) Non-residential activities provide for the community's social, economic and cultural well-being, while being compatible with the scale and intensity of development anticipated by the zone so as to contribute to the amenity of the neighbourhood.	

Standards	SHZ	MHSZ
<b>Minor Dwellings</b>	<p>Less than 65m<sup>2</sup> excluding decks and garage</p> <p>Have a directly accessible outdoor living space at least 5m<sup>2</sup>, 1.8m in depth for a studio or one-bedroom dwelling, 8m<sup>2</sup> for a two or more bedroom dwelling</p> <p>Only one minor dwelling per site</p>	N/A

<b>Standards</b>	<b>SHZ</b>	<b>MHSZ</b>
<b>Building Height</b>	8m + 1m for the entire roof slopes 15 degrees or more	8M + 1M for the entire roof slopes 15 degrees or more
<b>Height in Relation to Boundary</b>	2.5m + 45 degrees	2.5m + 45 degrees
<b>Alternative Height in Relation to Boundary</b>	N/A	First 20m from frontage 3.6m vertical + 1m horizontal + 73.3 degrees up to 6.9m vertical + 2m + 45 degrees
<b>Yards</b>	3m front yard 1m side yard 1m rear yard 10m riparian yard 30m lakeside 10m coastal protection yard	3m front yard 1m side yard 1m rear yard 10m riparian yard 30m lakeside 10m coastal protection yard
<b>Impervious Area</b>	Maximum 60% of the site area	Maximum 60% of the site area
<b>Building Coverage</b>	Maximum 35% of the net site area	Maximum 40% of the net site area
<b>Landscaped Area</b>	Minimum 40% of the net site area	Minimum 40% of the net site area
<b>Outlook Space</b>	N/A	4m x6m principal living room 3m X 3m principal bedroom 1m X 1m other habitable rooms



Standards	SHZ	MHSZ
<p align="center"><b>Outdoor Living Space</b></p>	<p align="center">N/A</p>	<p align="center"><b>At Ground Floor</b> at least 20m<sup>2</sup> No dimension less than 4m and a gradient not exceeding 1 in 20; And / or in the form of balcony, patio or roof terrace, at least 5m<sup>2</sup> and a minimum dimension of 1.8m</p> <p align="center"><b>Above Ground Floor Level</b> 5m<sup>2</sup> for studio and one-bedroom dwellings and a minimum dimension of 1.8m; 8m<sup>2</sup> for two or more bedroom dwellings and a minimum dimension of 1.8m</p> <p align="center">South facing outdoor living space standard</p>
<p align="center"><b>Daylight</b></p>	<p align="center">N/A</p>	<p>Any part of a building higher than 3m opposite buildings within the same site is limited in height to twice the horizontal distance for a length defined by a 55 degrees arc from the centre of the window</p>

Standards	SHZ	MHSZ
<p><b>Front, Side and Rear Fences and Walls</b></p>	<p><b>Within front yard</b>  1.4m in height, or  1.8m for 50% of the site frontage and 1.4m for remainder,  or  1.8m in height if the fence is at least 50% visually open perpendicular to the front boundary.</p> <p><b>Within side, rear, coastal protection, lakeside or riparian yards</b>  2m</p>	<p><b>Within front yard</b>  1.4m in height, or  1.8m for 50% of the site frontage and 1.4m for remainder,  or  1.8m in height if the fence is at least 50% visually open perpendicular to the front boundary</p> <p><b>Within side, rear, coastal protection, lakeside or riparian yards</b>  2m</p>
<p><b>Rainwater tanks</b></p>	<p>Not located in riparian, lakeside, or coastal protection yard unless less than 1m in height or wholly below ground level.</p> <p>front yard unless 1.5 from front boundary and a maximum height of 1m</p> <hr/> <p>Not exceed 3m in height in a side and rear yard</p> <p>Any overflow from the rainwater discharged to the existing authorised stormwater system</p>	<p>Not located in riparian, lakeside or coastal protection yard unless less than 1m in height or wholly below ground level.</p> <p>front yard unless 1.5 from front boundary and a maximum height of 1m</p> <p>forward of any street facing or private vehicle access building façade unless 1.5m from front boundary and a maximum height of 1m, with exemptions</p> <hr/> <p>Not exceed 3m in height in a side and rear yard</p> <p>Any overflow from the rainwater discharged to the existing authorised stormwater system</p> <p>Less than 1m high in outlook area</p> <p>Installed wholly below ground level if within outdoor living space</p>

Standards	SHZ	MHSZ
<b>Minimum Dwelling Size</b>	N/A	30m <sup>2</sup> for studio dwellings 45m <sup>2</sup> for two or more bedroom dwellings

