

Request for private plan change Redwood Park Golf Club

**Rezoning of land from Residential – Large Lot
to Open Space – Sport and Active Recreation**

Assessment of Environmental Effects and Planning Assessment



Redwood Park Golf Club

**Prepared by
Richmond Planning Limited
August 2023**

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- Appendix 1 Certificates of title
- Appendix 2 Operative and proposed rule comparison
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1. EXECUTIVE SUMMARY

- 1.1 This section 32 evaluation report and planning assessment has been prepared and is submitted in support of the private plan change request to the Auckland Unitary Plan – Operative in Part (**AUP**) by Redwood Park Golf Club (**RPGC** or **the club**).
- 1.2 The plan change is to rezone land used for golfing from Residential – Large Lot to Open Space – Sport and Active Recreation (**OS-SAR**). No other changes to the AUP are proposed. The purpose of the plan change is to apply a zone that reflects current and foreseeable use of the land as a golfing facility. All land included in the plan change has been utilised for golf for over 50 years. This includes a small portion of the land included in the plan change that is owned by Auckland Council but is an integral part of the golf course.
- 1.3 An evaluation of the plan change has been undertaken in accordance with section 32 of the Resource Management Act 1991 (**RMA**) and concludes that rezoning the land OS-SAR is the most appropriate way to achieve the purpose of the RMA. The AUP has established the OS-SAR zone for active sport and recreation, including golf courses and associated facilities. The rezoning is the most appropriate way of achieving the objectives of the Auckland Regional Policy Statement (**ARPS**) and the AUP. This plan change is consistent with three plan changes rezoning golf course land from residential to open space made operative by Auckland Council in the last two years. The plan change is not in conflict with the National Policy Statement on Urban Development 2020 as the land is not available for residential use now or in the foreseeable future.
- 1.4 There are no adverse effects on the environment from rezoning the land as the use of the land for golfing activity remains unchanged. There are positive effects on the environment arising from the use of the land as a golf course. Environmental and biodiversity benefits, and amenity benefits for the community. In high and extreme rainfall events significant parts of the course provide a stormwater detention benefit. Adjoining residents and nearby property owners are not expected to experience any difference in effects as no change in use or intensity of activity is anticipated. Standards in the OS-SAR zone and Auckland-Wide provisions suitably manage anticipated effects from permitted activities. Larger scale activities require discretionary activity resource consent where all effects and the suitability of the proposal can be considered.
- 1.5 This section 32 evaluation will continue to be refined in relation to any further consultation that occurs, and in relation to any new information that may arise during the Council plan change process.

2. INTRODUCTION

2.1 Clause 21 of Schedule 1 to the RMA provides for any person to request a change to a district or regional plan. This request shall:

- Explain the purpose of and reasons for the plan change;
- Contain an evaluation report assessing the extent to which the proposal is the most appropriate way to achieve the purpose of the RMA and the most appropriate way of achieving the AUP objectives; and
- Include an assessment of environmental effects.

2.2 In accordance with section 32(6) of the RMA and for the purposes of this evaluation:

- The 'proposal' means this private plan change request;
- The 'objectives' means the purpose of the plan change; and
- The 'provisions' means the policies, rules or other methods that implement, or give effect to the objectives of the plan change.

3. THE APPLICANT AND PROPERTY DETAILS

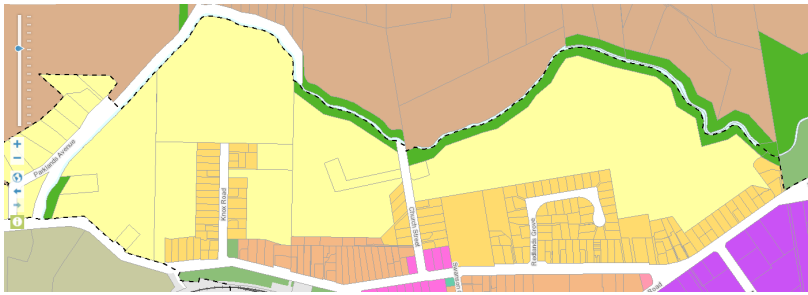
Applicant details

Table 1: Applicant and address for service

Applicant	Redwood Park Golf Club
Address for service	Tania Richmond Richmond Planning Limited PO Box 25734 St Heliers Auckland 1740 tania@richmondplanning.co.nz

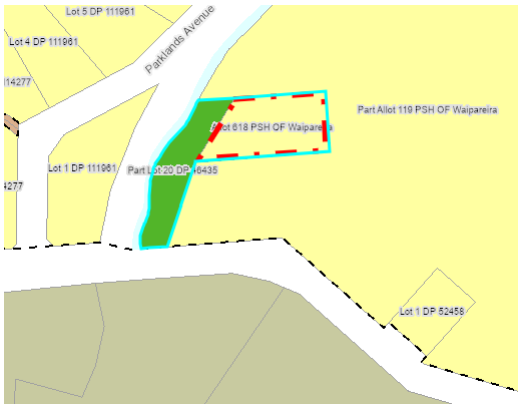
Property details

Table 2: Property summary - 13 Knox Road, Swanson

Property details	
Address	13 Knox Road, Swanson, Auckland 0612
Legal description	Pt Allot 117 SO 2914 Waipareira, Lot 1 DP 68064, Lot 4 DP 137782, Allot 120 SO 2914 Waipareira, Lot 4 DP 135381, Lot 1 DP 31833, Pt Allot 119 SO 2914 Waipareira, Pt Allot 118 SO 2914 Waipareira
Site area	39.789 hectares
Land owner	Redwood Park Country Club Incorporated
Auckland Unitary Plan	
Current zone	Residential – Large Lot
	
Overlays	<ul style="list-style-type: none"> • Natural Resources: Significant Ecological Areas Overlay - SEA_T_4670, Terrestrial • Natural Resources: Significant Ecological Areas Overlay - SEA_T_4588, Terrestrial • Natural Resources: Significant Ecological Areas Overlay - SEA_T_4675, Terrestrial • Natural Resources: Natural Stream Management Areas Overlay [rp]
Controls	<ul style="list-style-type: none"> • Controls: Macroinvertebrate Community Index – Exotic, Native, Rural, Urban

	<ul style="list-style-type: none"> Controls: Stormwater Management Area Control - SWANSON 4, Flow 1
Designations	<ul style="list-style-type: none"> None

Table 3: Property summary – 849 Swanson Road, Swanson

Property details	
Address	849 Swanson Road, Swanson, Auckland 0612
Legal description	PT Lot 20 DP 46435, Allot 618 SO 50169 Waipareira
Site area	5109m ² (Allot 618 SO 50169 Waipareira = 3006m ²)
Land owner	Auckland Council
Auckland Unitary Plan	
Current zone	<ul style="list-style-type: none"> Residential – Large Lot Open Space – Conservation (No change, not part of the plan change)
	 <p>land subject to plan change outlined in dashed red lines</p>
Overlays	<ul style="list-style-type: none"> None
Controls	<ul style="list-style-type: none"> Controls: Macroinvertebrate Community Index – Rural, Urban Controls: Stormwater Management Area Control - SWANSON 4, Flow 1
Designations	<ul style="list-style-type: none"> None

4. REDWOOD PARK GOLF CLUB

Historical information

- 4.1 In 1970 the decision was made at a meeting in the Hall at Redwood Park to purchase three properties at Swanson and establish the Redwood Park Country Club, now the Redwood Park Golf Club. Two of the properties were small farms of 19 acres and 46 acres respectively; the other property of 70 acres was owned by Redwood Park Ltd and had a long history of use as a tourist camp and picnic grounds. Since 1923 that property and the business had been owned and run by the Robertson family who held all shares in Redwood Park Limited. Reaching agreement with the Robertson family to acquire Redwood Park was key to the establishment of the Redwood Park Country Club, as many of the Park facilities continue to be used by the new members.
- 4.2 When the sale of the two small farms was agreed, farming use had become uneconomic, and the land was covered in gorse blackberry and scrub. The intention was to combine Redwood Park existing facilities with these adjoining small farms and develop a 18 hole golf course. The Redwood Park Country Club was incorporated in 1970, and in 1971 development of the golf course was commenced, with completion of the 2nd 9 holes being achieved in 1972. A great deal of land clearance and other development work was completed with members working bees. In 1975 a new clubhouse was built. In succeeding years further development and improvement of the golf course has been progressed in accordance with a Master Plan adopted by the club and 2002, together with buildings and facilities including a greenkeeper's depot and greenkeeper's residence.

Club membership

- 4.3 The current membership of the club totals 821, compared to just below 500 in 2019. Of this number, 138 are women, and 100 are juniors (19 years and under).

5. SITE AND LOCALITY DESCRIPTION

Land included in the plan change

- 5.1 Land included in the plan change is 40 hectares. This is made up 39.789 hectares of land owned by RPGC and 3006m² of the site at 849 Swanson Road owned by Auckland Council. All the land included in the plan change is used for or in association with golfing purposes.

Auckland Council owned land

- 5.2 Land at 849 Swanson Road is an 'L' shaped site that runs parallel to Swanson Stream. The land has a spilt zone which corresponds to the underlying parcels. PT Lot 20 DP 46435, is zoned Open Space – Conservation and vested as local purpose (esplanade) reserve and has an area of 2103m². This land is not part of the plan change. Allot 618 SO 50169 Waipareira is 3006m² and included in the plan change. A record of title for the land is attached in Appendix 1. A recent certificate of title for land has not been issued, but statutory actions confirm its parcel description.

RPGC owned land

- 5.3 The seven certificates of title are attached in Appendix 1. Interests on the land are water rights in favour of the Council, building line restrictions, grant of pipe laying and fencing agreements. None of these interests prevent or are affected by rezoning the land OS-SAR.
- 5.4 Unless otherwise stated, references to the 'property' or 'site' include all the land forming part of the plan change outlined in blue Figure 1: Location plan. As shown in Figure 1, Church Street divides the golf course into two parts. Pedestrian paths providing access between the two parts of the course are maintained by the club.

Figure 1: Location plan

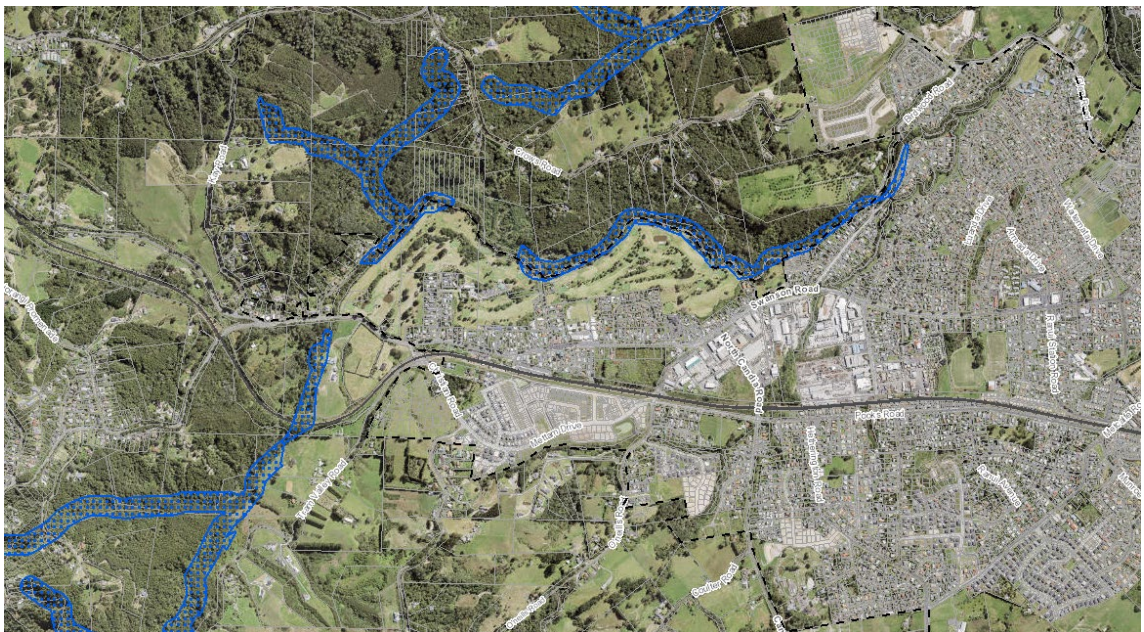


Source: Geomaps

Landform, catchments and hydrology

- 5.5 Over the last 50 years, modification of the natural landform has been undertaken to accommodate the golf course design. The general contour, including gullies and watercourses which falls north towards Swanson Stream, has been retained. Constructed components are greens, bunkers, tees, fairways and three ponds.
- 5.6 The Swanson Stream is a catchment for stormwater outfalls and piped stormwater from both sides of the valley including public stormwater lines that traverse the club's land. Parts of this stream and its catchment is within a Natural Stream Management Areas Overlay (shown in blue in Figure 2 below). This overlay extends over a small part of the club's land. The stream is recognised as a Freshwater Ecosystem of New Zealand (FENZ).

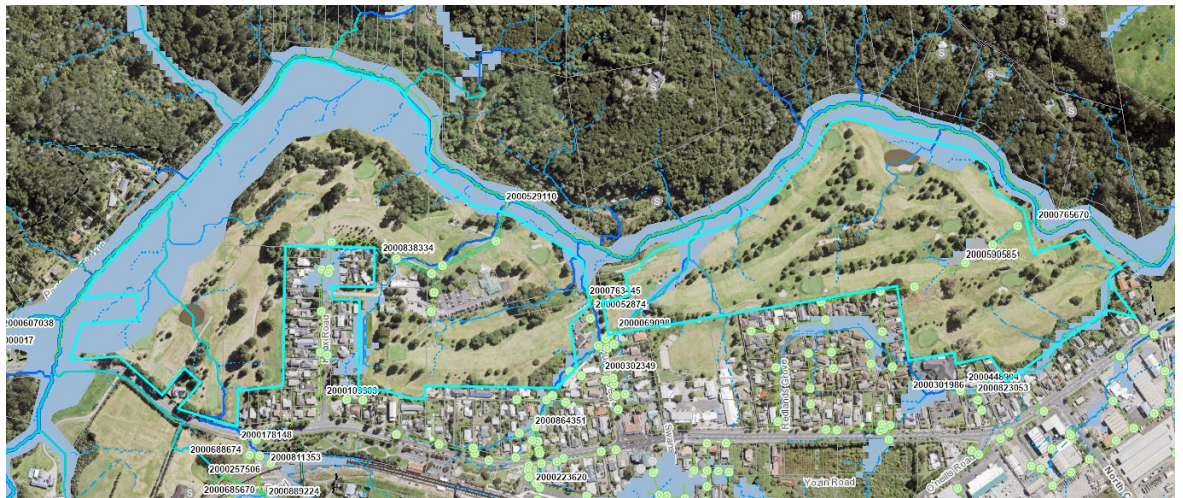
Figure 2: Natural Stream Management Areas Overlay



Source: Planning maps

- 5.7 The stream and adjacent land are also recorded in Council Geomaps as a floodplain. Various overland flow paths discharge from surrounding land to the stream. During the February 2023 floods, a significant overflow of the stream occurred onto the club's land, exacerbated by fallen trees within the esplanade reserve blocking the passage of the flow of the stream. Some of these trees still remain within the stream.

Figure 3: Overland flow paths, flood plains, streams and public stormwater



Source: Geomaps

Vegetation

- 5.8 Mature trees and vegetation are planted between fairways and in selected locations around the boundary. This includes remnants of the Redwood trees planted during the 1930's and after which the former campground and recreation park was named. Most of the trees and vegetation are exotic species.
- 5.9 The lower northern portion of the site contains parts of three ecologically significant area (SEA). These extend over the stream and land on the northern side of the gully. While containing exotic species, the SEA collectively form part of a wider ecosystem within the Waitākere Ranges.

Figure 4: Significant ecological areas



Source: Planning maps

Historic heritage

- 5.10 Auckland Council's Cultural Heritage Inventory (**CHI**) does not include any records of places of heritage interest or value on this site.
- 5.11 Māori who hold customary authority or Mana Whenua will have their own histories, interests and associations with the land.
- 5.12 Swanson is an early Pākeha settlement associated with kauri logging and gum digging. Following the construction of the western train line and Swanson Station, development flourished. Today there are few remaining pre-1900 buildings, but those that are of significant historic heritage value and scheduled in the AUP are identified in Figure 5 below with purple cross-hatching.¹ These are all entirely beyond the plan change area.

Figure 5: Scheduled historic heritage in the vicinity



Source: Planning maps

- 5.13 Land now used for golfing purposes likely has some social and historic significance for the local community reflecting its past use as a large recreation and camping park between the 1920's and 1960's. In addition to camping facilities, recreation and community facilities served the local community and attracted many visitors from further afield. Facilities included tennis courts, swimming pool, miniature golf and running tracks. Community days involved large scale picnics and pony rides. Also of historical note is Redwood Park and its facilities were used for military training purposes during World War II.²
- 5.14 The site is outside the Natural Heritage: Waitakere Ranges Heritage Area Overlay, although it is located immediately to the south-west. Land within this overlay is subject to subdivision restrictions and the Waitakere Ranges Heritage Area Act 2008.

Services and infrastructure

- 5.15 The site is fully serviced with public stormwater and wastewater, public water supply and electrical connections. The stormwater management area control – Flow 1 overlay applying to the land recognises it forms part of a catchment which discharges to sensitive or high value streams that have relatively low levels of existing impervious area.³ The extent of the

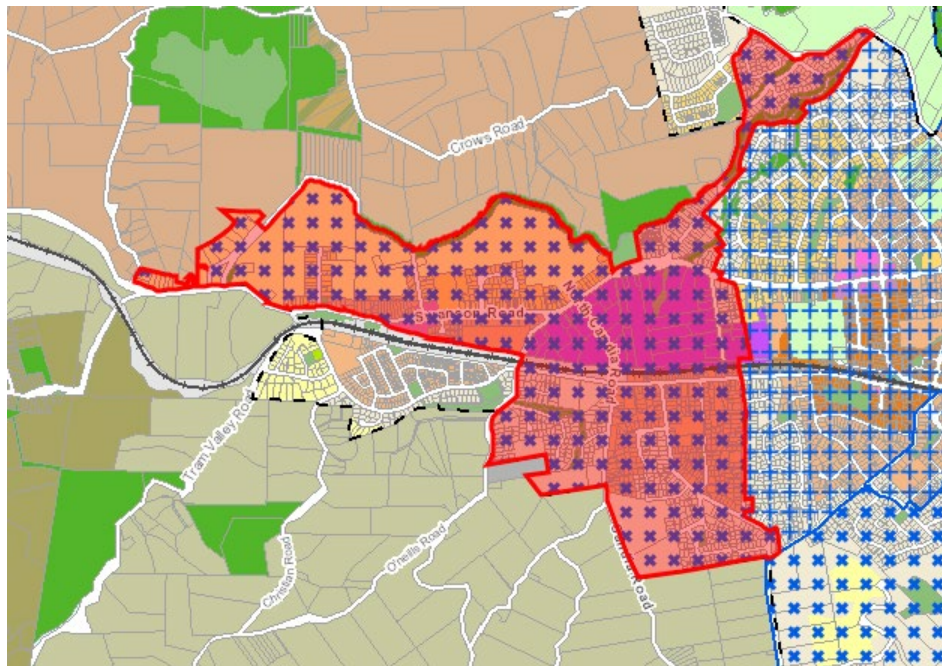
¹ Scheduled historic heritage places ID 63, 64, 65, 66, 67, 68, 78, 253

² Swanson Heritage

³ AUP, Chapter E10.1 Background

catchment is shown in Figure 6. In this overlay the AUP management tool is to require resource consent for new or redeveloped impervious area greater than 50m².

Figure 6: Stormwater management area 1 (Swanson 4)



Source: Planning maps

Existing buildings

- 5.16 Less than 10% of the land is impervious surface comprising buildings, paths, parking areas and driveways. Buildings and structures on the property are generally limited to:
- Clubhouse (containing the members lounge, meeting rooms, administration offices and changing facilities);
 - Maintenance buildings;
 - Greenkeeper's house;
 - Fencing and safety netting; and
 - Rest areas.
- 5.17 The clubhouse and entry to the golf course is accessed from Knox Road, located off Swanson Road. The carpark adjacent to the clubroom and first tee provides 140 parking spaces.
- 5.18 Knox Road is a local cul de sac road with a give way intersection at Swanson Road. Bus stops are located near the Swanson Train (stops 1588, 5975 and 5392). Swanson Road is the end of the Rapid Transit Network (**RTN**) for the western line. The station is approximately 610m walking distance from the clubhouse.

Current and foreseeable use

- 5.19 The management and use of the land for golf has remained unchanged for over 50 years. The club is an incorporated society that owns, maintains, and uses the land for its members and other golfers who play the course on payment of a green fee.
- 5.20 The number of players on the course at any one time is controlled by a tee booking system and the low intensity nature of golf as a recreational activity. For example, even if four people are playing in a group and all fairways on the course are in use, this is 72 players at any one time. Golf is played during daylight hours with the only evening activity within the clubhouse.
- 5.21 There are currently 15 staff, spread across course maintenance and improvement work, administration and the clubroom.
- 5.22 Private vehicles are the main form of transport for members due to the equipment needed for play. Shared transport where golfers are playing together is common. Members who live in nearby streets may choose to walk to the club.
- 5.23 No change in use will occur because of the plan change. The club has demonstrated a commitment to the property being retained as a golf course for the foreseeable future, including by ongoing course refurbishment, maintenance and the establishment of ancillary facilities (such as the clubhouse and greenkeeper's depot).

Adjoining properties

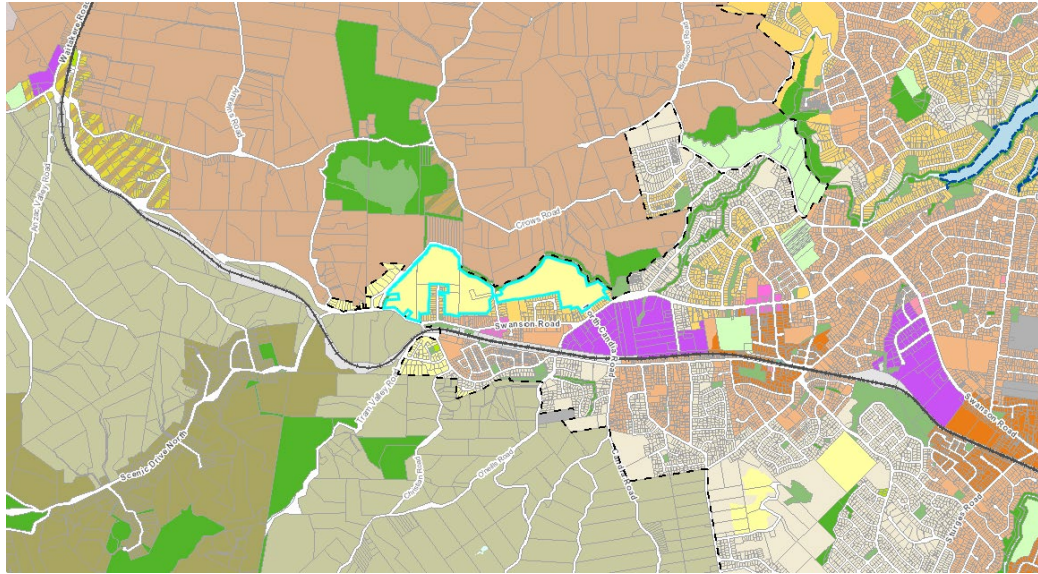
- 5.24 Almost all adjoining land is used for residential or open space purposes. A noted exception is the real estate office at 753 Swanson Road. Many residential properties sharing a boundary with the club make use of the open space amenity afforded by the golf course with an absence of high fencing and their outlook orientated to the fairways.
- 5.25 Land zoned Open Space – Conservation along the Swanson Stream is esplanade reserve, vested as part of subdivision creating Redlands Grove. There is no formed pedestrian access along the esplanade reserve. A lease between the club and the Council provides for the esplanade on the southern side of the stream to be used for golfing purposes. This land is not part of the plan change.

Surrounding locality

- 5.26 To the north, beyond the stream is rural land accessed off Crows Road. Where it adjoins the plan change site, the steeply sloping land (>1:5) is densely vegetated apart from where occupied by residential buildings and access.
- 5.27 Surrounding land to the south is predominately medium density residential. Early subdivision patterns have been altered by infill subdivision at the rear and larger lots subdivided to form Knox Road and Redlands Grove. Recent residential subdivision and development has occurred on the southern side of the railway line.
- 5.28 Warehouse, light industrial and trade supply activities are located to the south-east. Further east is predominately residential. Henderson Metropolitan Centre is approximately 6.5km from the plan change site.

5.29 To the south-west is the Rural Urban Boundary (**RUB**). Land use is predominately rural and or part of the Rural-Waitakere Ranges Zone. The extent of the RUB is marked with a black dotted line in Figure 8.

Figure 8: Zoning pattern



Source: Planning maps

6. ZONING HISTORY

Table 4: Recent zoning history

Planning document	Zone
Proposed Auckland Unitary Plan 2013 (PAUP)	Residential – Large Lot
Waitakere District Plan Operative 2003	Human Environment Map – Open Space Environment

- 6.1 The legacy Waitakere District Plan states that the Open Space Environment (zone equivalent) applies to 'land owned or managed by the Council, the Auckland Regional Council or other public agencies'. None of these descriptions applied to the plan change land, but it is understood the open space zoning reflected the land being used for open space/community purposes since at least the 1920's.
- 6.2 It is understood a residential zoning was applied to the land as part of the PAUP as Auckland Council practice was not to zone land open space without the support of the landowner.

7. THE PLAN CHANGE REQUEST

Scope of the plan change

7.1 The plan change request by RPGC is to rezone land from Residential – Large Lot to Open Space – Sport and Active Recreation. This plan change applies to the AUP Planning Maps. The land to be rezoned is:

- Pt Allot 117 SO 2914 Waipareira, Lot 1 DP 68064, Lot 4 DP 137782, Allot 120 SO 2914 Waipareira, Lot 4 DP 135381, Lot 1 DP 31833, Pt Allot 119 SO 2914 Waipareira, Pt Allot 118 SO 2914 Waipareira, being all land within 13 Knox Road, Swanson; and
- Allot 618 SO 50169 Waipareira being the western part of 849 Swanson Road, Swanson.

7.2 No changes are proposed to other AUP provisions including overlays and controls applying to the land.

Objectives or purpose of the plan change request

7.3 The objectives or purpose of the proposal change is to apply a zone that is used where the land use activity is recreational, and involves an organised sport. The rezoning will also align the land zoning with that applies to almost all Auckland golf courses within the RUB. Two recent private plan changes (PC57 and PC77) and a Council initiated plan change (PC60) that included a proposed zoning change to OS-SAR of the Whangaparoa golf course land were made for exactly this purpose.

8. PROCEDURES FOR PRIVATE PLAN CHANGES

8.1 Schedule 1 of the RMA sets out the procedures for making a private plan change request. This provides for any person to make a request to change a district or regional plan.⁴ The request shall:

- Explain the purpose of, and reasons for, the proposed change.⁵ This is in sections 4, 6 and 7 of this report.
- Contain an evaluation report prepared in accordance with section 32 of the RMA.⁶ This is in section 9 of this report.
- Where environmental effects are anticipated, include an assessment of the actual or potential environmental effects anticipated from the implementation of the plan change.⁷ This in section 10 of this report.

8.2 On receipt of the plan change request and having particular regard to the evaluation report prepared⁸ the Council must make decisions about whether to:

- Request further information;⁹
- As a result of the further information modify the request with the agreement of the person making the request¹⁰; and
- Consider the request¹¹ and:
 - i. adopt the private plan change as a public plan change; or
 - ii. accept the request in whole or part and proceed to notify the request; or
 - iii. reject the plan change request (on limited grounds only)¹².

8.3 Notification (full or limited service) of the plan change will occur if the Council decides to adopt or accept the request¹³. Any submissions will be considered by the Council at a hearing (if required)¹⁴.

⁴ RMA, Schedule 1 Clause 21(1)

⁵ RMA, Schedule 1 Clause 22(1)

⁶ RMA, Schedule 1 Clause 22(1)

⁷ RMA, Schedule 1 Clause 22(2)

⁸ RMA, Schedule 1 Clause 25(1A)

⁹ RMA, Schedule 1 Clause 23

¹⁰ RMA, Schedule 1 Clause 24

¹¹ RMA, Schedule 1 Clause 25

¹² RMA, Schedule 1 Clause 25(4)

The local authority may reject the request in whole or in part, but only on the grounds that—

(a) the request or part of the request is frivolous or vexatious; or

(b) within the last 2 years, the substance of the request or part of the request—

(i) has been considered and given effect to, or rejected by, the local authority or the Environment Court; or

(ii) has been given effect to by regulations made under section 360A; or

(c) the request or part of the request is not in accordance with sound resource management practice; or

(d) the request or part of the request would make the policy statement or plan inconsistent with Part 5; or

(e) in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than 2 years.

¹³ RMA, Schedule Clauses 5, 5A, 25(2)

¹⁴ RMA, Schedule 1 Clauses 8B and 8C

9. SECTION 32 EVALUATION

The most appropriate way to achieve the purpose of the RMA

- 9.1 A section 32 evaluation must examine the extent to which the purpose of the plan change is the most appropriate way to achieve the purpose of the RMA.¹⁵
- 9.2 The AUP was prepared in accordance with Part 2 of the RMA. As this plan change is limited to rezoning, the focus of this examination is on the suitability of the zoning of the land in the context of the AUP framework.
- 9.3 Zoning is a key method to give effect to the objectives and policies of the ARPS as zones manage the way in which areas of land and the coastal marine area are to be used, developed, or protected.¹⁶
- 9.4 The AUP provides for a regionally consistent zoning approach through:
- Six Residential zones;
 - Five Open Space zones;
 - Ten Business zones;
 - Seven Rural zones;
 - Eight Special Purpose zones;
 - Seven Coastal zones;
 - The Strategic Transport Corridor Zone;
 - The Future Urban Zone.
- 9.5 The five public open space zones are Conservation, Informal Recreation, Sport and Active Recreation, Civic Spaces and Community. These five zones give effect to ARPS B2.7.2(1) as they enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences, and functions.
- 9.6 The AUP acknowledges that while most open space zoned land is vested in the Council or is owned by the Crown, some areas are privately owned and may restrict public use and access.¹⁷
- 9.7 Clause H7.6.1 describes the Open Space – Sport and Active Recreation Zone as applying to open spaces used for indoor and outdoor organised sports, active recreation and community activities. It includes facilities such as sports fields, hard-court areas and greens, recreational and multi-sport facilities, and marine-related activities such as ramps, jetties, slipways, hardstand areas.

¹⁵ RMA, s32(1)(a)

¹⁶ AUP, A.6.4 Zones

¹⁷ AUP H7.1 Open Space zones

9.8 Including RPGC, only two out of the eighteen golf courses in the Auckland Urban Area have a residential zoning and all but four are zoned OS-SAR. This reflects the use of the OS-SAR zone for zoning of golf course land.¹⁸ The majority of golf courses within Auckland are privately owned.

9.9 Three plan changes made operative by Auckland Council in the last two years have rezoned golf course land from residential to open space (PC57, 60 and 77). In approving each plan change the Council recognised the appropriateness of zoning the land OS-SAR to achieve the purpose of the RMA and that the plan change was consistent with the ARPS.

Table 5: Zoning of Council golf courses in the Auckland Urban Area¹⁹

Name	Address	Zone
Chamberlain Park	46A Linwood Avenue, Mount Albert	Open Space - Sport and Active Recreation
Takapuna Golf Club	27 Northcote Road, Hillcrest	Open Space - Sport and Active Recreation
Pupuke Golf Club	231 East Coast Road, Campbells Bay	Open Space - Sport and Active Recreation
Remuera Golf Club	Winstone Drive, Remuera	Open Space - Sport and Active Recreation
Waitemata Golf Club	15 Derby Street, Devonport	Open Space – Sport and Active Recreation
Waitakere Golf Club	35 Falls Road, Bethells Beach	Open Space – Conservation ²⁰

Table 6: Zoning of privately owned golf courses in the Auckland Urban Area

Name	Address	Zone
Titirangi Golf Club	11 Links Road, New Lynn	Open Space - Sport and Active Recreation
North Shore Golf Club	52 Appleby Road, Albany	Open Space - Sport and Active Recreation
Howick Golf Club	32 Musick Point Road, Beachlands	Open Space - Sport and Active Recreation
Akarana Golf Club	1388 Dominion Road, Mount Roskill	Open Space - Sport and Active Recreation
Maungakiekie Golf Club	5 Anita Avenue, Mt Roskill	Open Space - Sport and Active Recreation
Royal Auckland and Grange Golf Club	2 Grange Road, Papatoetoe	Open Space - Sport and Active Recreation
Gulf Harbour Country Club	180 Gulf Harbour Drive, Gulf Harbour	Open Space - Sport and Active Recreation

¹⁸ AUP J1 Definitions, Organised sport and recreation 'Activities that require physical effort and skills, are competitive, occur on a regular basis, have formal rules, referees and officials, and are organised within formal structures'.

¹⁹ The AUP Urban Area, 2016

²⁰ The zoning of this land reflects location of the golf course within the Waitākere Ranges Heritage Area

Name	Address	Zone
Pakuranga Golf Club	199 Botany Road, Golflands	Open Space - Sport and Active Recreation
Redwood Park Golf Club	13 Knox Road, Swanson	Residential – Large Lot
RNZAF Golf Club, Huapai	Kauri Road, Whenuapai	Special Purpose – Airport and Airfields and Future Urban ²¹
Wattle Downs Golf Course	130 Wattle Farm Road, Wattle Downs	Mixed Housing Suburban
Whangaparaoa Golf Club	1337 Whangaparaoa Road, Army Bay	Open Space - Sport and Active Recreation

- 9.10 The proposed change of zoning will recognise the landowner's intentions and commitment to the ongoing maintenance and development of the land as a golf course and ancillary activities. Otherwise, the use and development of the site would have to rely on the existing use rights provisions of the RMA or require ongoing resource consent approvals to enable the course to operate and undertake its maintenance and upgrading functions. In this regard, the plan change should assist the Council to carry out what it has already established is the most appropriate way to achieve the purpose of the RMA, being to promote the sustainable management of natural and physical resources.

Development of options

- 9.11 Section 32 requires an examination of whether the plan change is the most appropriate way to achieve the purpose of the proposed plan change by identifying other reasonably practical options. In the preparation of this plan change, the following options have been identified:

Option 1 – do nothing/retain the status quo

Option 2 – plan change to apply a precinct plan

Option 3 – plan to rezone the land Open Space – Sport and Active Recreation

Option 4 – plan change to rezone only 13 Knox Road, Swanson

Evaluation of options

- 9.12 In accordance with sections 32(1)(b) and 32(2) of the RMA, the options have been assessed on their appropriateness, efficiency, effectiveness, costs, benefits, and risks. The results of this evaluation are included in Table 7.

²¹ The zoning of this land reflects its location on the Whenuapai Air Base. This is the RNZAF Auckland Golf Club.

Table 7: Summary of analysis under section 32 of the RMA

Options	Appropriateness	Efficiency and effectiveness	Benefits	Costs
<p>Option 1 do nothing/retain the status quo</p>	<p>This does not achieve the objective of the proposal, which is to provide a long-standing use. The current zone is not the most appropriate way to achieve the objectives and policies of the ARPS as it fails to recognise and provide for the long-standing use and foreseeable future use of the land for golf.</p>	<p>The ‘do nothing’ option is not an effective or efficient option to achieve the objectives of the plan change as this option retains the land with a residential zoning. Multiple resource consents are required for activities and development associated with open space.</p>	<p>There would be no costs to RPGC in making this plan change. Retaining the current zoning provides for a very limited potential opportunity to use the land for residential purposes (given the minimum lot size of 4000m² in the current zone).</p>	<p>The zoning of the land incorrectly identifies the land as being available for residential activity.</p> <p>Recreational needs of people are not supported by an appropriate zoning. RPGC currently rely on existing use rights for the golfing activity and/or non-complying activity resource consents.</p> <p>Existing use rights do not apply to new buildings or additions to a building, requiring non-complying activity consent applications.²² This is costly and time consuming for a property that has been in continuous use as a golf course for over 50 years and open space/community use for over 90 years.</p>
<p>Option 2 plan change to rezone the land OS-SAR and apply a precinct plan</p>	<p>The recreation activity and supporting uses are anticipated and provided for as permitted activities in the OS-SAR zone.</p> <p>A precinct is not appropriate as the purpose of a precinct is to enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or</p>	<p>Applying a precinct when provisions of a zone achieve the purpose of the proposal is not efficient or effective.</p>	<p>Site specific provisions can be applied to address potential effects that could occur if the land is used for a recreation activity other than golf.</p>	<p>This adds an unnecessary administrative layer to the AUP when existing provisions provide for the activity.</p> <p>Costs in preparing, assessing and the Council determining the plan change would be met by RPGC.</p>

²² Activity Tables H3.4.1, H5.4.1 and H6.4.1 all state the same activity status and standards applies to the land use activity that the new building or addition to a building is designed to accommodate. ‘Building’ is defined in Chapter J1 of the AUP as ‘Any permanent or temporary structure’

Options	Appropriateness	Efficiency and effectiveness	Benefits	Costs
	Auckland-wide provisions and can be more restrictive or more enabling. ²³			
Option 3 plan change to rezone the land OS-SAR	<p>It is appropriate and consistent with the ARPS and AUP structure to apply a zone that reflects the function carried out and intended to be carried out on this land.</p> <p>This achieves the objectives or purpose of the proposal.</p>	<p>It is efficient and effective to apply an existing zone to achieve the purpose of the proposal.</p>	<p>Recreational needs of the community are supported by an appropriate zoning.</p> <p>The long-standing and foreseeable future activity is afforded permitted activity status.</p> <p>The OS-SAR is consistent with the zone applied to most golf courses in the Auckland region.</p> <p>There is greater visibility and certainty for adjoining residents that the land is for open space purposes (i.e. as indicated on the planning maps).</p> <p>Council's modelling for residential intensification to support the ARPS objectives of providing for growth within the urban area correctly excludes this land from its calculations.</p> <p>High levels of amenity for the local community are assured under the OS-SAR.</p> <p>Environmental benefits by the land adjoining an SEA and Natural Stream Management Area being retained as open space. Environmental benefits from Chapter</p>	<p>Costs in preparing, assessing and the Council determining the plan change would be met by RPGC.</p> <p>Land value is reduced to reflect reduction in residential development potential.</p> <p>Chapter E16 Trees in Open Space would apply. This would incur additional time and cost for RPGC obtaining resource consent for works relating to trees.</p>

²³ AUP, A1.6.5

Options	Appropriateness	Efficiency and effectiveness	Benefits	Costs
			<p>E16 Trees in Open Space would apply.</p> <p>As Council owned land does not have a separate access, it would be very difficult if not impossible to use this land for residential purposes independent of the club's land and the golf course activity. Rezoning reflects the long-standing use of the land for open space activities.</p>	
<p>Option 4 plan change to rezone land only within 13 Knox Road OS-SAR (i.e. exclude the Council owned land)</p>	<p>Same as option 3.</p>	<p>Same as option 3.</p>	<p>Same as option 3.</p>	<p>The current residential zoning of the Council owned land is of no financial benefit to the Council as it cannot be used for residential purposes independently of the land owned by RPGC. As the balance of 849 Swanson Road is vested as esplanade reserve (Stream) revocation of the reserve status is very unlikely as it would conflict with the Reserves Act 1977.</p> <p>Rezoning is a social benefit to the community as it provides certainty over its future use.</p>

Risk of acting or not acting

- 9.13 There is sufficient information to analyse the appropriateness of acting or not acting as:
- This plan change does not introduce new objectives, policies or methods;
 - It uses an existing zoning that specifically enables golfing as a permitted activity and that applies to almost all golf courses in the urban Auckland region;
 - The expected outcomes are well understood and anticipated by the zone;
 - No changes to the environment are anticipated as the existing use will continue as it has for over 50 years; and
 - The rezoning is consistent with recent plan changes.

Reasons for the preferred option

- 9.14 The AUP uses zones to manage activities and development. Privately owned land would generally only be zoned open space if supported by the landowner otherwise the zoning could be considered an unreasonable restriction on the use of the land.²⁴
- 9.15 RPGC seeks to apply a zone that reflects the long-standing and foreseeable future use of the land for outdoor recreation. The current residential zoning of the Council owned land is of no financial or other benefit to the Council as it cannot be used for this purpose independently of RPGC land. This is because it does not have separate access except via the Open Space – Conservation zoned portion of the land. Providing residential access through an esplanade (stream) reserve is not compatible with the principal or primary purpose of the reserve.²⁵
- 9.16 Golf is an activity within the definition of ‘organised sport and recreation’, which is a permitted activity in the zone. Under the current residential zone applying to the land, golf is a non-complying activity.

²⁴ RMA, s85(2)

²⁵ Reserves Act 1977, s23(2)(a)

10. STATUTORY ASSESSMENT

Relevant sections of the RMA

Section 31 Functions of territorial authorities

- 10.1 Section 31(a) of the RMA states that a function of territorial authorities is the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.
- 10.2 This plan change assists the Council to carry out its functions as set out in section 31 of the RMA. It uses an appropriate method to manage the effects of an outdoor sporting activity, i.e. an existing zone and its objectives, policies and rules.

Section 74 Matters to be considered by territorial authority

- 10.3 Section 74 of the RMA sets out the matters to be considered by a territorial authority when preparing or changing its district plan and this includes its functions under section 31. A district plan must give effect to national planning documents and the regional policy statement. A plan change must also be prepared and changed in accordance with Part 2 and its obligation to have particular regard to the section 32 evaluation report. Other matters it shall have regard to include management plans or strategies prepared under other legislation relevant to the resource management issues of the district.
- 10.4 Other matters set out in section 74 are not considered relevant to this plan change. For completeness it is noted that:
- There is no proposed regional policy statement and proposed regional plan;
 - There is no entry on the New Zealand Heritage List/Rārangī Kōrero applying to the land;
 - Regulations relating to fisheries resources do not apply to the land;
 - There are planning documents recognised by an iwi authority applying to the area, but these are not considered to have a direct bearing on the rezoning; and
 - Trade competition is not a factor relevant to this plan change.

Section 75 Content of district plans

- 10.5 Section 75 of the RMA outlines the content of district plans. Section 75(3) requires that a district plan must give effect to any national policy statement, any New Zealand Coastal Policy Statement, any regional policy statement and must not be inconsistent with a regional plan.

Part 2 of the Resource Management Act 1991

- 10.6 The overarching purpose of the RMA is to promote the sustainable management of natural and physical resources, as defined in section 5(2) of the RMA. The plan change is the most appropriate method to manage the protection, use and development of an open space

resource. Open space provides for people and communities by providing for social wellbeing and health.

- 10.7 The natural character of the Swanson Stream (river) and significant ecological area overlays (terrestrial), which are sections 6(a) and 6(c) matters, remain unaffected by this plan change. An open space zone is more compatible with recognising and protecting these matters of national importance than a residential zone. Similarly, an open space zone where there are fewer buildings and no (or only one) habitable use enables greater management of significant risks from natural hazards (section 6(h)) than residential use as it is a flood tolerant activity.²⁶
- 10.8 Section 7 sets out other matters that all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to. Rezoning the land open space recognises what is an efficient use and development of natural and physical resources (in this case outdoor recreation on a golf course).²⁷ It also maintains and enhances the environmental and amenity values of open space and the amenity values of the local area.²⁸
- 10.9 Section 8 requires that all persons exercising functions and powers under it shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). In preparing this plan change, mana whenua were advised of the proposed plan change and invited to comment. Te Kawerau Iwi Tiaki Trust responding seeking to engage on the plan change. The club is in the process of engaging with Te Kawerau Iwi Tiaki Trust.

National Policy Statements

- 10.10 The AUP is required to give effect to any national policy statements.²⁹ Two national policy statements are potentially relevant to this plan change.

National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

- 10.11 The National Policy Statement on Urban Development 2020 (**NPS-UD**) applies to all local authorities that have all or part of an urban environment within their district or region and planning decisions by any local authority that affect an urban environment. Tāmaki Makaurau Auckland is identified as a Tier 1 urban environment in the NPS-UD. The NPS-UD recognises the national significance of:
- Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future³⁰; and
 - Providing sufficient development capacity to meet the different needs of people and communities³¹.

²⁶ AUP, Chapter J1 Definitions

²⁷ RMA, s7(b)

²⁸ RMA, s7(c)

²⁹ RMA s67(3) and s75(3)

³⁰ Objective 1 and Policy 1

³¹ Policy 2

10.12 The NPS-UD directs enabling development capacity in the form of building height and density of urban form in specified locations, which includes land near RTN³². The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**) also requires Tier 1 councils to implement medium density residential standards (**MDRS**) across the entire residential zones³³. Auckland Council notified three plan changes to give effect to this direction on 18 August 2022.³⁴ These plan changes are discussed later in this evaluation report.

10.15 The plan change to rezone the land will give effect to the NPD-US as:

- Provision of open space is essential to providing for well-functioning urban environments that enable people and communities to provide for their social wellbeing, and for their health, now and in the future;
- While the western part of the site is within the walkable catchment of RTN for Swanson Train Station, the land is not available for residential development and has not been for the last 50+ years;
- As the rezoning corrects what is considered a zoning error that occurred as part of the PAUP, the NPS-UD provides that Policy 3(c) applying to walkable catchments accommodate a qualifying matter, which includes land used for open space provided for public use.³⁵ If the land had the correct zoning, sections 77K and 77O of the RMA would have provided for an existing qualifying matter (open space) to be carried over when the Intensification Planning Instrument (IPI) was notified;
- Council's position on qualifying matters is that land zoned OS-SAR is a qualifying matter;³⁶
- The land contains qualifying matters relating to natural hazards (flooding and overland flow paths). This property experienced significant flooding during the February storms. The presence of natural hazards constrains the ability to develop the site to the theoretical maximum plan-enabled capacity;³⁷
- The eastern part of the site is outside the walkable catchment and remains zoned Large Lot residential. Council's plan-enabled capacity analysis excludes this zone;³⁸
- The Council's economic analysis indicates that qualifying matters do not significantly reduce the region's ability to experience a well-functioning urban environment as described by the NPS-UD. Housing capacity remains well ahead of demand, with capacity spread across the region.³⁹
- It is understood the Council is considering localised implications for housing capacity, and in particular in the inner isthmus where there is a concentration of qualifying

³² Policy 3(c)

³³ With the exception of large lot residential and land outside the RUB

³⁴ Plan Change 78: Intensification, Plan change 79: Amendments to the transport provisions, Plan change 80: RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters

³⁵ NPS-UD, Policy 4 and 3.32.

³⁶ PC78, Chapter A – Introduction (all open space zoned land for public use is listed as a qualifying matter)

³⁷ Council identified this as a significant issue and the IPI hearings have been paused pending further modelling.

³⁸ PC78, overall evaluation report, page 74

³⁹ Primary Statement of Evidence (Strategic Planning) of David Mead, 20 February 2023, paragraph 14

matters (e.g. Specialist Character Overlays and Maunga Viewshafts).⁴⁰ Other than natural hazards, there isn't a concentration of qualifying matters within the Swanson walkable catchment that otherwise constrain intensification in the walkable catchment.

National Policy Statement on Freshwater Management 2020

- 10.13 The National Policy Statement on Freshwater Management 2020 (**NPS-FM**) seeks that natural and physical resources are managed in a way that prioritises first, the health and well-being of water bodies and freshwater ecosystems, second, the health needs of people, and third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
- 10.14 Specific objectives and policies which seek to avoid the loss of the extent and values of rivers, and maintain and improve the passage of desirable fish, have been directly inserted into the AUP as specified by the NPS-FM. It is understood Council is proposing a comprehensive plan change to implement the additional requirements of the document in 2024. This comprehensive plan change could potentially amend the AUP provisions to achieve the prioritisation of the health and well-being of water bodies and freshwater ecosystems.
- 10.15 While no part of Swanson Stream or Swanson Esplanade are included in the plan change, due to its proximity, the NPS-FM is considered of relevance to this plan change. Rezoning the land to OS-SAR would not result in any adverse effects on or changes to the Swanson Stream and its catchment. Any standards relating to earthworks in proximity to riparian yards and SEA apply regardless of the zoning of the land. OS-SAR zoning has a greater potential for positive effects on freshwater systems than residential zones. This is due to the policy and rule framework of the OS-SAR placing greater emphasis on protecting and maintaining trees. Where the land is used for golfing, there is a much lower ratio of building and impervious areas than in the residential zones. As a result, this reduces overland flow and manages peak flows discharging to streams and connecting ecosystems.

National Environmental Standards

- 10.16 There are currently eight National Environmental Standards in force as regulations⁴¹. Only one is considered relevant to this site. The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health is a nationally consistent set of planning controls and soil contaminant values. Activities on the Hazardous Activities and Industries List (HAIL) are subject to this NES. On this list are sport turfs where it involves persistent pesticide bulk storage and use and historic use of the land for horticultural purposes. While both HAIL activities potentially apply to the land, this plan change does not affect the implementation of this NES.

National Planning Standards

- 10.17 The purpose of the National Planning Standards (**NPS**) is to improve consistency in plan and policy statement structure, format and content so they are easier to prepare, understand, compare and comply with.

⁴⁰ Primary Statement of Evidence (Strategic Planning) of David Mead, 20 February 2023, paragraph 15

⁴¹ NES for Plantation Forestry; NES for Air Quality; NES for Sources of Drinking Water; NES for Telecommunications Facilities; NES for Electricity Generation Activities; NES for Assessing and Managing Contaminants in Soil to Protect Human Health, NES for Freshwater and NES for Marine Aquaculture

- 10.18 Section 8 of the NPS sets out a discretionary direction on zone names and descriptions of zones. The AUP OS-SAR zone is consistent with the Sport and Active Recreation zone in the NPS.

Auckland Plan

- 10.19 The Auckland Plan 2050 is the Council's long-term spatial plan to ensure Auckland grows in a way that will meet the opportunities and challenges of the future. It is required by legislation to contribute to Auckland's social, economic, environmental and cultural well-being.⁴²
- 10.20 Six important areas are identified so that Auckland can continue to be a place where people want to live, work and visit. One of the outcomes is Aucklanders live in secure, healthy, and affordable homes, and have access to a range of inclusive public places.⁴³
- 10.21 The Auckland Plan sets out development areas where housing and business development capacity is supported by the AUP zoning and Council or Government led initiatives. The site is located outside the targeted business growth area of Henderson Metropolitan Centre.
- 10.22 Population growth and demographic change will put pressure on existing services and facilities. Varied and accessible services and facilities which support the needs of communities are essential in helping people to participate in society and create a sense of belonging. This includes provision of open spaces.⁴⁴ While it is expected the provision of open space will largely be public, privately owned open space supports the needs of the golfing community. Golf is the largest club based sport in New Zealand, and in Auckland.

Auckland Unitary Plan

Auckland Regional Policy Statement

- 10.23 When preparing or changing a district plan, the Council must give effect to any regional policy statement and have regard to any proposed regional policy statement. The ARPS identifies nine issues of regional significance, and the following are relevant to this plan change.

B2: Tāhuhu whakaruruhau ā-taone - Urban growth and form

- 10.24 Chapter B2 sets out the objectives and policies for growth and form in the region. Relevant objectives and policies provide direction on urban growth and form, a quality built environment, residential growth, and commercial and industrial growth. The chapter recognises that growth needs to be provided in a way that achieves a number of matters.⁴⁵ Objective B2.2.1(1) requires that a quality compact urban form is one 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;

⁴² Auckland Plan 2050 June 2018, page 5

⁴³ Auckland Plan 2050 June 2018, page 6

⁴⁴ Auckland Plan 2050 June 2018, page 54

⁴⁵ ARPS, issue B2.1

- (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*

10.25 This objective recognises that growth cannot occur without those aspects that contribute to a quality environment.

10.26 B2.7 contains objectives and policies specifically for open space and recreation facilities. Directly relevant to this plan change are objectives that:

- Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities;⁴⁶ and
- Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.⁴⁷

10.27 Supporting policies are:

- Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions;⁴⁸
- Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities;⁴⁹
- Avoid, remedy or mitigate significant adverse effects of land use or development on open spaces and recreation facilities;⁵⁰ and
- Avoid, remedy or mitigate significant adverse effects from the use of open spaces and recreational facilities on nearby residents and communities.⁵¹

10.28 The plan change does not constrain urban growth or impact on land capacity as the land is not available for residential intensity. It is important to emphasise that while the land has a plan enabled capacity for residential development, RPGC has no intention of using the land for any other purpose than what it has been used for in the last 50+ years. This plan change would not be progressed if this were the case.

10.29 The proposed zoning will maintain and enhance the existing open space amenity values of an area. The OS-SAR reflects an appropriate and well-established recreational activity. An assessment of effects of the plan change on nearby residents and communities is discussed in section 11 of this report.

⁴⁶ ARPS objective B2.7.1(3)

⁴⁷ ARPS objective B2.7.1(3)

⁴⁸ ARPS policies B2.7.2(1)

⁴⁹ ARPS policies B2.7.2(3)

⁵⁰ ARPS policies B2.7.2(7)

⁵¹ ARPS policies B2.7.2(8)

B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao - Infrastructure, transport and energy

- 10.30 Chapter B3 is relevant only to the extent that realising Auckland's full economic potential while maintaining the quality of life for its inhabitants needs to integrate the provision of infrastructure with urban growth.⁵²

B4 Te tiaki taonga tuku iho - Natural heritage

- 10.31 B4.4. Waitākere Ranges Heritage Area includes objectives and policies to protect the Waitākere Ranges. The plan change borders but is entirely outside the Waitākere Ranges Heritage Area. An OS-SAR zoning is compatible with Waitākere Ranges Heritage Area.

B6 Mana Whenua

- 10.32 Objective B6.2.1(2) is that the principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised through Mana Whenua participation in resource management processes. Mana whenua were consulted in the development of this plan change. Engagement is ongoing.

B10 Ngā tūpono ki te taiao - Environmental risk

- 10.33 Objective B10.2 is concerned with risks associated with natural hazards, flooding, and the effects of climate change on natural hazards. This is relevant given the OS-SAR and in particular the activity of golfing is more able to accommodate the overland flow paths and floodplains within the site (these have been incorporated into the course design) than residential development. It is expected that even with a low density residential development provided for with the Residential – Large Lot zone, the floodplain catchment would reduce and the overland flow paths, some of which meet the AUP definition of 'stream', would need diversion or piping.

ARPS summary

- 10.34 Zoning is a key method to give effect to the objectives and policies of the ARPS as zones manage the way in which areas of land and the coastal marine area are to be used, developed, or protected.⁵³ The use of the land will not change in the foreseeable future. There is no reason to retain the residential zoning as it will not be implemented for the purpose of the zone. Much of the golf course is not suitable for residential development and use, as recognised by mapping constraints, or because of the presence of public infrastructure. It is more appropriate to apply a zone that reflects the existing and future use of the land rather than an established land use having to rely on existing use rights.
- 10.35 The plan change does not constrain urban growth and impact on land capacity as the land is not available for housing and should not form part of the Council's development capacity modelling. There is a very low, if any, likelihood that any of the land would become available for residential use in the next 30 years. For these reasons, greater emphasis is placed on the appropriateness of the plan change by reference to the ARPS B2.7 Open space and recreation facilities objectives and policies.

⁵² ARPS, issue B3.1(2)

⁵³ AUP, A.6.4 Zones

District plan chapter H1 Residential - Large Lot Zone

10.36 The description of the zone currently applying to the land is:

The Residential – Large Lot Zone provides for large lot residential development on the periphery of urban areas. Large lot development is managed to address one or more of the following factors:

- *it is in keeping with the area's landscape qualities; or*
- *the land is not suited to conventional residential subdivision because of the absence of reticulated services or there is limited accessibility to reticulated services; or*
- *there may be physical limitations to more intensive development such as servicing, topography, ground conditions, instability or natural hazards where more intensive development may cause or exacerbate adverse effects on the environment.*⁵⁴

10.37 Recreational activities, such as golf, are a non-complying activity in all residential zones. This reinforces the inappropriateness of the zone in relation to the established land use. The consequence of retaining the residential zoning is that golfing activity, the establishment of golfing-related facilities, and the ongoing maintenance of the facility must rely on existing use rights under Section 10 of the RMA. It is inappropriate for a long-standing activity to have to rely on existing use rights due to the uncertainty and constraints this places on the use and on-going development and upgrading of the golf course, and on future golfing activities.

District plan chapter H7 Open Space

10.38 Objectives for all open space zones recognise the importance that recreational needs are met through the provision of a range of quality open space areas⁵⁵ and adverse effects of use and development of open space on residents, communities and the environment are avoided, remedied or mitigated.⁵⁶

10.39 Policies supporting these general objectives focus on the design, development, and management of the spaces as well as reflecting mana whenua values where appropriate and enabling infrastructure located on open spaces.

10.40 Chapter H7 also includes specific objectives and policies for each of the five open space zones. Those applying to OS-SAR are at H7.6.2.

(1) Indoor and outdoor sport and active recreation opportunities are provided for efficiently, while avoiding or mitigating any significant adverse effects on nearby residents, communities and the surrounding areas.

(2) Activities accessory to active sport and recreation activities are provided for in appropriate locations and enhance the use and enjoyment of areas for active sport and recreation.

⁵⁴ AUP, H1.1 Zone Description

⁵⁵ AUP, H7.2(1)

⁵⁶ AUP, H7.2(2)

(3) Larger scale, or clusters of land-based marine-related recreation facilities, are recognised and provided for while maintaining and enhancing public access to and along the coast.

10.41 The golfing facility and supporting uses will be permitted activities in H7.9.1. Activity Table – Open Space Zones. This is more efficient than requiring a non-complying activity application for these uses, as required under the current zone. The magnitude of any adverse effects on the nearby residents, communities and the surrounding areas remains unchanged. Anticipated effects of plan enabled permitted recreation activities that are more intensive than golf are managed by various standards to ensure effects such as high levels of traffic, noise, lighting glare and scale of buildings are managed. Rezoning the land OS-SAR is the most appropriate way to achieve the objectives of Chapter H7, particularly those of the OS-SAR zone.

10.42 The following existing uses on the land would be permitted activities in H7.9.1 Activity Table – Open Space, which is further support for this plan change:

- (A10) Clubrooms;
- (A15) Organised sport and recreation;
- (A25) Parks depot, storage and maintenance;
- (A31) Accessory buildings;
- (A37) Buildings for public amenities;
- (A46) Parks infrastructure;
- (A47) Sport and recreation structures;
- (A48) Parks maintenance; and
- (A49) Recreational trails.

10.43 Appendix 2 is a comparison of development standards under the current and proposed zone. This shows some variation between the two zones although the overarching approach to the standards is to limit the height and scale of buildings under both zones.

Chapter E Auckland-wide

10.44 Appendix 2 also includes a comparison of Auckland-wide standards where the rules vary by zone,⁵⁷ and in summary:

- In all open space zones, tree trimming, works in protected rootzone and removal over thresholds are a restricted discretionary activity. There is no equivalent rule in the residential zones;
- There is no difference in Auckland-wide lighting standards (illuminance and lux) between the zones. The OS-SAR permits structures up to 18m high to support artificial lighting.⁵⁸ The effects of this are discussed in section 11 of this report;

⁵⁷ The table does not include Chapter E12 Land disturbance and this is not considered of any consequence given the area of land included in the plan change.

⁵⁸ AUP, H7.11.8 Non-security floodlighting, fittings and supports and towers up to 18m high.

- The OS-SAR provides a higher noise standard than the residential zone. This is to accommodate the higher noise levels often generated by active sport and recreation. The effects of this are discussed in section 11 of the report.

Plan changes 78, 79 and 80

- 10.45 On 18 August 2022, Council introduced three plan changes to give effect to NPS-UD and MDRS.⁵⁹
- 10.46 PC79 introduces amendments to the transport provisions of the AUP. This is not considered relevant to this plan change.
- 10.47 PC80 integrates new concepts and terms in the NPS-UD and urban resilience to the effects of climate change and qualifying matters into the ARPS. Amendments in PC80 relating to climate change are primarily focused on sea level rise over at least 100 years. The site is not an area susceptible to coastal instability and erosion (ASCIE) so the vast majority of the plan change is not relevant. Chapter B7 Toitū te whenua, toitū te taiao – Natural resources includes provisions relating to freshwater systems and the following amendment (underlined) is proposed to this chapter:
- B7.3.2 Policies
- (5) Manage subdivision, use, development, including discharges and activities in the beds of lakes, rivers, streams, and in wetlands, to do all of the following...
- (a) ...
- (aa) improve resilience to the effects of climate change...
- 10.48 This is relevant to the extent that rezoning the land OS-SAR offers greater potential for a use compatible with adjoining a stream than high density THAB. Unlike residential, golfing is a flood tolerant activity⁶⁰ and does not involve significant discharges to the stream as it has a low ratio of impervious surface. An OS-SAR activity has more resilience to the effects of climate change than residential activity and there are few issues with managed retreat. Many of the Auckland urban golf courses are recognised as providing a stormwater detention function in extreme events, as has recently occurred at this course.
- 10.49 Plan Change 78: Intensification is considered directly relevant to this private plan change (**PC78**). This has been notified using the IPI process and is currently on hold pending Council making a variation to address flooding matters and the Auckland Light Rail Corridor.
- 10.50 Under PC78, the western part of the land, the subject of this plan change is within the Council's identified walkable catchment of a RTN (Swanson Train Station). As a result, in accordance with Policy 3(c) of the NPS-UD and the Council's zoning approach, this land is proposed to be rezoned Terrace Housing and Apartment Building (**THAB**). Within walkable catchments, as identified on the planning maps, development of at least six storeys is enabled unless qualifying matters apply.⁶¹

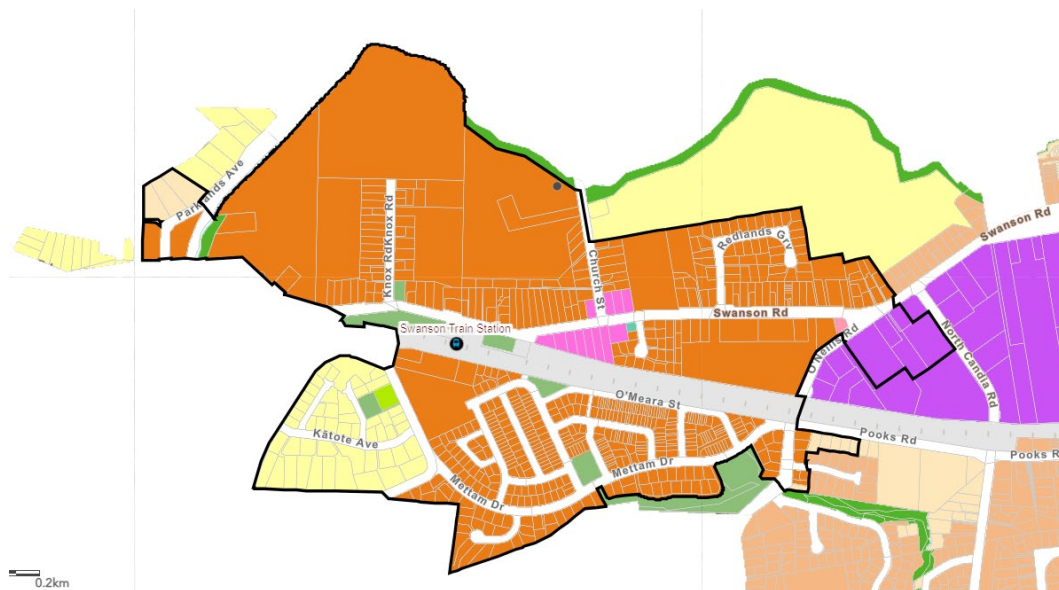
⁵⁹ Plan Change 78: Intensification, Plan change 79: Amendments to the transport provisions, Plan change 80: RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters

⁶⁰ AUP, Chapter J1 Definitions

⁶¹ PC78: Intensification, H6.1 Zone Description

10.51 The club made a submission⁶² opposing parts of PC78. The submission highlights the long-standing use of the land for recreation and community activity and the plan change fails to recognise and provide for this use. It also highlights the flooding issues with the land and how this makes it unsuitable for residential activity. Opposing the rezoning and seeking an open space zone the club considers will ensure and protect the future use of the qualify open space for the benefit of members and the residents of West Auckland. Submission point 1057.2 seeks “all the club land and the adjoining leased pieces all be rezoned Open Space – Sport and Active Recreation”.

Figure 9: PC78 – Swanson Train Station Walkable Catchment and Proposed Zoning



Source: Plan Change 78 Viewer (walkable catchment shown with the black outline)

10.52 The planning map viewer shows the entire land included in the plan change (including that part owned by the Council) is subject to two spatially mapped qualifying matters:

- Significant Ecological Areas – Terrestrial
- Flood Plains

10.53 The presence of overland flow paths (unmapped on the PC78 viewer) is also a qualifying matter. Any qualifying matter means that MDRS cannot be applied. In any case, Section 77G(1) of the RMA would exclude the use of MDRS as the land is currently zoned Large Lot Residential, which is an excluded zone.⁶³

10.54 As noted earlier, if the correct zoning had been retained as part of the PAUP, the land would be zoned open space and therefore subject to a qualifying matter. Council cannot compel an owner to build greater intensity residential development where the land is not used for that purpose as is the case with the land owned by RPGC. When considered in this context, the rezoning is not inconsistent with PC78.

⁶² Submission # 1057, recorded under Hendrick Johannes Greeff, the club secretary

⁶³ This is also stated in the section 32 (PC78 – overall evaluation report, page 32)

Local Board plans

- 10.55 RPGC is located within the Waitākere Ranges Local Board. The Waitākere Ranges Local Board Plan 2020 is a non-statutory plan that provides a flexible framework to support growth and development in the Local Board area over three years. Objectives and outcomes are focused on protecting and restoring the environment particularly the Waitākere Ranges Heritage Area, working with mana whenua as partners, supporting community wellbeing, protecting and providing a range of opportunities to experience arts, culture and heritage, infrastructure that supports the community.
- 10.56 Outcome 7 and supporting key initiatives include:
- Provide well maintained, accessible parks, facilities and public spaces.
 - Recognise access to local and sports parks, quality gathering and resting spaces, and good transport, walking and cycling connections are vital for good urban living.
 - Recognise people need access to green space and connections between suburbs that support freedom of movement without depending on cars.
 - Support the introduction and use of quick and easy lease renewal processes for facilities where there are existing rights of renewal or community outcome plans are currently being delivered.
 - Provide recreation programmes, opportunities and facilities to get Aucklanders more active, more often.
- 10.57 While the Local Board objectives and outcomes for open space are primarily in the context of land within their management, this plan change, particularly as it relates to part of 849 Swanson Road, supports the above-mentioned outcomes.

Parks policy plans

- 10.58 Auckland Council has plans and strategies for parks, sport, open space and reserves. Most apply to land and facilities owned or administered by the council so are not directly relevant to this plan change, except for the small portion of land within Council ownership. Three documents are referenced as they apply to sport and recreation regardless of land ownership.
- 10.59 The Parks and Open Spaces Strategic Action Plan is an overarching document. It recognises open space not owned by the Council makes up a big part of the open space network in Auckland. Auckland Council's role in relation to this part of the network is as an advocate, enabler and partner.⁶⁴
- 10.60 Auckland Sport and Recreation Strategic Action Plan 2014-2024 (refreshed 2017) recognises that sport and recreation can make a major contribution to our quality of life, health and wellbeing. It provides opportunities for fun and entertainment and contributes to making Auckland a place that Aucklanders are proud of, they want to stay or return to, and that other people want to visit, move to, or invest in.⁶⁵

⁶⁴ 10.20 The Parks and Open Spaces Strategic Action Plan, page 14

⁶⁵ Auckland Sport and Recreation Strategic Action Plan 2014-2024, page 18

- 10.61 Auckland Sport Sector: Facilities Priorities Plan 2017 sets out a co-ordinated and integrated approach for future sport facility provision in Auckland. The plan considers the challenges, current gaps in provision and future demand for investment in sport facilities in Auckland. Included in the plan is golf, which is within the category of ‘bespoke outdoor sporting facilities’. It does not set priorities specifically for golf, but it does list an outcome of this plan is to support the development of a hierarchy and network of facilities.⁶⁶
- 10.62 RPGC is predominately a local facility. On the limited occasions they occur, tournaments draw people from around the Auckland region and New Zealand. One of the means to help the sporting sector deal with future growth is to utilise existing assets. In this regard, RPGC is an existing facility providing for an established local demand.

Māori Plan

- 10.63 The Māori Plan 2017 is prepared by the Independent Māori Statutory Board. This plan provides an understanding of Māori development aspirations and sets measures for monitoring progress towards desired cultural, economic, environmental and social outcomes for Māori.
- 10.64 The Māori Plan does not raise issues that relate specifically to this plan change. RPGC consulted with mana whenua as part of the Schedule 1 process. This engagement is ongoing.

⁶⁶ Auckland Sport Sector: Facilities Priorities Plan 2017, page 17

11. ENVIRONMENTAL EFFECTS OF THE PLAN CHANGE

Character and amenity values

- 11.1 The RMA defines amenity values as those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.⁶⁷

Non-residential zoned land

- 11.2 There is no effect on the amenity of non-residential zoned properties in the vicinity i.e. Business – Local Centre Zone, Business – Light Industry Zone, Strategic Transport Corridor Zone, Rural – Waitakere Foothills Zone and Rural – Countryside Living Zone as:
- The business zoned land and current activities occurring on these properties have a greater level of intensity than the OS-SAR zone;
 - The OS-SAR zone is compatible with these zones and has less reverse sensitivity risk than residential zones; and
 - The site is separated from non-residential zones by road, open space zoned land, stream or intervening properties.

Open space zoned land

- 11.3 There is no adverse effect on the character and amenity values of land zoned open space as it provides a suitable interface with the Conservation and Informal Recreation zone. Noting that it is very common for larger open spaces to have more than one open space zone and for esplanade reserves to adjoin various zoned land. Effects are suitably managed in the AUP by yard setbacks⁶⁸ and Auckland-Wide provisions relating to earthworks and vegetation.

Residential zoned land

- 11.4 Potential effects on amenity values from the plan change are limited to the residential properties that adjoin or are in close proximity to the golf course. These properties are currently afforded a high level of amenity from the open spaciousness of the golf course and low intensity activity. This is acknowledged in the feedback from local residents (refer to Appendix 3).
- 11.5 The plan change applies rules that maintains the amenity afforded by this open space. This includes standards in the OS-SAR limiting the size of buildings (and therefore intensity of activity) to 150m². Any building exceeding 150m² is a discretionary activity. The existing clubrooms are over this threshold.
- 11.6 A discretionary activity requires a full assessment of effects and analysis of objectives and policies. This includes consideration of effects on residential properties as well as traffic generation and parking demand. Other parts of the AUP would also likely trigger resource consent, e.g., Chapter E12 land disturbance and E27 transport (standard E27.6.1 trip generation).

⁶⁷ RMA, section 2 Interpretation

⁶⁸ H7.11.3 (including a 10m riparian yard)

11.7 The OS-SAR zoning does provide the opportunity for more intensive recreation facilities as a permitted activity, for example swimming pools and playing fields. These activities could generate more intensive effects than currently occurring or are anticipated in a residential zone. For the reasons identified earlier, this is a very unlikely scenario as the club will continue to operate a golfing facility for the foreseeable future. The amenity provided for local residents by the rezoning is positive. On this basis, there are no adverse amenity effects arising for the plan change as:

- The primary activity occurring on the land is low intensity;
- Buildings and other uses on the land are ancillary to the primary activity and could never be more than that without compromising the primary activity; and
- Mature trees are protected, and their removal requires resource consent under the OS-SAR zone.

Infrastructure

11.8 There are no adverse effects on infrastructure, e.g. stormwater, wastewater, water, as no new infrastructure is required as a consequence of the plan change. The activity is compatible with continuing to provide public stormwater and wastewater infrastructure as open space zoned land can more readily accommodate underground public services. Existing Watercare Infrastructure is an example of this.

Transport

11.9 Vehicle access is limited to Knox Avenue and then a give way intersection at Swanson Road. Traffic generation by private vehicles entering the site peaks mid-morning i.e. after the commuter demand during the week and on the weekends.

11.10 The plan change does not change or alter the access, trip generation or parking demand. As noted earlier, more intensive activities will likely require resource consent where there is the opportunity to assess effects of issues relating to numbers of parking, on-site parking and manoeuvring. If the land is used for another recreational activity, it would very likely require resource consent and be subject to these provisions, which are intended to manage transport related effects.

Noise

11.11 The OS-SAR provides a higher noise standard than the residential zone. The main difference in the standard is:

- up to 5dB higher during the day (55dB LAeq);
- up to 10dB higher (60dB LAeq) for up to 21 hours per week during the day.

11.12 Private plan changes 57 and 77 (both now operative) are directly relevant to this plan change as they also rezoned land from residential to OS-SAR specially to provide for two well-established golfing facilities. In support of PC57, acoustic consultant Mr Jon Styles provided evidence from noise readings demonstrating golfing activity is around 40dB LAeq, or less. In his evidence for the hearing, Mr Styles concluded that:

34. *The Request proposes to include the Site in the OS-SAR zone to recognise and provide for the ongoing use of the Site as a golfing facility. Essentially, if the re-zoning is confirmed, there is unlikely to be any change to the noise levels which currently comprise the existing noise environment.*
35. *The noise monitoring I have undertaken also confirms the golfing activities on the Site generate significantly lower noise levels than the maximum permitted noise levels authorised by the OS-SAR noise standard, E25.6.17. The maximum permitted noise levels of E25.6.17 are therefore unlikely to be realised while the Site is used for golfing activities.*
36. *The noise level generated by the use of the golf course is also considerably less than what I would expect to be generated if the Site were developed for intensive residential use.*
37. *The noise monitoring I have undertaken demonstrates that the adjacent residential receivers enjoy a relatively high level of noise amenity arising from the low intensity of recreational activity on the Site. This level of noise amenity will be maintained under the Request.⁶⁹*

11.13 This was accepted by Council when assessing PC77. There is no reason a similar noise level would not occur with the golfing activity played at RPGC.

11.14 As noted earlier, more intensive activities would be subject to an application for resource consent. A change in use to more intensive non-golfing recreational activity is a hypothetical scenario as golfing related activities will not occur on the land for the foreseeable future.

Loss of residential zoned land

11.15 Based on the current planning maps, the rezoning reduces only in a very small way, the potential available land for housing supply to meet current and future needs of the people of Auckland. This would change under PC78 where half of the site is re-zoned THAB. As noted, this land has not been available for residential use for over 50 years and there is no intention of making it available in the foreseeable future. Accordingly, there is no loss of land for housing as it not available for this purpose.

11.16 If at some future time the club decides to reduce the area of its site used for golfing purposes or dispose of the site in its entirety, then the appropriateness of the zoning for residential development (or some other land use) can be revisited at that time.

⁶⁹<https://www.aucklandcouncil.govt.nz/have-your-say/hearings/find-hearing/Pages/Hearing-documents.aspx?HearingId=463>

12. CONSULTATION ON THE PLAN CHANGE

- 12.1 As part of the preparation of this plan change consultation was undertaken. Appendix 3 is a list of those consulted, responses received and the actions in relation to the responses. This includes consultation with adjoining and adjacent landowners, mana whenua and the Waitākere Ranges Local Board. To date, no concerns were raised about the rezoning during the consultation. The two responses received from residents supported the rezoning.

13. CONCLUSION

13.1 The private plan change by RPGC is to rezone land OS-SAR. The purpose of the proposed plan change is to reflect and provide for the long-standing use of the land as a golfing facility. The analysis provided in this section 32 evaluation and planning report is that the rezoning:

- Is the most appropriate way to achieve the purpose of the RMA and is consistent with the principles in Part 2 of the RMA;
- Assists the Council in carrying out its functions of the RMA;
- Is consistent with the objectives and policies of the ARPS and Chapter H7 Open Space; and
- Is the most appropriate means of achieving the objective of the plan change.