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Dear Bryce

CLAUSE 23 REQUEST FOR FURTHER INFORMATION, 80 MCLARIN RD PRIVATE PLAN CHANGE

1.0 Introduction

A Private Plan Change request has been submitted by HD Project 2 Ltd to Auckland Council (AC) for 80 McLaren Road, Glenbrook, under Clause 21 to Schedule 1 of the Resource Management Act (RMA) 1991. AC has completed an assessment of the information supplied, and pursuant to Clause 23 (1) of the RMA, requires further information to continue processing the private plan change request.

Pattle Delamore Partners Ltd (PDP) has been engaged by Harrison Grierson Ltd (HG) to respond to the further information requests relating to ecology, following on from a series of ecological investigations undertaken by PDP at the site between 2020 and 2022. It is noted that the ecology related requests from Auckland Council do not fall within the remit of Clause 23.

2.0 Auckland Council Information Requests

2.1 E1 – Precinct Plan

It is requested that the precinct plan be updated with a precinct map that shows all waterbodies (both streams and wetlands) within the plan change area.

PDP agrees that the mapping and provision of freshwater waterbodies (streams and wetlands) in precinct plans provides guidance for future developments and is consistent with the objectives and policies of the Auckland Unitary Plan-Operative in Part 2016 (AUP-Op) Regional Policy Statement and National Policy Statement for Freshwater Management (NPS-FM; 2020). This has been provided for the adjacent Glenbrook 3 Precinct Plan. PDP can provide GIS files along with this letter for inclusion on the Glenbrook 4 Precinct Plan map. It is noted that the areas currently mapped as wetlands may not be defined as wetlands in the future due to proposed changes to wetland regulations which outline consenting pathways for urban development (e.g., Managing our Wetlands, MfE 2021).



2.2 E2 – Precinct Provisions for Riparian Planting

The proposed precinct plan includes a standard for riparian planting for streams and wetlands, as per IXXX7.1(3).

The proposed standard encourages a 10 m riparian yard and building set-back from streams and wetlands; with 5 m of this to be planted.

It is considered practical to recommend that the precinct proposes a minimum of 10 m of riparian planting and restoration around all freshwater waterbodies.

To address this concern, it is recommended that the standard be updated to reflect:

- *10 m riparian margins along all watercourses.*
- *Riparian planting to be undertaken in accordance with Appendix 16 of the AUP.*
- *Cycleways and pedestrian paths be excluded from the riparian planting area.*

PDP notes that in the Land Use Zone provisions of the AUP-Op, there are no requirements to plant wetland and stream edges. However, best practice guidelines and policy does recommend this (e.g., TP148 and the AUP-Op Regional Policy Statement) and the ecological benefits are well documented.

PDP has reviewed literature in relation to riparian buffer widths and setbacks from waterbodies, including guidance from other regional councils and recent research by Landcare Research NZ Ltd¹. This research has investigated riparian planting widths for land uses and activities including urban areas and roads which potentially have a high risk of contributing to water contamination, particularly where impervious surfaces are directly connected to surface waters through drainage systems. Minimum riparian setback recommendations to achieve various functional objectives (e.g., reduction of contaminant inputs, water temperature control, freshwater ecosystem health, terrestrial and aquatic habitat diversity) start at 10 m.

A review of the adjacent Glenbrook 3 Precinct provisions states that riparian margins must be established either side of the banks of permanent/intermittent streams and wetlands to a minimum width of 10 m, and it is evident that this planting has already taken place.

Following this review, PDP agrees that a 10 m wide riparian buffer should also be implemented in the Glenbrook 4 Precinct, to enhance degraded freshwater systems and to mitigate adverse effects of changes in land use on freshwater. This will allow for indigenous vegetation succession, lower maintenance and support aquatic functions. Cycleways and pedestrian paths could be incorporated alongside the riparian buffers.

PDP generally supports the changes in wording to the Precinct Plan in regard to riparian margins. This will address AC's concerns in regard to providing a greater diversity of species. Recommended wording is provided below:

Riparian margins identified in the precinct plan must:

- Be established either side of intermittent/permanent streams and wetlands shown on the precinct plan to a minimum width of 10 m. For the avoidance of doubt, the 10 m should be measured from the edge of wetlands (as defined in the NPS-FM 2020), not the edge of any existing riparian vegetation. The purpose of this is to define where the riparian margin should be measured from in the absence of a defined stream bank.
- Riparian planting is to be undertaken in accordance with Appendix 16 of the AU-Op.
- Cycleways and pedestrian paths to be excluded from the riparian planting area.

¹ Fenemor, A., and Samarasinghe, O.(2020) Riparian Setback Distances from Waterbodies for High Risk Land Uses and Activities. Contract Report LC3832. Prepared for Tasman District Council by Manaaki Whenua

2.3 E3 – Precinct Provisions for the Enhancement of Ecological Functions

It is considered necessary to recommend that the plan change include additional provisions that relate to the enhancement of ecological functions, not linked to the implications of subdivision and development (as the current ecology-related objectives and policies that are proposed are).

PDP has reviewed the precinct provisions of Plan Change 48 (Drury Centre Precinct) and Plan Change 49 (Drury East Precinct), in particular objectives 4.34.1 and 4.34.2 relating to improvements in water quality, habitat and biodiversity. We agree that a similar objective and policy can be included in the Glenbrook 4 Precinct Plan and that this will be adequately achieved by the riparian planting specified above. This is already included to some extent under the following provisions of the Glenbrook 4 Precinct Plan:

- ∴ Objective 9: Freshwater is protected, with the effects of stormwater runoff on the receiving environment and freshwater systems avoided to the extent practicable or otherwise mitigated using water sensitive design principles, and
- ∴ Policy 5: Protect and enhance natural intermittent streams and wetlands, including planting riparian margins, providing riparian yard setbacks and by managing stormwater runoff at source.

Objective 9 can be further emphasised through the addition of the following, adopting the recommended wording from Plan Change 48 and 49, i.e.:

Objective 10. Freshwater, sediment quality and biodiversity is improved.

We consider that the existing Policy 5 above can be replaced by the following wording:

Contribute to improvements to water quality, habitat and biodiversity, including by providing planting on the riparian margins of permanent and intermittent streams.

3.0 Limitations

This letter has been prepared by Pattle Delamore Partners Limited (PDP) on the basis of information provided by Harrison Grierson Ltd. PDP has not independently verified the provided information and has relied upon it being accurate and sufficient for use by PDP in preparing the report. PDP accepts no responsibility for errors or omissions in, or the currency or sufficiency of, the provided information.

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Yours faithfully

PATTLE DELAMORE PARTNERS LIMITED

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