



# Proposed Plan Change 78 - Intensification (PC78)

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Proposed Plan Change 78 - Intensification to  
the Auckland Unitary Plan (Operative in part)

**Section 32 and section 77J / 77L new or additional qualifying matter:  
INFRASTRUCTURE – BEACHLANDS TRANSPORT CONSTRAINTS CONTROL  
EVALUATION REPORT**

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## Executive Summary

1. Council has identified a total of 2,414 sites in Beachlands that are subject to significant transport infrastructure constraints that will not be able to be addressed in the next 10 years. The purpose of the qualifying matter is to provide for an appropriate level of intensification within the constrained area, while achieving outcomes relating to well-functioning urban environments and quality compact urban form. In particular, intensification beyond that which can be met by the constrained transport network within and connecting to the identified Beachlands area is likely to generate adverse effects including:
  - Further exacerbation of the existing accessibility issues to employment, education and community services in the local area; and
  - without support from sufficient transport infrastructure and significant roading network upgrades, increased traffic congestion and air pollution as a result on reliance on private vehicle trips.
2. Beachlands is predominantly a car-reliant coastal settlement positioned on a peninsula. Although there are ferry and bus options these are limited and infrequent with capacity constraints. The Whitford-Maraetai Road is the only road connection to the wider regional destinations to the west and has limited capacity to accommodate additional traffic. Significant investment (including acquisitions) would be required to upgrade the road and the surrounding rural roading network.
3. The inability to provide new dwellings with adequate access to employment, education and community services, including by public and active transport is a significant resource management issue. Providing for the level of intensity anticipated by the Medium Density Residential Standards ('**MDRS**') and Policy 3 of the National Policy Statement for Urban Development ('**NPS-UD**') within the constrained Beachlands area does not align with Objective 1 of the NPS-UD which emphasises the importance of 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.
4. An options assessment identified three responses to this issue, with the recommended option being only the changes necessary to accommodate the qualifying matter. This is through the application of the Infrastructure – Beachlands Transport Constraints Control to land zoned Mixed Housing Urban and Low Density Residential. The qualifying matter control limits development to one dwelling per site as a permitted activity, and requires resource consent for development of two or more dwellings as a non-complying activity.
5. Analysis of the costs and benefits of the recommended option, and the impact it will have on development capacity identifies that the overall social and environmental benefits outweigh any economic loss as a result of reduction in yield. While limited, the recommended option provides for a degree of housing variety which is suitable for the likely demand in that area. This option achieves a well-functioning urban environment as it provides for a level of intensification that:

- is appropriate to the level of access to employment, education and community services; and
  - can be accommodated by the existing transport infrastructure and therefore supports reductions in carbon emissions.
6. An analysis of the proposed qualifying matter finds the recommended approach aligns with Objectives 1 and 2 of the NPS-UD and Objective 2.2.1(1) of the RPS.
  7. The recommended qualifying matter and its application through the Infrastructure – Beachlands Transport Constraints Control is both justified under the legislation, and strikes an appropriate balance with the growth aspirations of the NPS-UD.

## Introduction

8. This report is prepared as part of the evaluation required by Section 32 and Sections 77J and 77L of the Resource Management Act 1991 ('RMA') for proposed Plan Change 78 (PPC78) to the Auckland Unitary Plan (Operative in Part) (AUP(OP)).
9. The background to and objectives of PPC78 are discussed in the overview report, as is the purpose and required content of section 32 and 77J / 77L evaluations:
  - Sec 77J relates to evaluation steps for relevant residential zones
  - Sec 77L relates to evaluation steps for the application of s77(j).
10. This report discusses the implications of applying transport constraints in Beachlands as a qualifying matter to the MDRS of Schedule 3A of the RMA and the implementation of Policy 3 of the NPS-UD. This report also evaluates the provisions which have been included in PPC78 relating to the Infrastructure – Beachlands Transport Constraint Control.
11. In summary, the Beachlands Transport Constraint is a necessary qualifying matter to be included in PPC78 to justify limiting further residential intensification in areas subject significant transport infrastructure constraints. This is considered necessary to achieve:
  - the overarching objective of the NPS-UD for well-functioning urban environments which enable people and communities to provide for their social, cultural, economic and environmental wellbeing and health and safety; and
  - RPS objectives seeking to provide for quality compact urban environments.
12. 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 only to the extent necessary to accommodate 1 or more of the qualifying matters listed in 77I.

## Integrated evaluation for existing qualifying matters

13. For the purposes of PPC78, evaluation of the Infrastructure – Beachlands Transport Constraints Control as a new or additional qualifying matter has been undertaken in an integrated way that combines sections 32 and 77L requirements. The report follows the evaluation approach described in the table below.
14. The preparation of this report has involved the following:
  - assessment of the AUP(OP) to identify any relevant provisions that apply to this qualifying matter

- development of draft amendments to the operative district plan provisions of the AUP(OP) to implement this matter as a Qualifying Matter in accordance with s77J and s77L
- review of the AUP(OP) to identify all relevant provisions that require a consequential amendment to integrate the application of this qualifying matter
- review of the AUP(OP) Maps to assess the spatial application of this qualifying matter
- section 32 options analysis for this qualifying matter and related amendments

15. The scale and significance of the issues is assessed to be minor.

16. This section 32/77L 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.

**Table 1 Integrated approach**

Standard sec 32 steps	Plus sec 77J / 77L steps for existing qualifying matter
<p><b>Issue</b></p> <p><b>Define the problem- provide overview/summary providing an analysis of the qualifying matter</b></p>	<p>Sec 77J or 77P</p> <p>Describe the qualifying matter.</p> <p>Identify by location (for example, by mapping) where an existing qualifying matter applies.</p> <p>Identify the specific characteristic that makes the level of development provided by the MDRS (as specified in Schedule 3A or as provided for by policy 3) inappropriate in the area</p>
<p><b>Identify and discuss objectives / outcomes</b></p>	<p>Sec 77J and 77L</p> <p>Identify relevant RPS objectives and policies. Describe why the Council considers that 1 or more existing qualifying matters apply to the identified areas and why the qualifying matter is necessary.</p> <p>Justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD</p>
<p><b>Identify and screen response options</b></p>	<p>Sec 77J and 77L</p> <p>Consider a range of alternative density standards or methods for these areas having considered the particular MDRS standards and/or Policy 3 intensification requirements.</p>

	Site by site analysis that evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter
<b>Collect information on the selected option(s)</b>	<p>Sec 77J and 77L</p> <p>Assess the impact that limiting development capacity, building heights or density as relevant will have on the provision of development capacity.</p> <p>Site by site analysis that evaluates an appropriate range of options to achieve the greatest heights and densities permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 while managing the specific characteristics.</p>
<b>Evaluate options – costs for housing capacity</b>	<p>Sec 77J and 77L</p> <p>Assess the costs and broader impacts of imposing the limits on development capacity.</p>
<b>Evaluate option(s) - environmental, social, economic, cultural benefits and costs</b>	<p>Sec 77J and 77L</p> <p>Provide an assessment of the benefits and costs of the options in the light of the new objectives introduced by the NPS-UD and MDRS relating to well-functioning urban environments.</p>
<b>Selected method / approach</b>	<p>Sec 77J and 77L</p> <p>Describe how the preferred approach to implementing the qualifying manner is limited to only those modifications necessary to accommodate the qualifying matter; and how the qualifying matter is applied.</p>
<b>Overall judgement as to the better option (taking into account risks of acting or not acting)</b>	<p>Conclusion as to the implications of the qualifying matter for development capacity to be enabled by NPS-UD/MDRS in the areas where the qualifying matter applies.</p>

## Issues

The overarching issue to be addressed is how to incorporate MDRS and give effect to Policy 3 of the NPS-UD, while achieving a well-functioning urban environment and a quality compact urban form.

### **Beachlands transport constraints as a qualifying matter**

17. The Beachlands Transport Constraint Control qualifying matter to be accommodated in the Auckland Council's intensification planning instrument is an 'other qualifying matter; in terms of section 771(j) of the RMA. This provides that "any other matter that makes higher density, as provided for by the MDRS or Policy 3 inappropriate in an area" may be a qualifying matter provided that section 77L of the RMA is satisfied. This evaluation report will demonstrate how section 77L has been satisfied.

The Beachlands Transport Constraints Control is proposed to be included as a qualifying matter in PPC78 due to the significant constraints in addressing gaps in transport infrastructure provision to that area. A map showing the location and spatial application of the proposed control is provided in **Appendix 1**.

18. Under the AUP(OP), the predominant zoning in Beachlands is the Residential – Single House Zone (SHZ). There is a small localised area of Residential – Mixed Housing Suburban zone (MHS) and Residential – Terraced Housing and Apartment Buildings zone (THAB) adjacent to the Pine Harbour Marina. Additional zonings include small pockets of Business – Light Industrial zone; Business – Neighbourhood Centre zone; and Business – Local Centre zone.
19. As discussed in the relevant s32 evaluation, it is generally proposed to replace the SHZ with the Residential – Mixed Housing Urban zone (MHU) and the Residential – Low Density Residential zone ('LDR') in the urban environment. As discussed in the relevant s32 report, these zones are identified as relevant residential zones which are subject to the intensification policies provided for under Schedule 3A of the RMA and the NPS-UD.
20. It is proposed to apply the Infrastructure – Beachlands Transport Constraint Control across all land zoned MHU and LDR within the Beachlands area. It is proposed that one dwelling per site is enabled as a permitted activity. Two or more dwellings will require resource consent as a non-complying activity. An objective and policy are proposed to support this activity status for these activities, seeking to avoid intensification in areas where there is a significant transport constraint which is not able to be readily addressed.
21. The Control is not proposed to be applied to the THAB zone or any of the identified business zones. This is because these zones are only applied to small areas of land and it is considered the increase in growth from enabling MDRS and providing for Policy 3 on these land parcels can be accommodated within the existing transport infrastructure capacity.

### **Overview of the constraint / qualifying matter**

22. Beachlands is predominantly a car-reliant coastal settlement positioned on a peninsula. Although there are ferry and bus options these are limited and infrequent with capacity



constraints (discussed further below). Residents currently travel outside of Beachlands for the majority of employment, education and community service opportunities.

23. If PPC78 was applied to the Beachlands area with no qualifying matters, it is estimated the overall increase in yield from the AUP(OP)(OP) could be an additional 18,788 dwellings (with a total of 21,202 dwellings possible). There are however limited education, shopping or employment options due to limited land supply and other infrastructure servicing in the area. Accordingly, it is expected that residents would continue to travel outside of Beachlands to access those opportunities.

#### *Roading networks*

24. The Whitford-Maraetai Road is the only road connection to the wider regional destinations to the west and has limited capacity to accommodate additional traffic and is expected to reach capacity prior to the development of additional dwellings that could be enabled under the NPS-UD. Significant investment (including acquisition of private land) and major upgrades / improvement projects to the Whitford-Maraetai Road corridor would be required to accommodate potential growth. The existing rural road network surrounding Beachlands would require upgrades to urbanise the network to cater for this potential plan enabled demand from housing growth in the area. This cost is estimated to exceed \$200 million and is currently unbudgeted for.

#### *Ferries*

25. The existing ferry service operating out of Pine Harbour Ferry Terminal runs between Pine Harbour and Auckland City Centre. The terminal currently caters for ferries with a capacity for 98 people, per sailing and prior to Covid (2020) was running close to capacity. The terminal could provide for ferries catering for up to 150 seats, however this would only provide an increase of 48 seats. Weekend services are not currently available and services on Monday to Friday operate:
- every 20mins between 6.20am – 10.20am and 3.20pm – 5.20pm
  - every 40-60mins until 7pm.
  - a 7.30pm service and a 8.30pm service on Friday only.
26. To provide for the level of increase in ferry capacity that is likely to be required from additional housing development, funding of a new ferry terminal site in the vicinity of the current Pine Harbour marina area would be required. As an initial estimate, for a proposed development in 2019 for 1,500 – 2,000 dwellings found costs to develop a new ferry terminal to be between \$10 million and \$13 million for the required infrastructure and dredging requirements. It is anticipated that costs would be significantly higher to cater for an additional 18,788 dwellings that could be enabled under PPC78 with no qualifying matter applied. Proposed growth would require a number of new vessels of 150 plus seated capacity which would incur further capital investment and operational costs. An increase in demand would require an increase in service frequency which would increase operating costs by approximately 25% - 40%. These capital and operating costs are currently unbudgeted.

#### *Bus*

27. The current bus service is a local service 739. This service operates on a limited frequency and hours of operation. This service is being provided more for general accessibility reasons rather than mode shift / reducing vehicle traffic. In May 2019, prior to the Covid pandemic, the bus had low patronage, averaging 8.6 boardings per hour Monday to Friday. Currently the Ministry of Education provides school bus services to Howick College from the Beachlands / Maraetai area.

*Walking and cycling*

28. There is an existing footpath and road network for pedestrian and cycle movement within the Beachlands area. However, given the geographical location, walking and cycling is not a practical form of transport to areas outside Beachlands.

*Feasibility of improving capacity*

29. It is considered that costs to improve public transport infrastructure in Beachlands for an additional 18,788 dwellings will be significant. Additionally, it is anticipated that there will be little benefit in return from this investment given difficulties in addressing accessibility to employment, education and community services in the local area.

30. The delivery of programmes and projects to reduce the presence and extent of water and wastewater servicing constraints in Auckland is currently prioritised and aligned to Council's growth expectations as outlined in the Auckland Plan 2050 and the AUP(OP). The risk of not securing funding to improve transport infrastructure is considered high given the number of other high priority projects competing for funding and which are anticipated to generate greater benefits regionally.

31. Overall, given the significant transport infrastructure costs, minimal benefit and high risk associated with improvements, it is considered unfeasible to address the capacity constraints within Beachlands within the next 10 years (being the lifetime of the AUP(OP)).

32. It is considered that applying the proposed MHU and LDR zones to Beachlands without the transport related qualifying matter would result in significant adverse effects on traffic congestion and on the existing public transport network.

33. These outcomes would not align with Policy 1 of the NPS-UD which seeks planning decisions to contribute to well-functioning urban environments and to align with Objective B2.2.1(1) of the RPS which seeks a quality compact urban form, for the following reasons:

- Limited land supply, geographical location and significant cost of improving infrastructure impede the ability to achieve good accessibility to jobs and community services, including by way of public or active transport; and
- The lack of realistic funding to provide for improved public transport infrastructure to support growth will not support reductions in greenhouse gas emissions due to increased traffic congestion and contributions to air pollution; and
- The significant cost of improvements with little return on benefit due to limitations described above will result in inefficient use of infrastructure.

## Objectives and Policies (existing)

34. The AUP(OP)(OP) does not provide a framework of objectives and policies that specifically supports the qualifying matter. However, spatial application of the operative SHZ does generally support the qualifying matter. The application of the SHZ in Beachlands is directed by the RPS Objective B2.4.1(1) and (3) and Policies B2.4.2(6).

### *B2.4.1. Objectives*

*(1) Residential intensification supports a quality compact urban form.*

*(3) Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification.*

### *B2.4.2 Policies*

*(6) Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.*

35. In this instance, the SHZ is consistently applied to those sites which have poor access to employment, education, community services and where improvements to existing transport capacity cannot be reasonably achieved prior to, or at the same time as, residential intensification. The SHZ then enables one dwelling per site as permitted activity and development of two or more dwellings requires resource consent as a non-complying activity.

## Development of Options

36. As discussed in the s32 report Geospatial, Policy 3 has been achieved in Beachlands through retaining THAB zone and replacing the SHZ with MHU where appropriate. The LDR zone has been applied to address other qualifying matters as discussed in relevant s32 reports elsewhere.

37. Three options were evaluated in considering how to manage the potential adverse effects as a result of significant transport constraints in the Beachlands area while incorporating MDRS and giving effect to Policy 3:

- **Option 1:** Status Quo – incorporate MDRS and give effect to Policy 3 (retain THAB and rezone all other residential land to MHU) but do not provide a framework for addressing the qualifying matter
- **Option 2:** Incorporate MDRS, give effect to Policy 3 (retain THAB and rezone all other residential land to MHU and LDR zones as appropriate) and apply the transport qualifying matter over all residential and business zoned land
- **Option 3 (preferred option):** Incorporate MDRS, give effect to Policy 3 (retain THAB and rezone all other residential land to MHU and LDR zones as appropriate) and apply a qualifying matter over all residential MHU and LDR zoned land.

## Consequences for development potential

38. The following table provides a comparison of the activity status for dwellings as proposed by the Infrastructure – Beachlands Transport Constraints Control qualifying matter with the current AUP(OP)(OP) activity status and that proposed in MHU and LDR zones under PC78.

**Table 2: Comparison between AUP(OP)(OP), NPS-UD and proposed qualifying matter**

<b>Zone- Current AUP(OP)</b>	<b>Activity Status – Current AUP(OP)</b>	<b>Activity Status – MDRS and NPS-UD Policy 3</b>	<b>Activity Status – Beachlands Transport Constraints QM</b>
<b>Single House</b>	Permitted – one dwelling per site	N/A	N/A
	Non-complying – two or more dwellings per site	N/A	N/A
<b>Low Density Residential</b>	N/A	Permitted – one dwelling per site	Permitted – one dwelling per site
	N/A	Restricted Discretionary – two or more dwellings per site	Non-complying – two or more dwellings per site
<b>Mixed Housing Urban</b>	Permitted – up to three dwellings per site	Permitted – up to three dwellings per site	Permitted – one dwelling per site
	Restricted Discretionary – four or more dwellings per site	Restricted Discretionary – four or more dwellings per site	Non-complying – two or more dwellings per site

Zone- Current AUP(OP)	Activity Status – Current AUP(OP)	Activity Status – MDRS and NPS-UD Policy 3	Activity Status – Beachlands Transport Constraints QM
<b>Chapter E38: Subdivision - Urban</b>	Restricted Discretionary – Subdivision of sites identified in the Subdivision Variation Control (minimum net site area (NSA) of 800m <sup>2</sup> )	MHU – Controlled  LDR – Restricted Discretionary (with approved land use consent)  LDR - Restricted Discretionary (vacant lot less than 1ha with minimum NSA of 600m <sup>2</sup> )  LDRZ – Discretionary (vacant lot 1ha or greater with minimum average NSA 600m <sup>2</sup> )	Discretionary – vacant site minimum NSA 600m <sup>2</sup>  Non-complying – vacant site minimum NSA less than 600m <sup>2</sup>

39. A total of 2,414 sites will be subject to the proposed qualifying matter. Modelling has demonstrated that under the current AUP(OP) provisions, a total of 2,844 dwellings is achievable. Whereas, if all SHZ land was rezoned to MHU and no qualifying matters were applied (including LDR), a total of 21,202 dwellings would be achievable.
40. As demonstrated, the proposed qualifying matter will apply the AUP(OP) density limits to those areas zoned MHU and LDR. For the small area of land currently zoned MHU, this will effectively reduce the development potential of these properties from what can be achieved under the AUP(OP). While the land proposed to be rezoned to MHU will be able to achieve 11m heights instead of the operative 8m height, this is offset by the non-complying activity status for two or more dwellings.
41. The qualifying matter is not proposed to be applied to the THAB zone or any of the business zones. However, given the location outside a walkable catchment, it is anticipated that there will be no change in development potential from the business zones as the operative provisions are considered to already give effect to Policy 3d.
42. The THAB zoned land will experience a marginal increase in development potential as a result of incorporating MDRS and proposed changes to the THAB zone as set out in the relevant s32 report. However, at a local scale this increase in development potential is offset by the reduction in development potential available to the existing MHU land and restrictions on development through application of the qualifying matter to proposed MHU and LDR zoned land.

43. There will be a considerable impact on the overall development potential achievable within the Beachlands area as a result of the proposed qualifying matter. However, as described above, it is considered that there is limited return in terms of benefits from providing for growth in Beachlands given that the geographic location (being a coastal settlement positioned on a peninsula) and limited land supply hinders the ability to achieve good accessibility to employment, education and community services.

## **Evaluation of options**

44. The following section evaluates the overall efficiency and effectiveness of the identified options in managing the potential adverse effects in a manner that achieves the NPS-UD while being consistent with AUP(OP) Regional Policy Statement (RPS).

45. The most relevant objectives of the NPS-UD which relate to MDRS and Policy 3 and which provide the context of this evaluation include:

### *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.*

46. Part 2 of the RPS sets out the objectives and policies relating to 'Urban growth and form' which the provisions of the AUP(OP) are required to achieve. Objectives B2.2.1(1) provides an appropriate lens through which to evaluate the identified options:

*B2.2.1(1) A quality compact urban form that enables all of the following:*

*(a) a higher-quality urban environment;*

*(b) greater productivity and economic growth;*

*€ better use of existing infrastructure and efficient provision of new infrastructure;*

*(d) improved and more effective public transport;*

(e) greater social and cultural vitality; .....and

(g) reduced adverse environmental effects.

<b>Qualifying matter</b>	<b>Status Quo - incorporate MDRS and give effect to Policy 3 (retain THAB and rezone all other residential land to MHU) but do not provide a framework for addressing the qualifying matter</b>	<b>Option–2 - Incorporate MDRS, give effect to Policy 3 (retain THAB and rezone all other residential land to MHU and LDR zones as appropriate) and apply the transport qualifying matter over all residential and business zoned land</b>	<b>Option 3 – Incorporate MDRS, give effect to Policy 3 (retain THAB and rezone all other residential land to MHU and LDR zones as appropriate) and apply a qualifying matter over all MHU and LDR zoned land.</b>
<b>Costs</b>			
<b>Costs of applying QM – housing supply / capacity</b>	<b>No cost</b> The transport qualifying matter would not be applied, therefore there would be no restriction to development.	<b>High cost</b> Significantly reduces development potential to the small area of THAB zoned land which has capacity to intensify due to limited area and proximity to the ferry terminal. Minor cost to business zoned land which is unlikely to provide for significant numbers of dwellings.	<b>High Cost</b> Reduces the overall development potential of the Beachlands area from what could be achieved under Option 1, but provides a moderate increase from what can be achieved under the AUP(OP) of approximately an additional 430 dwellings.
<b>Costs: Social</b>	<b>High Cost</b> Residential intensification is achieved with a good variety of housing types but with constrained access to jobs, education, shopping and community services such that people are not able to provide for their social, cultural and economic wellbeing.	<b>Modera–e - Low cost</b> Intensification is maintained at a level appropriate to existing infrastructure capacity which maintains levels of accessibility to jobs, education, shopping and community services so that people and communities can continue to provide for their wellbeing.  However, ability to provide for a range of housing types is hindered due to restrictions on THAB and Business zones.	<b>Low cost</b> Intensification is maintained at a level appropriate to existing infrastructure capacity which maintains levels of accessibility to jobs, education, shopping and community services so people can provide for their wellbeing.  Development is able to provide for a range of housing types through exclusion of THAB and Business zoned land from the qualifying matter.
<b>Costs: Economic (not otherwise)</b>	<b>High Cost</b>	<b>High Cost</b>	<b>High Cost</b>

<b>Qualifying matter</b>	<b>Status Quo - incorporate MDRS and give effect to Policy 3 (retain THAB and rezone all other residential land to MHU) but do not provide a framework for addressing the qualifying matter</b>	<b>Option–2 - Incorporate MDRS, give effect to Policy 3 (retain THAB and rezone all other residential land to MHU and LDR zones as appropriate) and apply the transport qualifying matter over all residential and business zoned land</b>	<b>Option 3 – Incorporate MDRS, give effect to Policy 3 (retain THAB and rezone all other residential land to MHU and LDR zones as appropriate) and apply a qualifying matter over all MHU and LDR zoned land.</b>
<b>covered by housing capacity issues)</b>	Increased cost of fuel and vehicle maintenance to a larger number of individuals and households as a result from commuting. Loss of productivity from time spent in traffic.	Loss of economic gain from development and temporary employment opportunities associated with construction of dwellings.	Loss of economic gain from development and temporary employment opportunities associated with construction of dwellings, although loss will be less than Option 2 as some intensification is provided for in the THAB and Business zones.
<b>Costs: Environmental</b>	<b>High Cost</b> Increased traffic congestion and pollution due to insufficient public transport infrastructure to support intensification in an area with limited opportunity for employment and education.	<b>Low Cost</b> No increase to traffic congestion and pollution as existing public transport infrastructure capacity is sufficient to support the local community.	<b>Low Cost</b> Negligible increase to traffic congestion and pollution as existing public transport infrastructure capacity is sufficient to support the local community.
<b>Benefits</b>			
<b>Benefits of the – M - social</b>	<b>Low Benefit</b> Increased housing supply and variety of housing to meet demand, however offset but constrained accessibility to employment, education and community services.	<b>Low Benefit</b> Provides accessibility due to sufficient public transport capacity but does not prove for a variety of housing types and limited opportunity business or community services growth to support local community.	<b>High Benefit</b> Provides for a level of housing variety which is suitable for likely demand and opportunity for business or community service growth to support local community and improve local accessibility. Generally, accessibility remains high due to sufficient public transport capacity.
<b>Benefi–s - economic</b>	<b>Moderate Benefit</b> Likely to generate economic gains from construction of	<b>Low Benefit</b> No economic gains due to reduced development capacity across the area.	<b>Moderate – Low Benefit</b> Marginal economic gains from enabling intensification to occur in



<b>Qualifying matter</b>	<b>Status Quo - incorporate MDRS and give effect to Policy 3 (retain THAB and rezone all other residential land to MHU) but do not provide a framework for addressing the qualifying matter</b>	<b>Option–2 - Incorporate MDRS, give effect to Policy 3 (retain THAB and rezone all other residential land to MHU and LDR zones as appropriate) and apply the transport qualifying matter over all residential and business zoned land</b>	<b>Option 3 – Incorporate MDRS, give effect to Policy 3 (retain THAB and rezone all other residential land to MHU and LDR zones as appropriate) and apply a qualifying matter over all MHU and LDR zoned land.</b>
	dwelling. However, this is offset by potential reductions in productivity due to increased traffic congestion and low accessibility.		the THAB zone and not applying the qualifying matter to the business zones.
<b>Benefits – environmental</b>	<b>Low Benefit</b> The significant increase in traffic congestion, air pollution and poor accessibility for the local community will inhibit realisation of any real built or natural environmental benefits	<b>Moderate Benefit</b> Existing level of accessibility is retained and the capacity of the existing public transport infrastructure network is sufficient to support the local community. There is no increase in traffic congestion or air pollution due to restrictions on development.	<b>Moderate Benefit</b> Opportunity to improve accessibility through not applying the qualifying matter to THAB and business zoned land. Negligible increase in traffic congestion and air pollution as the capacity of the existing public transport infrastructure network is sufficient to support the local community.

## Analysis

47. Option 1 is able to achieve the intensification anticipated under the NPS-UD and provides the greatest variety and choice of housing. However, given it is considered unfeasible to improve transport infrastructure to support the level of anticipated intensification, this option would not achieve a well-functioning urban environment for the following reasons:
- intensification would exacerbate accessibility issues to employment, education and community services in the local area; and
  - without sufficient public transport infrastructure, the increase in traffic congestion and air pollution as a result on reliance on private vehicle trips would not align
  - the existing roading network connecting Beachlands with the wider Manukau area would require significant upgrading to safely and efficiently accommodate a significant increase in trip generation which is unbudgeted for.
48. The social and environmental costs outweigh any marginal economic benefits (which are offset regardless due to travel costs borne by individuals and loss of productivity from time

lost in congestion). Option 1 is not considered the most appropriate option for achieving the NPSUD while providing quality compact urban form outcomes.

49. Option 2 does not achieve the objectives of the NPS-UD as it restricts intensification beyond what is necessary in terms of transport capacity. This option maintains development capacity at a level which can be accommodated by the existing transport infrastructure network and therefore supports management of environmental effects and maintains accessibility to employment, education and community services. However, it does not provide for the effective use of existing transport infrastructure and it excludes the ability for people to access a variety of housing types. Overall, it is considered that Option 2 is not the most appropriate option for achieving the NPS-UD while providing quality compact urban form outcomes.
50. Option 3 enables a level of intensification that can be accommodated within the capacity of the existing transport infrastructure network. While limited, this option provides for a degree of housing variety which is suitable for the likely demand. This option achieves a well-functioning urban environment and aligns with quality compact urban form outcomes as it provides for a level of intensification that:
- is appropriate to the level of access to employment, education and community services; and
  - can be accommodated by the existing public transport infrastructure and therefore supports reductions in carbon emissions.
51. Overall, Option 3 is considered the most appropriate option for achieving the NPS-UD while providing for quality compact urban form outcomes.
52. Option 3 is the preferred option.

#### **Risks or acting or not acting.**

53. The risk of not acting is considered significant due to the likely adverse effects of traffic congestion and accessibility limiting the ability of people and communities to provide for their social, cultural and economic wellbeing and health and safety. The risk of acting is considered low given Option 3 will achieve the mandatory NPS-UD objectives by providing a sufficient level of variety to meet likely demand and supporting a well-functioning urban environment.

#### **Effectiveness and efficiency**

54. The proposed qualifying method is effective and efficient in implementing the objectives of the IPI and relevant parts of the RPS because it provides strong policy direction in terms of addressing effects of development on areas subject to significant transport infrastructure constraints. The spatial application of the qualifying matter enables a level of intensification that can be accommodated within the capacity of existing public transport infrastructure and provides opportunities to address accessibility to employment and community services.

#### **Description of how the qualifying matter is to be implemented**

55. As described in paragraphs 18 to 19 above, it proposed that the new qualifying matter is to be incorporated into the AUP(OP)(OP) via a new overlay titled "Infrastructure – Beachlands

Transport Constraints Control". The overlay will be applied to the MHU and LDR zones located in the Beachlands area.

56. An objective, policy and activity are proposed for both the MHU and LDR zones. In both zones, the objective and policy seek to avoid intensification in areas subject to significant public transport constraint. This will be supported through activities enabling one dwelling per site as a permitted activity and requiring two or more dwellings to obtain resource consent as a non-complying activity. All other incorporated and proposed standards apply as set out in the s32 report on the residential and business zones.

### **Overall conclusion**

57. The purpose of the Infrastructure – Beachlands Transport Constraints Control as a qualifying matter is to provide for a level of intensification while achieving outcomes relating to well-functioning urban environments and quality compact urban form, particularly:

- Maintaining accessibility to employment, education and community services in the local area; and
- Minimising adverse effects on traffic congestion and air pollution as a result on reliance on private vehicle trips.

58. The social and environmental benefits are considered to outweigh the reduction on development capacity from what could be achieved if no qualifying matter was applied.

59. An analysis of the proposed qualifying matter finds the recommended approach aligns with Objectives 1 and 2 of the NPS-UD and Objective 2.2.1(1) of the RPS.

60. Accordingly, the recommended qualifying matter and the manner in which it is applied is both justified under legislation and will manage the effects of intensification proposed by PC78 to provide a well-functioning urban environment.

## Appendices

- Appendix 1 – Sites subject to the proposed Infrastructure – Beachlands Transport Constraints Control

## 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)

<b>Name of document, report, plan</b>	<b>How did it inform the development of the plan change</b>
<b>Auckland Regional Land Transport Plan 2021 – 2031</b>	Understanding the current funding priorities and to ascertain the level of risk associated with reallocating funds to improve public transport in Beachlands.
<b>Statement of Evidence of Nicholas Jon Roberts on Behalf of Auckland Council Planning – Residential Zones 9 September</b>	Understanding the rationale behind the AUP(OP)(OP) zoning strategy.
<b>Review of previous submissions/applications for intensification in and around the Beachlands area</b>	Understanding the receiving environment and existing capacity constraints to assist in defining the problem.

## Consultation

1. Which section of RMA
2. Level of consultation undertaken with community and stakeholder engagement
3. Consultation with Mana whenua / iwi authorities
4. Internal consultation with relevant subject matter experts

## **Appendix 1 – Sites subject to the proposed Infrastructure – Beachlands Transport Constraints Control**

