

REQUEST FOR PRIVATE PLAN CHANGE

25-May-2020

520-522 GREAT SOUTH ROAD & 21 GATLAND ROAD
PAPAKURA

SECTION 32 ASSESSMENT REPORT

PREPARED FOR:
520 Great South Road Limited

B&A

Urban & Environmental

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1.0 THE APPLICANT AND PROPERTY DETAILS

To:	Auckland Council (Attention: <u>Craig Cairncross</u>)
Site Address:	520 Great South Road, 21 Gatland Road & 522 Great South Road
Applicant's Name:	520 Great South Road Limited
Address for Service:	Barker & Associates Ltd PO Box 1986 Shortland Street Auckland 1140 Attention: Rachel Morgan
Legal Description:	Refer to Certificates of Title as Appendix 2
Site Area:	4.6268 Hectares
AUP Zoning:	Future Urban Zone
Brief Description of Proposal:	Private Plan Change request to rezone 4.6268 hectares of land in Papakura from Future Urban zone to Mixed Housing Urban.

2.0 EXECUTIVE SUMMARY

520 Great South Road Limited (the Applicant) is seeking to rezone their site at 520 Great South Road and the adjoining sites at 522 Great South Road and 21 Gatland Road. The Plan Change area is within the Future Urban zone under the Auckland Unitary Plan – Operative in Part (AUP) and the Applicant is seeking to amend this to Mixed Housing Urban, consistent with the Council’s Drury-Opāheke Structure Plan.

The Future Urban Land Supply Strategy 2017 (FULSS) states that the Plan Change area will be ‘development ready’ in 2028-2032, which the Drury-Opāheke Structure Plan also applies to the site. The FULSS is a non-statutory document and is a high-level staging plan for Auckland’s future urban areas. Despite this, the more detailed analysis undertaken as part of this proposal supports the early release of the Plan Change area for development. The reasons for this are summarised as follows:

- The Plan Change area is contiguous with the existing urban area and development can be serviced by existing infrastructure, open space and social facilities.
- The surrounding road network can operate safely and efficiently with the rezoning in place, there is existing public transport serving the Plan Change area and development of the site would not preclude any future transport upgrades.
- There are no notable environmental constraints within the Plan Change area that would preclude urban development.
- The proposed zoning is consistent with Council’s Drury-Opāheke Structure Plan and development of the Plan Change area would not preclude the achievement of quality built outcomes on adjoining Future Urban zoned land.
- The area is market attractive for development given that there are motivated developers involved who want to commence construction as soon as possible.
- The likely yield of approximately 113 dwellings is small and is unlikely to have a discernible impact on the uptake of land for development within the existing urban area.
- Iwi are being consulted on the Plan Change and the outcome of these discussions will inform future development.
- The Government has now committed to funding and bringing forward key roading and public transport projects in the wider Drury area that will overcome the transport constraints that have led to a delayed release of land within this area.

For these reasons, and in the context of the staging criteria set out in Appendix 1 of the FULSS and Appendix 1 of the Regional Policy Statement (RPS), in our view, the proposal is consistent with sound resource management practice and Part 5 of the Resource Management Act (RMA). Therefore the Council can accept the Plan Change for processing.

Further, in our opinion, the proposed rezoning of the Plan Change area to Mixed Housing Urban and the early release of land for development:

- is the most appropriate way to achieve the purpose of the RMA and the proposal would give effect to the Regional Policy Statement (s32)(1)(a)).
- gives effect to the relevant National Policy Statements and the Regional Policy Statement (s75).
- is appropriate given that the actual and potential effects of the rezoning and associated rules on the environment would be acceptable and any adverse effects would be less than minor (s76(3)).
- Supports the integrated management of the use and development of land (s31).

3.0 INTRODUCTION

3.1 BACKGROUND

The Plan Change area has been recently rezoned from Rural Plains under the former Papakura District Plan to Future Urban under the AUP and is within the Rural Urban Boundary (RUB). The Future Urban zone is applied to land identified as being suitable for urbanisation. It is a transitional zone that enables mostly rural activities and some other types of activities, subject to scale and related impacts, until such time as a Structure Plan is prepared and a Plan Change is undertaken to apply an urban zoning.

The FULSS shows the Plan Change area and surrounding Drury/Opāheke areas as being 'development ready' in 2028-2032. The reasons provided in support of this timeframe focus on the bulk infrastructure required to service the wider area, including the Southern Interceptor, resolution of complex flooding issues in Opāheke and major transport projects. None of these projects are required to service the Plan Change area as detailed in the report below.

The Council released the Drury-Opāheke Structure Plan in August 2019, which shows the Plan Change area and surrounding areas as Mixed Housing Urban zone. In relation to staging, the Structure Plan refers to the reasoning set out the FULSS and does not provide any additional analysis or reasoning in support of that view.

Within this context, the proposed Plan Change builds on the analysis already undertaken by the Council and proposes an urban zoning consistent with its own Structure Plan for the area.

3.2 ACCEPTING THE PLAN CHANGE REQUEST (CLAUSE 25)

The Council has discretion to accept or reject a Plan Change request in accordance with Clause 25 of Schedule 1 of the Resource Management Act 1991 (RMA), subject

to the matters set out in Clause 25(4)(a)-(e). Given that the AUP has now been operative for more than two years, the Council is able to reject the Plan Change request only on the following grounds:

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

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

‘Sound resource management practice’ is not a defined term under the RMA, however, previous case law suggests that the timing and substance of the Plan Change are relevant considerations. This requires detailed and nuanced analysis of the proposal that recognises the context of the Plan Change area and its specific planning issues.

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

- The proposed zoning is consistent with that shown in Council’s own Structure Plan for Drury/ Opāheke.
- While the proposed timing of the rezoning differs from Council’s current proposed staging set out in the FULSS, the more detailed technical analysis undertaken as part of this proposal demonstrates that there is no planning reason for preventing development occurring earlier.
- All necessary statutory requirements have been met, including an evaluation in accordance with S32¹ with supporting evidence, and consultation with affected iwi is on-going.
- The proposed Plan Change is considered to be consistent with the sustainable management purpose of the RMA as discussed in the report below.

The RPS places a strong emphasis on delivering integrated urban development in Future Urban areas (B2.2.1(5) and B2.2.2(7)). There may be concern that allowing rezoning of the Plan Change area to occur ahead of the timing indicated in the FULSS would be a piece-meal approach that risks poorly integrating with surrounding development. We agree that this would be the case if the Plan Change area were located centrally within the Future Urban zone, relied on inter-related infrastructure upgrades or pre-determined land use or connections to adjoining Future Urban

¹S32 of the RMA

zoned sites. That is not the case here. The Plan Change area is contiguous with the urban area, is bounded by existing and proposed roads and the land use is consistent with Council's Drury-Opāheke Structure Plan. The Plan Change area can be serviced, and the urban design analysis at **Appendix 5** demonstrates that a development on the subject land would successfully integrate with the surrounding Future Urban area.

In relation to (c), given that the Plan Change area has been identified for residential use in the Council's Structure Plan, then the proposed zoning would not in our view be inconsistent with Part 5.

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

4.0 SITE LOCATION AND DESCRIPTION

4.1 SITE DESCRIPTION

The Plan Change area is situated between the centres of Papakura and Drury, approximately 3km south of the Papakura Metropolitan Centre. The Plan Change area includes the Future Urban zoned land bounded to its west by existing residential subdivisions and Great South Road, to its north and east by Papakura South Cemetery, and to the south by rural lots not located within the RUB and, primarily used for horticulture and pasture.

The Plan Change area is 4.63 hectares and is comprised of three separate lots, being:

- 520 Great South Road, Lot 2 DP 172553;
- 522 Great South Road, Lot 1 DP 172553; and
- 21 Gatland Road, Lot 16 DP 43579.2.

The majority of the Plan Change area is currently used for pasture but features three existing residential dwellings and a commercial building at 520 Great South Road.

The Plan Change area is located within 2km of motorway interchanges at Papakura and Drury, and within 2.5km of the existing Papakura Train Station which features a 230 space 'park and ride' facility. The Council's Drury-Opāheke Structure Plan indicates that a future train station will be located at Drury and in January 2020 the Government confirmed the funding of this station as well as the electrification of the railway from Papakura to Pukekohe. This future train station would be located approximately 2km from the Plan Change area.

The certificates of title for the sites are included at **Appendix 2**. There are consent notices registered on 520 and 522 Great South Road relating to stormwater, but this relates to previous subdivision and would not impede future development.

The Plan Change area is shown in Figure 1 below.



Figure 1: Showing the location of the Plan Change area.

4.2 SURROUNDING AREA / LOCAL CONTEXT

Great South Road and Gatland Road (as they pass the Plan Change area) are best characterised as peri-urban, with both urban and rural features fragmented throughout. Urban development, in the form of residential subdivision, gradually extends south along the Great South Road corridor between Papakura and Drury. There are a range of architectural styles present and can be associated with successive phases of urban development since the 1960s.

With the exception of a handful of small parks, rural businesses and Park Estate School the surrounding area is dominated by low-intensity residential uses. The nearest neighbourhood centre is located approximately 1.5km north of the Plan Change area on Edinburgh Avenue, while larger areas of employment such as Drury or the Papakura Industrial area are located 2-3km away from the Plan Change.

5.0 DESCRIPTION OF THE PLAN CHANGE REQUEST

5.1 DESCRIPTION OF THE PROPOSAL

This Plan Change seeks to rezone 4.6268 ha of land from Future Urban zone to Mixed Housing Urban zone (MHU) as shown in Figure 2 below.

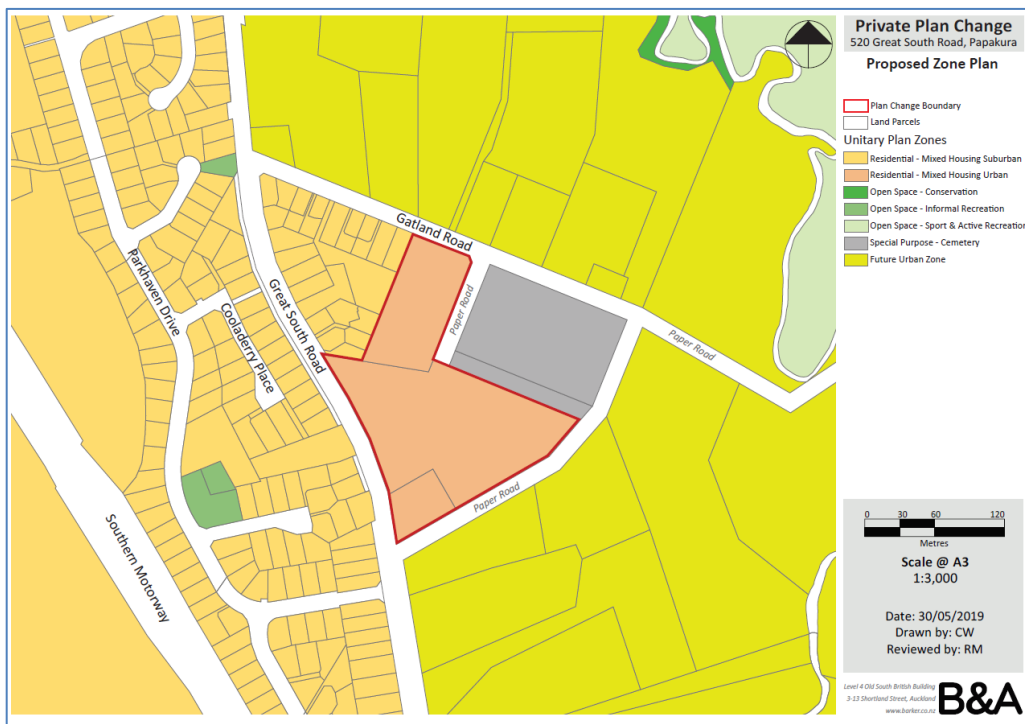


Figure 2: Showing the proposed zoning of the Plan Change area.

The proposed zoning would allow for higher density residential living, subject to a future resource consent process. The proposed zoning would provide urban living that increases housing capacity and choice in a location that is accessible to public transport.

No open space zoning is proposed given that the Plan Change area is within 600m of the Suburban Park on Opaheke Road, and within 100m of the Neighbourhood Park on Drumkean Place. This accords with the Council’s Open Space Provision Policy 2016.

All relevant Auckland-wide and zone rules would apply to future development within the Plan Change area, and no site-specific controls or overlays are considered necessary. This is the policy intent of precincts under the AUP. In this regard we note that the AUP sets out a clear hierarchy of provisions in A1 – Introduction. The purpose of precincts is to “enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling”². In a greenfield context, these place-based provisions relate to specific environmental features that development needs to respond to, and which are justified following a s32 analysis. This approach does not support the use of precincts to provide a greater or lesser degree of regulation than the zone or Auckland-wide provisions, unless there are

² Refer A1.6.5 of the AUP.

clear place-based reasons for doing so, which are different to other parts of the region.

The Plan Change area is a relatively small greenfield area that adjoins the existing urban area. Therefore, a spatial framework for development exists and the Auckland-wide and zone provisions can be relied upon to achieve a quality built environment. Reliance on these provisions also enables the Plan Change area to develop to a scale and intensity which is broadly consistent with areas of similar zoning patterns across the region.

In tandem with this Plan Change request, the Applicant is progressing a resource consent to develop the site for approximately 103 lots. This resource consent has been prepared using the Mixed Housing Urban zone as the basis for assessment, in addition to the Auckland-wide rules, including subdivision, transport and the natural environment provisions. The outcome is a high-quality design that is consistent with the AUP policy framework. This serves to illustrate the point that place-based provisions for this relatively small site are not warranted in this case.

In relation to stormwater, The Plan Change proposes to apply the Stormwater Management Area – Flow 1 controls to the site, which is consistent with the recommendations of the Stormwater Management Plan prepared by Tonkin & Taylor. With the SMAF1 controls in place, the following process would apply. No place-specific precinct provisions are considered necessary as these would be assessed through future resource consent processes with reference to the SMP approved through this Plan Change and a particular development proposal.

Stage 1: Plan Change

- SMP provisionally agreed with Healthy Waters.
- Assesses effects of additional run-off at a high level and confirms the toolbox of approaches available to mitigate effects.

Stage 2: Resource Consents

- Effects of additional run-off are assessed in detail and with reference to a particular development proposal.
- Mitigation measures are confirmed and appropriate consents are sought if required.

Activities	Assessment Matters	Relationship with Council's NDC
Stormwater discharge: E8	Refer to Schedule 4 of Council's NDC or the objectives and policies in E1.	SMP adopted in Council's NDC or private stormwater discharge consent (SDC) sought.
Subdivision: E38	See E38.3 and Policies 17, 20 and 22 in particular. Effects on stream health considered.	Consistency with an approved NDC or SDC required (Policy 22)
New/redeveloped impervious area SMAF1: E10	Policy E10.3(1), (2) and (3); and (b) policy E1.3(1), (2), (3), (4), (5), (8) and (9) in E1 Water quality and integrated management. Effects on stream health considered.	SMAF1 confirmed as BPO in Plan Change SMP.
Stormwater quality: E9	See E9.4.1.	Council's NDC covers additional treatment requirements.
Buildings: H5	Compliance with maximum impervious area. Demonstrate that the site can be serviced.	Any increase in impervious area above what the zone allows would require assessment.

Note that if works are identified as being required to mitigate the effects of additional stormwater discharge, this would require resource consent at the same time that the additional impervious area is being created, i.e. assessed at subdivision or land use consent stage, whichever comes first, and prior to any vesting of stormwater assets and riparian margins.

5.2 PURPOSE AND REASONS FOR THE PLAN CHANGE

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

The purpose of the Plan Change, or the objective of the Plan Change, is to apply an urban residential zoning to 4.6268 hectares of Future Urban zoned in Papakura, consistent with the Council's Drury-Opāheke Structure Plan.

The reason for this Plan Change request is that the applicant, who is the majority owner of the Plan Change area, and intends to develop their landholdings in a manner consistent with the proposed zoning framework, which this Plan Change request will enable.

This report provides an assessment of effects of the rezoning proposal and an evaluation of the Plan Change prepared in accordance with Section 32 of the RMA. Supporting expert assessment reports are appended to this report. The evaluation of Plan Change concludes that the proposed rezoning of the Plan Change area is the most appropriate way to achieve the purpose of the RMA, as outlined in Section 9.

6.0 POLICY FRAMEWORK

6.1 NATIONAL POLICY DOCUMENTS

Section 74(1)(ea)³ states that a Territorial Authority must prepare and change its District Plan in accordance with a national policy statement, a national planning standard and any regulations. Section 75(3)(a)-(ba)⁴ states that a District Plan must give effect to any National Policy Statement or National Planning Standard.

6.1.1 National Policy Statement on Urban Development Capacity

The National Policy Statement on Urban Development Capacity 2016 (NPS UDC) came into effect on 1 December 2016. It recognises the national significance of urban environments and provides direction to decision-makers on planning for urban environments. The NPS UDC seeks to ensure there is sufficient development capacity for housing and business with a suite of objectives and policies to guide decision-making in urban areas. There is an emphasis on integrated planning of land use, development and infrastructure provision.

Policy PA1 sets out housing and business land development capacity that local authorities are required to provide in the short, medium and long-term.

Enabling an additional 113 dwellings to be constructed would contribute to increased housing supply in Papakura and the Plan Change area would be developed in an integrated way. Notwithstanding this, the scale of the development is small relative

³ RMA

⁴ RMA

to the wider Papakura/Drury area and a detailed assessment of the impacts of this proposal on the housing market is not required.

6.1.2 The National Policy Statement on Urban Development – Discussion Document

In August 2019 the Ministry for the Environment released a discussion document on the proposed National Policy Statement on Urban Development (**NPS – Urban Development**). The NPS – Urban Development will replace the NPS on Urban Development Capacity. The discussion document contains objectives and policies that require councils to carry out long term planning to accommodate growth and ensure well-functioning cities. There is an emphasis on allowing for growth ‘up’ and ‘out’ in a way that contributes to a quality urban environment, and to ensure their rules do not necessarily constrain growth. Councils’ must also enable higher density development in areas close to employment, amenity, infrastructure and demand.

Of particular relevance to this Plan Change is the proposal to include a policy direction that will direct local authorities in major urban centres in their jurisdiction to consider plan change requests for urban development in locations that are out of sequence where development will support good urban outcomes, environmental effects could be adequately managed and the costs of development can be met.

While not yet having statutory effect, the Plan Change is consistent with the policy direction within the discussion document. The Plan Change provides for an increase in housing supply in close proximity to a funded future train station with delivery anticipated in the next five years. The Plan Change will support good urban outcomes as the proposed rezoning and associated rules is likely to have positive effects on the quality of the built environment, and development within the Plan Change area will integrate well with the wider Drury area. As outlined in Section 11 the Plan Change will not adversely affect the environment as any effects can be appropriately mitigated.

6.1.3 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2011 (NPSFM) sets a national policy framework for managing freshwater quality and quantity. The NPSFM was updated in August 2017 to incorporate amendments from the National Policy Statement for Freshwater Amendment Order 2017. The amendments came into effect on 6 September 2017 and include provisions that seek to improve fresh water quality with a target to increase the proportion of rivers and lakes suitable for primary contact to 90 per cent by 2040.

The AUP provisions regarding lakes, rivers and streams (E1 and E3) give effect to this NPS and any future development within the Plan Change area would need to comply with those provisions. The Urban Design Report at **Appendix 5** and the Stormwater

Management assessment at **Appendix 7** demonstrates that a future development within the Plan Change area would not adversely affect existing waterways on the site.

6.1.4 National Planning Standards

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

6.1.5 National Environmental Standards

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

- NES for Air Quality;
- NES for Sources of Drinking Water;
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health.

These NES documents are not considered relevant for this rezoning proposal given the proposed land uses. The existing activities within the Plan Change area, being residential and farming are unlikely to trigger any requirements under the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.

6.1.6 Discussion Document – Valuing Highly Productive Land

In August 2019 the Ministry for the Environment and the Ministry for Primary Industries released the proposed National Policy Statement for Highly Productive Land (**NPS – HPL**). The purpose of the proposed NPS-HPL is to improve the way that highly productive land is managed under the RMA. It does not provide absolute protection of highly productive land, but rather it requires local authorities to proactively consider the resource in their region or district to ensure it is available for present and future primary production. The proposal does not impact on existing urban areas and land that councils have identified as future urban zones in district plans. Further, the majority of sites in the Plan Change area are used for pastoral farming, commercial or countryside living and are not in productive use.

As the Plan Change area is currently within the Future Urban Zone the draft policies are not proposed to apply.

6.2 MANAGEMENT PLANS AND STRATEGIES

Section 74(2)(b)(i)⁵ states that a Territorial Authority must have regard to any management plans and strategies prepared under other Acts. In this case, the relevant plans include the Auckland Plan 2050 and the FULSS 2017, which are considered below.

6.2.1 Auckland Plan 2050

The Auckland Plan is the key strategic document which sets the Council's social, economic, environmental and cultural objectives. A key component of the Auckland Plan is the Development Strategy which sets out how future growth will be accommodated up to 2050. The Auckland Plan focusses new development in existing urban areas and provides for 'managed expansion' in future urban areas. This managed expansion is with reference to structure planning processes. As noted above, this Plan Change, while not strictly consistent with the timing for development set out in the Drury-Opāheke Structure Plan, nevertheless delivers integrated and managed development.

In terms of the form of development, the Auckland Plan takes a quality compact approach to growth and development. The Auckland Plan defines this as⁶:

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

In relation to the first two points, the development is within walking distance of suburban and neighbourhood parks and public transport is available immediately adjoining the site on Great South Road. The proposed MHU zoning supports maximising the efficient use of land, and development can be serviced by existing infrastructure.

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

⁵ RMA

⁶ Auckland Plan 2050, pg. 206.

6.2.2 Future Urban Land Supply Strategy 2017

The council's Future Urban Land Supply Strategy, refreshed in July 2017, implements the Auckland Plan and gives effect to the NPS UDC by identifying a programme to sequence future urban land over 30 years. The strategy relates to greenfield land only and ensures there is 20 years of supply of development capacity at all times and a seven-year average of unconstrained and ready to go land supply. 'Ready to go' land is land with operative zoning and bulk services in place.

As noted above, the FULSS identifies the Plan Change area as being development ready in 2028-2032. The FULSS is a non-statutory document and the publicly available analysis that informed the staging as part of the 2017 Refresh was high level, and reflects the broad-brush nature of the staging proposed.

It is appropriate in our view to consider an alternative staging proposal on its merits through the Plan Change process. To inform this Plan Change a detailed analysis of bringing forward the release of the Plan Change area to enable urban development now has been undertaken against the staging principles in Appendix 1 of the FULSS 2017. This is included as Appendix 10 to this report. To summarise however, the location of the Plan Change area adjoining the urban area, the fact it can be serviced and that development can integrate well with the surrounding area, supports enabling development now. As for more strategic considerations and priorities, the development enabled by the Plan Change is small scale (113 lots) and is unlikely to impact urban development capacity and more strategic decisions about the sequencing of development in Future Urban areas.

It is also important to note that the Drury-Opaheke Structure Plan has been approved by the Council and the Government has committed to funding key infrastructure in Drury since the FULSS applied the current staging to the site. In particular in January 2020 the Government committed funding to wider public transport and roading infrastructure projects within Drury. These projects will overcome many of the transport constraints that lead to the current staging of development within the FULSS.

6.3 IWI ENGAGEMENT

All of the Iwi who have an interest within the area were contacted regarding the Plan Change proposal to see if they wished to engage. The following Iwi groups expressed an interest in the proposal:

- Ngati Te Ata;
- Ngai Tai Ki Tamaki;
- Ngati Tamaoho.

A hui on-site was undertaken on 8 July 2019. The Iwi confirmed that they did not have issues with the rezoning proposal but would like to engage further as the development progresses. An on-site hui for the resource consent proposal is currently being set up and we will advise on the outcome of this.

7.0 REGIONAL POLICY STATEMENT AND PLANS

Section 75(3)(c)⁷ states that a District Plan must give effect to any Regional Policy Statement and Section 75(4)(b)⁸ states that a District Plan must not be inconsistent with a Regional Plan for any matter specified in Section 30(1)⁹.

7.1 REGIONAL POLICY STATEMENT

The RPS provides the policy framework guiding development in Auckland. It sets out the resource management issues and the policies to achieve integrated management of the region's natural and physical resources.

Of particular relevance to this Plan Change are the provisions in Chapter B2 of the RPS relating to urban growth and form. There is strong direction to provide for Auckland's growing population in an integrated manner within the metropolitan area as defined in Appendix 1A of the RPS. There is an emphasis on the need to provide for integrated land use, development and the provision of infrastructure, along with direction to avoid urbanisation without carrying out a structure planning exercise first. Appendix 1 of the RPS sets out the structure planning guidelines which are to be followed when undertaking a structure planning exercise.

Overall, in our view, the proposal is consistent with this integrated approach to managing development in Future Urban areas, given that development of the Plan Change area can be serviced by existing infrastructure and can integrate successfully with the adjoining existing urban and future urban areas. The zoning is consistent with the land use shown for the Plan Change area in the Drury-Opāheke Structure Plan and enabling development ahead of the surrounding area will not compromise the ability of that land or supporting infrastructure to establish.

A comprehensive assessment of the proposed rezoning against the relevant objectives and policies of the RPS are provided at **Appendix 4**. This demonstrates that the proposed rezoning will give effect to the RPS.

⁷ RMA

⁸ RMA

⁹ RMA

7.2 REGIONAL PLAN

The Auckland Regional Plan provisions control the use of land for the purpose of soil conservation, water quality and managing natural hazards. There are no particular environmental constraints within the Plan Change area relating to soils, water or natural hazards that would impact rezoning as set out in Section 8 of the report below.

Development within the Plan Change area will be regulated by the Auckland-wide provisions within the AUP, which will ensure the effects of development on the natural environment will be appropriately managed and will achieve the objectives and policies of the Regional Plan.

7.3 OTHER PLANS

7.3.1 Drury-Opāheke Structure Plan and Supporting Growth Transport Network

In accordance with Policy B2.2.2(3) of the Regional Policy Statement, the proposed Plan Change has been prepared following the preparation of a Structure Plan that accords with the Structure Plan Guidelines at Appendix 1 of the AUP.

The Council's Drury-Opāheke Structure Plan has been in development for over two years. The Council has consulted with the public on the Structure Plan on three occasions:

- Issues and opportunities – September 2017;
- Draft land use plan – October 2018;
- Draft Structure Plan – April 2019.

The Council's Drury-Opāheke Structure Plan applies to the greater Drury- Opāheke as illustrated in **Figure 3**. The total area is about 1921 ha. It includes: Opāheke in the north east, Drury in the south east, and part of Karaka sometimes referred to as Drury West. It adjoins Drury Creek - Pahurehure Inlet and Te-Manuka-O-Hoturoa (Manukau Harbour). It is bisected by State Highway 1 (SH 1), the North Island Main Trunk Line railway, and Transpower's transmission lines. Land use is predominantly rural including countryside living and some business uses. The existing Drury village is located near the middle but is not part of the Drury – Opāheke structure planning area. The Drury-Opāheke Structure Plan 2019 was reported to, and adopted by Auckland Council's Planning Committee on Tuesday 6 August 2019.

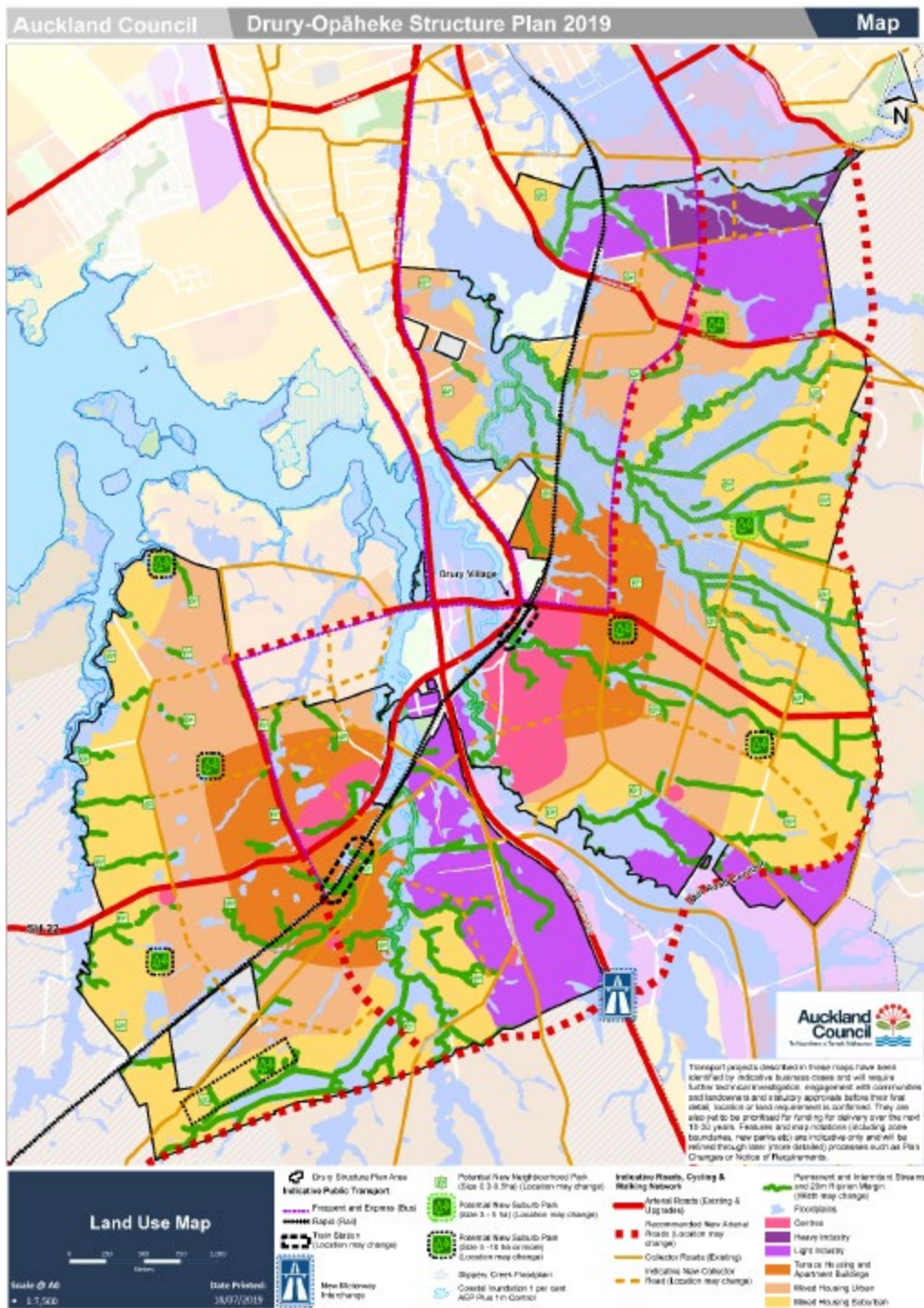


Figure 3: Auckland Council Drury-Opāheke Structure Plan.

The proposed rezoning is consistent with this vision and the key outcomes for Drury sought in the draft Structure Plan given that it would enable higher density residential development immediately adjacent to public transport and within easy walking distance of open space and amenities. The Plan Change area is close to

existing employment areas at Drury Village and Papakura, both of which are accessible by public transport.

The Plan Change area is within the school zones for Drury School (primary & intermediate) and Rosehill College and given the scale of development proposed, the rezoning is unlikely to significantly impact the capacity of these schools.

Preferred Transport Network

As part of the Drury-Opāheke Structure Plan, the Supporting Growth Alliance has prepared an Integrated Transport Assessment (ITA) and identified a preferred transport network for Drury. In relation to the Plan Change area, the preferred network shows Great South Road as an 'Existing Arterial'. It notes that frequent and express buses could operate on Great South Road in the future, which would enhance the accessibility of the Plan Change area.

The ITA recommends Great South Road to be sequenced first and progressively upgraded over time, with bus priority to enable frequent bus services initially, with further improvements occurring as parallel routes are developed to increase overall north-south capacity¹⁰. There is scope within the existing Great South Road cross section adjoining the Plan Change area to accommodate an urban arterial upgrade and rezoning the subject land earlier than currently planned would not prevent this occurring in the future.

Summary

The Plan Change is consistent with the Drury-Opāheke Structure Plan. Releasing the Plan Change Area for development is consistent with the vision and key outcomes sought for Drury given the proximity of the Plan Change area to public transport, open space, amenities and employment. Existing infrastructure can service the Plan Change area therefore development is not contingent on future upgrades to the transport network. Where future upgrades are planned to Great South Road, these can be implemented with the zoning in place.

8.0 ASSESSMENT OF ENVIRONMENTAL EFFECTS

Section 76¹¹ states that in making a rule, the territorial authority must have regard to the actual or potential effect on the environment of activities including, in particular, any adverse effect. This section details the actual and potential effects that the Plan Change provisions may have on the environment. This assessment is based on analysis and reporting undertaken by various experts, which are attached as appendices to this report.

¹⁰ Refer to pg. 120 of the ITA.

¹¹ RMA

In this case, the rules of the Plan Change relate to those of the MHU zone. The effects of these rules and the corresponding Auckland-wide rules are considered below.

8.1 QUALITY BUILT ENVIRONMENT

An urban design assessment has been prepared by Barker & Associates¹² (refer **Appendix 5**). This report has undertaken detailed site analysis and outlined an indicative masterplan for the Plan Change area and surrounding area. It also provides high level lot testing and analyses whether the design-based rules of the MHU zone are the most appropriate means to achieve a quality built environment.

This urban design assessment assists in defining the likely effects of the rezoning on the quality of the built environment and the extent to which the proposed rezoning, and associated rules, give effect to the quality built environment and residential amenity objectives of the RPS (B2.3 and B2.4).

In assessing the actual and potential effects of the proposed rezoning on the quality of the built environment, we make the following comments, informed by the urban design assessment:

- **Quality of the built environment:** The existing residential development that adjoins the Plan Change area to the west and the south is generally low density and presents a lower quality frontage to the street. Applying the MHU zone provisions to the Plan Change area provides the opportunity to enhance the visual quality of the existing environment through new development, which is a positive effect of the proposed rezoning. The lot testing set out in 4.3 of the urban design assessment¹³ demonstrates that the high quality and varied housing types envisaged for the MHU zone can be achieved within the Plan Change area.
- **Responding to intrinsic qualities:** The urban design assessment sets out the environmental conditions of the Plan Change area in detail and the site masterplan at 4.3¹⁴ and shown in Figure 3 below demonstrates how future development within the Plan Change area is able to respond to these conditions effectively. This includes retaining the existing stream, transitioning density to existing residential boundaries and optimising the location of roads to achieved an integrated street pattern.

¹² Appendix 5: Urban Design Statement: Private Plan Change Request – Great South Road, Papakura prepared by Barker and Associates 14 June 2019

¹³ Appendix 5: Urban Design Statement: Private Plan Change Request – Great South Road, Papakura prepared by Barker and Associates 14 June 2019

¹⁴ Appendix 5: Urban Design Statement: Private Plan Change Request – Great South Road, Papakura prepared by Barker and Associates 14 June 2019



Figure 4: Showing an indicative masterplan for the Plan Change area (refer to page 24 of the urban design assessment¹⁵).

- **Amenity effects on neighbours:** The Future Urban zone currently applying to the Plan Change area allows buildings up to 15m in height, provided they are setback 12m from any side boundary. Under the MHU zone, the height limit is 11m and buildings would need to comply with the Mixed Housing Suburban (MHS) zone height in relation to boundary control. For those sites in the MHS zone that immediately adjoin to the west, while the density of buildings allowed within the Plan Change area would be greater, their amenity would be appropriately managed through the MHU zone standards with respect to height, height in relation to boundary and outlook.
- **Safety of site, street & neighbourhood:** Applying the MHU zone to the Plan Change area would ensure that future development contributes to the safety of the site, street and neighbourhood. This is achieved by requiring resource consent for multi-unit development, which would be assessed against matters that encourage buildings to address the street and provide an appropriate degree of activation and surveillance to it¹⁶. Taking into account the design of existing

¹⁵ Appendix 5: Urban Design Statement: Private Plan Change Request – Great South Road, Papakura prepared by Barker and Associates 14 June 2019

¹⁶ Refer to H5.8.2(2)(c) of the Mixed Housing Urban zone.

dwelling, this is likely to result in development that enhances the safety of the street & neighbourhood beyond what currently exists in the surrounding area.

- **Quality of future street and block patterns:** The indicative masterplan for the Plan Change area clearly illustrates that future development can deliver a safe and legible street layout within the Plan Change area. In addition to this, the indicative neighbourhood masterplan prepared at 4.1 of the urban design assessment¹⁷ and shown in Figure 4 below demonstrate that this indicative street network within the Plan Change area can successfully integrate with the wider neighbourhood.



Figure 5: Showing how development within the Plan Change area can integrate successfully with the likely form of surrounding development in the future.

For the reasons outlined above, in our opinion, the proposed rezoning is likely to have **positive effects** on the quality of the built environment, and development within the Plan Change area will integrate well with the wider neighbourhood.

8.2 OPEN SPACE, AMENITIES AND SOCIAL FACILITIES

In establishing the potential effects on the amenity of future residents resulting from the rezoning, it is relevant to consider whether those residents would have access to existing or planned open space and amenities, including local shops and schools. This

¹⁷ Appendix 5: Urban Design Statement: Private Plan Change Request – Great South Road, Papakura prepared by Barker and Associates 14 June 2019

assessment is necessary in the context of objectives B2.7.1(1), B2.8.1(1) and B2.5(1) of the RPS that seeks to provide for the recreational, social and commercial needs of people and communities.

With respect to open space, the Council's Open Space Provision Policy 2016 is a key guiding document. In relation to the MHU zone the policy states:

- Neighbourhood Parks should be within a 400m walk in high and medium density residential areas, are typically between 0.3 to 0.5 ha and typically include play space and flat 'kick a ball' space.
- Suburb parks should be within a 1km walk of high and medium density residential areas, are typically between 3 – 5 ha and typically include provision for organised sport and recreation.

Opaheke Reserve is a 41 ha suburban park that has been recently developed with sportsfields. The facility is within 600m of the Plan Change area. The neighbourhood park on Drumkeen Place is within 100m of the Plan Change area and is approximately 4000m². It provides play facilities and green space. Consistent with the Council's Open Space Provision Policy, no additional open space is required to support the proposed rezoning of the Plan Change area.

In relation to social facilities, the Plan Change area is within approximately 1.5km of the existing Drury Centre and 3km of the Papakura Metropolitan Centre. Both are accessible by bus services on Great South Road. The closest local shop is located approximately 200m to the south of the Plan Change area, although the site is not zoned as a Neighbourhood Centre. Given this, the local day-to-day needs of residents would be met within walking distance of the Plan Change area. Larger commercial and community facilities would be available within a short bus ride or moderate walking distance.

The urban design assessment¹⁸ has identified the need for a new Neighbourhood Centre within the wider neighbourhood. While this is not in our view required to support the rezoning of the Plan Change area, it should be considered when rezoning the surrounding Future Urban zone.

With respect to schools, Drury School and Pinehill College are within a moderate walking distance of the Plan Change area (1.5km – 1.9km) or a short bus ride. The scale of development enabled is unlikely to significantly impact on the capacity of these schools.

In summary, the surrounding open space, amenities and social facilities located close by, are accessible by active and public modes of transport, and are of a sufficient size

¹⁸ Appendix 5: Urban Design Statement: Private Plan Change Request – Great South Road, Papakura prepared by Barker and Associates 14 June 2019

to cater for the social and cultural needs and well-being of future residents of the Plan Change area.

8.3 TRANSPORT

The effects of the proposed rezoning on the safety and efficiency of the transport network have been considered in detail in the transport assessment prepared by Traffic Planning Consultants (TPC)¹⁹ (refer **Appendix 6**).

The Plan Change area has frontage to Gatland Road and Great South Road. An unformed paper road currently sits on the eastern boundary of the Plan Change area. Great South Road is an Arterial Road and any access from it would require resource consent in the future under E27 Transport of the AUP as part of a future development.

For the purpose of the transport assessment, TPC has assumed that there would be a single access to Great South Road that connects through the Plan Change area to Gatland Road and that the Plan Change provides capacity for approximately 113 dwellings. TPC also assume that widening of Great South Road outside of the Plan Change area will occur to provide for a dedicated right turn pocket into the Plan Change area. The detailed design and location of this would be determined through a future resource consent process under E27 Transport. We note that this approach for assessment was accepted by Council and Auckland Transport as part of Plan Change 8 to the AUP (Kings College).

Vehicle access to Great South Road via the unformed paper road has been discounted as an option given the potential for traffic conflicts with Parkhaven Drive.

Based on TPC's analysis, we make the following comments:

- The modelling results show that a future access to Great South Road can operate safely and efficiently with minimal delay and queueing.
- In relation to Gatland Road, the modelling results show that the intersection would continue to operate satisfactorily, noting that the existing right turn from this intersection is challenging given the restricted visibility to the south. We note that future residents would have the option of using a new access to Great South Road to make this right turn as an alternative.
- The Plan Change area is accessible to public transport and the ITA prepared for the Drury-Opāheke Structure Plan indicates that this is likely to increase in time, particularly as the Government has now confirmed funding for the

¹⁹ Appendix 6: Transport Assessment: Proposed Rezoning of land at 520/522 Great South Road and 21 Gatland Road, Papakura prepared by Traffic Planning Consultants Ltd

Drury Central Train Station and the electrification of rail between Papakura and Pukekohe.

For the reasons set out above, the adverse effects of the proposed rezoning on the safety and efficiency of the surrounding transport network are considered to be ***less than minor***.

8.4 FLOODING, STORMWATER MANAGEMENT & ECOLOGY

Tonkin & Taylor has prepared a stormwater management plan²⁰ to assess the effects of the proposal in relation to water quality and natural hazards (refer **Appendix 7**).

Tonkin & Taylor conclude that based on the results of the flood modelling, the peak flows generated by a future development within the Plan Change area are able to be passed forward without attenuation given that the peak flows would discharge into the main catchment streams before the peak flows from the greater catchment arrive. This means that that the downstream flood risk can be appropriately managed given that the timing of the peaks does not coincide. Notwithstanding this, given the small-scale nature of the proposal, the increased peak flow would be negligible compared with the greater catchment peak. The effects of passing flows forward on neighbouring sites, including 91 and 95 Gatland Road will need to be considered in more detail as noted in the SMP.

In addition to this, a range of methods are proposed to treat stormwater and mitigate potential flooding effects. These are set out in Table 8.1 of the Tonkin & Taylor report²¹ and are consistent with the requirements of the Council's Network Discharge Consent and the objectives and policies in B7 and E1 of the AUP.

The Tonkin & Taylor report²² notes the presence of a potential intermittent or permanent stream at the northern edge of the Plan Change area. This has been taken into account in the indicative masterplan shown in Figure 3 above. A stream assessment has been carried out as part of the resource consent process. Regarding the potential for stream erosion as a result of the increased stormwater runoff, the existing Plan Change area has been assessed by Tonkin & Taylor as presenting low or no erosion risk at the discharge point into Slippery Creek and there will only be a minimal increase in erosion risk during low frequency storm events. Further, the SMAF 1 hydrological mitigation will reduce flows and reduce the stream erosion risk further.

²⁰ Appendix 7: 520 Great South Road - Stormwater Management Plan prepared by Tonkin and Taylor

²¹ Appendix 7: 520 Great South Road - Stormwater Management Plan prepared by Tonkin and Taylor

²² Appendix 7: 520 Great South Road - Stormwater Management Plan by Tonkin and Taylor

In our view, the Tonkin & Taylor report demonstrates that the potential adverse effects of the rezoning on flooding downstream and on water quality will be *less than minor*.

The specific mitigation measures would be considered as part of the resource consent process via the certification requirements of the Council's regional Network Discharge Consent. In our view, it is appropriate to enable this assessment in the context of a particular development proposal.

8.5 INFRASTRUCTURE & SERVICING

Bluebarn Engineers have prepared an infrastructure report²³ detailing how the Plan Change area can be serviced (refer **Appendix 8**). In summary:

- There are no restrictions on the capacity of the water supply network and development within the Plan Change area can connect to the existing network.
- Power and telecommunications can be readily extended to service the Plan Change area.
- The Plan Change area can be served with a gravity connection to the existing wastewater network. Where future lots will be below the level necessary for a gravity connection, Veolia has advised that an on-site pump station would be required in preference to a low-pressure system with individual booster pumps for the affected lots. Subject to these requirements, wastewater infrastructure is available to service the Plan Change area.

Based on this analysis, development of the Plan Change area can connect efficiently to existing infrastructure networks and development does not rely on more comprehensive upgrades to the network.

8.6 GEOTECHNICAL

ENGEO has undertaken a geotechnical investigation²⁴ of the Plan Change area to confirm that it is suitable for urban development (refer **Appendix 9**). ENGEO conclude that the Plan Change area is generally suitable for residential development subject to specific recommendations to be implemented as part of future design and subdivision.

The report confirms that the Plan Change area is not subject to erosion, significant subsidence, falling debris, slippage or inundation by soil or rocks. Further,

²³ Appendix 8: 520 Great South Road, Papakura – Engineering Infrastructure Report prepared by Blue Barn Consulting Ltd

²⁴ Appendix 9: Geotechnical Investigation: 520 Great South Road, Papakura prepared by ENGEO

development within the Plan Change area is not likely to worsen, or result in material damage to the land provided that proper engineering practices are followed. These will be addressed in detail as part of future consenting processes. Further, more detailed assessments will be undertaken as part of the resource consent process.

Subject to ENGEO's findings, the ground conditions of the Plan Change area are favourable for urban development and the potential adverse effects of rezoning and allowing development on the land will be *less than minor*.

8.7 SUMMARY OF EFFECTS

In summary, the actual and potential effects of the proposed rezoning on the environment arising from the rules contained in the MHU zone and Auckland-wide provisions are appropriate for the following reasons:

- The MHU zone is likely to support an improvement in the amenity and safety of the neighbourhood compared with the existing situation.
- The MHU zone appropriately maintains the amenity of adjoining sites.
- A development within the Plan Change area under the MHU zone and Auckland-wide transport & urban subdivision provisions would integrate well with the existing and likely future surrounding road network.
- The existing open space network and nearby centres & schools would provide for the recreational, social and day-to-day needs of future residents and are accessible by active and public modes of transport.
- The adverse effects of a future development on the safety and efficiency of the existing transport network would be less than minor and the Auckland-wide transport and urban subdivision provisions appropriately manage the design and layout of access to and within the Plan Change area.
- The adverse effects of rezoning and developing the Plan Change area on flooding downstream would be less than minor given the small scale of the area and the timing of discharges relative to the wider catchment.
- There is infrastructure available to service the Plan Change area and the proposed rezoning will not adversely affect the ability of the Council to efficiently provide infrastructure to existing areas.
- The ground conditions of the Plan Change area are suitable for urban development and the potential adverse effects of developing the Plan Change area on the land would be less than minor.

9.0 SECTION 32 ANALYSIS

9.1 EVALUATION OF PROVISIONS

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

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

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

As the Plan Change is amending the AUP, the above assessment must relate to the provisions and objectives of the Plan Change, and the objectives of the AUP to the extent that they are relevant to the Plan Change and would remain if the proposed Plan Change were to take effect²⁵.

The following sections address the matters set out in Schedule 1 and Section 32 of the RMA.

9.2 OBJECTIVES OF THE PROPOSAL

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

9.2.1 Objectives

No site-specific objectives are proposed to apply to the Plan Change, however the standard objectives as set out in the MHU zone are proposed to apply together with the relevant Auckland-wide objectives. The objectives of the MHU zone are as follows:

*(1) Land near the Business – Metropolitan Centre Zone and the Business – Town Centre Zone, high-density residential areas and **close to the public transport network** is efficiently used for higher density residential living and to provide urban living that increases housing capacity and choice and access to public transport.*

²⁵ RMA s32(3)

(2) Development is in keeping with the neighbourhood's planned urban built character of **predominantly three-storey buildings, in a variety of forms and surrounded by open space.**

(3) Development provides **quality on-site residential amenity** for residents and adjoining sites and the street.

(4) Non-residential activities provide for the community's social, economic and cultural well-being, while being compatible with the scale and intensity of development anticipated by the zone so as to contribute to the amenity of the neighbourhood²⁶.

9.2.2 Assessment of the Objectives Against Part 2

Section 5 of the RMA identifies the purpose of the RMA as being the sustainable management of natural and physical resources. This means managing the use, development and protection of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

It is considered that the objectives of the Plan Change are consistent with Part 2 of the RMA, given that the proposed urbanisation of the Plan Change area will provide opportunities for quality housing in an area close to public transport and amenities, enabling communities to meet their own social well-being. The Auckland-wide provisions in relation to stormwater and stream management will ensure that the life supporting capacity of ecosystems would be protected while at the same time mitigating the adverse effects of development on the environment.

Section 6 of the RMA sets out a number of matters of national importance which need to be recognised and provided for in achieving the purpose of the RMA. This includes the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins; protection of outstanding natural features and landscapes, the protection of areas of significance indigenous vegetation and significant habitats of indigenous fauna; maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers; the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga; the protection of historic heritage; the protection of protected customary rights and the management of significant risks from natural hazards.

²⁶ AUP: Section H5 Residential – Mixed Housing Urban Zone

The objectives of the Plan Change areas set out in the MHU zone, would not compromise the recognition of, or provision for these matters of national importance for the reasons set out in Section 8 of the report above. In particular, the Applicant is engaging with Mana Whenua on the development and the risks arising from natural hazards (flooding) would be appropriately managed in accordance with Tonkin & Taylor's recommendations²⁷.

Section 7 of the RMA identifies a number of "other matters" to be given particular regard by Council. Specific matters from section 7 that are relevant to the Plan Change include:

- *b) The efficient use and development of natural and physical resources* – The Plan Change will support the efficient use of natural and physical resources by applying a residential zoning that is attractive for development and which is in an accessible location.
- *c) The maintenance and enhancement of amenity values and f) Maintenance and enhancement of the quality of the environment* – The proposed zoning will enable a connected and high quality urban environment to be achieved that responds to the specific land characteristics of the Plan Change area. The provisions that would apply to future development under the AUP would ensure that a high quality, built environment is achieved at the street, block and site scale.

Section 8 requires Council to take into account the principles of the Treaty of Waitangi. It is considered that this proposal will not offend against the principles of the Treaty of Waitangi.

The Plan Change is a more effective means of achieving the sustainable management purpose of the RMA than the current zone or an alternative (as detailed below). It is considered that the objectives of the Plan Change are the most appropriate way to achieve the purpose of the RMA.

9.3 APPROPRIATENESS OF THE PROVISIONS TO ACHIEVE THE OBJECTIVES

9.3.1 The Objectives

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

- Identifying other reasonably practicable options for achieving the objectives;

²⁷ Appendix 7: 520 Great South Road - Stormwater Management and Flooding Assessment prepared by Tonkin and Taylor

- Assessing the efficiency and effectiveness of the objectives;
- Summarising the reasons for deciding on the provisions.

As the proposed Plan Change is amending the AUP (District Plan), the above assessment must relate to the provisions and objectives of the AUP to the extent that they are relevant to the proposed Plan Change and would remain if the Plan Change were to take effect²⁸.

The options considered relate to the proposed zoning of the Plan Change area. Therefore the AUP objectives with particular relevance to this plan change are listed below:

- B2.2.1 (1) A quality compact urban form that enables better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects.
- B2.2.1(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.
- B2.2.1(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.
- B2.3.1 (1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- B2.4.1 (1) Residential intensification supports a quality compact urban form.
- B2.4.1 (3) Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification.
- B2.4.1 (4) An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population.
- H5.2(1) Land near the Business – Metropolitan Centre Zone and the Business – Town Centre Zone, high-density residential areas and close to the public transport network is efficiently used for higher density residential living and to

²⁸ RMA s32(3)

provide urban living that increases housing capacity and choice and access to public transport.

9.3.2 Other Reasonably Practicable Options for Achieving the Objectives

9.3.2.1 Theme 1.1: Land Use Pattern

In determining the most appropriate method for achieving the objectives of the Plan Change, consideration has been given to the following other reasonably practicable options:

- *Option 1: Rezone the Plan Change area Mixed Housing Suburban zone.*

This option involves rezoning the Plan Change area Mixed Housing Suburban Zone, consistent with the surrounding zoning pattern. The MHS zone is similar to the MHU zone but applies an 8m height limit (enabling generally two storeys).

- *Option 2: Rezone the Plan Change area Mixed Housing Urban zone (the preferred option)*

This option involves rezoning the Plan Change area in accordance with the zoning framework proposed in Council’s Drury-Opāheke Structure Plan (Mixed Housing Urban Zone).

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in Table 9.3.2.1.1.

Table 9.3.2.1.1: Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Rezone the Plan Change area Mixed Housing Suburban zone	Option 2: Preferred Option - Rezone the Plan Change area Mixed Housing Urban zone
Benefits	<p>The application of the MHS zone will enable the land to be developed for residential purposes, in an accessible location, with ability to be serviced with infrastructure and where the adverse effects on the environment can be appropriately mitigated.</p> <p>The MHS zone is consistent with the zoning of the surrounding urban area however, it is inconsistent with the Council’s preferred future land use pattern for the area, as set out in the Drury-Opāheke Structure Plan. Therefore an MHS zone will</p>	<p>The application of the MHU zoning has been informed by an urban design assessment and master planning exercise for the Plan Change area which has taken into account the intrinsic qualities and physical characteristics of the site.</p> <p>The MHU zone enables buildings up to 11m in height (generally three storeys) and offers the potential for a greater range of housing types, contributing to greater housing choice in an accessible location.</p> <p>The effects of this rezoning on the amenity of adjoining sites would be effectively managed by the amenity</p>

	Option 1: Rezone the Plan Change area Mixed Housing Suburban zone	Option 2: Preferred Option - Rezone the Plan Change area Mixed Housing Urban zone
	<p>not integrate as well with future development.</p> <p>While the MHS zoning will apply a similar set of bulk and location provisions to the neighbouring sites allowing development to integrate well, the effects of higher development under the MHU zoning can be effectively managed by the amenity controls of the zone.</p> <p>This option applies a less intensive residential zone to land subject to flooding hazard however, this is potentially inconsistent with the precedent in the AUP to apply an appropriate zone and rely on Auckland-wide provisions to ensure development appropriately responds to natural hazards²⁹.</p>	<p>controls of the zone, in particular height in relation to boundary, which limits the building height and bulk close to existing MHS zone boundaries to the west.</p> <p>Applying the MHU zone to the Plan Change area would ensure that future development enhances the visual quality of the existing environment, contributes to the safety of the site, street and neighbourhood. This is achieved by requiring resource consent for multi-unit development.</p> <p>The Government has now committed funding to wider transport projects within Drury including the Drury Central Train Station. The MHU zoning makes the most efficient use of land located on the Great South Road corridor that is serviced by a bus network linking the Plan Change area to two train stations (Drury Central/Papakura). The frequency of this bus network is likely to increase given the investment into rapid transit in the area.</p>
Costs	<p>This option does not make the most efficient use of land located on the Great South Road corridor that is serviced by a bus network linking the Plan Change area to two train stations (Drury Central/Papakura). The frequency of this bus network is likely to increase given the investment into rapid transit in the area.</p> <p>The MHS zone does not provide for as greater flexibility for providing different housing typologies and</p>	<p>This option applies a higher density residential zone to land that is affected by flooding hazards however, the flooding affects a small portion of the site and this can be managed through the Auckland-wide provisions and the impervious area standard.</p>

²⁹ Auckland Unitary Plan Independent Hearings Panel Report to Auckland Council – Changes to the Rural Urban Boundary, Rezoning and Precincts: Hearing topics 016, 017 Rural Urban Boundary, 080 Rezoning and precincts (General) and 081 Rezoning and precincts (Geographic areas) July 2016 pg 19

	Option 1: Rezone the Plan Change area Mixed Housing Suburban zone	Option 2: Preferred Option - Rezone the Plan Change area Mixed Housing Urban zone
	therefore does not offer as greater housing choice as the MHUs zone.	
Efficiency & Effectiveness	While this option would enable residential development to occur within the Plan Change area, contributing to increasing housing supply and choice, it would not achieve this effectively. This is due to the close proximity of the Plan Change area to public transport (existing and planned), open space, social facilities and amenities, which support a more intensive residential zoning of the Plan Change area, consistent with objective B2.4.1(3), B2.4.1 (4) and H5.2(1) of the RPS.	<p>This option enables residential development to occur within the Plan Change area, contributing to increasing housing supply and choice in close proximity to public transport (existing and planned), open space, social facilities and amenities, which support a more intensive residential zoning of the Plan Change area, consistent with objective B2.4.1(3), B2.4.1 (4) and H5.2(1) of the RPS.</p> <p>The application of the MHU zone has been informed by an Urban Design Assessment that has considered the characteristics of the Plan Change area. The application of the MHU zone will achieve a quality built environment that can integrate with the surrounding development and enhances the visual quality of the existing environment, contributes to the safety of the site, street and neighbourhood. Therefore it is consistent with B2.3.1 (1).</p>

9.3.2.2 Summary of Reasons for Deciding on the Provisions

Option 2 is preferred. Applying the Mixed Housing Urban zone, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed zoning pattern will ensure that sufficient development capacity is provided to support growth in accordance with B2.2.1(3).
- The proposed zoning pattern enables the land to create a quality built environment through effectively integrating with future surrounding development in accordance with B2.3.1(1).

9.3.2.3 Theme 1.2: Timing of Development

In determining the most appropriate method for achieving the objectives of the Plan Change, consideration has been given to the following other reasonably practicable options:

Option 1: Do nothing

This option involves retaining the Future Urban zone and waiting for the Council to initiate a Plan Change to rezone the Plan Change area.

Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council’s Drury-Opāheke Structure Plan

The Drury-Opāheke Structure Plan indicates that the Plan Change area will be development ready in 2028-2032. Therefore, this option would delay a Plan Change so that land is released in accordance with these timeframes.

Option 3: Preferred option – Proposed Plan Change

This option brings forward the release of land for urban development in the Plan Change area so that it can be developed now.

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in Table 9.3.2.1.2.

Table 9.3.2.1.2: Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Do nothing (wait for Council to rezone the land)	Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council’s Structure Plan	Option 3: Preferred option – the proposed Plan Change
Benefits	Removes the cost of initiating a plan change for the applicant. Allows the Council to progress a wider plan change for the future land use for the Drury Opāheke area in accordance with the structure plan.	Stages the release of land for development in a manner that is consistent with the Drury-Opāheke Structure Plan and therefore the community’s expectations.	The Plan Change area is contiguous with the urban area along Gatland Road and Great South Road. The Plan Change area can connect efficiently to existing infrastructure networks and development does not rely on more comprehensive upgrades to the network. This option will result in much needed additional housing capacity within the short term.

	Option 1: Do nothing (wait for Council to rezone the land)	Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council's Structure Plan	Option 3: Preferred option – the proposed Plan Change
Costs	<p>This option does not add to Auckland's housing supply to accommodate growth in the short term despite there being infrastructure to service the Plan Change area available.</p> <p>Would delay the redevelopment of land, where there is currently a shortfall in the amount of new dwellings being constructed to meet the Council's targets.</p> <p>Ratepayers would carry the cost of the Plan Change as opposed to the developer.</p>	<p>Taking into account the timeframes required to process a plan change and prepare the land for urban development, this option is likely to result in a significant delay in the redevelopment of land, where there are efficient and effective infrastructure solutions available now.</p>	<p>Cost to developers to rezone the land via a private plan change process.</p>
Efficiency & Effectiveness	<p>This option is not efficient or consistent with B2.2.1(3) and the requirements of the NPS-UDC as no additional residential capacity is enabled in the short – mid-term despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.2.1(1), and B2.2.1(5). Therefore, delays to rezoning the land unjustifiably 'lock up' land for urban development that could be efficiently developed sooner to support an increase in housing capacity.</p>	<p>This option is not efficient or in keeping with B2.2.1(3) and the requirements of the NPS-UDC as no additional residential capacity is enabled in the short – mid-term despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.2.1(1) and B2.2.1(5). Therefore, delays to rezoning the land unjustifiably 'lock up' land for urban development that could be efficiently developed sooner to support an increase in housing capacity.</p>	<p>This option is efficient as it brings forward the release of land that adjoins the existing urban area and which can be serviced and will contribute to an increase in housing capacity and choice in the short to medium term in accordance with B2.2.1(3) and B2.4.1(4).</p>

9.3.2.4 Summary of Reasons for Deciding on the Provisions

Option 3 is preferred. Bringing forward the release of land within the Plan Change area is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- This proposal provides the technical analysis necessary to determine the most appropriate land use and form of development for the Plan Change area and supporting evidence confirms that the land can be appropriately serviced.
- The Government has now confirmed the funding to bring forward key transport infrastructure projects in the wider Drury area which was not known when the FULSS staging was put in place, however, this Plan Change does not rely on wider upgrades to the infrastructure network given the scale of development proposed, its location adjoining the existing urban area and the proposed servicing solutions.
- As the Plan Change area can be serviced and is accessible delaying the rezoning of the land would not be the most efficient or effective option in achieving the AUP objectives, particularly as it relates to increasing housing supply and choice.

9.3.3 Risk of Acting or Not Acting

In this case, there is sufficient information about the subject matter of the provisions to determine the range and nature of environmental effects of the options set out in Table 1 above. For this reason, an assessment of the risk of acting or not acting is not required.

9.3.4 Summary of Reasons for Deciding on the Provisions

Compared with other potential zoning options for the Plan Change area, it is considered that the proposed rezoning is the most efficient and effective and gives effect to the RPS, particularly in relation to urban growth (Chapter B2).

In particular, the proposed MHU zone recognises and responds to the characteristics of the Plan Change area, including its proximity to the urban area, and the accessibility of the surrounding public transport network (existing and planned), open space, social facilities and open space. The Plan Change area can be serviced and there are no environmental constraints that would make rezoning undesirable.

We acknowledge that there are perceived costs in progressing a rezoning ahead of a Council-led Plan Change with respect to achieving integrated development and the potential precedent this approach might create. However, in our view this needs to be considered in the context of the Plan Change area's particular characteristics, the

fact the Plan Change area can be serviced and can integrate with future infrastructure projects and development in the wider area. When balancing these matters, in our view, the benefits of enabling land to be developed for housing where there is currently a significant shortfall in the Auckland market, outweigh the perceived costs of progressing a Plan Change ahead of Council's current schedule.

Within the proposed zoning framework, the potential effects of development are able to be appropriately managed through the application of the standard zone and Auckland-wide rules.

10.0 CONCLUSION

This report has been prepared in support of 520 Great South Road Limited's request for a Plan Change to the provisions of the AUP to rezone their site at 520 Great South Road and the adjoining sites at 522 Great South Road and 21 Gatland Road to Mixed Housing Urban.

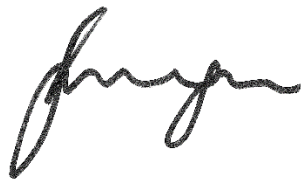
The request has been made in accordance with the provisions of Schedule 1; Section 32 of the Resource Management Act 1991, and generally in accordance with the Council's draft Drury-Opāheke Structure Plan.

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

An assessment against the provisions of S 32 of the RMA is provided in section 9 of the report. This includes an analysis with respect to the extent to which the objectives of the Plan Change are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the Plan Change are the most appropriate way to achieve the objectives.

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

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Date: 22/05/2020