



# Riverhead

## Private Plan Change Request

Section 32 Assessment Report

4 October 2023

**B&A**

Urban & Environmental

Prepared for:  
Riverhead Landowner Group

B&A Reference:

18369

Status:

Final Revision 3

Date:

4 October 2023

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## 1.0 Applicant and Property Details

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

## 2.0 Executive Summary

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

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

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

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

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

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

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

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

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

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

## 3.0 Introduction

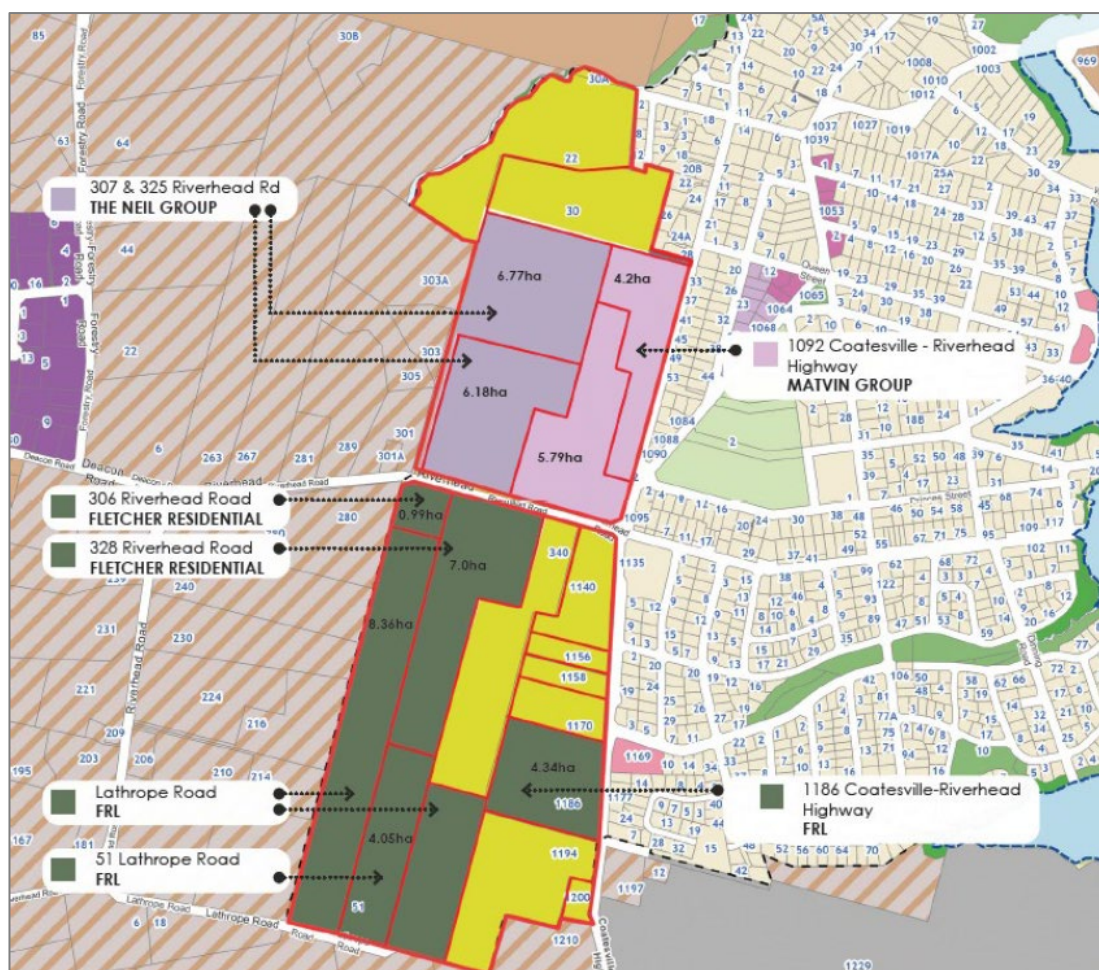
### 3.1 Background

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

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

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

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



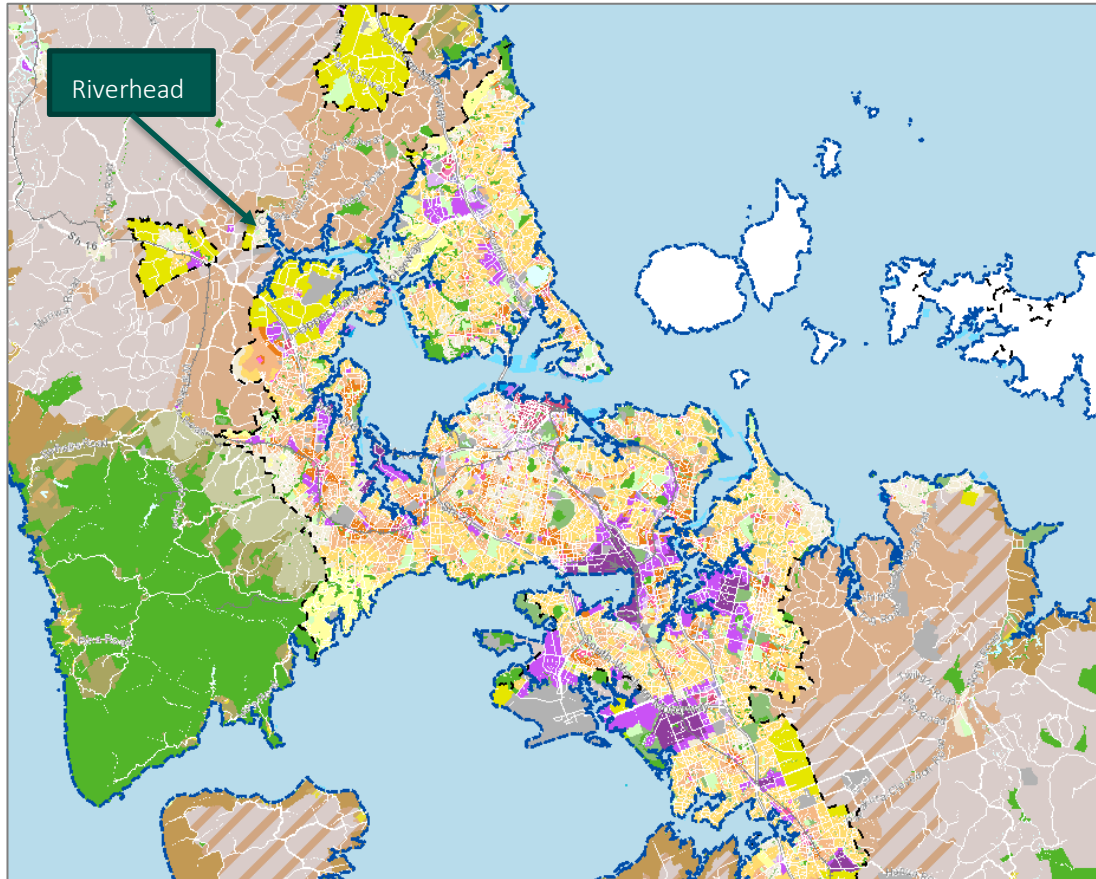
**Figure 1: RLG landholdings within the Plan Change area.**



## 3.2 Site Location and Description

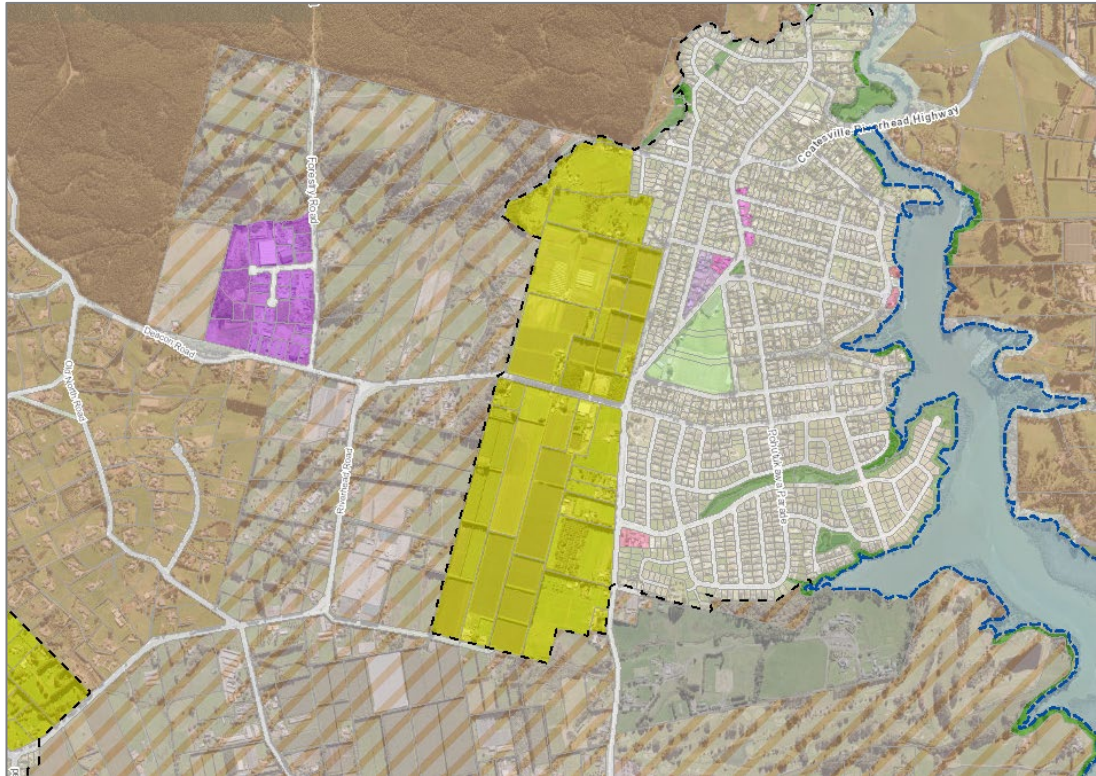
### 3.2.1 Site Description

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



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

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



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

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

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

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

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

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

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

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

### 3.2.2 Surrounding Area and Local Context

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

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

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

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

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

## 4.0 Description of the Plan Change Request

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### 4.1 Description of the Proposal

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

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

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

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

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

#### 4.1.2 Overview of the Proposed Zoning

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

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

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

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

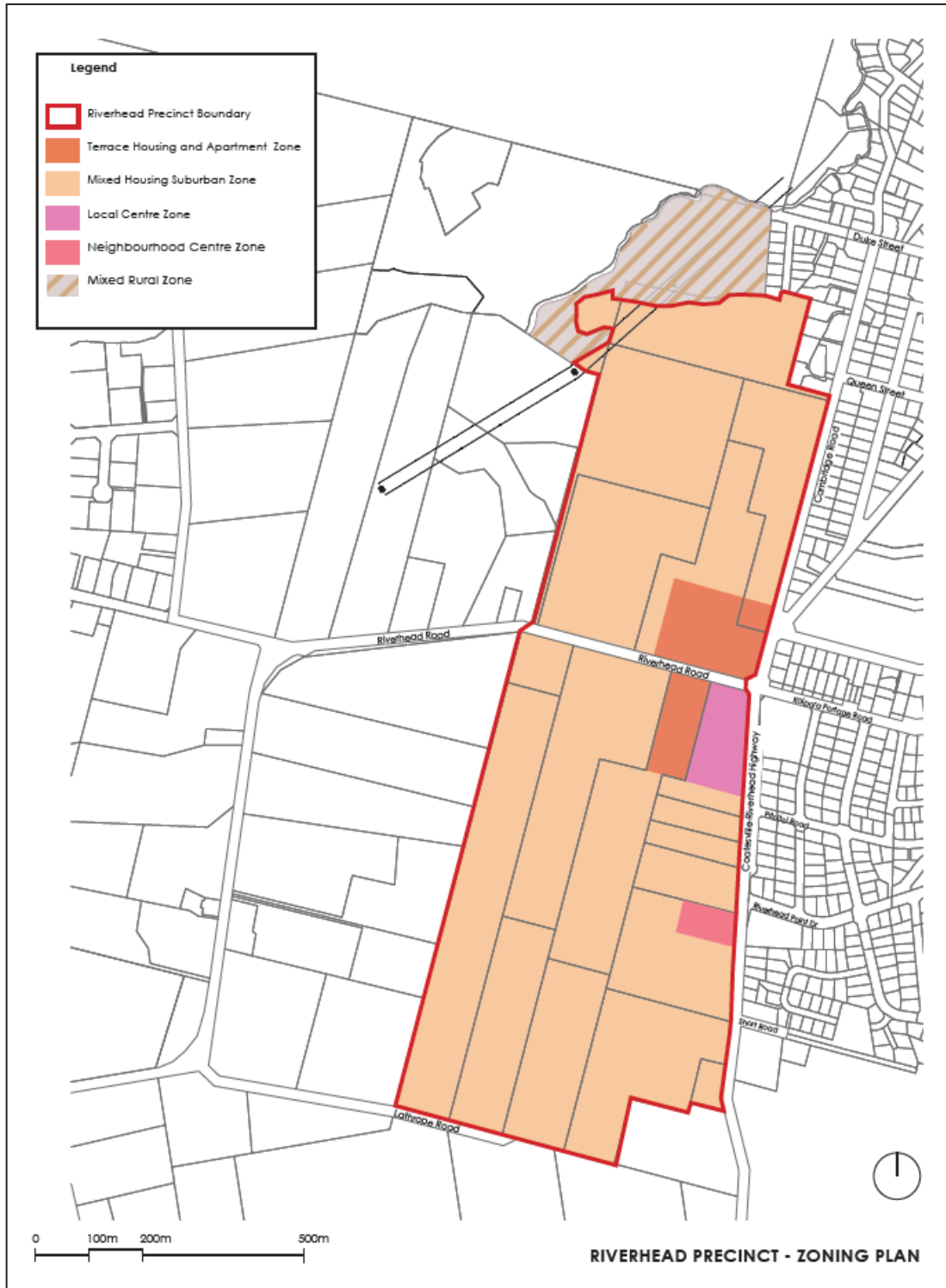
Residential – Terrace Housing and Apartment Building zone has been applied surrounding the Local Centre zone to reinforce the village heart. It would accommodate the proposed Botanic Retirement Village. The Residential – Terrace Housing and Apartment Building ('THAB') zone provides the opportunity for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

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

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

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

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



**Figure 4: Proposed zoning.**

#### 4.1.3 Other Unitary Plan Controls

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

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



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

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

#### 4.1.4 Proposed Precinct Provisions

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

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

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

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



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

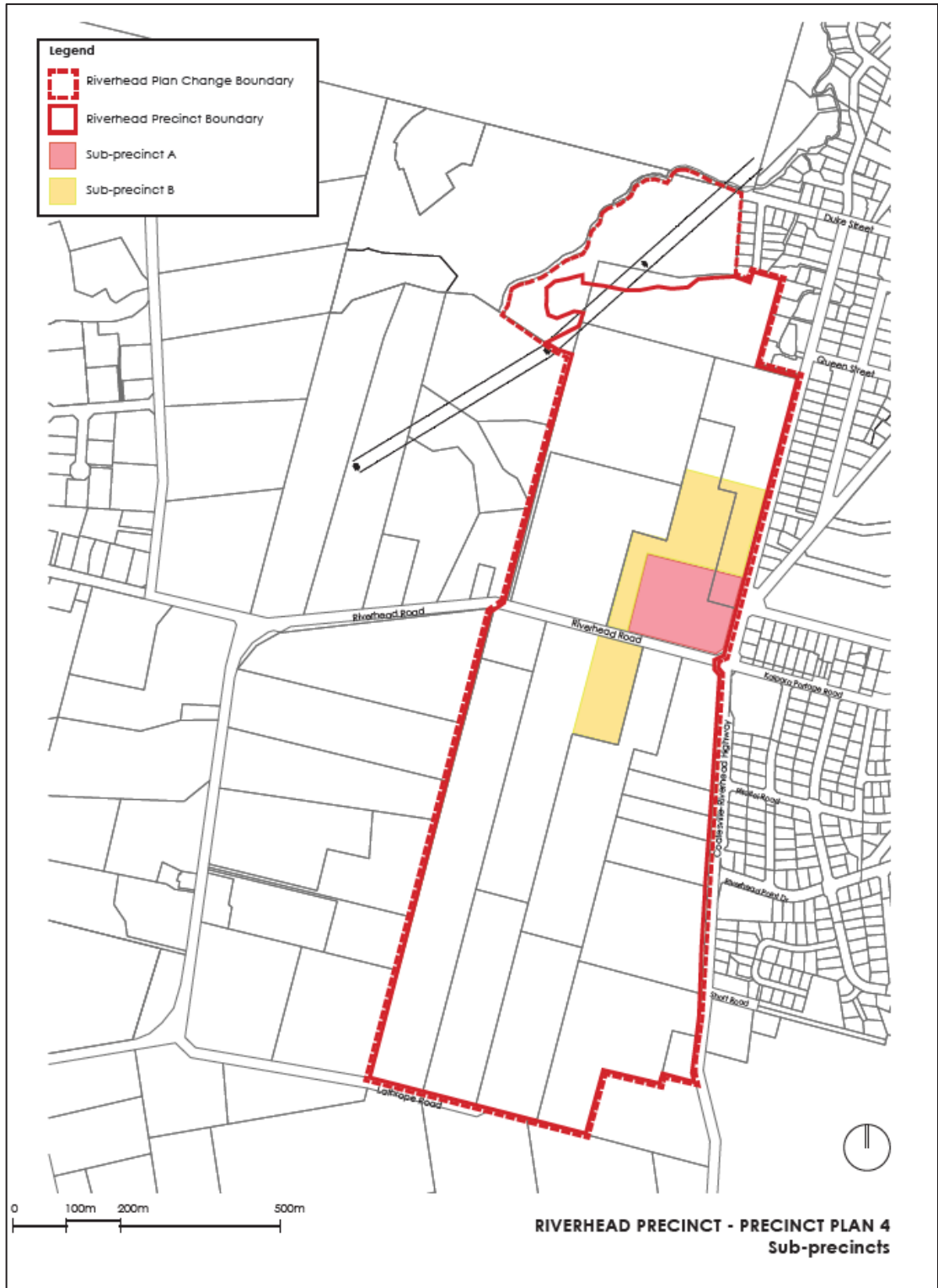


Figure 6: Riverhead Precinct Plan.

## 4.2 Purpose and Reasons for the Plan Change

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

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

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

## 5.0 The Riverhead Structure Plan

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### 5.1 Structure Planning

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

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

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

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

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

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

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

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

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

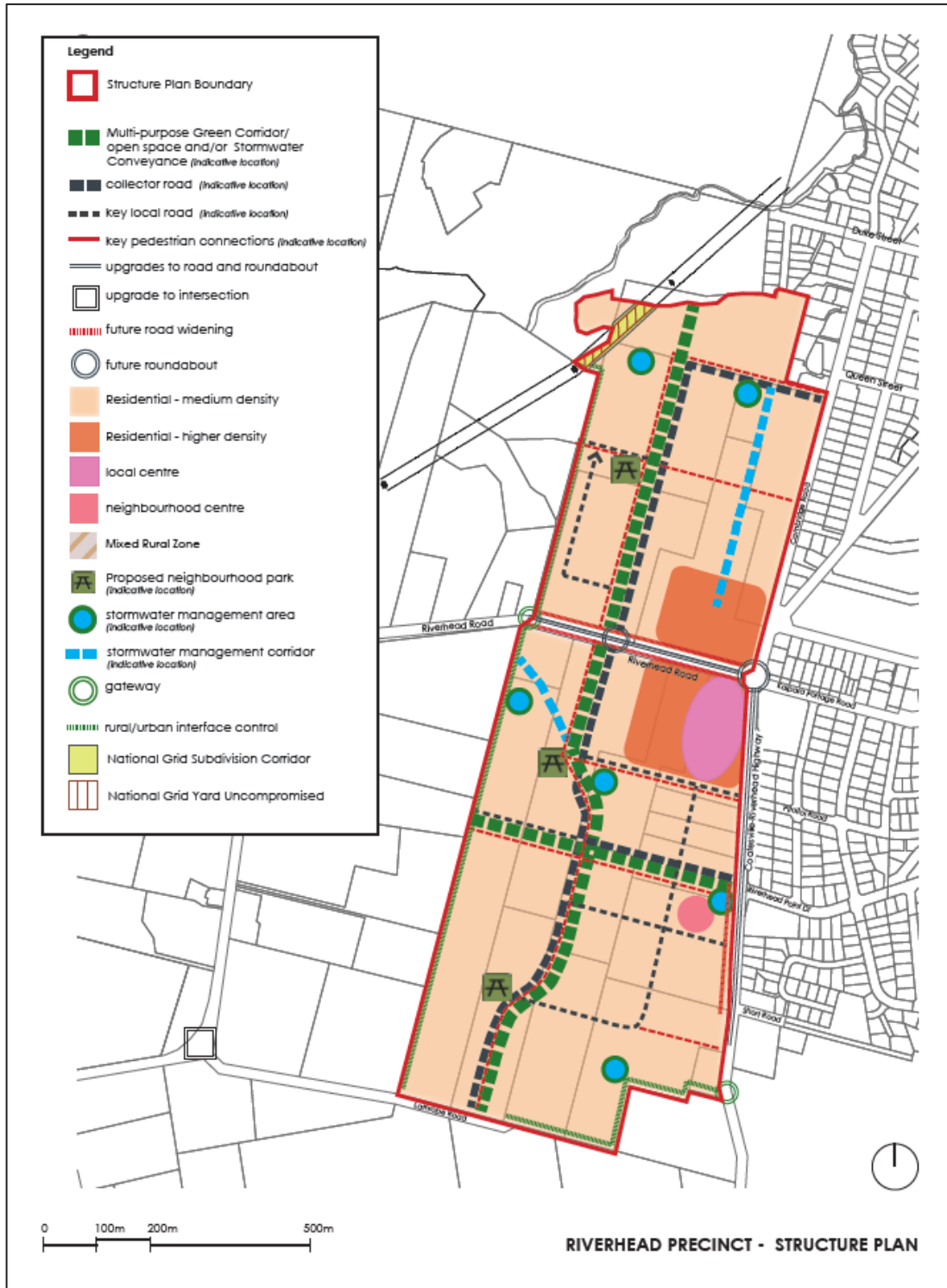


Figure 7: Riverhead Structure Plan.

## 5.2 Consultation and Engagement

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## 6.0 Strategic Planning Framework

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

### 6.1 Resource Management Act

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

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

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



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

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

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

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

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

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

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

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

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

## 6.2 National Policy Documents

### 6.2.1 The National Policy Statement – Urban Development

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

#### Well-Functioning Urban Environment

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

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

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

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

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

### Development Capacity

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

### Planned Urban Built Form and Amenity Values

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

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

### Responsive Planning

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

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

### Reduction in Greenhouse Gas Emissions

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

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

### Summary

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

## 6.2.2 New Zealand Coastal Policy Statement

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

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

## 6.2.3 National Policy Statement for Freshwater Management

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

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

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

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

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

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

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

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

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

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

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

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

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

### 6.2.6 National Planning Standards

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

### 6.2.1 National Policy Statement for Indigenous Biodiversity

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

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

### 6.2.2 National Environmental Standards

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

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

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

## 6.3 Auckland Council Strategic Plans

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### 6.3.1 The Auckland Plan 2050

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

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

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

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

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

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

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

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

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

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

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

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

### 6.3.2 Future Urban Land Supply Strategy 2017

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

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

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

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

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



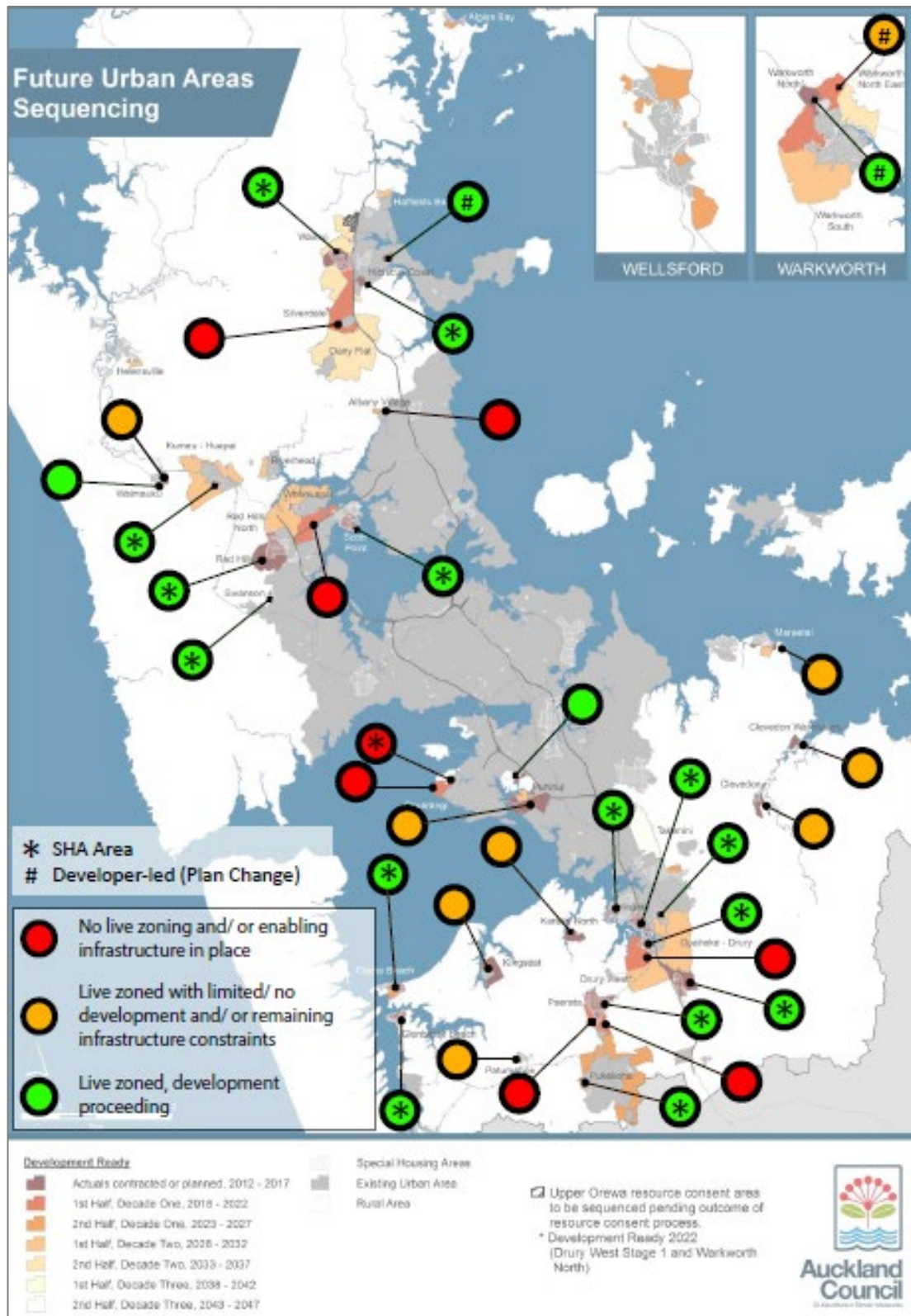


Figure 8: Showing the Council’s progress with live-zoning land in line with the FULSS.

### 6.3.3 Open Space and Community Facilities

#### 6.3.3.1 Rodney Greenways Plan

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

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



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

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

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

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

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

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

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

#### 6.3.3.2 General Policies and Action Plans

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

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

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

## 6.4 Regional Policy Statement and Plans

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

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

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

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

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

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

## 6.4.2 B2.2 Urban Growth and Form

### *B2.2.1 Objectives*

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

### *B2.2.2 Policies*

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

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

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

*While:*

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

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

*Quality compact urban form*

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

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

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

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

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

#### ***B2.6.1 Objectives***

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Refer to section 5.2 above.

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

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

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

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

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

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

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



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

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

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

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

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

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

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

The Riverhead Structure Plan is attached to this Plan Change request (refer to **Appendix 4**) and it addresses the structure planning requirements set out in Appendix 1 of the AUP. The Structure Plan maps and technical reports address the Appendix 1 Structure Plan guidelines and support the expansion of the Riverhead town. The Plan Change is in accordance with the Structure Plan and provides additional detailed technical assessment that supports the expansion of the Riverhead township and ensures the required infrastructure and transport upgrades are coordinated with development within the precinct.

*(4) Enable small scale growth of and development of rural and coastal towns without structure planning.*

Small scale growth is not proposed within the Plan Change and therefore this policy does not apply.

### Summary

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

## 6.5 Other Plans

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### 6.5.1 Iwi Planning Documents

As described in section 5.2 above, engagement correspondence was sent to 19 iwi groups were contacted in September and October 2021. Six iwi groups responded confirming their interest in being involved: Te Kawerau ā Maki; Ngāti Whātua o Kaipara; Te Rūnanga o Ngāti Whātua; Te Ākitai Waiohua; Ngāti Manuhiri; and Ngāti Whanaunga. Several hui have been held with Te Kawerau a Maki and Ngāti Whātua o Kaipara, as well as the other iwi (either via hui or further email correspondence).

Of these six interested iwi, none have publicly available iwi management plans or planning documents. Notwithstanding this, the feedback received during the consultation process, in particular from Te Kawerau a Maki and Ngāti Whātua o Kaipara who have engaged more extensively, has been taken into account in the Structure Plan and Plan Change.

## 7.0 Assessment of Effects

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Section 76 of the RMA states that in making a rule, the territorial authority must have regard to the actual or potential effect on the environment of activities including, in particular, any adverse effect. This section details the actual and potential effects that the proposed plan change provisions may have on the environment. This assessment is based on analysis and reporting undertaken by various experts, which are attached as appendices to this report.

### 7.1 Urban Form

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An Urban Design Statement has been prepared by Urban Acumen and is included as **Appendix 6** of this report. The following structuring elements are identified within the proposed precinct plan and will determine the built urban form within the Plan Change area:

- A north-south and east-west oriented multi-purpose green corridors which will integrate the provision of open space and stormwater management features. The north-south corridor will align with a key collector road, and their location will reflect a potential portage routh of cultural significance and to promote views to high points in Riverhead Forest; The policy framework proposed in the precinct sets out the desired outcomes for this corridor;

- The identification of key collector and local roads where they provide for key connectivity outcomes, including internal connectivity within the Plan Change area and integration with the existing road network. The identified road networks are predominantly north south oriented and will promote good solar orientation for future development; and
- The provision of a focal point at the centre of Riverhead, supported by the proposed local centre and Terraced Housing and Apartment Building ('THAB') zoning. This focal point will complement existing neighbourhood scale business activities within the Riverhead township.

The proposed precinct assessment criteria seek to ensure that the above key features and elements are delivered at the time of future subdivision and development. Overall, it is considered that the proposed plan change will enable the development of positive urban form outcomes that contribute to a quality compact urban form and well-functioning urban environment.

## 7.2 Centres Hierarchy

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A Centres Assessment for the plan change has been undertaken by Property Economics and this is enclosed as **Appendix 7**.

In terms of commercial growth, the Riverhead Retail catchment generates around \$100m in annual retail expenditure. Based on the future development of Riverhead Precinct (plus expected growth elsewhere in the catchment), retail spending is expected to grow to \$161m by 2038. A significant portion of the retail expenditure is expected to occur in higher order centres such as Westgate, which is well positioned to service the higher-order shopping needs of Riverhead. In this regard, any retail development within Riverhead is considered to be complementary to these centres and the overall centres hierarchy.

The Economic Assessment also states that the following is sustainable within Riverhead:

- Approximately 6,850m<sup>2</sup> GFA of retail and commercial services (including a 3,200m<sup>2</sup> supermarket) with a supermarket;
- Approximately 3,970m<sup>2</sup> GFA of retail and commercial services without a supermarket; and
- Approximately 1-1.5 hectares of business zoned land to accommodate the above.

Based on this advice, the most appropriate zone for the Riverhead Centre is Local Centre because this often takes the form of a small to medium sized centre anchored by an appropriately-sized supermarket. This would provide for the development of mainly convenience retail and commercial services and some office activity.

Overall, it is considered that the proposed Business – Local Centre and Business – Neighbourhood centre zoning of the Village Centre of Riverhead is considered to be consistent with the centres hierarchy of the AUP and will not compromise the economic viability of the existing business centres or result in an out of context centre. The limited size of the centre within the plan change area will ensure that it remains complementary to the centres hierarchy and will not grow to a size that creates future inconsistencies challenging the centres approach of the AUP.

## 7.3 Visual Amenity

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Zoning within the Plan Change area includes Business – Local Centre and Business – Neighbourhood Centre to support local business development and Residential – THAB and Residential – Mixed Housing Suburban within residential areas. A Landscape and Visual Assessment

(‘LVA’) has been prepared by Boffa Miskell (refer **Appendix 16**) and a Neighbourhood Design Statement has been prepared by Urban Acumen (refer **Appendix 6**).

The Local Centre is proposed at the intersection of Riverhead Road and Coatesville-Riverhead Highway and the Neighbourhood Centre is proposed along Coatesville-Riverhead Highway, opposite Riverhead Point Drive and the existing Neighbourhood Centre within the Riverhead township. Existing standards within the AUP Local Centre and Neighbourhood Centre zones will apply, including total building heights of 18m and 13m respectively. THAB zoning is proposed to the east of the Plan Change area adjacent to Cambridge Road and Riverhead Road and the proposed local centre. The remainder of the Plan Change areas is proposed to be zoned Mixed Housing Suburban. The proposed precinct standards include heights of up to 18m in the Local Centre zone, 16m in the THAB zone, 11m in the Mixed Housing Suburban zone immediately adjoining THAB (Sub-precinct B), and 8m plus 1m roof height in the remainder of the Mixed Housing Suburban zone.

While greater heights will be permitted in the proposed local centre and THAB zones when compared to the existing Riverhead township, this area will act as a focal point within Riverhead, providing for variation in building height and form. The LVA finds that this area will act as an appropriate landmark to signify the centre of the Riverhead township, with the enabled built form contributing positively to visual interest, diversity, and legibility. The proposed neighbourhood centre is considered to be viewed as a logical extension to the existing neighbourhood centre within the Riverhead township.

As discussed above, the location of the THAB zone will complement the proposed local centre as a focal point within the Plan Change area and has also been located within close proximity to existing public transport networks. The THAB zone will enable a variety of housing choice and typologies, including a retirement village for which a separate resource consent is being sought concurrently. Where the THAB and Local Centre zones interface with the Coatesville-Riverhead Highway, the width of the road corridor in conjunction with zoning provisions will provide an appropriate transition between The Site and residential properties to the east of the Coatesville-Riverhead Highway.

The remainder of the Plan Change area is proposed to be zoned Mixed Housing suburban with varying height limits. Immediately around the THAB, a height limit of 11m will apply (through Sub-Precinct B), while the remainder of the zone is subject to the 8m height limit underlying height limit, which responds to the existing built character of the Riverhead Settlement. This approach to height enables a transition in height from the THAB and Local Centre down to the two-storey. The MHS zone is considered to enable the efficient use of greenfield land and support a greater variety of housing choice within Riverhead, while also responding to the existing Single House and rural zoning adjacent to the Plan Change area.

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

## 7.4 Natural Character and Landscape

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The LVA prepared by Boffa Miskell considers the potential effects of development within the Plan Change area on natural character and landscape values.

The LVA finds that the Plan Change area does not contain any areas or features that are considered to be of high landscape value. In addition, there are no outstanding natural features or landscapes as identified under the AUP within the Plan Change area, with the closest being the Paremoremo Escarpment landscape feature located over four kilometres to the east.

Natural features identified within the Plan Change area include the stream and associated riparian vegetation located to the eastern side, a tree with intrinsic age, health, and character attributes located on the western side, pastoral grassland, and shelter belts that have been established within the existing rural environment. Proposed Precinct 1, which identifies the indicative location of key structural elements provides the opportunity to retain the existing stream and tree with identified value. In addition, the proposed precinct standards will provide for enhancement planting within the riparian margins of the stream (10m either side). The LVA concludes that the pastoral grasslands and shelter belts are not considered to have high natural character values. While development within the Plan Change area will result in visual changes and the clearance of some existing natural features, it is considered that this can be anticipated as Future Urban zoned land is utilised to accommodate urban development.

In terms of landscape character, it is acknowledged that the development of the Plan Change area will change the existing character of the landscape, which is currently rural in character and includes a number of rural production activities including horticulture, and some rural lifestyle blocks. In particular, development will include earthworks which will alter the undulating nature of the topography urban built features, including roading open spaces, and residential and commercial buildings. While these changes will be visible to viewing audiences within the immediate vicinity of the existing Riverhead township and road users passing the site, they are considered to be in keeping with the development of greenfield land and will not be out of character within a Future Urban zoned environment. As discussed above, visual effects associated with development of the Plan Change area have been assessed to range for very low to low-moderate.

With regard to the wider landscape context, of significance is the Riverhead Forest is located to the north. While greater building heights and densities will be enabled within the proposed THAB and centre zones and have the potential to restrict views towards the Riverhead Forest, it is noted that there are limitations to existing views due to the relatively flat landscape. Some views will also be retained through the north south oriented multi-purpose green corridor identified within proposed Precinct Plan 1, which has been positioned to reflect a potential portage route of cultural significance and to promote views to high points in Riverhead Forest. It is considered that the Riverhead Forest will provide a well-defined landscape and visual backdrop that is complementary to the development of the Plan Change area.

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

## 7.5 Cultural Values

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As discussed in Section 5.2 above and set out in the consultation report provided as **Appendix 18**, engagement correspondence was made to 19 iwi groups and a hui was subsequently held with Te Kawerau a Maki and Ngāti Whātua o Kaipara to develop a cultural landscape map for the Riverhead Structure Plan area. The following features were identified to be of cultural significance:

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

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

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

## 7.6 Transport

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An Integrated Transport Assessment ('ITA') has been prepared by Flow Transportation for the Plan Change and is included as **Appendix 8** to this report.

The ITA identifies a number of transportation upgrades to enable development within the Plan Change area, has regard to potential trip generation, and provides an assessment on the appropriateness of internal road network with regard to roading hierarchy and design.

These matters are addressed in turn below.

### 7.6.1 Transportation Upgrades

A number of localised transportation measures and upgrades are identified within the ITA. In summary, these include:

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

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

The above transportation works will also align with the aspirations of the Te Tupu Ngātahi Supporting Growth Programme, which identifies roading and safety improvements for Coatesville-Riverhead Highway between State Highway 16 and Riverhead, with hearings currently underway for new designations on Coatesville-Riverhead Highway.

The following transportation works are also planned and funded within the surrounding area, creating additional transportation benefits for Riverhead in terms of improving roading safety, capacity, alleviating congestion, and increasing mode choice:

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

## 7.6.2 Trip Generation

The ITA includes modelling of the expected traffic generation predicted as a result of development within the Plan Change area.

The ITA finds that while the proposed Plan Change will generate new trips, a number of trips will be local and internal within Riverhead due to the range of activities provided in the existing Riverhead township and Plan Change area.

The effects of the proposed Plan Change on the wider roading network are assessed in ITA relative to key intersections surrounding the Plan Change area. In summary, it is anticipated that all intersections are able to perform well, without significant queue lengths or delays. In particular, the SH16 / Coatesville-Riverhead Highway intersection has been tested across multiple scenarios, including a worse case 100% buildout in 2038, with higher sensitivity trip generation rates and the intersection is predicted to perform well for all of the scenarios tested.

Taking the above into account, it is considered that the trip generation effects at this intersection will be acceptable.

### 7.6.3 Internal Road Network

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

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

### 7.6.4 Transport Summary

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

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

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

## 7.7 Infrastructure and Servicing

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The proposed stormwater management strategy and SMP is set out in the stormwater management assessment prepared by CKL, included as **Appendix 10** of this report.

The wastewater and water supply servicing strategy within the Plan Change area is set out in the water and wastewater servicing strategy prepared by GHD, included as **Appendix 11** of this report.



### 7.7.1 Stormwater Management

The proposed SMP sets out the best practicable options for managing stormwater within the Plan Change area and confirms that the proposed maximum allowable impervious area is appropriate, being 65% in residential areas and 90% in business areas.

It is proposed that the SMP will be adopted into the region-wide stormwater Network Discharge Consent and provisional approval for the SMP will be sought during the plan change process.

The identified requirements for managing stormwater quality and flow within the Plan Change include:

- Water quality treatment (90<sup>th</sup> percentile event) for all impervious areas; and
- Stormwater Management Area Flow ('SMAF') 1 retention and detention for all impervious areas other than those located within 1170 and 1186 Coatesville-Riverhead Highway (part of the Riverhead Point Drive catchment) as these areas are not proposed to discharge to a stream receiving environment.

A stormwater management strategy for the Plan Change area has been developed to address the above requirements. The stormwater management strategy demonstrates the overarching principles of how stormwater is to be managed, and has the objective of minimising or mitigating any detrimental effects of urban development on the receiving environment.

The stormwater management strategy includes:

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

Overall, it is considered that the above methods will be sufficient to achieve hydrological mitigation of the effects of stormwater runoff generated by increased impervious areas enabled by the proposed plan change.

### 7.7.2 Water Supply

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

### 7.7.3 Wastewater Servicing

Modelling undertaken by GHD confirms that there is capacity within the existing Riverhead wastewater pump station to service the Plan Change area in the short term. In the long term, the planned diversion Kumeu and Huapai from the Riverhead system will also provide sufficient capacity to service the entirety of the Plan Change area. Should development within the Plan

Change area occur prior to this diversion, the GHD assessment identifies a number of available options to provide for additional capacity, including both localised upgrades relative to the Plan Change area and the construction of a new wastewater pump station.

#### 7.7.4 Other Utilities

In terms of telecommunications, Chorus has confirmed that the Plan Change area can be serviced by the existing fibre network.

Communications with Vector confirm that the Plan Change area can be serviced by Vector's reticulated electrical unit, subject to the installation of new cables and equipment which will provide the Plan Change area with points of supply.

Correspondence with Chorus and Vector in relation to the Plan Change area is included at **Appendix 12**.

#### 7.7.5 Infrastructure and Servicing Summary

It has been demonstrated that infrastructure solutions for three waters servicing and utilities are available to service the immediate development of the Plan Change area. In terms of water supply, wastewater, and electricity, upgrades to provide additional capacity would be required as development progresses, and several suitable options to facilitate these upgrades have been identified.

The detailed design of infrastructure provision will therefore be determined at the time of future development, noting that the AUP Auckland-wide chapters and provision for infrastructure servicing and stormwater management will apply. Appropriate provision has also been made within the proposed Precinct matters of discretion and assessment criteria to consider whether appropriate arrangements are in place for infrastructure servicing at the time of subdivision and development.

### 7.8 Existing Infrastructure

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

### 7.9 Ecology

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An Ecological Assessment prepared by RMA Ecology has been undertaken to support the Plan Change and is included at **Appendix 9** to this report. This includes an assessment of ecological values of freshwater and terrestrial ecosystems. A combination of desktop assessments and site visits were carried out for the Plan Change area, during which, key terrestrial and aquatic habitat features were identified across the site. An arboriculture assessment of existing trees within the Plan area has also been carried out by Greenscene and is included at **Appendix 17** of this report.

### 7.9.1 Terrestrial Ecology

The Plan Change area is predominantly worked in pasture, with no presence of indigenous vegetation or species recognised to be threatened or at risk. A copper beech tree meeting the criteria to be nominated as a notable tree under the AUP is located at the western side of the Plan Change area at 298 Riverhead Road, Riverhead. This tree has been assessed by Greenscene to have a score of 23, where a score of 20 is needed to meet the threshold for nomination in accordance with Auckland Council guidelines.

The proposed precinct provisions provide recognition of the copper beech tree through identification in proposed Precinct Plan 2 and as a distinctive site feature in the proposed precinct policies and assessment criteria, which will apply to future consideration of the overall layout and design of development and provide opportunities to retain the tree.

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

### 7.9.2 Freshwater Ecology

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

The northern portion of the Plan Change area containing the largest sized wetland will predominantly be rezoned Mixed Rural and therefore not subject to urban development. Within the areas proposed to be urbanised, the proposed Precinct Plans demonstrate that key roading connection through the Plan Change area can be accommodated while avoiding the reclamation of and works in and around streams and natural wetlands. In particular, key infrastructure, including roads and pedestrian access connections are located clear of the stream and all natural wetlands. The intermittent stream and a number of low-lying wetlands have also been incorporated into the multi-purpose green corridor, which forms one of the key structuring elements identified in the proposed precinct provisions, providing for the protection of these waterbodies. In addition, the proposed precinct provisions include a standard that provides for the protection and restoration of riparian margins, which will ensure positive effects as the land is developed. It is therefore considered that any future works that may affect streams and natural wetlands can be appropriately managed under the existing statutory framework with respect to freshwater and ecological values, including Chapter E3 Lakes, Rivers, Streams, and Wetlands under the AUP (OP), the NES-FW, and the NPS-FM.

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

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

### 7.10 Natural Hazards – Flooding

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The Plan Change area is subject to flood plains, flood prone areas, and overland flow paths.

A flood risk assessment has been prepared by CKL, and is included as **Appendix 10** of this report. The modelling considers pre and post-development scenarios and has accounted for the proposed impervious area coverages proposed within the Precinct Provisions.

In summary, this assessment includes modelling undertaken in relation to three downstream catchments being 'Riverhead Point Drive', 'Southern Stream', and 'Riverhead Forest Stream'. The modelling results indicate that urban development within the Plan Change area will not exacerbate existing flood hazards or create new flood hazards within the sub-catchments discharging to 'Riverhead Point Drive' and 'Southern Stream'.

It has been assessed that new development is likely to impact the Riverhead Forest Stream sub-catchment due to existing flooding issues that have the potential to be exacerbated by additional development and insufficient capacity within the existing Riverhead Road culvert. CKL identify that flood risks and hazards within this sub-catchment can be appropriately managed through the upgrade of the Riverhead Road culvert.

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

### 7.11 Natural Hazards – Geotechnical

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With regard to geotechnical constraints, the Plan Change area is considered to be generally near-level, with moderate slopes on the edge of erosional gully features located to the south east. A preliminary geotechnical assessment has been prepared by Soil and Rock and a copy is included as **Appendix 15** of this report.

The geotechnical assessment has considered the suitability of the Plan Change area for urban development with regard to soil qualities and the condition of topsoil and fill areas, groundwater, slope stability, and expansivity. Overall, it is concluded that the Plan Change area will be able to accommodate future urban development in accordance with the proposed zoning. In particular, no areas of significant geotechnical hazards that would require a lower intensity of development were identified. Detailed geotechnical investigations will be required as part of future resource consent applications regarding the management of earthworks, groundwater, and building foundation design.

Based on these findings, it is considered that the land conditions are generally suitable for urban development and can be appropriately managed through the resource consent process and the provisions of Chapter E36 Natural Hazards and Flooding of the AUP (OP).

## 7.12 Land Contamination

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A Detailed Site Investigation ('DSI') has been undertaken by Soil and Rock for the Plan Change Area, and is included at **Appendix 14** of this report. This DSI confirms the presence of contaminants exceeding acceptable concentrations include heavy metals (arsenic, metal, zinc) and asbestos within the Plan Change area. The regulations of the National Environmental Standard for Assessing and Managing Contaminants in the NESCS therefore apply.

Resource consent requirements under the NESCS and AUP would ensure that a Site Management Plan is prepared at the time of resource consent for subdivision or development to demonstrate how the works will be managed to ensure that any land disturbance and urban use of the land avoid and mitigate adverse effects on the environment and human health.

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

Overall, it is considered that there is a high level of confidence that the Plan Change area can be remediated and that the potential adverse effects of land contamination associated with land disturbance and the change of use of the site can be appropriately managed through the existing statutory framework with respect to the NES regulations and AUP for any discharges.

## 7.13 Heritage and Archaeology

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An assessment of the archaeological and heritage values of the Plan Change area has been undertaken by Clough & Associates, and their report is included as **Appendix 13** of this report. While there are no existing records of archaeological or other historic heritage sites being recorded within the Structure Plan area, a detailed field survey identified two archaeological sites relating to early European settlement.

These sites include the mid-19<sup>th</sup> century Riverhead Mill water race at Lot 20 DP 499876 and the former late 19<sup>th</sup> century Ellis house at Lot 1 DP 164978. Clough and Associates have assessed the significance of these places in accordance with the AUP criteria. In this case, the assessment of the relevant criteria identifies significance evaluations of 'little' for the majority of the criteria, with 'moderate' for several. None of the classifications are 'considerable' or 'outstanding'. Therefore, it is considered that the objectives and policies of RPS B5.2 are not applicable as these sites are not 'significant historic heritage places'. As such, additional protection of these sites with 'little' or 'moderate' value is not required. Although there are no present known features or structures of significance in relation to these sites, there is the possibility that subsurface remains of archaeological value due to their information potential are located during land development.

In the event that subsurface remains are uncovered during future development, the archaeological provisions of the Heritage New Zealand Pouhere Taonga Act 2014 ('HNZPTA') will apply. It is also anticipated that standard accidental discovery protocols in the AUP will be implemented in the event that any archaeological material is uncovered during excavation works. The Precinct provisions include a Special Information Requirement which states that any future application for land modification on 22 Duke Street (the location of the mill race) must be accompanied by an

archaeological assessment, including a survey. The purpose of this assessment would be to evaluate the effects on archaeological values associated with the Waitemata Flour Mill/Riverhead Paper Mill site R10\_721 prior to any land disturbance, and to confirm whether the development will require an Authority to Modify under the Heritage New Zealand Pouhere Taonga Act 2014.

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

#### 7.14 Reverse Sensitivity

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The Plan Change area adjoins land that is zoned Mixed Rural to the north, south and west, which has the potential to create reverse sensitivity effects. The proposed Plan Change locates THAB zoning away from the Mixed Rural zone, and proposes the lower intensity Mixed Housing Suburban zoning at this interface. The Neighbourhood Design Statement (refer **Appendix 6**) recommends that a greater side and rear yard setback is applied. This will provide separation between future development and existing rural activities, as well as provide opportunities for future land owners to implement additional buffers and screening. The proposed precinct standards will require any Mixed Housing Suburban zoned site within the Plan Change area immediately adjoining the Mixed Rural zone to apply a 5m side and rear yard setback from common boundaries with this zone.

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

#### 7.15 Summary of Effects

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The actual and potential effects of the proposed Plan Change have been considered above, based on extensive reporting and analysis undertaken by a wide range of technical experts. On the basis of this analysis, it is considered that the area is suitable for urban development, the proposed mix of uses will result in positive effects on the environment in terms of the social and economic well-being of the community, and the development can be serviced by existing infrastructure with appropriate upgrades in place. Where adverse effects are anticipated, the proposed policies and rules of the Plan Change, in addition to those in the Auckland-wide and zone provisions, will ensure they are appropriately avoided, remedied or mitigated.

## 8.0 Section 32 Analysis

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### 8.1 Appropriateness of the Proposal to achieve the purpose of the Act

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Section 32(1)(a) of the RMA requires an evaluation to examine the extent to which the objectives of the proposed plan change are the most appropriate way to achieve the purpose of the RMA.

### 8.1.1 Objectives of the Plan Change

The purpose or overarching objective of the plan change is to deliver a comprehensively developed residential environment through the expansion of the existing Riverhead settlement to primarily provide additional land for housing. The plan change will achieve medium and high density residential activities serviced by a local centre to provide for local convenience needs and some limited employment opportunity. A smaller neighbourhood centre is proposed along Coatesville-Riverhead Highway to provide for daily needs within a walkable catchment. The plan change will also achieve a connected multi-modal transport network which integrates with the existing settlement. In addition, the plan change will retain and enhance key ecological features to improve ecological outcomes, and respect Mana Whenua values. Overall, the plan change is considered to be complementary to the Riverhead Structure Plan.

The proposed precinct incorporates objectives to guide development within the Plan Change area to achieve the following outcomes:

- The extension of Riverhead rural town to create a comprehensively developed residential environment that integrates with the existing settlement, the natural environment and respects Mana Whenua values;
- Development provides a variety of housing types and sizes, including Integrated Residential Development, to meet demand;
- Local employment opportunity is provided in the Local Centre and Neighbourhood Centre, while complementing higher order centres;
- Development is coordinated with the provision of infrastructure, transport upgrades and social facilities;
- Adverse effects on receiving waterbodies are minimised or mitigated;
- The protection, restoration, enhancement and maintenance of ecological habitats within the Plan Change area including riparian margins is achieved; and
- The relationship of Mana Whenua with the Māori cultural landscape is recognised, protected, and enhanced.

The proposed precinct objectives enable a comprehensive and integrated urban development outcome whilst also achieving positive environmental outcomes. The requirement for growth and transport/infrastructure upgrades to be developed together will also ensure development progresses in a coordinated manner.

### 8.1.2 Assessment of the Objectives against Part 2

In accordance with Section 32(1)(a), **Table 1** below provides an evaluation of the objectives of the plan change.

**Table 1: Assessment of Objectives against Part 2 of the RMA.**

Objective	RMA S5 Purpose	RMA S6 Matters of National Importance	RMA S7 Other Matters	RMA S8 Treaty of Waitangi
<b>Theme 1: Well-functioning Urban Environment</b>				
(2) A variety of housing types and sizes that respond to: (a) Housing needs and demand; and (b) The neighbourhoods planned urban built character. (3) Activities in Business – Local Centre zone do not compromise the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone.	These objectives seek to enable future communities of Riverhead to meet their social, economic, and cultural well-being by: <ul style="list-style-type: none"> <li>Ensuring that a selection of housing is available to meet the diverse needs of the community; and</li> <li>Providing opportunity for local employment while respecting the higher order centres and the role these have within the wide community.</li> </ul>	This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The PPC and the AUP contain a suite of objectives which will appropriately manage matters of national importance within the Plan Change area.	This objective does not compromise the recognition of, or the provision of other matters.	These objectives will not offend against the principles of the Treaty of Waitangi.
<b>Theme 2: Coordinating the development of land with infrastructure in Riverhead</b>				
(5) Subdivision and development are coordinated with the supply of sufficient transport, water, energy and telecommunications infrastructure. (8) Development is supported by social facilities, including education and healthcare facilities.	The alignment of social and physical infrastructure and land use planning will ensure development occurs in a sustainable manner through ensuring that there is adequate infrastructure to service staged growth and mitigate the adverse effects of development on the receiving environment.	This objective does not compromise the recognition of, or the provision of these matters of national importance. The AUP contains existing objectives that manages any potential conflict between matters of national importance and infrastructure and social facilities.	These objectives do not compromise the recognition of, or the provision of other matters. In particular the alignment of infrastructure and land use planning will ensure development makes efficient use of land where there are funded infrastructure solutions available.	These objectives will not offend against the principles of the Treaty of Waitangi.
<b>Theme 3: Achieving integrated and quality development</b>				
(1) Riverhead is a well-functioning urban environment that integrates with the existing Riverhead settlement, the natural environment and respects Mana Whenua values. (4) Access to and from the precinct occurs in a safe, effective and efficient manner for all modes of transport.	The emphasis of the proposed objectives on achieving a connected development which integrates with the existing settlement will enable future communities of Riverhead to meet their social, economic, and cultural well-being.	This objective does not compromise the recognition of, or the provision of these matters of national importance. The AUP contains existing objectives that manages matters of national importance.	The objectives have regard to the maintenance and enhancement of amenity values and the quality of the environment through ensuring development is connected and integrated with the existing Riverhead development and the natural environment.	These objectives are consistent with the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
<b>Theme 4: Natural Environment</b>				
(7) Identified ecological values within wetland and stream habitats are protected, restored and enhanced. (6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate adverse effects on the receiving environment.	The emphasis of the proposed objectives on the protection and enhancement of natural and ecological features as well as the adverse effects on receiving water bodies will ensure that the natural resources within the Plan Change area are sustained for future generations.	The objectives recognise and provide for the preservation of the natural character of wetlands and rivers and their margins through ensuring the maintenance and enhancement of the ecological values within stream, and wetland habitats.	The objectives have regard to the intrinsic value of ecosystems and the maintenance and enhancement of the quality of the environment through ensuring the maintenance and enhancement of the ecological values within stream, and wetland habitats. Additionally, the objectives have particular regard to the effects of the quality of receiving waters through ensuring that	The precinct is framed by two awa which have cultural value to mana whenua. These objectives recognise that guiding principles for enables Te Kawerau a Maki and Ngati Whatua Kaipara identified through ongoing engagement on the PPC include the protection of taonga and the restoration of mana to taonga. These objectives are consistent with the



Objective	RMA S5 Purpose	RMA S6 Matters of National Importance	RMA S7 Other Matters	RMA S8 Treaty of Waitangi
			stormwater quality is managed to avoid, minimise or mitigate effects.	principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
<b>Theme 5: Mana Whenua Cultural Landscape</b>				
<p>(9) Mana Whenua cultural values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, waahi tapu, and other taonga, in the Riverhead Precinct are identified, recognised, protected, and enhanced.</p>	<p>Recognising and protecting the Māori cultural landscape enables Te Kawerau a Maki and Ngati Whatua Kaipara to meet their own cultural well-being while ensuring these resources are sustained for future generations.</p>	<p>The Riverhead area is notable for its continued association with Te Kawerau a Maki and Ngati Whatua Kaipara and other iwi since pre-European times. Fundamental guiding principles for mana whenua include the protection of taonga, the restoration of mana to taonga and the retention of wahi tapu and sites of cultural significance. These objectives recognise and protect these values and therefore provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taonga as matter of national importance.</p>	<p>These objectives will support the recognition of, or the provision of other matters. In particular the recognition and protection of the Māori cultural landscape is consistent with kaitiakitanga.</p>	<p>These objectives recognise the Māori cultural landscape plan which has been developed in partnership with Te Kawerau a Maki and Ngati Whatua Kaipara consistent with the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p>

## 8.2 Appropriateness of the Provisions to Achieve the Objectives

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### 8.2.1 The Objectives

Section 32(1)(b) of the RMA requires an evaluation to examine whether the provisions (i.e. policies and methods) of the proposed Plan Change are the most appropriate way to achieve its objectives by:

- Identifying other reasonably practicable options for achieving the objectives;
- Assessing the efficiency and effectiveness of the objectives; and
- Summarising the reasons for deciding on the provisions.

As the proposed Plan Change is amending the AUP (District Plan), the above assessment must relate to the provisions and objectives of the proposed Plan Change, and the objectives of the AUP to the extent that they are relevant to the proposed Plan Change and would remain if the Plan Change were to take effect<sup>6</sup>.

In addition to the objectives of the proposed Plan Change which are outlined above, the AUP objectives with particular relevance to this plan change are summarised below:

Within the RPS:

- A quality compact urban form that enables a higher quality urban environment, better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects (B2.2.1(1));
- Ensure there is sufficient development capacity to accommodate growth and require the integration of land use planning with the infrastructure to service growth (B2.2.1(3) and B2.2.1(5));
- Urbanisation is contained within the Rural Urban Boundary, towns and rural and coastal towns and villages (B2.2.1(4));
- A quality-built environment where subdivision, use and development respond to the intrinsic qualities and physical characteristics of the area, reinforce the hierarchy of centres and corridors, contribute to a diverse mix of choice and maximise resource and infrastructure efficiency (B2.3.1(1));
- Ensure residential intensification supports a quality compact urban form and land within and adjacent to centres and corridors or in close proximity to public transport is the primary focus for residential intensification (B2.4.1(1) and B2.4.1(3));
- An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population (B2.4.1(4));
- Ensure employment and commercial and industrial opportunities meet current and future demands (B2.5.1(1));
- Ensure growth and development of existing or new rural and coastal towns and villages is enabled in ways that avoid natural and physical resources that have been scheduled, avoid elite soils and avoid where practicable prime soils, avoid areas with significant natural hazard

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<sup>6</sup> RMA s32(3)

risks, are consistent with the local character of the town or village and the surrounding area and enables the development and use of Mana Whenua's resources for their economic well-being (B2.6.1(1));

- Ensure rural and coastal towns and villages have adequate infrastructure (B2.6.1(2));
- Ensure recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities and that public access to streams is maintained and enhanced (B2.7.1(1) and B2.7.1(2));
- Ensure the mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall (B6.3.1(2));
- Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring (B7.2.1(2));
- Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced (B7.3.2(5)); and
- Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring (B7.2.1(1)).
- Rural areas make a significant contribution to the wider economic productivity of, and food supply for, Auckland and New Zealand (B9.2.1(1)).
- Auckland's rural areas outside the Rural Urban Boundary and rural and coastal towns and villages are protected from inappropriate subdivision, urban use and development (B9.2.1(4)).

Within the Residential Zones:

- Within the Terrace Housing and Apartment Building zone - land adjacent to centres and near the public transport network is efficiently used to provide high-density urban living that increases housing capacity and choice and is in keeping with the planned urban character of predominantly five, six or seven storey buildings in a variety of forms (H6.2(1) and H6.2(2)); and
- Within the Mixed Housing Suburban zone - enable a range of housing types and in a manner that is in keeping with the planned suburban built character of the zone (H4.2(1) and H4.2(2)).

Within the Business Zones:

- Provide a strong network of centres that are attractive environments and attract ongoing investment, promote commercial activity, and provide employment, housing and goods and services, all at a variety of scales (H12.2(1) and (H11.2(1)); and
- Ensure business activity is distributed in locations, that is accessible and is of a form and scale that provides for the community's social and economic needs (H12.2(4) and (H11.2(4))).

Within the Rural Zones:

- Within the Mixed Rural Zone - Rural character and amenity values of the zone are maintained while anticipating a mix of rural production, non-residential and rural lifestyle activities (H19.4.2(3)).

Within the Auckland-wide Provisions:

- Auckland-wide objectives relating to lakes, rivers, streams and wetland, water quality, stormwater, land disturbance and vegetation management and biodiversity seek to avoid adverse effects where possible but recognise the need to use land identified for future urban land uses efficiently;
- Auckland-wide objectives relating to subdivision seek to ensure that subdivision has a layout which is safe, efficient, convenient and accessible and that Infrastructure supporting subdivision and development is planned and provided for in an integrated and comprehensive manner; and
- Auckland-wide objectives relating to transport seek to ensure that an integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.

The objectives and provisions of the Plan Change and the relevant objectives of the AUP can be categorised into the following themes:

- Theme 1: Timing of urbanisation and land use pattern;
  - Theme 1.1: Extent of urbanisation in Riverhead;
  - Theme 1.2: Timing of Development in Riverhead;
  - Theme 1.3: Residential land use pattern;
  - Theme 1.4: Commercial land use pattern; and
  - Theme 1.5: Rural land use pattern.
- Theme 2: Coordinating the development of land with infrastructure;
- Theme 3: Achieving integrated and quality development;
- Theme 4: Natural Environment; and
- Theme 5: Mana Whenua Cultural Landscape.

The following sections address the matters set out in Schedule 1 and Section 32 of the RMA on the basis of the themes listed above.

## 8.3 Other Reasonably Practicable Options for Achieving the Objectives

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### 8.3.1 Theme 1: Timing of Urbanisation and Land Use Pattern

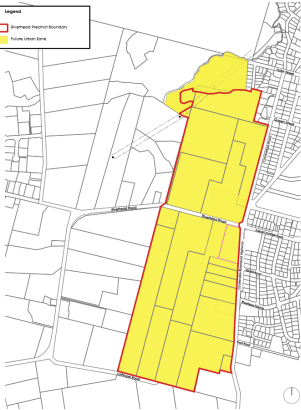
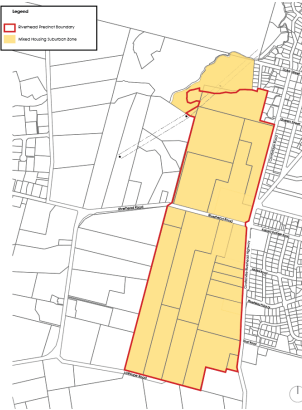
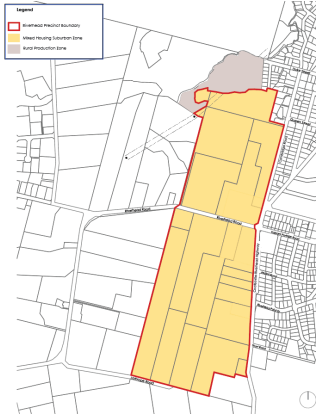
The existing AUP objectives and proposed precinct objectives which have particular relevance for Theme 1 include:

- B2.2.1(1): A quality compact urban form that enables a higher quality environment, better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects;
- B2.2.1(3): Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth;
- B2.2.1(4): Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages;

- B2.2.1(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.
- B2.3.1(1): A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change;
- B2.4.1(1): Residential intensification supports a quality compact urban form;
- B2.4.1(3): Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification;
- B2.4.1(4): An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population;
- B2.4.1(5): Non-residential activities are provided in residential areas to support the needs of people and communities;
- B2.5.1(1): Employment and commercial and industrial opportunities meet current and future demands;
- B2.6.1(1): Growth and development of existing or new rural and coastal towns and villages is enabled in ways that: (a) avoid natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character unless growth and development protects or enhances such values; and (b) avoid elite soils and avoid where practicable prime soils which are significant for their ability to sustain food production; and (c) avoid areas with significant natural hazard risks; (d) are consistent with the local character of the town or village and the surrounding area; and (e) enables the development and use of Mana Whenua's resources for their economic well-being;
- B2.6.1(2): Rural and coastal towns and villages have adequate infrastructure;
- H6.2 (1): Land adjacent to centres and near the public transport network is efficiently used to provide high-density urban living that increases housing capacity and choice and access to centres and public transport;
- H4.2(1) Housing capacity, intensity and choice in the zone is increased;
- H19.4.2(3) Rural character and amenity values of the zone are maintained while anticipating a mix of rural production, non-residential and rural lifestyle activities.
- H11.2(4) & H12.2(4): Business activity is distributed in locations, and is of a scale and form, that: (a) provides for the community's social and economic needs; (b) improves community access to goods, services, community facilities and opportunities for social interaction; and (c) manages adverse effects on the environment, including effects on infrastructure and residential amenity.

In accordance with Section 32(1)(a) and (1)(b), **Table 2** and **Table 3** below provide an evaluation of options in respect of the extent of urbanisation at Riverhead.

**Table 2: Evaluation of Provisions – Theme 1.1: Extent of urbanisation in Riverhead.**

	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
Description of Option	<p>This option involves retaining the Future Urban zone.</p> 	<p>This option involves urbanising the entire Plan Change area.</p> 	<p>This option will shift the RUB and rezone the northern portion of the plan change area rural to avoid urbanising land subject to extensive flooding constraints.</p> 
Benefits			
Environmental	<p>While this option avoids urban development of land subject to extensive flooding the Future Urban Zone does not provide certainty regarding future land use.</p> <p>This option will maintain the existing rural character of the Plan Change area.</p> <p>There is no change to the AUP provisions proposed through this option. Existing rules will apply.</p>	<p>This option will have the least environmental benefits of all the options as it involves urbanisation of land in the northern portion of the plan change area which is subject to significant natural hazards.</p>	<p>This option will ensure that land subject to significant natural hazard risk from flooding is not urbanised.</p> <p>This option will maintain the existing rural character of the northern portion of the Plan Change area, utilising the flood plain as a natural boundary which forms a suitable urban edge.</p>
Economic	<p>This option provides the least economic benefit of all the options as it is</p>	<p>This option will provide the greatest capacity for residential and commercial</p>	<p>This option will provide the additional capacity for</p>

	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
	essentially a transition zone. While there are constraints to urban development in the northern portion of the Plan Change area the technical analysis in support of the Structure Plan and Plan Change application demonstrates that the balance of the Plan Change area is suitable for urbanisation.	development however this is theoretical only given there is limited ability to develop the land in the north subject to flooding.	residential and commercial development
<b>Social</b>	This option provides the least social benefit of all the options as the FUZ zone does not enable additional development opportunity. Therefore this option will not provide population growth to support additional social facilities for Riverhead.	This option will result in a scale of development that provides opportunity to provide for social amenities to meet the diverse demographic and cultural needs of the future and existing Riverhead community in a coordinated manner. Given the limited ability to develop the land to the north there maybe opportunities to provide additional open space in this area however, there would be funding constraints to purchasing and maintaining such a large area of open space.	This option will result in a scale of development that provides opportunity to provide for social amenities to meet the diverse demographic and cultural needs of the future and existing Riverhead community in a coordinated manner.
<b>Cultural</b>	This option defers further intensification and development of land where there is cultural, spiritual and historical values and associated with the Māori cultural landscape.	The proposed precinct provisions to recognise and protect the cultural landscape do not extend to the entire Plan Change area. That may result in development of land around sites of significance and development which	This option includes precinct provisions that will holistically recognise and protect the cultural landscape and sites of significance.

	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
		compromises the cultural landscape. .	
<b>Costs</b>			
<b>Environmental</b>	This option is less likely to result in the environmental improvements provided for through Option 3, including the protection and restoration of riparian margins.  Environmental impacts associated with ongoing rural use and on-going uncontrolled sediment discharge to the CMA.	This option will result in the urbanisation of land in the northern portion of the plan change area that is subject to extensive flooding.  Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Riverhead.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Riverhead.
<b>Economic</b>	This option does not make efficient use of land where there are funded infrastructure and transport solutions to service growth.  Does not add to Auckland’s housing and business land supply to accommodate growth in the short term and is therefore likely to have a negative impact on economic growth and employment.	Costs involved in undertaking the development and delivery of transport infrastructure necessary to service a larger live zoned area.	Costs involved in undertaking the development and delivery of infrastructure.  Costs for the property owners to the north who will not benefit from urban zonings being applied to their land and the associated increase in land value.
<b>Social</b>	This option does not provide for any additional community facilities or open spaces to meet the diverse demographic and cultural needs of the	The scale of development delivered through this option may be considered by some members of the community to be not in keeping with the community’s expectations	The scale of development delivered through this option may be considered by some members of the community to be not in keeping with the community’s expectations



	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
	future and existing Riverhead community.	given the current rural land use.	given the current rural land use.
<b>Cultural</b>	There is no change to the cultural environment through this option. However, has the potential to result in rural use which may compromise cultural landscape values. Option 3 includes precinct provisions that will recognise and protect the cultural landscape.	May result in development of land that is not in keeping with the mana whenua cultural landscape.	May result in development of land that has significant association to lwi however, the mana whenua cultural landscape is recognised and protected through proposed precinct provisions.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or consistent with B2.2.1(3) and the requirements of the NPS- UD as no additional business and residential capacity is enabled in the short – mid-term despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.6(1) and B2.2.1(1).	This option is not efficient and effective at achieving B2.6(1)(c) as it seeks to urbanise land subject to significant natural hazards.	This option efficient and effective at achieving B2.6(1)(c) as it avoids urbanising land subject to significant natural hazards.  This option is efficient and effective at achieving B2.2.2(2) as it relocates the RUB to avoid urbanising land subject to significant natural hazards. The realignment of the RUB aligns with the flooding extent forming a strong natural boundary consistent with B2.2.2(2)(m).  This option is efficient and effective at achieving B2.2.1(3) as it will enable the development of 1,500-1800 dwellings which represents a significant opportunity to increase residential

	Option 1 – Do nothing Retain the FUZ Zoning across the entire Plan Change area	Option 2 – Urbanise the entire Plan Change area	Option 3 - Proposed plan change Shift the RUB and apply a rural zone to the area of land subject to flooding constraints
			development capacity within the short term.
<b>Summary</b>	Option 3 is preferred. The proposed shift in the RUB and rezoning of the northern portion of the Plan Change area from FUZ to Mixed Rural avoids urbanising land subject to significant natural hazards consistent with B2.6(1)(c) and B2.2.2(2).		

**Table 3: Evaluation of Provisions – Theme 1.1: Timing of Development in Riverhead.**

	Option 1 – Do nothing (wait for Council to rezone the land in accordance with the FULSS)	Option 2 – Proposed plan change Live zone the entire FUZ area
<b>Description of Option</b>	This option involves retaining the Future Urban zone and waiting for the Council to initiate a Plan Change to rezone the Plan Change area in accordance with the FULSS.	This option brings forward the release of land for urban development in Riverhead in accordance with the Plan Change.
<b>Benefits</b>		
<b>Environmental</b>	This option will maintain the existing rural character of the Plan Change area. There is no change to the AUP provisions proposed through this option. Existing rules will apply.	This option provides an opportunity to take a holistic view on urban growth and form of Riverhead providing the essential elements that contribute to a successful rural town consistent with the planning framework of the Regional Policy Statement. The Riverhead Structure Plan has assessed the suitability of the Plan Change area for urbanisation and the Plan Change is consistent with the Structure Plan. Infrastructure solutions are available and funded and therefore there are no significant constraints to urban development of the Plan Change area.
<b>Economic</b>	There is no economic benefit for this option.	Enables the staged development of the Plan change area as infrastructure is available, providing additional business and residential capacity from the short term. Provides greater certainty for the council, community, developers and landowners

	Option 1 – Do nothing (wait for Council to rezone the land in accordance with the FULSS)	Option 2 – Proposed plan change Live zone the entire FUZ area
		about the nature, extent and pace of development of Riverhead.
<b>Social</b>	This option does not facilitate any improved social outcomes.	This option proposes a comprehensive and integrated development over a large land holding that is contiguous with existing urban development on the opposite side of Coatesville Riverhead Highway. This scale of development will enable social amenities such as schools, open spaces, ecological corridors, a retirement village and a village centre to be established.
<b>Cultural</b>	This option defers further intensification and development of land where there is cultural, spiritual and historical values and associated with the Māori cultural landscape.	This option has been developed in consultation with Te Kawerau a Maki and Ngati Whatua Kaipara includes precinct provisions that will holistically recognise and protect the cultural landscape
<b>Costs</b>		
<b>Environmental</b>	This option is less likely to result in the environmental improvements provided for through Option 2, including the protection and restoration of riparian margins.  Environmental impacts associated with ongoing rural use and on-going uncontrolled sediment discharge to the CMA.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Riverhead.
<b>Economic</b>	This option does not make efficient use of land where there are funded infrastructure and transport solutions to service growth.  Does not add to Auckland’s housing and business land supply to accommodate growth in the short term and is therefore likely to have a negative impact on economic growth and employment.	Costs involved in undertaking the development and delivery of infrastructure.
<b>Social</b>	This option does not provide for any additional community facilities or open spaces to meet the diverse demographic and cultural needs of the future and existing Riverhead community.	The scale of development delivered through this option may be considered by some members of the community to be not in keeping with the community’s expectations given the current Single House zoning throughout Riverhead.

	<p style="text-align: center;">Option 1 – Do nothing (wait for Council to rezone the land in accordance with the FULSS)</p>	<p style="text-align: center;">Option 2 – Proposed plan change Live zone the entire FUZ area</p>
<p><b>Cultural</b></p>	<p>There is no change to the cultural environment through this option. However, has the potential to result in rural use which may compromise cultural landscape values. Option 2 includes precinct provisions that will recognise and protect the cultural landscape.</p>	<p>May result in development of land where there is cultural, spiritual and historical values to mana whenua, however, the mana whenua cultural landscape is recognised and protected through proposed precinct provisions.</p>
<p><b>Efficiency &amp; Effectiveness</b></p>	<p>This option is not efficient or consistent with B2.2.1(3) and the requirements of the NPS-UD as no additional business and residential capacity is enabled in the short – mid-term despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.6(1) and B2.2.1(1).</p>	<p>This option is efficient and effective at achieving B2.6(1) as the potential development of the land does not affect any scheduled items and natural hazards. Additionally, the effects of built form enabled by the Plan Change are largely consistent with and complementary to the local character of Riverhead with interface controls to manage the relationship with the higher density development and existing single house development along Coatesville Riverhead Highway. Precinct provisions are also proposed to protect the mana whenua cultural landscape.</p> <p>This option is efficient and effective at achieving B2.6(2) as analysis undertaken as part of this Plan Change request confirms there are infrastructure solutions available and able to be funded.</p> <p>This option is efficient and effective at achieving B2.2.1(1) as it supports a high quality environment that is integrated with public transport use and reduce adverse effects.</p> <p>This option is efficient and effective at achieving B2.2.1(3) as it will enable the development of 1,500-1800 dwellings which represents a significant opportunity to increase residential development capacity within the short term.</p>
<p><b>Summary</b></p>	<p>Option 2 is preferred. The extension of the settlement at Riverhead within the Plan Change area is consistent with B2.6.1. Analysis undertaken as part of this Plan Change request confirms there are infrastructure solutions available and able to be funded, without reliance on funding from Council. Furthermore, this option is efficient and effective at</p>	

	Option 1 – Do nothing (wait for Council to rezone the land in accordance with the FULSS)	Option 2 – Proposed plan change Live zone the entire FUZ area
	achieving B2.2.1(3) as it will enable the development of 1,500-1800 dwellings increasing residential development capacity.	

In accordance with Section 32(1)(a) and (1)(b), the below tables provide an evaluation of options in respect to land use pattern:

- **Table 4** addresses the lower density residential zoning;
- **Table 5** addresses the higher density residential zoning;
- **Table 6** addresses the commercial zoning; and
- **Table 7** addresses the rural zoning.

**Table 4: Evaluation of Provisions – Theme 1.3: Residential Land Use Pattern – Lower Density Residential Area.**

	Option 1 – Single House Zone	Option 2 – Mixed Housing Suburban Zone	Option 3 – Mixed Housing Urban Zone	Option 4 – Proposed Plan Change
<b>Description of Option</b>	<p>This option involves applying the Single House zone to enable residential development at lower densities.</p>	<p>This option involves applying the Mixed Housing Suburban zone to enable medium density residential development while retaining a suburban built character of predominantly two storeys.</p>	<p>This option involves applying the Mixed Housing Urban zone to enable medium density residential development while retaining a urban built character of predominantly three storeys throughout the lower density area.</p>	<p>This option involves a refined zoning approach to enable medium density residential development by applying the Mixed Housing Suburban zone to retain a suburban built character of predominantly two storeys, and providing for three storeys adjacent to the higher density residential areas only. The residential standards have been tailored within the precinct to incorporate the standards that apply to the Mixed Housing Urban zone/Medium Density Residential Standard to provide more flexibility and efficient use of land while retaining an overall suburban built character defined by the two storey height limit.</p>
<b>Benefits</b>	<p><b>Environmental</b> This option retains the low-density nature of the existing development within Riverhead.</p>	<p>This option retains the suburban character of Riverhead while allowing greater capacity and choice.</p>	<p>This option will provide the greatest capacity for residential development however, the extent of the MHU zoning has not been sized to align with the provision of infrastructure which could lead to a dispersed pattern of residential development.</p>	<p>This proposed zoning layout includes opportunities for different housing types and intensity that are complementary to the residential character of the area and has been informed by a structure planning exercise.</p>

	Option 1 – Single House Zone	Option 2 – Mixed Housing Suburban Zone	Option 3 – Mixed Housing Urban Zone	Option 4 – Proposed Plan Change
			Other benefits include greater proximity of residential to support the Local Centre.	This option makes efficient use of greenfield land through enabling medium density development. Sub-Precinct B provides for a three-storey height limit to enable a transition in building height between the higher density THAB land and the surrounding Mixed Housing Urban area, where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.
<b>Economic</b>	This option will provide for in the least residential capacity within Riverhead compared with the other options and is likely to result in a dispersed pattern of residential development.	This option will provide the opportunity for increased housing typologies such as duplexes and terraces which will enable housing for different price points.	This option will provide for the greatest level of residential capacity of all the options, supporting competitive development markets. However, a dispersed and lower density pattern of development is likely to arise due to insufficient infrastructure provision.	This option will provide the opportunity for increased housing typologies, such as duplexes and terraces, which will enable housing for different price points.
<b>Social</b>	This option will not provide the range of housing typologies and choice provided for through option 2 - 4.	This option provides for a range of housing typologies and choice to meet the diverse needs of the Riverhead population.	This option provides for a range of housing typologies and choice to meet the diverse needs of the Riverhead population. It will enable development yields that can support the development of additional community facilities.  The scale of development will increase the long-term population and consequently the social benefits associated with intensification and use of community facilities.	This option provides for a range of housing typologies and choice to meet the diverse needs of the Riverhead population. It will enable development yields that can support the development of additional community facilities.
<b>Cultural</b>	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.
<b>Costs</b>				
<b>Environmental</b>	The proposed zoning layout will result in low density residential development which is an inefficient use of land, particularly in areas of the Plan Change area that are within walking distance to the proposed local centre.	The proposed zoning layout will result in medium density residential development which is a greater density than the existing Riverhead area however, the similarities in the core development standards will ensure that development results in a suburban character which is in keeping.	This proposed zoning layout provides for development at an intensity and scale which is different to the residential character of the existing Riverhead area.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height (within Sub-Precinct B) and density than currently provided for within Riverhead.
<b>Economic</b>	This option will limit the range of housing types and price points available within Riverhead.  Costs involved in undertaking the development and delivery of infrastructure.	Costs involved in undertaking the development and delivery of infrastructure.	This option will result in the application of residential zones that have not been sized to meet the short-medium term market demand and infrastructure availability.  Costs involved in undertaking the development and delivery of transport infrastructure necessary to service a higher density lived zoned residential area.	Costs involved in undertaking the development and delivery of infrastructure.

	Option 1 – Single House Zone	Option 2 – Mixed Housing Suburban Zone	Option 3 – Mixed Housing Urban Zone	Option 4 – Proposed Plan Change
<b>Social</b>	This option does not make efficient use of land and therefore may not result in the development yields to support the development of additional community facilities to support the growing population within Riverhead.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the community’s expectations given the current single house zoning.	While this zoning pattern that enables the greatest density of development compared to the other options, the scale of development will actually be of a reduced density due to infrastructure limitations and consequentially reduce the long-term population. This will reduce social benefits associated with intensification.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the community’s expectations, given the current Single House zoning of the existing settlement.
<b>Cultural</b>	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.
<b>Efficiency &amp; Effectiveness</b>	<p>This option is not efficient and effective at achieving B2.3.1 (1) as the zoning pattern is not consistent with the Riverhead Structure Plan and therefore does not respond to the intrinsic qualities and physical characteristics of the site and area.</p> <p>This option does not efficiently use land within a walkable catchment to the proposed local centre and therefore is not consistent with B2.3.1 (1).</p>	This option is efficient and effective at achieving B2.3.1 (1) as the zoning has been informed by a structure plan however, not to the same degree as Option 4 where the zoning has been more specifically tailored to respond to the intrinsic qualities and physical characteristics of the site and area.	This option is not efficient and effective at achieving B2.3.1(1) as applying the three-storey development enabled by the Mixed Housing Urban throughout the Plan Change area is not in keeping with the existing Riverhead settlement.	<p>This option will effectively and efficiently achieve B2.3.1(1) as the two storey development enabled by the refined Mixed Housing Suburban zone is in keeping with the existing Riverhead settlement.</p> <p>This option is efficient and effective at achieving B2.3.1 (1) as the refined zoning has been informed by a structure plan and therefore responds to the intrinsic qualities and physical characteristics of the site and area.</p> <p>This option will efficiently and effectively achieve B2.4.1 (4) as it enables the development of 1450-1750 dwellings and a variety of typologies to support greater housing capacity and choice.</p>
<b>Summary</b>	Option 4 is preferred. The proposed zoning layout has been informed by a structure plan to respond to the characteristics of the Plan Change area and enables two-storey development in keeping with the existing Riverhead settlement, while delivering additional residential capacity.			



**Table 5: Evaluation of Provisions – Theme 1.4: Residential Land Use Pattern – Higher Density Residential Area**

	Option 1 – Mixed Housing Urban Zone	Option 2 – Terrace Housing and Apartment Buildings Zone	Option 3 – Proposed Plan Change
<b>Description of Option</b>	<p>This option involves applying the Mixed Housing Urban zone to enable residential development at medium density.</p>	<p>This option involves applying the Terrace Housing and Apartment Building zone to enable residential development at higher densities, with an urban built character of 16m.</p>	<p>This option involves applying a refined set of provisions to enable residential development at higher densities, with an urban built character of 16m-18m.</p>
<b>Benefits</b>			
<b>Environmental</b>	<p>This option provides for medium density development close to the proposed centre which is more in keeping with existing Riverhead settlement.</p>	<p>This option provides for high density development to make efficient use of land in close proximity to the proposed local centre and public transport. This proposal enables high density development around the local centre, while applying the MHU zone to land adjacent to existing properties along Cambridge Road to minimise effects on the Single House zoned properties.</p>	<p>This option provides for high density development to make efficient use of land in close proximity to the proposed local centre and public transport. This proposal enables high density development around the local centre, while applying the MHU zone to land adjacent to existing properties along Cambridge Road to minimise effects on the Single House zoned properties. This option provides for a transition in height between the THAB zone and the surrounding Mixed Housing Urban zoned land subject to the proposed two storey height limit to manage amenity and built form effects.</p>
<b>Economic</b>	<p>This option will provide for the least residential capacity within Riverhead compared with the other options.</p>	<p>This option will provide for the greatest level of residential capacity of all the options, supporting competitive development markets.</p>	<p>This option provides for a range of housing typologies that will result will result in a range of housing prices, some of which will be affordable for the area.</p>
<b>Social</b>	<p>This option will provide some opportunity for terraces and walk-up apartments within the Mixed Housing Urban zone however, it will not</p>	<p>This option provides for a range of housing typologies and choice to meet the diverse needs of the Riverhead population. It will enable a package of</p>	<p>This option provides for a range of housing typologies and choice, including a retirement village, to meet the diverse needs of the Riverhead population.</p>

	provide the range of housing typologies and choice provided for through Option 2 or 3.	provisions that can support the development of a retirement village and development yields that can support the development of additional community facilities.  The scale of development will increase the long-term population with a greater area of high density residential zoning, and consequently the social benefits associated with intensification and use of community facilities.	It will enable development yields that can support the development of additional community facilities.
<b>Cultural</b>	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.
<b>Costs</b>			
<b>Environmental</b>	The proposed zoning layout will result in medium density residential development which is an inefficient use of land in areas of the Plan Change area that are within walking distance to the proposed local centre and public transport.	This option does not provide for a transition in height between the THAB zone and the surrounding Mixed Housing Urban zoned land subject to the proposed two storey height limit. This could result in adverse amenity and built form effects.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than what is currently provided for within Riverhead but not to the same extent as Option 2. The extent of THAB adjacent to the existing Riverhead settlement has been limited in order to manage the interface to Single House development along Cambridge Road.
<b>Economic</b>	This option will limit the range of housing types and price points available within Riverhead.  Costs involved in undertaking the development and delivery of infrastructure.	This option will result in the application of residential zones that have not been sized to meet the short to medium-term market demand and infrastructure availability.  Costs involved in undertaking the development and delivery of transport infrastructure necessary to service a higher density lived zoned residential area.	Costs involved in undertaking the development and delivery of infrastructure.
<b>Social</b>	This option will limit the range of housing types including the ability to develop a retirement village to meet the community's diverse needs within Riverhead.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the community's expectations, given the Single House zoning that currently applies within Riverhead.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the community's expectations given the Single House zoning that currently applies within Riverhead. This scale of development is potentially not as great as Option 2 and the extent of THAB adjacent to the existing Riverhead settlement has been limited in order to manage the interface to Single House development along Cambridge Road.
<b>Cultural</b>	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient and effective at achieving B2.3.1 (1) as the zoning pattern has not been informed by a Structure Plan and therefore does not respond to the intrinsic qualities and physical characteristics of the site and area.  This option does not efficiently use land within an 800m walkable catchment to the proposed local centre and therefore is not consistent with B2.3.1 (1).	This option is not efficient and effective at achieving B2.3.1 (1) as the zoning pattern has not been informed by a masterplan and therefore does not respond to the intrinsic qualities and physical characteristics of the site and area.	This option is efficient and effective at achieving B2.4.1 (1) and B2.4.1 (3) as the THAB zone has been applied to support the efficient use of land within an 800m walkable catchment to the proposed local centre and public transport. This will support quality compact urban form outcomes.  This option is efficient and effective at achieving B2.3.1 (1) as the zoning pattern has been informed by a masterplan and therefore responds to the intrinsic qualities and physical characteristics of the site and area.  This option will efficiently and effectively achieve B2.4.1 (4) as it enables the development of a variety of typologies to support greater housing capacity and choice.
<b>Summary</b>	Option 3 is preferred. The proposed zoning layout has been informed by a Structure Plan to respond to the characteristics of the Plan Change area and enables efficient use of land around the proposed Local Centre, supporting transport mode shift and quality compact outcomes while delivering additional residential capacity.		

**Table 6: Evaluation of Provisions – Theme 1.5: Commercial Land Use Pattern**

	Option 1 – Rely on the existing Riverhead Local Centre and a new Neighbourhood Centre	Option 2 – Establish a Local Centre north of Riverhead Road and a Neighbourhood Centre on Coatesville-Riverhead Highway	Option 3 – Establish a Local Centre opposite Hallertau and a Neighbourhood Centre on Riverhead Road.	Option 4 – Proposed Plan Change – Establish a Local Centre south of Riverhead Road and a Neighbourhood Centre on Coatesville-Riverhead Highway
<p><b>Description of Option</b></p>	<p>This option involves relying largely on the existing Local Centre within Riverhead (possibly expanded) to service the Plan Change area, with the addition of a Neighbourhood Centre.</p>	<p>This option involves applying a Local Centre within the Plan Change area to the north of Riverhead Road, with a supporting Neighbourhood Centre on Coatesville-Riverhead Highway.</p>	<p>This option involves applying a Local Centre within the Plan Change area opposite Hallertau, with a supporting Neighbourhood Centre on Riverhead Road.</p>	<p>This option involves applying a Local Centre within the Plan Change area to the south of Riverhead Road, with a supporting Neighbourhood Centre on Coatesville-Riverhead Highway.</p>
<p><b>Benefits</b></p>				
<p><b>Environmental</b></p>	<p>This option will utilise the existing Local Centre which is visible to passers-by, has on-street parking and is part of the existing community; within good proximity to Riverhead Tavern, the existing community hall and the coastal environment.</p>	<p>Most of the Plan Change area falls into an accessible 800m walkable catchment to the Local Centre and Neighbourhood Centre. The centres can access the upgraded walking network and cycleways which will be delivered as part of the Plan Change.</p>	<p>This option will enable the development of a Local Centre that can be accessed via pedestrian and cycle paths to be delivered as part of the Plan Change.</p>	<p>Most of the Plan Change area falls into an accessible 800m walkable catchment to the Local Centre and Neighbourhood Centre. The centres can access the upgraded walking network and cycleways which will be delivered as part of the Plan Change.</p>
<p><b>Economic</b></p>	<p>Future development will support the existing centre within Riverhead, however there is limited opportunity for growth and economic analysis undertaken in support of this Plan Change identified the need for an additional Local Centre.</p>	<p>A full size centre can be planned/accommodated as well as a future Neighbourhood Centre to service growth within the Plan Change area. The sizing of the centre may, however, in reality, be limited within this location due to the presence of the planned retirement village.</p>	<p>A full size centre can be planned/accommodated as well as future Neighbourhood Centre to service growth within the Plan Change area.</p>	<p>A full size centre can be planned/accommodated as well as future Neighbourhood Centre to service growth within the Plan Change area.</p>
<p><b>Social</b></p>	<p>The current Local Centre is within close proximity to existing social facilities, including the childcare facility.</p>	<p>The Local Centre has been sized to meet the needs of the local community, however, in reality, the size of the centre may be limited within this location due to the proposed retirement village.</p>	<p>The Local Centre has been sized to meet the needs of the local community. This option co-locates the centre with the Hallertau Brewery which is an existing</p>	<p>The Local Centre has been sized to meet the needs of the local community.</p>

	Option 1 – Rely on the existing Riverhead Local Centre and a new Neighbourhood Centre	Option 2 – Establish a Local Centre north of Riverhead Road and a Neighbourhood Centre on Coatesville-Riverhead Highway	Option 3 – Establish a Local Centre opposite Hallertau and a Neighbourhood Centre on Riverhead Road.	Option 4 – Proposed Plan Change – Establish a Local Centre south of Riverhead Road and a Neighbourhood Centre on Coatesville-Riverhead Highway
	There is an established sense of place within the existing Local Centre.		landmark within Riverhead, to foster a sense of place and identity.	This option is adjacent to a proposed retirement village increasing the accessibility to retail and commercial services for elderly residents.
<b>Cultural</b>	There are no cultural benefits associated with this option.	There are opportunities within a new centre to incorporate Te Aranga design principles into the design of publicly accessible spaces.	There are opportunities within a new centre to incorporate Te Aranga design principles into the design of publicly accessible spaces.	There are opportunities within a new centre to incorporate Te Aranga design principles into the design of publicly accessible spaces.
<b>Costs</b>				
<b>Environmental</b>	The existing Local Centre within Riverhead is not within an 800m walkable catchment of the southern portion of the Plan Change area, resulting in increased car reliance and associated environmental costs. The existing centre is not connected to cycleways and upgraded walking network which will be delivered as part of the Plan Change.	The roundabout at Coatesville- Riverhead Highway and Riverhead Road will need to be designed to prioritise the safety of pedestrians accessing the centre.	The northern portion of the Plan Change area is not within an accessible catchment to the proposed Local Centre, resulting in increased car reliance and associated environmental costs.	The roundabout at Coatesville- Riverhead Highway and Riverhead Road will need to be designed to prioritise the safety of pedestrians accessing the centre.
<b>Economic</b>	The current Local Centre is constrained, and economic analysis undertaken in support of this Plan Change identified the need for an additional Local Centre.	The sizing of the Local Centre may be limited due to the planned retirement village on this site. Therefore, it is unlikely the Local Centre will meet the size requirements for Riverhead as indicated in the economic analysis ( <b>Appendix 7</b> ) within this location.	The existing Local centre may decline, however it is currently constrained and economic analysis undertaken in support of this Plan Change identified the need for an additional Local Centre to service growth within the Riverhead catchment.	The existing Local centre may decline, however it is currently constrained and economic analysis undertaken in support of this Plan Change identified the need for an additional Local Centre to service growth within the Riverhead catchment.
<b>Social</b>	The current Local Centre is constrained, and therefore there will be less opportunity for supporting social facilities to establish within the centre. Expansion would occupy land currently used for residential purposes.	The ability to achieve the required size of the Local Centre specified within the economic report is constrained within this location. Therefore, there will be less opportunity for supporting social facilities to establish within the centre.	The Local Centre within this option is less accessible for the proposed retirement village residents.	This option does not co-locate the proposed Local Centre with existing community facilities or landmarks and therefore will not benefit from an established sense of place.
<b>Cultural</b>	There is less opportunity to incorporate Te Aranga design principles into the design of publicly accessible spaces within the centre.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.
<b>Efficiency &amp; Effectiveness</b>	This option is inefficient as the commercial zones are not sized to meet current and future demands (B2.5.1(1)). This option is less effective at achieving H11.2(4) and H12.2(4) than the other options as the existing Local Centre is not within an 800m walkable catchment for the southern portion of the Plan Change area.	This option is inefficient as the proposed retirement village will constrain the development of a Local Centre to a size that is not sufficient to meet current and future demands (B2.5.1 (1)).	This option is not as effective at achieving H11.2(4) and H12.2(4) as the other options, as the proposed Local Centre is not within an 800m walkable catchment for the northern portion of the Plan Change area.	This option is efficient as the proposed Local Centre zone has been sized to meet current and future demands (B2.5.1(1)). This option is effective at achieving H11.2(4) and H12.2(4) as most of the Plan Change area falls into an accessible 800m walkable catchment to the Local Centre and Neighbourhood Centre.
<b>Summary</b>	Option 4 is preferred. The proposed zoning layout has been informed by a Structure Plan to respond to the characteristics of the Plan Change area. The Local Centre zone has been sized to meet current and future demands (B2.5.1(1)) and most of the Plan Change area falls within an accessible 800m walkable catchment to improve community access to good, services and community facilities in accordance with H11.2(4) and H12.2(4).			

**Table 7: Evaluation of Provisions – Theme 1.6: Rural Land Use Pattern**

	Option 1 – Rural Production Zone	Option 2 – Countryside Living Zone	Option 3 – Proposed Plan Change
<b>Description of Option</b>	<p>This option involves applying the Rural Production zone to provide for the use and development of land for rural production activities and rural industries and services.</p>	<p>This option involves applying the Countryside Living Zone to enable opportunities for rural lifestyle living.</p>	<p>This option involves applying the Mixed Rural Zone to enable rural production, generally on smaller rural sites and non-residential activities of a scale compatible with smaller site sizes.</p>
<b>Benefits</b>			
<b>Environmental</b>	<p>This option will maintain the existing rural character of the northern portion of the Plan Change area.</p>	<p>This option will maintain the existing rural character of the northern portion of the Plan Change area.</p>	<p>This option is consistent with the zoning of the adjoining rural sites and therefore will result in a consistent zoning pattern.</p> <p>This option will maintain the existing rural character of the northern portion of the Plan Change area.</p>
<b>Economic</b>	<p>This option will maintain the ability to undertake rural production activities which will result in economic benefits.</p>	<p>While the current Countryside Living zoning enables some further development opportunity and consequential economic benefit, this is very limited. Further development under the Countryside Living zoning is more likely to result in the fragmentation of land for countryside living purposes which will compromise the economic use of the land for rural production, while not adding significantly to residential capacity.</p>	<p>This option will maintain the ability to undertake rural production activities at a smaller scale more suited to the size of the land parcel than Option 1, which will result in economic benefits.</p>
<b>Social</b>	<p>There are no social benefits associated with this option.</p>	<p>There are no social benefits associated with this option.</p>	<p>There are no social benefits associated with this option.</p>

	Option 1 – Rural Production Zone	Option 2 – Countryside Living Zone	Option 3 – Proposed Plan Change
<b>Cultural</b>	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.	There are no cultural benefits associated with this option.
<b>Costs</b>			
<b>Environmental</b>	This option will introduce a different rural zoning to the surrounding sites and therefore will result in a “spot zoning”.	The Countryside Living zoning will result in some limited development opportunity on land that is subject to significant natural hazard risk from flooding.  This option will introduce a different rural zoning to the surrounding sites and therefore will result in a “spot zoning”.	Potential effects on adjoining properties and surrounding land uses as a result of ongoing rural use on properties that adjoin rural zones. This is managed however, through additional development setbacks in the Riverhead Precinct provisions.
<b>Economic</b>	Does not add to Auckland’s housing and business land supply to accommodate growth in the short term to the same extent of Option 2 however, any additional capacity provided under Option 2 will be very limited.	This option will potentially result in greater fragmentation of rural land reducing productive benefits.	Does not add to Auckland’s housing and business land supply to accommodate growth in the short term to the same extent of Option 2 however, any additional capacity provided under Option 2 will be very limited.
<b>Social</b>	There are no social costs associated with this option.	There are no social costs associated with this option.	There are no social costs associated with this option.
<b>Cultural</b>	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.	There are no cultural costs associated with this option.
<b>Efficiency &amp; Effectiveness</b>	This option is efficient and effective at achieving B9.2.1(1) as the zoning pattern will contribute to economic productivity through enabling ongoing rural uses.	This option is not efficient and effective at achieving B9.2.1 (4) as it will enable increased subdivision opportunity when compared with option 1 and 2 which could result in greater fragmentation of rural land.	This option will most efficiently and effectively achieve B9.2.1(1) as the zoning pattern will contribute to economic productivity through enabling ongoing rural uses at the same scale currently enabled on the surrounding rural properties.
<b>Summary</b>	Option 3 is preferred. The proposed zoning layout is consistent with the surrounding rural properties and enables ongoing rural production activity on a site not suitable for urban development due to the presence of significant natural hazards.		

### 8.3.2 Theme 2: Coordinating the development of land with transport and three waters infrastructure

The existing AUP objectives and proposed precinct objectives which have particular relevance for Theme 2 include:

- B2.2.1(5): The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure;
- B3.2.1(5): Infrastructure and land use planning are integrated to service growth efficiently;
- B3.3.1(1)(b): Effective, efficient and safe transport that integrates with and supports a quality compact urban form;
- E27.2(1): Land use and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; and (b) the adverse effects of traffic generation on the transport network to be managed; and
- IX.2(5): Subdivision and development are coordinated with the supply of sufficient transport, water, energy and communications infrastructure.

**Table 8: Evaluation of Provisions Theme 2: Coordinating the development of land with transport and three waters infrastructure in Riverhead.**

	Option 1 – Do nothing – no staging provisions	Option 2 - Deferred zoning – when all the local infrastructure upgrades are operational	Option 3 – Proposed Plan Change
<b>Description of Option</b>	This option involves putting in place urban zoning and coordinating the development of land with transport and three waters infrastructure through processes and agreements which sit outside of the AUP.	This option involves putting in place urban zonings with a precinct that applies the Future Urban Zone provisions until a certain date from which the urban zone provisions will take effect. The date will be based on the point in time when all required local infrastructure upgrades are projected to be complete.	This option coordinates development with the delivery of required infrastructure within the AUP through: <ul style="list-style-type: none"> <li>• Transport infrastructure staging rules to coordinate the occupation of buildings with the delivery of required infrastructure; and</li> <li>• A road widening setback rule along Riverhead Road to provide for future widening; and</li> <li>• Additional assessment criteria to ensure there is adequate wastewater/water supply infrastructure to service development.</li> </ul>
<b>Benefits</b>			
<b>Environmental</b>	Potentially avoids the complexity in the planning provisions associated with Options 2-3, although relying on existing operative zone provisions will also add complexities	This option will ensure that no development occurs prior to the necessary infrastructure being in place to service growth.	This option provides for interim development to increase residential and commercial capacity which can be serviced without the final infrastructure upgrades required to support a full build out of the Plan Change area.
<b>Economic</b>	Removes the cost of developing rules for the applicant.	The administration of this rule is less complex than Option 3.	This option enables consenting to progress for land modification or development, which would will reduce unnecessary delays in the development process. This option allows for staged development to proceed, providing associated economic benefits.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	This option provides more certainty to the community than option 1 as there is assurance that development cannot occur until infrastructure is in place.	This option provides the most certainty to the community as the scale of development is tied to specific infrastructure upgrades. This option allows for staged development to proceed, providing associated social benefits, including the potential provision of a school and other social facilities.
<b>Cultural</b>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
<b>Costs</b>			
<b>Environmental</b>	The lack of recognition within the AUP of the required infrastructure may result in significant environmental costs if development was to proceed the required infrastructure upgrades. Management of environmental issues would be reliant on the requirement for an ITA under clause E27.3(2) and E27.9(5) and three waters issues under criteria E38.11.2(2)(6)(a)(ii), E38.11.2(2)(7)(b)(i), H6.8.2(2)(a)(j), and H4.8.2(2)(h) and provides less certainty than Options 2 and 3.	This option does not provide for interim development to increase residential and commercial capacity despite the traffic modelling determining the timing of the transport infrastructure upgrades and how these can be coordinated with the release of residential, retail, light industrial and commercial development capacity.  This option does not provide for interim development to increase residential and commercial capacity despite the engineering analysis identifying a number of solutions for three water infrastructure.	This option is informed by transport modelling that has determined the timing of the transport infrastructure upgrades and how these can be coordinated with the occupation of residential, retail, light industrial and commercial buildings.  This option is informed by engineering analysis identifying a number of solutions for three water infrastructure.



	Option 1 – Do nothing – no staging provisions	Option 2 - Deferred zoning – when all the local infrastructure upgrades are operational	Option 3 – Proposed Plan Change
<b>Economic</b>	This option is heavily reliant on infrastructure/funding agreements that sit outside the AUP. There is nothing in the AUP to tie the release of development capacity with the delivery of transport infrastructure.	This option is blunt and does not enable consenting to progress for land modification or development, which would create unnecessary delays in the development process.	This is a more complex set of provisions which will require greater monitoring by Council than Options 1 & 2. Although there are risks with this approach Council has the ability and technology to monitor this it will just be a matter of putting a system in place.
<b>Social</b>	This option provides no certainty to the community as there is no transparency within the AUP regarding when development will occur.	This option will result in costs to the community as the future urban zoning will not facilitate the development of community facilities to service the existing or future community which can be serviced without the final infrastructure upgrades required to support a full build out of the Plan Change area.	Some members of the community may be disappointed with an increase in traffic volumes. This issue will ultimately arise however, with all options.
<b>Cultural</b>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
<b>Efficiency &amp; Effectiveness</b>	This option is ineffective as there are no provisions within the plan to decline applications for development which cannot be serviced by infrastructure, which would not achieve B2.21(5), B3.2.1(5), B3.3.1(1)(b) or E27.2(1).	This option is highly inefficient as traffic modelling shows that the release of residential and commercial development capacity can be coordinated with the transport infrastructure upgrades required to service this growth. Therefore, as this option allows for no additional capacity in the interim prior to the completion of the complete infrastructure upgrades it is not in keeping with B3.2.1(5).	This option will efficiently coordinate development with infrastructure and achieve the policy direction of B2.21(5), B3.2.1(5) and B3.3.1(1)(b), because the provisions stage the occupation of buildings with the delivery of required infrastructure.
<b>Summary</b>	Option 3 is preferred. Coordinating the occupation of buildings within the precinct with the delivery of required infrastructure through the inclusion of a transport staging rule and servicing assessment criteria is the most appropriate mechanism for achieving the objectives of the AUP. The proposed provisions will stage the release of development capacity with the delivery of required infrastructure and therefore is consistent with B2.21(5), B3.2.1(5) and B3.3.1(1)(b).		

### 8.3.3 Theme 3: Achieving Integrated and Quality Development

The existing AUP objectives and proposed precinct objectives which have particular relevance for Theme 3 include:

- B2.3.1(1): A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change;
- B2.3.1(3): The health and safety of people and communities are promoted;
- B3.3.1(1): Effective, efficient and safe transport that: (a) supports the movement of people, goods and services... (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community;
- E27.2(2): An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for;
- E27.2(5): Pedestrian safety and amenity along public footpaths is prioritised;
- E38.2(6) Subdivision has a layout which is safe, efficient, convenient and accessible;
- IX.2(1) Riverhead is a well-functioning urban environment that integrates with the existing Riverhead settlement, the natural environment and respects Mana Whenua values.
- IX.2(2) A variety of housing types and sizes that respond to: (a) Housing needs and demand; and (b) The neighbourhood's planned urban built character.
- IX.2(4) Access to and from the precinct occurs in a safe, effective and efficient manner for all modes of transport.

**Table 9: Evaluation of Provisions Theme 3: Achieving Integrated and Quality Development**

	Option 1 – Rely on Auckland-Wide and Zone Provisions	Option 2 – Proposed Plan Change
<p><b>Description of Option</b></p>	<p>The street network and the provision of open spaces are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions (E38 Subdivision – Urban, E27 Transport).</p> <p>This option does not include bespoke provisions to manage the interface between the existing rural environment and development within the Plan Change area.</p> <p>This option does not include bespoke provisions to manage the relationship of development within the Plan Change area to the built character of the existing Riverhead settlement.</p>	<p>The proposed Riverhead Precinct includes a bespoke set of provisions to guide the development of buildings, roads and open spaces within the precinct:</p> <ul style="list-style-type: none"> <li>• Assessment criteria and precinct plans that guide the layout and design of key structuring elements including the street network and open space.</li> <li>• A policy that encourages the provision of a continuous and connected multi-purpose green corridor through the Plan Change area that integrates stormwater management, passive recreation opportunities and active transport mode connections, to promote the efficient use of land; provides additional amenity for the key north-south and east-west movement networks; promotes ecological linkages through the Precinct; and co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space;</li> <li>• A policy that encourages higher buildings which will act as marker buildings at the Coatesville-Riverhead Highway and Riverhead intersection, support the legibility of a new centre and reinforce the role of Memorial Park as the heart of the settlement;</li> <li>• A policy that provides for three-storey development within Sub-Precinct B to enable a transition in height between the five and two storey development in the adjacent areas; and enables three storey development within the Mixed Housing Suburban zone where sites overlook public open space to take advantage of amenity and outlook of public open spaces and promote passive surveillance;</li> </ul>

Option 1 – Rely on Auckland-Wide and Zone Provisions	Option 2 – Proposed Plan Change
	<ul style="list-style-type: none"> <li>• More permissive activity statuses for restaurants, cafes, retail, and healthcare facilities within the Residential – Terrace Housing and Apartment Building zone;</li> <li>• A height rule that limits height within the majority of the Mixed Housing Suburban zone to 8m (two-storeys) to respond to the existing Riverhead settlement, with three storey development adjoining the Terrace Housing and Apartment Building zone and the Local Centre zone to enable a transition in height between the five and two-storey development in the adjacent areas;</li> <li>• A rural interface setback rule to provide a buffer between residential activities within the precinct and the neighbouring Mixed Rural zone;</li> <li>• Additional assessment criteria for open space to ensure that the open space network integrates with natural features and delivers the north-south and east-west multi-purpose green corridors which are a key structuring element for the precinct and required for stormwater conveyance purposes; and</li> <li>• Additional assessment criteria for the layout and design of roads to ensure a highly connected street layout that integrates with the wider Riverhead area and provides for all modes of transport.</li> </ul>

Option 1 – Rely on Auckland-Wide and Zone Provisions		Option 2 – Proposed Plan Change
<b>Benefits</b>		
<b>Environmental</b>	The street network, the provision of open spaces and the design and layout of development are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide and zone provisions.	<p>The precinct provisions implement key structuring elements of the Riverhead Structure Plan, which has been developed to ensure a high-quality development outcome result.</p> <p>The tailored precinct provisions and assessment criteria which implement the Riverhead Structure Plan will result in a built form which reinforces the unique sense of place within Riverhead.</p> <p>The planned open spaces and connected street network will support transport mode shift to active transport modes, as they provide safe and convenient movement to and through the precinct.</p>
<b>Economic</b>	A less complex set of planning provisions will apply within the Plan Change area.	The Plan Change will deliver variety of housing types, which supports competitive markets.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	<p>Expectations and requirements of key stakeholders, landowners and land developers can be clearly set out within the proposed precinct.</p> <p>The provisions increase the amenity values of the Plan Change area as the future residents will enjoy the planned open spaces and connected street network which offers safety to pedestrians and cyclists.</p>
<b>Cultural</b>	This option does not facilitate any improved cultural outcomes.	The precinct provisions implement key structuring elements of the Riverhead Structure Plan which has been informed by ongoing engagement with Te Kawerau a Maki and Ngati Whatua Kaipara.
<b>Costs</b>		
<b>Environmental</b>	No requirement to implement the key structuring element of the Riverhead Structure Plan which responds to the specific characteristics of the Plan Change area and the unique sense of place.	This option will not result in any environmental costs.

	Option 1 – Rely on Auckland-Wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Economic</b>	Landowners, developers, the Council and community will not have clear expectations about where the future street and open space network will be located.	Cost to future applicants to prepare resource consent applications assessing additional planning provisions and implementing the requirements.
<b>Social</b>	Reduced amenity values as the provisions will not achieve an integrated and quality-built environment which responds to the characteristics of the Plan Change Area to the same extent as Option 2.	This option will not result in any social costs.
<b>Cultural</b>	Reduced cultural values as the provisions will not implement the key structuring elements of the Riverhead Structure Plan which has been informed by ongoing engagement with Te Kawerau a Maki and Ngati Whatua Kaipara.	This option will not result in any cultural costs.
<b>Efficiency &amp; Effectiveness</b>	<p>Ineffective as the indicative primary road network and open space network are not shown in the plan, so piecemeal and ad hoc development may occur.</p> <p>Without the guidance of a precinct, the Plan Change area is unlikely to be developed in a comprehensive and coordinated manner.</p> <p>Area-specific approaches are not considered, which is less effective in achieving B2.3.1(1)(a).</p>	<p>This option is effective as the provisions seek to ensure adequate provision of public open space in accordance with B2.7.1(1).</p> <p>This option is effective as the provisions seek to ensure development provides a connected street network which promotes safe cycling and a walkable urban form, in accordance with B3.3.1(1) and B2.3.1(3).</p> <p>The proposed precinct meets B2.3.1(1)(a) as it ensures that subdivision, use and development will respond to the intrinsic qualities and physical characteristics of the site.</p>
<b>Summary</b>	Option 2 is the preferred option. The inclusion of a refined set of provisions to implement the structuring elements of the Riverhead Structure Plan and require quality-built form outcomes that respond to the unique sense of place enables the Plan Change to efficiently and effectively achieve B2.7.1(1), B3.3.1(1), B2.3.1(3) and B2.3.1(1)(a).	

### 8.3.4 Theme 4: Natural Environment

The existing AUP and proposed precinct objectives which have particular relevance for Theme 4 include:

- B7.2.1(2): Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring;
- E3.2(2): Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced;
- E15.2(2): Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring;
- IX.2(6): Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate adverse effects on the receiving environment; and
- IX.2(7): Identified ecological values within wetland and stream habitats are protected, restored, maintained and enhanced.

**Table 10: Evaluation of Provisions Theme 4: Natural Environment**

	Option 1 – Rely on Auckland-wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Description of Option</b>	The natural environment and stormwater quality are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions.	<p>The proposed Riverhead Precinct includes provisions to enhance the natural environment:</p> <ul style="list-style-type: none"> <li>• The requirement of a planted riparian margin along permanent and intermittent streams;</li> <li>• A stormwater quality rule to ensure impervious areas are treated and that development incorporates inert building materials to increase the quality of stormwater runoff; and</li> <li>• Additional assessment criteria for open space to ensure that the open space network integrates with natural features and delivers the north-south and east-west multi-purpose green corridors which provide a green connection between the two riparian and coastal environments.</li> </ul>

Option 1 – Rely on Auckland-wide and Zone Provisions		Option 2 – Proposed Plan Change
<b>Benefits</b>		
<b>Environmental</b>	It is possible to achieve good environmental outcomes under this approach but this will rely largely on non-statutory mechanisms.	This option will enhance the ecological values of streams through requiring planted riparian margins along both sides of permanent and intermittent streams and is consistent with the rule included in other greenfield precincts within the AUP.  The requirement to improve stormwater quality will enhance the water quality of receiving environments.
<b>Economic</b>	Less costs associated with developing along streams as there is no requirement to provide riparian planting.  A less complex set of planning provisions will apply within the Plan Change area.	This option will not result in any economic benefits.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	Increased aesthetic and amenity values for communities as a result of riparian planting along streams.
<b>Cultural</b>	This option does not facilitate any improved cultural outcomes.	This option will enhance Mana Whenua values associated with water and the natural environment.
<b>Costs</b>		
<b>Environmental</b>	No requirements to provide riparian planting along streams within the Plan Change area and therefore the ecological values of streams will not be enhanced.  No requirement to improve stormwater quality could result in the degradation of ecological values of receiving environments.	This option will not result in any environmental costs.
<b>Economic</b>	This option will not result in any economic costs.	The requirement for riparian planting will increase the costs when developing along streams.  The requirement to manage stormwater quality through treating impervious areas and incorporating inert building material will increase development costs.



	Option 1 – Rely on Auckland-wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Social</b>	Reduced aesthetic and amenity values for communities from a lack of riparian planting along streams.	This option will not result in any social costs.
<b>Cultural</b>	Reduced cultural values associated with a lack of indigenous biodiversity along streams.	This option will not result in any cultural costs.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or effective and will not achieve B7.2.1(2), E3.2(2) and E15.2(2) as there is no requirement to plant riparian margins along streams and therefore there is no assurance that indigenous biodiversity along streams will be restored to enhance the ecological values of streams.	This option is efficient at achieving B7.2.1(2), E3.2(2) and E15.2(2) as they ensure that indigenous biodiversity along streams is restored to enhance the ecological values of streams while maintaining flexibility for appropriate development of cycle and pedestrian paths.
<b>Summary</b>	Option 2 is the preferred option. The inclusion of a bespoke set of provisions to enhance the natural environment enables the PPC to efficiently and effectively achieve B7.2.1(2), E3.2(2), E15.2(2), IX.2(6) and IX.2(7).	

### 8.3.5 Theme 5: Mana Whenua Cultural Landscape

The existing AUP and proposed precinct objectives which have particular relevance for Theme 4 include:

- B2.6.1(1): The mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall; and
- IX.2(9): Mana Whenua cultural values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, wāhi tapu, and other taonga, in the Riverhead Precinct are identified, recognised, protected, and enhanced.

**Table 11: Evaluation of Provisions Theme 5: Mana Whenua Cultural Landscape**

	Option 1 – Rely on Auckland-wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Description of Option</b>	The Mana Whenua Cultural Landscape within the precinct is controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions.	<p>The proposed Riverhead Precinct includes a bespoke set of provisions to enhance the Mana Whenua Cultural Landscape:</p> <ul style="list-style-type: none"> <li>• The Riverhead precinct recognises and respects these values of Te Kawerau a Maki and Ngati Whatua Kaipara by incorporating an objective, policy, assessment criteria and precinct plan seeking to recognise and protect the Mana Whenua cultural landscape; and</li> <li>• The Cultural Landscape Plan on Precinct Plan 1 recognises spiritual connections and key views of cultural significance to Te Kawerau a Maki and Ngāti Whatua Kaipara.</li> </ul>
<b>Benefits</b>		
<b>Environmental</b>	There is no change to the AUP provisions proposed through this option. Existing rules will apply which will not cover any additional features identified by Te Kawerau a Maki and Ngati Whatua Kaipara on Precinct Plan 1.	This option will protect additional features identified by Te Kawerau a Maki and Ngāti Whatua Kaipara on Precinct Plan 1 not currently protected through the AUP provisions.
<b>Economic</b>	A less complex set of planning provisions will apply within the Plan Change area.	The maintenance and enhancement of many of the values recognised through the Cultural Landscape Plan, such as key views, are likely to have wider benefits in terms of establishing a unique sense of place which will contribute to the identity of Riverhead, attracting visitors into the area.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	The maintenance and enhancement of many of the values recognised through the Cultural Landscape Plan, such as key views, are likely to have wider social benefits.

Option 1 – Rely on Auckland-wide and Zone Provisions		Option 2 – Proposed Plan Change
<b>Cultural</b>	This option does not facilitate any improved cultural outcomes.	The Riverhead area is notable for its continued association with Te Kawerau a Maki and Ngāti Whatua Kaipara. Fundamental guiding principles for Mana Whenua include the protection of taonga, the restoration of mana to taonga and the retention of wahi tapu and sites of cultural significance. This option recognises and protect these values, resulting in much greater cultural benefits than Option 1.
<b>Costs</b>		
<b>Environmental</b>	This option will not result in any environmental costs.	This option will not result in any environmental costs.
<b>Economic</b>	This option will not result in economic costs.	A more complex set of planning provisions will apply within the Plan Change area. The provisions may restrict development within some areas or result in a more complex design process.
<b>Social</b>	The maintenance and enhancement of many of the values recognised through the Cultural Landscape Plan, such as key views, are likely to have wider social benefits which this option does not provide for.	This option will not result in any social costs.
<b>Cultural</b>	This option does not specifically provide for the protection of taonga, the restoration of mana to taonga and the retention of wahi tapu and sites of cultural significance to Mana Whenua within the Plan Change area to the same extent as Option 2.	This option will not result in any cultural costs.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or effective and will not achieve B2.6.1 (1), and IX.2(9) as there is no recognition and protection of the Mana Whenua Cultural Landscape unique to Riverhead.	This option is efficient and effective at achieving B2.6.1 (1), and IX.2(9) as it will ensure Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected.
<b>Summary</b>	Option 2 is preferred as it will ensure Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected and enhanced and it is most efficient and effective at achieving B2.6.1 (1) and IX.2(9).	

#### 8.4 Risk of acting or not acting

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In this case, there is sufficient information about the subject matter of the provisions to determine the range and nature of environmental effects of the options set out in the report above. For this reason, an assessment of the risk of acting or not acting is not required.

#### 8.5 Section 32 Analysis Conclusion

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On the basis of the above analysis, it is concluded that:

- The proposed objectives in the Riverhead Precinct are considered to be the most appropriate way to achieve the purpose of the RMA by applying a comprehensive suite of planning provisions to enable appropriate urbanisation of the site;
- The proposed provisions are considered to be the most efficient and effective means of facilitating the use and development of the subject land into the foreseeable future; and
- The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed precinct, having regard to their efficiency or effectiveness and the costs and benefits anticipated from the implementation of the provisions.

### 9.0 Conclusion

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This report has been prepared in support of the RLG's request for a Plan Change to the provisions of the AUP to rezone 80.5 hectares of land to the west of the existing Riverhead settlement for urban activities.

The request has been made in accordance with the provisions of Schedule 1 and Section 32 of the Resource Management Act 1991, and the preparatory work has followed Appendix 1 of the AUP – Structure Plan Guidelines.

Based on an assessment of environmental effects and specialist assessments, it is concluded that the proposed Plan Change will have positive effects on the environment in terms of the social and economic well-being of the community as well as the enhancement and protection of waterways. Other potential effects are able to be managed through the application of the AUP zone and Auckland-wide provisions.

An assessment against the provisions of section 32 of the RMA is provided in section 7.0 of the report. This includes an analysis with respect to the extent to which the objectives of the plan change are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the plan change are the most appropriate way to achieve the objectives.

For the above reasons, it is considered that the proposed Plan Change accords with the sustainable management principles outlined in Part 2 of the RMA and should be accepted and approved.