

Proposed Plan Change 78 (PC78)

to the Auckland Unitary Plan (Operative in
part)

**SECTION 32 and sec77K / sec 77Q alternative process for existing qualifying
matters**

**EVALUATION REPORT for qualifying matter 77I(a) and qualifying matter
77O(a)**

**77I(a) matter of national importance that decision makers are required to
recognise and provide for under section 6**

**Wetlands Management Area Overlay
Qualifying Matter**

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Executive Summary – Wetlands, the Wetlands Management Area Overlay and Qualifying Matters

The region's uninterrupted urban growth and former coastal and freshwater management practices have placed Auckland's land and water resources - including areas of natural habitats and biodiversity, under significant pressure. The Auckland Unitary Plan (AUP) Regional Policy Statement (RPS) B7 - Natural Resources acknowledges this pressure and seeks to manage the developmental burden on these natural resources. This management includes wetland areas which make up some of Auckland's most at-risk ecosystems. These Wetland systems are managed under regional planning rules.

RPS B7.3.1. Freshwater systems, aims to ensure the loss of freshwater systems is minimised and that degraded freshwater systems are enhanced, and to ensure that the adverse effects of land use are avoided, remedied or mitigated. B7.3.1 also seeks to spatially identify all fresh water systems and avoid the permanent loss and significant modification or diversion of lakes, rivers, streams, and wetlands and their margins. These fresh water systems and wetlands can also be seen as part of their wider catchment framework, and it is important that catchment is consider in protecting these natural assets.

AUP D8. The Wetland Management Areas Overlay identifies the significant wetlands listed in Schedule 1: the Wetland Management Areas Schedule. (There are 102 Wetlands listed on the schedule). The overlay provisions protect wetlands from the adverse effects of discharges, water takes, wetland drainage, invasive pest species and their physical disturbance. The Wetlands Management Area Overlay is functions under regional plan rules. While district plan provisions are also used to manage biodiversity, these biodiversity provisions reflect the purpose of a regional plan.

The Wetland Management Area overlay has been identified as a qualifying matter in accordance with Clause 77I(a) and 77O(a) of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. It is important NPSUD and MDRS planning rules continue to maintain these wetland areas and their associated biodiversity in accordance with RMA Section 6 *Matters of National Importance*, (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.

There are no identified wetlands on the Wetland Management Areas Schedule. within Auckland's residentially zoned areas. While a number are located within Auckland's urban area, these are predominately located on open space zoned areas. In a few cases there are residential developments nearby, however it is my view these developments are not necessarily adjacent. Policy D8.3. [rp] 1(3) states that wetland management areas should be maintained or enhanced by avoid activities in, on or adjacent to the wetlands. This policy can be applied as part of any environmental assessment of a nearby site.

The one example of wetland with what can be considered an urban zoning 43 Galway Street Onehunga and is sited in an area of Light Industrial zoning. The wetland is within Onehunga Town Centre 400 metres walkable catchment and could be identified intensification under

Policy 3 (d). This related to Qualifying Matter 77O(a) re non-residential areas, however any residential development would require a plan change and an environmental assessment of the impact on the wetland.

Auckland Council's Terrestrial Biodiversity Monitoring Programme (TBMP) undertaken by RIMU has collected biodiversity data since 2010 from a network of 189 permanent plots located in wetlands across the region. This analysis of data from the wetland plot network focusses on wetland health, with an analysis of wetland extent data underway. The great majority of these plots are not included in the Wetland Management Area Overlay. 91 wetland plots are located in Terrestrial SEA's.

In considering the Wetland Management Area as qualifying matter – three possible options have been canvassed, with Wetlands Option 2, the status quo option determined as the best means of protecting Wetlands and meeting the NPS-UD and MDRS objectives. The impact on housing supply and capacity of the Qualifying Matter is negligible.

Introduction

This report is prepared as part of the evaluation required by Section 32 and Sections 77I and 77Q of the Resource Management Act 1991 ('**the Act**') for proposed Plan Change 78 (**PPC78**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).

The background to and objectives of PCX are discussed in the overview report, as is the purpose and required content of section 32 and 77I / 77Q evaluations.

This report discusses the implications of applying xyz as a qualifying matter to the medium density residential standards (MDRS) of Schedule 3A of the RMA and the implementation of policy 3 of the NPS-UD

An existing qualifying matter is a qualifying matter referred to in section 77I or 77O (a) to (i) that is operative in the relevant district plan when the IPI is notified.

- Sec 77I relates to relevant residential zones.
- Sec 77O relates to urban non-residential zones.

The Council may make the MDRS and the relevant building height or density requirements under policy 3 less enabling of development in relation to an area within a relevant residential zone or urban non-residential zone only to the extent necessary to accommodate 1 or more of the qualifying matters listed in 77I or 77O.

Integrated evaluation for existing qualifying matters

For the purposes of **PC78** evaluation of D8 the Wetlands Management Overlay as an existing qualifying matter has been undertaken in an integrated way that combines sec 32 and 77K / 77Q requirements. The report follows the evaluation approach described in the table below.

Preparation of this report has involved the following:

- Review of the AUP to identify all relevant provisions that apply this qualifying matter

- Research related to the application and performance the Wetland Management Overlay and the protection of biodiversity on residential zoned land
- The scale and significance of the issues is assessed.
- section 32 options analysis for this qualifying matter and related amendments
- The consideration of 3 options
- The determination of a preferred option: Option 2 (status quo).

This section 32/77K evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received.

Integrated evaluation for existing qualifying matters (continued)

Table 1, Integrated approach

Standard sec 32 steps	Plus sec 77K / 77Q steps for existing qualifying matter
Summary providing an analysis of the qualifying matter	<p>Sec 77K</p> <p>The qualifying matter relates to the AUP, D8 Wetland Management Areas Overlay, Schedule 1 Wetland Management Areas Schedule sites and the wetland sites identified on the AUP maps.</p> <p>Wetlands have been identified as nationally threatened ecosystems that have been reduced significantly from their former extent. Wetlands are characterised as being permanently or intermittently wet areas of shallow water, with land/water margins that support a natural ecosystem of indigenous plants and animals that are adapted to wet conditions.</p> <p>The NPSUD and MS DR changes relate to urban residential zoning within Auckland and this instance the Qualifying Matter Section 32 analysis relates to the D8. Wetland Management Areas Overlay.</p> <p>S 77K - An Alternative process for existing qualifying matters provides for identifying by location (for example by mapping) where an existing qualifying matter apply, specifying the alternative density standard proposed for those areas identified under paragraph and identify in the report prepared under section 32 why the territorial authority considers they should be applied.</p> <p>There are no Wetland Management Areas Schedule sites within an urban residential zoning. When reviewing Auckland’s urban area only the wetland at Tahuna Torea, Glendowie could be considered “adjacent” to residential housing. However, it is considered that this residential area would not affect the wetland.</p> <p>Other rules that apply to the Wetlands Management Overlay are located in</p> <ul style="list-style-type: none"> • E3 Lakes, rivers, streams and wetlands, • E7 Taking, using, damming and diversion of water and drilling,

- E11 Land disturbance – Regional and
- E15 Vegetation management and biodiversity

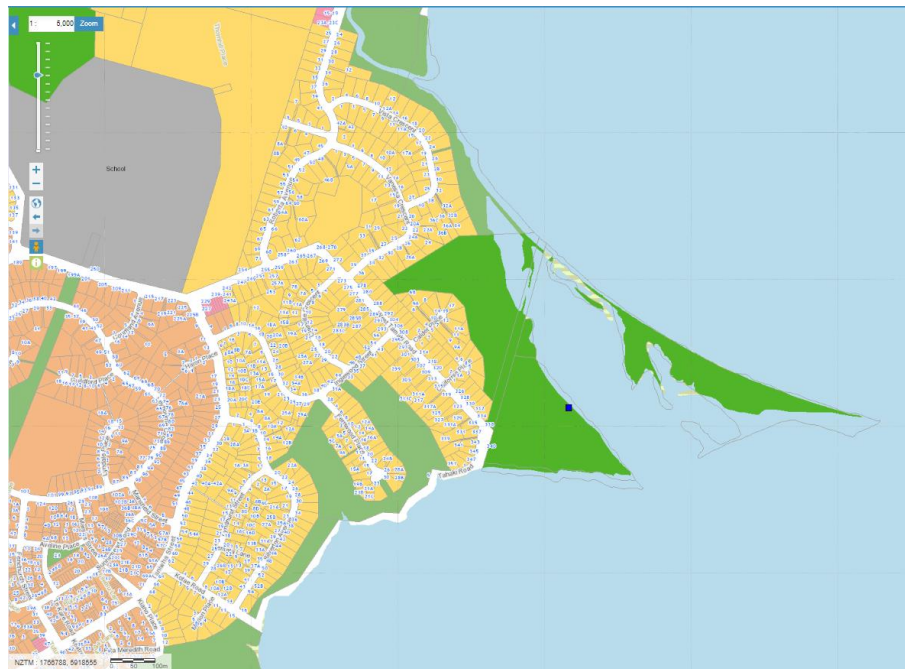
The D8: Wetlands Management Area locations

The Wetlands Management Areas Overlay and indicated Schedule 1 Wetland Management Areas Schedule includes

- Tahuna Torea, Glendowie (open space zone)
- Puhinui Reserve Puhinui (open space zone)
- 43 Galway Street, Onehunga (Onehunga Springs, Light Industry zone)
- 140 Captain Springs Road, (Onehunga Springs, Open Space zone).

The Wetland at 43 Galway Street, Onehunga is the only example of a Wetland with a non-open space zoning in the Auckland area

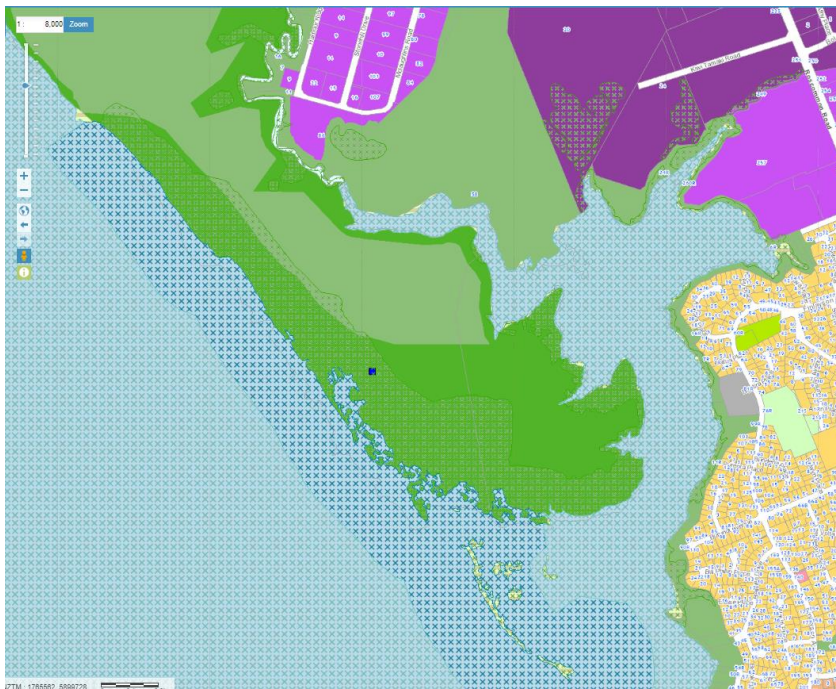
Map1. AUP Wetland (dark blue square) Tahuna Torea, Glendowie



Map 2. Wetland and housing Tahuna Torea, Glendowie



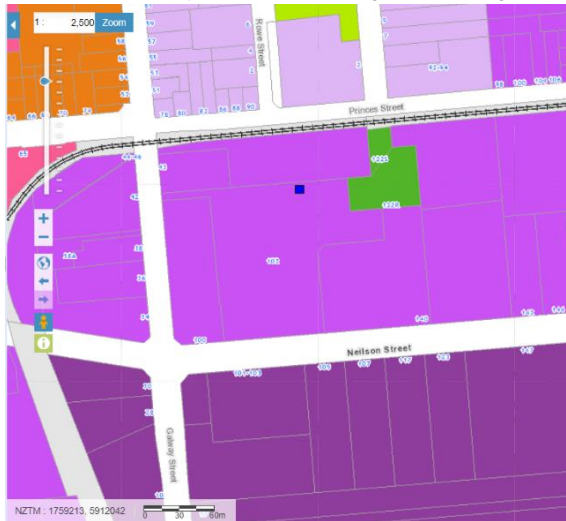
Map 3. AUP Puhinui reserve - Wetland overlay (blue dot)



Map 4. Aerial: Puhinui Reserve Wetland and Weymouth housing



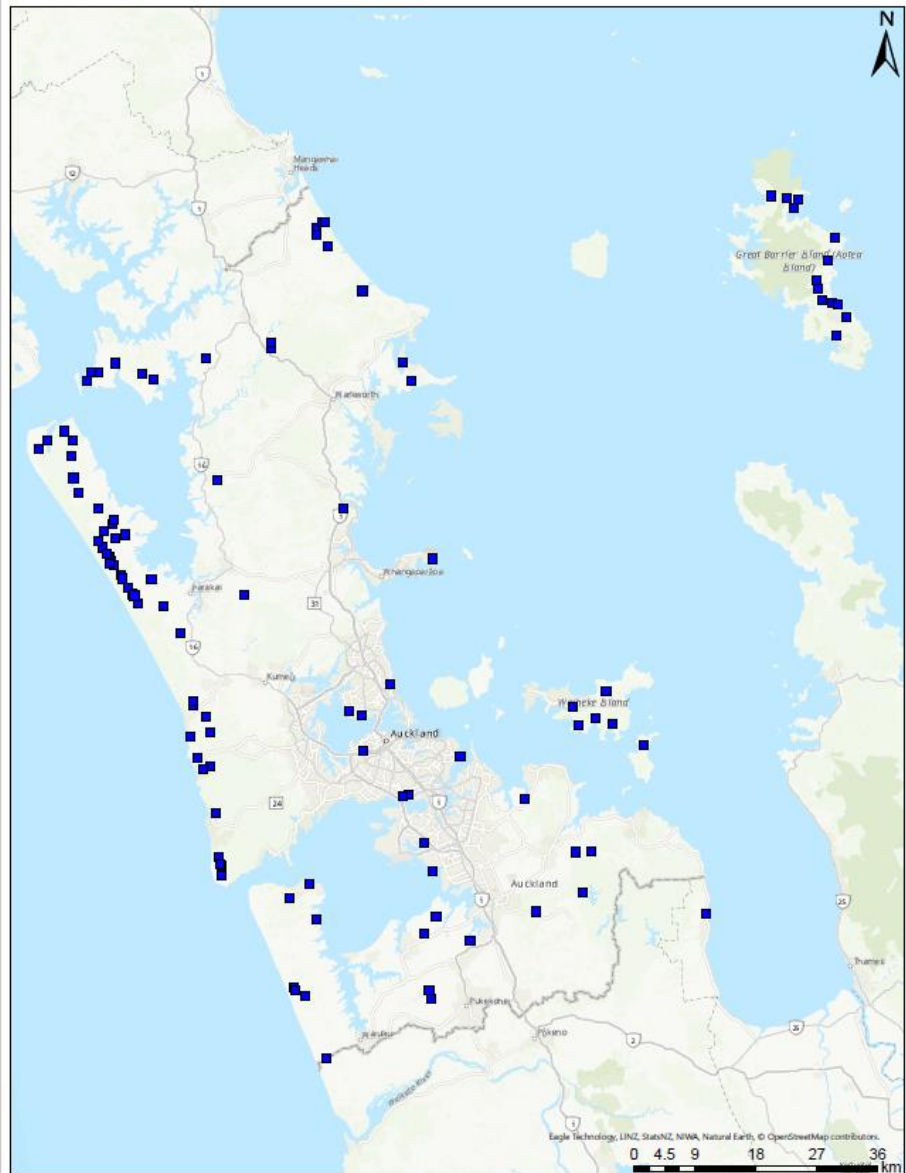
Map 5, 43 Galway Street, Onehunga (Onehunga Springs, Light Industry zone)



Map 6: 43 Galway Street, Onehunga (Onehunga Springs aerial photo)



Map 7 AUP Wetland Management Area Overlay



Auckland wetlands

Map 7 - indicates the Wetland Management Areas within the Auckland region, it also identifies those Wetland Management Areas within the Auckland Urban area that are Qualifying Matters as required by 77J Requirements in relation to a evaluation report, 3(a) the area subject to a Qualifying Matter.

AUP RPS - Objectives and Policies for Wetlands

Table 2, Objectives, Policies and Wetlands

RPS B7.3 Objectives and Policies		
<ul style="list-style-type: none"> Regional Policy Statement B7.3.1. Freshwater systems, aims to ensure the loss of freshwater systems is minimised and that degraded freshwater systems are enhanced, and to ensure that the adverse effects of land use are avoided, remedied or mitigated. To protect this biodiversity it is important that wetlands are identify and protected and this what the RPS objectives and policies seek to achieve and D8: Wetlands Management Areas Overlay a Qualifying Matter re 77Q(a) non-residential zones 		
B7.3. Freshwater systems B7.3.1. Objectives	(1) Degraded freshwater systems are enhanced.	<ul style="list-style-type: none"> Establish Wetland Management Area Overlay and schedule. The reduction in the spatial extent of wetlands is avoided Replanting of Wetlands D8: Wetlands Management Area Overlay Research and monitoring of wetlands undertaken by RIMU. E39 Subdivision – Rural
	(2) Loss of freshwater systems is minimised.	<ul style="list-style-type: none"> The reduction in the spatial extent of wetlands is avoided Managed through an environmental assessment. Replanting of Wetlands The reduction in the spatial extent of wetlands is avoided
	(3) The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated	<ul style="list-style-type: none"> Managed through an environmental assessment. Replanting of Wetlands Rural and urban subdivision controls.
RPS: Policies		
Policies B7.3.2. freshwater systems	(1) Integrate the management of subdivision, use and development and freshwater systems by undertaking all of the following: <ol style="list-style-type: none"> ensuring water supply, stormwater and wastewater infrastructure is provided for in areas of new growth or intensification. ensuring catchment management plans form part of the structure planning process. controlling the use of land and discharges to minimise the adverse effects of runoff on freshwater systems and progressively reduce existing adverse effects where those systems or water are degraded Minimize adverse effects 	<ul style="list-style-type: none"> Wetlands Management Area Overlay Schedule 1: Wetlands Management Areas Schedule AUP E38. Subdivision – Urban AUP E39. Subdivision – Rural Assessment of adverse effects Minimize adverse effects Incorporate catchment management plans and structure plan processes.
	(2) Degraded freshwater systems are enhanced	<ul style="list-style-type: none"> Assessment of adverse effects Minimize adverse effects

	(3) Degraded freshwater systems are enhanced	<ul style="list-style-type: none"> • Assessment of adverse effects • Minimize adverse effects
	(4) Loss of freshwater systems is minimised	<ul style="list-style-type: none"> • Research and monitoring of wetlands undertaken by RIMU. • Schedule 1 Wetland Management Areas Schedule
	(3) The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated.	<ul style="list-style-type: none"> • Research and monitoring of wetlands undertaken by RIMU. • Environment Assess undertaken as part of the planning process.
	4) Avoid the permanent loss and significant modification or diversion of lakes, rivers, streams (excluding ephemeral streams), and wetlands and their margins.	<ul style="list-style-type: none"> • Research and monitoring of wetlands undertaken by RIMU. • Environment Assess undertaken as part of the planning process.
	(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) protect identified Natural Lake Management Areas, Natural Stream Management Areas, and Wetland Management Areas	<ul style="list-style-type: none"> • AUP E38. Subdivision – Urban rules apply • AUP E39. Subdivision – Rural potential transferable offsets. • Covenant of SEAs areas through subdivision process
B7.2. Indigenous biodiversity B7.2.2. Policies	(3) Identify degraded freshwater systems.	<ul style="list-style-type: none"> • Managed through an environmental assessment. • Avoid adverse effects
	(3) Promote the enhancement of freshwater systems identified as being degraded to progressively reduce adverse effects.	<ul style="list-style-type: none"> • Managed through an environmental assessment. • Avoid adverse effects
D8: Wetlands Management Area – a Qualifying Matter		
D8.2. Objectives [rp]	1) High natural character and ecological values of wetland management areas are maintained or enhanced.	<ul style="list-style-type: none"> • Managed by Regional Plan rules • Managed through an environmental assessment. • Avoid adverse effects
	(2) The reduction in the spatial extent of wetlands is avoided as far as is practicable.	<ul style="list-style-type: none"> • Managed by Regional Plan rules • Managed through an environmental assessment. • Avoid adverse effects
	(3) Cultural, recreational and amenity values of wetland management areas are maintained or enhanced.	<ul style="list-style-type: none"> • Managed by Regional Plan rules • Managed through an environmental assessment. • Avoid adverse effects
D8.3. Policies [rp]		
D8.3. Policies [rp]	(1) Maintain or enhance wetland management areas by:	<ul style="list-style-type: none"> • Managed by Regional Plan rules

	<p>(a) maintaining water quality where it is excellent or good and progressively improve where it is degraded; (b) maintaining water levels to ensure ecosystem functionality and significant variations in water levels occur only through natural fluctuations</p> <p>(c) avoiding the removal or degradation of wetland vegetation in, on, or adjacent to wetlands.</p> <p>(d) avoiding adverse effects of any activity on ecological values.</p> <p>(e) maintaining the size and spatial extent of the wetland area by avoiding progressive loss of wetland areas; and</p> <p>(f) providing for wetland enhancement activities, including riparian planting and the removal of invasive pests.</p>	
	<p>(2) Recognise and provide for ecosystem functions of wetlands in wetland management areas, including the attenuation of flooding and treatment of discharges, where these functions will not result in significant adverse effects on the ecological or cultural values of the wetland.</p>	<ul style="list-style-type: none"> • Managed by Regional Plan rules
	<p>(3) Avoid activities in, on or adjacent to wetland management areas except where the activity:</p> <p>(a) is for wetland conservation purposes, including pest removal.</p> <p>(b) is for public access and interpretative activities relating to high natural character and ecological values; or</p> <p>(c) is for operation, maintenance, upgrading or replacement of existing or new infrastructure; provided significant adverse effects on the high natural character and ecological values of the wetland are avoided, and other adverse effects are avoided, remedied, mitigated or offset.</p> <p>(4) Provide for infrastructure in, on, under or over the wetland management areas only where there is a functional or operational need to be in that location or traverse the area where there is no practicable alternative.</p>	

Table 3: Wetland Management Areas – a Qualifying Matter Options

Wetland Management Areas – a Qualifying Matter Options (Managed by RP rules) Evaluate option(s) – 1, 2 and 3	
<p>Evaluate option(s) - environmental, social, economic, cultural benefits and costs Sec 77K or Q (1) (b)</p>	<p>Option 1: NPSUD and MDRS zone but retain development controls related to coverage of identified Wetland and adjacent sites</p> <ul style="list-style-type: none"> • Wetlands managed by current Wetlands Management Area Overlay • Managed by Regional Plan rules • Potential assessment of environmental effects • Retains significant areas of Wetland • Supports objects of the RMA section 6 and AUP RPS • Supports Manu whenua in protection off the environment <p>Costs</p>

	<ul style="list-style-type: none"> • Changes not required given the location of wetlands • There is only one wetland site with a “non-open space” zoning this is a Light Industry zoned site any residential development to be managed via plan change process • Regional rules make any change out of scope • There are limited adjacent residential properties next to wetlands Any controls on adjacent property likely to be out of scope <p>Option 2: NPSUD and MDRS zone controls put in place without modification</p> <ul style="list-style-type: none"> • Identified Wetlands managed current by Wetlands Management Area Overlay • Align with existing regional planning rules and is the status quo option • Potential managed by assessment of environmental effects • Retains significant areas of Wetland • Supports objects of the RMA section 6 and AUP RPS • No Identified Wetlands in current urban residential zoning • Plan Change required to develop residential area in Light Industry in walkable catchments • Aligns with Mana whenua expectations • Aligns with NPSUD and MDRS zone controls <p>Option 3: NPSUD and MDRS zone controls put in place, changes made to strength D9 Significant Ecological Areas Overlay (and consequential changes made to D11: Outstanding Natural Character Overlay, E12. Land disturbance, E15. Vegetation management and biodiversity)</p> <ul style="list-style-type: none"> • Focus on avoiding loss of Wetlands Management Area Overlay • Meets objects of the Section 6: <i>Matters of National Importance</i> and RPS • Aligns with Manu-whenua • Limits the cumulative impact of the loss of Wetlands Management Area Overlay • Changes potential out of scope of project • Wetland Management Area overlay managed by Regional Planning rules which are out of scope • Changes the balance in the environmental assessment process • Changes in Overlay Objectives and Policies likely to be out of scope
<p>Overall judgement as to the better option (taking into account risks of acting or not acting)</p>	<p>Option 2 - is considered to be the best option</p> <ul style="list-style-type: none"> • It meets the objectives of the RMA (1991), section 6 (c) <i>Matters of National Importance</i> and the Auckland Unitary Plan RPS, objectives. • Aligns with the Regional Planning rules and is within scope • It provides for a “balanced” environmental assessment of Wetlands where the residential zoning allows for development, • It provides a sounder methodology for the management of the cumulative effect on Wetlands, and • Option 2 also provides for the broad application of the MDRS but allows for the Qualifying Matters of development controls.

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Issues

- The Wetlands has been identified as a qualifying matter in accordance with Clause 77I(a) of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The qualifying matter also relates to AUP Schedule 1: Schedule 1: Wetland Management Areas Schedule and Section 6, *Matters of National Importance (a) and (c)* and AUP RPS B7.2.
- Wetlands are managed under the AUP's – regional plan rules. As the proposed NPSUD and the MDRS only provides for changes to District Plan rules any changes to the Overlay would be out of scope. However D* Wetland Management Area Overlay remains a qualifying matter.
- The NPSUD and the MDRS zone rules will significantly increase development expectations. The NPSUD rules create a series 'walkable catchments' around: the city centre, metropolitan centres, rapid transport stops, town centres and selected local centres.
- These areas of walkable catchments, which can include Business Zoned areas, will allow for six storey and five stories developments and lead to a significant increases in residential expansion. The MDRS rules will cover the remainder of Auckland's urban residential zonings.
- Significantly the one non-open space wetland in the Auckland urban area, the Onehunga Springs wetland is sited in a Light Industry zone area at 43 Galway Street, Onehunga. This wetland site is within the Onehunga Town Centre walkable catchment.
- However, in this instance for residential development to occur on this site a plan change would be required. This would necessitate a full environment assessment of the wetland, and this would provide for the management and protection the wetland under the existing rules.
- It would also appear there would be limited impact from the development of adjacent properties and that could be managed through the management of adverse effects re these properties.
- The Qualifying Matter will seek to manage development expectations and provide a balance for any environmental assessment that is a precursor to such development.
- Not all wetland areas are managed under the D8: the Wetland Management Area Overlay. Auckland Council's RIMU undertakes a Terrestrial Biodiversity Monitoring Programme (TBMP) based on a network of 189 permanent plots located in wetlands across the region. This analysis of data from the wetland plot network focusses on wetland health. An analysis of wetland extent data is

currently underway. There are 91 wetland plots are located in Terrestrial SEA's a protected by the SEA provisions.

- The RIMU study in 2021 on the potential loss and/or degradation of urban wetlands reported the loss of 3.8% of existing wetlands over a six -seven-year period with the area of the RUB. This was considered by the studies' authors as a significant loss. However, making appropriate adjustments to wetland management is likely to be beyond the scope of this project.¹
- There is no proposed for changes to the NPSUD and MDRS zoning rules in relation to the Wetland Management Area Overlay and Qualifying matter and that the status quo option is preferred.
- There is no proposal to amendments to district level objectives and policies proposed in response to the MDRS/Policy 3. Three possible qualifying matter options have been canvassed, with Wetlands Option 2, the option determined as the best means for the ongoing management of Wetlands and meeting the objectives of the NPSUD and the MDRS. The will be no overall impact on housing supply and capacity in the relevant residential zones and Policy 3 areas.

Objectives and Policies (existing)

See RPS B7.3 Objectives and Policies and D8: Objectives and Policies as listed above

Development of Options

The MDRS / Policy 3 will be applied in part in relation to the qualifying matter. No alternative density controls or additional objectives or policies will be required in this instance.

Consequences for development potential

Development of a site enabled by the MDRS / Policy 3 would continue to be managed through an environmental assessment of the site. However, at this stage there are no scheduled wetlands sites that would be directly affected by the introduction of the NPSUD and MDRS zoning rules.

Evaluation of options

- Evaluate the options using a basic matrix as per below.

¹ Wetlands in Tāmaki Makaurau – Preliminary results, Dr G Griffiths and G Lawrence, Research and Evaluation Unit, RIMU 2022

- Evaluation needs to be in the context of the objectives of the MDRS and Policy 3, namely:

Objective 1

a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Objective 2

a relevant residential zone provides for a variety of housing types and sizes that respond to:

- i. housing needs and demand; and*
- ii. the neighbourhood's planned urban built character, including 3-storey buildings.*

- Note the qualifying matter does not need to be (re) justified. The evaluation is to focus on the extent to which the objectives of the MDRS / Policy 3 are met/not met by the qualifying matter and whether those 'costs' outweigh the benefits of applying the qualifying matter.

Table 4: Cost and Benefit Analysis of the three Options

Qualifying matter	Option 1 (retain & development a set of planning controls re coverage etc)	Option 2 (Status Quo)	Option 3
Costs of applying the QM – broader social, economic, environmental, cultural	<p>No change for urban development sites.</p> <p>A plan change required for residential development at Onehunga Springs wetland location – within the Onehunga walkable. (Low Cost)</p> <p>Additional layer of rules applied (High Cost)</p>	<p>No change urban development sites.</p> <p>Plan change required for residential development at Onehunga Springs wetland location within the Onehunga walkable. (Low Cost)</p>	<p>Requires review of wetland overlay provisions objectives and policies (High Cost)</p> <p>Part of existing Regional Plan rules so out of scope. (High Cost)</p> <p>Requires change to Regional Planning rules (High Cost)</p> <p>Possibility of unintended consequences (High Cost)</p>

Costs of applying QM – housing supply / capacity	Provides development further restrictions on identified and adjacent sites (High Cost)	Provide for NPSUD and MDRS zoning rules without additional rules (Low Cost)	Provides development further restrictions on identified and adjacent sites (High Cost)
Benefits of the QM – broader social, economic, environmental, cultural	Retains protection for wetlands (High Benefit) Provides for balance approach in impact assessment. (Low benefit) Aligns with Manu whenua kaitiakitanga (High Benefit)	Retains protection for wetlands (High Benefit) Wetlands protected by rules and locations. (High Benefit) Provide for NPSUD and MDRS zoning rules. (High Benefit) Provides for balance approach in environmental impact assessment. Low benefit) Allows for greater development expectations, (Low benefit) Aligns with Manu whenua kaitiakitanga (High Benefit)	Retains better protection for wetland (High Benefit) Focus on avoiding damage to wetland sites. Manages cumulative effect of development Aligns with Manu whenua kaitiakitanga High Benefit)

Preferred Option: Option 2:

- This provides for better management of site coverage in relation to the D8: Wetland Management Areas Overlay and it better able to manage development expectation.
- Can provide a level of protection to the unique biodiversity identified in the Wetland Management Areas Overlay and meet the requirements of RMA (1991), Section 6 Matters of National Importance (a).
- Aligns with Manu whenua kaitiakitanga expectations for wetland management.
- Impact on Policy 3 areas considered less than minor

Overall conclusion

Recommendation - Support the Adoption of Option 2, the status quo option. This provides for new NPSUD/MDRS zoning. The D8: Wetland Management Areas Overlay continues to align with Regional Plan rules. No addition rules are proposed in relation to tis Qualifying Matter. Overall impact on housing supply and capacity as a result of the Wetland Management Areas Overlay Qualifying Matter in relation Policy 3 areas is considered less than minor.

How will the MDRS be modified

NPSUD and MDRS rules will not need to be modified in this instance.

Information Used

1. Outline and refer to the list of reports, documents, evidence, plan versions et al that you used to help with the development of the plan change and assessment of the (these could be listed below in a table form)

Name of document, report, plan	How did it inform the development of the plan change
Wetlands in Tāmaki Makaurau – Preliminary results Dr G Griffiths, Senior Terrestrial Ecologist, G Lawrence, Spatial Researcher Research and Evaluation Unit, RIMU October 2021	Outlines the loss of wetlands and biodiversity within Auckland Council Rural Urban boundary.
Auckland Council's Terrestrial Biodiversity Monitoring Programme (TBMP)	Outlines the loss of wetlands and biodiversity within Auckland Council Rural Urban boundary.
The root causes of wetland loss in New Zealand: an analysis of public policies and processes. Denyer, K., Peters, M. (2020). National Wetland Trust.	

Consultation

1. This report cover RMA 1991, Section 6, Matters of National Importance

Schedule 1 of the Act sets out the relevant consultation requirements. Mana whenua have been engaged in the preparation of the IPI plan change at various stages in the process as required by Schedule 1 of the Act.

The Council provided an opportunity to the Auckland community to comment on its 'preliminary response' proposals during the period April 19 to May 9, 2022. While not specifically consulted on, submitters were overwhelmingly in favour of the continued protection Wetlands listed on AUP Wetlands Management Area Schedule 1 and their application as a qualifying matter. There is a clear consensus across otherwise conflicting submissions that the retention and protection of these places is of value to Tāmaki Makaurau Auckland.

2. Internal consultation with subject matter expert:

- Dr G Griffiths, Senior Terrestrial Ecologist, Research and Evaluation Unit
- G Lawrence, Spatial Researcher, Research and Evaluation Unit

Attachment 1: Spreadsheet Analysis of Wetlands

<U:\CPO\RLP\FC\LUP\UP MODIFICATIONS\PC078 – Intensification\02 Preparation\Qualifying Matters A-G\QMs options s32 table - 17 March 2022 - Wetlands 3.xlsx>