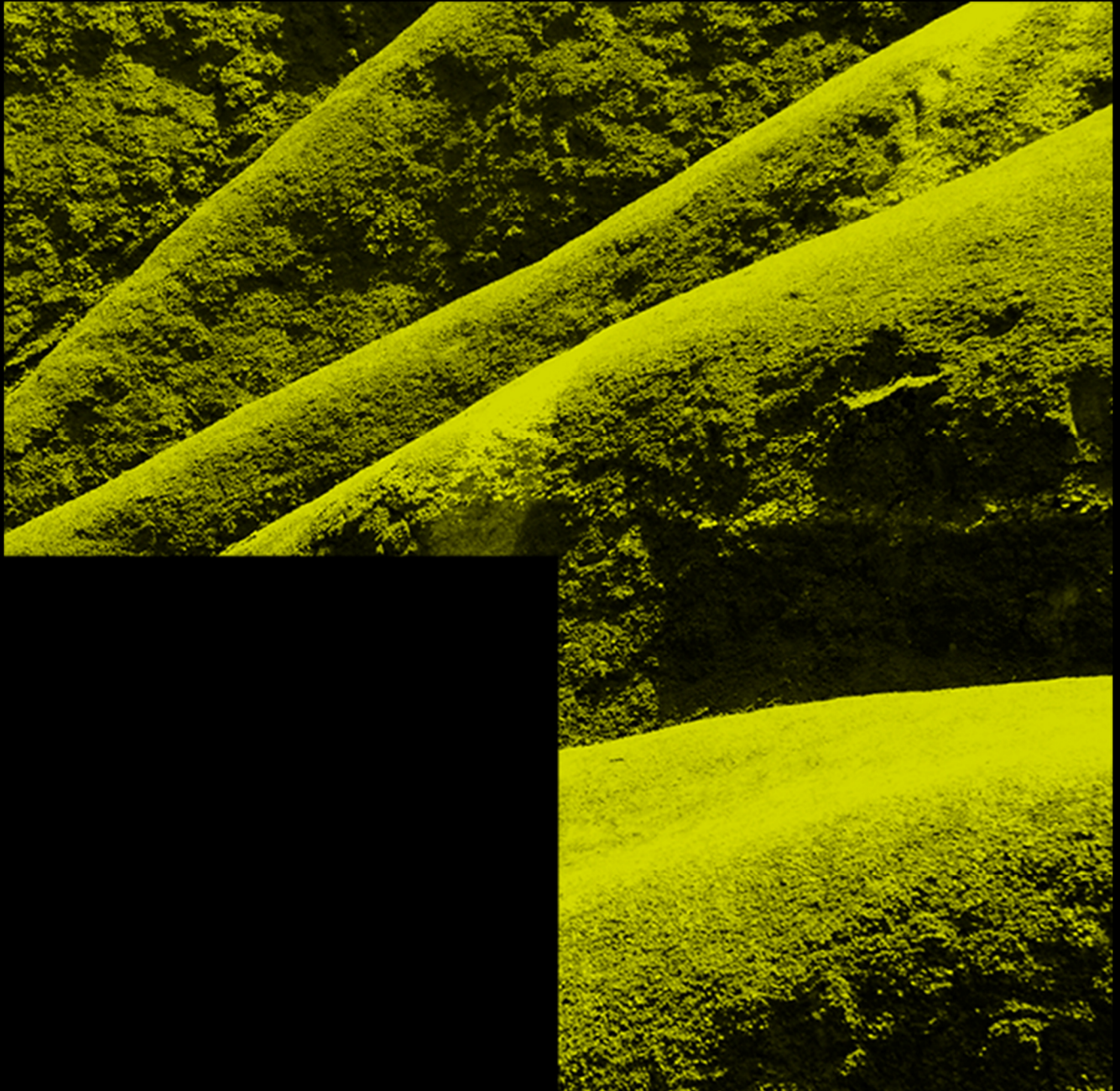


**80 MCLARIN ROAD,  
GLENBROOK BEACH -  
GLENBROOK 4 PRECINCT**

Section 32 Evaluation

HD Project 2 Ltd





# DOCUMENT CONTROL RECORD

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## 1.0 INTRODUCTION

This Section 32 Evaluation Report has been prepared in support of a private plan change request to the Auckland Unitary Plan 2016 – Operative in Part (the AUP(OP)) by HD Project 2 Limited (the ‘applicant’).

The request (proposal) is seeking to rezone land that is zoned ‘Future Urban’ under the AUP(OP) to ‘Residential – Mixed Housing Suburban’ and to create a new ‘Glenbrook 4’ precinct overlay. The extent of the site that is subject to the request is set out within **Figure 1** below.

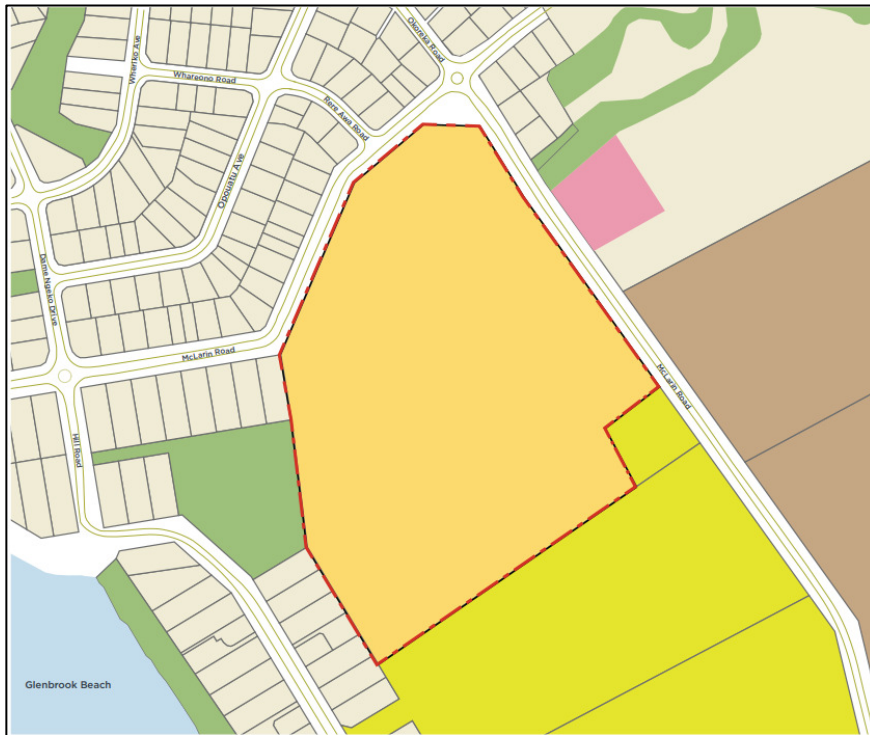


**FIGURE 1:** The extent of the plan change request is shown in red outline

Further details of the plan change request are included within the plan change request application and supporting reports, which should be read in conjunction with this evaluation report.

In summary, the proposal is seeking the following changes to the AUP(OP):

1. The rezoning of approximately 7.897ha of land from Future Urban to Residential – Mixed Housing Suburban (MHS) zone (refer **Figure 2** below).
2. A new precinct overlay with objectives, policies and rules that will apply to the development, use and subdivision of land. The precinct rules will take precedence over the MHS zone rules, as per C1.6(4).
3. Application of the Stormwater Management Area – Flow 1 (SMAF1) overlay and provisions to the site.



**FIGURE 2:** The proposed extent of the rezoning



**FIGURE 3:** The proposed extent of the Glenbrook 4 precinct (area proposed to be rezoned MHS zone)



**FIGURE 4:** The proposed extent of the Stormwater Management Area – Flow 1 (SMAF1) overlay

Section 32(1)(1) of the Resource Management Act 1991 (the 'Act') requires an evaluation to examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act. The objectives are defined within s32(6) to mean:

- a) For a proposal that contains or states objectives, those objectives; and
- b) For all other proposals, the purpose of the proposal (which in this context means the other aspects of the plan change request that don't relate to objectives, being the rezoning and structure plan amendments).

The following sections provide the evaluation that is prescribed by s32 of the Act:

- Section 2 provides details of the objectives of the plan change request (the proposal) and assesses the appropriateness of the proposal to achieve the purpose of the Act.
- Section 3 then assesses the appropriateness of the provisions to achieve the objectives of the proposal. It does this by identifying the key issues/ outcomes, the alternative options to achieve the proposal, and assesses the efficiency and effectiveness of the proposed options as well as their costs and benefits. It also includes an assessment of the risks of not acting.

## 2.0 THE PLAN CHANGE OBJECTIVES

### 2.1 THE OBJECTIVES OF THE PLAN CHANGE

The proposed plan change (the proposal) seeks to:

- Retain objectives and policies that are contained within MHS zone (Part H4) within the AUP(OP);
- Retain objectives and policies that are contained within Part E10 – Stormwater Management Area – Flow 1 and Flow 2 within the AUP(OP); and
- Introduce new objectives and policies within a new precinct overlay (Glenbrook 4) to the AUP(OP).

The proposed objectives for the Glenbrook 4 Precinct are summarised within section 2.1.2 below. Many of the proposed Glenbrook 4 objectives will be drawn from the Glenbrook 3 precinct, which are contained within Part I453.1 of the AUP(OP) and applies to land immediately to the north of the site.

These are defined as the ‘objective of the plan change’ (under s32(6) of the Act) and summarised within section 2.1.2 below.

### 2.1.2 THE OBJECTIVE OF THE PLAN CHANGE

The objective of the plan change is to:

*“Achieve the co-ordinated expansion of the Glenbrook Beach coastal settlement in a manner that enables mixed housing opportunities for all ages and household types, and seamlessly integrates freshwater assets of the site with future development.”*

### 2.1.3 THE OBJECTIVES AND POLICIES OF THE RESIDENTIAL - MIXED HOUSING SUBURBAN ZONE

The proposal will retain all the objectives and policies of the MHS zone without change.

The objectives and policies of the MHS zone are attached (**Attachment A**).

### 2.1.4 THE OBJECTIVES AND POLICIES OF THE STORMWATER MANAGEMENT AREA – FLOW 1 AND FLOW 2 (SMAF1) OVERLAY

The proposal will retain all the objectives and policies of the Stormwater Management Area – Flow 1 and Flow 2 overlay without change.

The objectives and policies of the SMAF1 and SMAF2 overlay are attached (**Attachment B**).

### 2.1.5 THE OBJECTIVES OF THE GLENBROOK 4 PRECINCT

As discussed in section 1 of this report, this plan change request seeks to introduce a new precinct overlay to the AUP(OP) called the “Glenbrook 4 Precinct.” The precinct overlay is intended to achieve a higher degree of certainty than would be achieved without making changes to the provisions of the MHS zoning that apply Auckland-wide, in particular to address the unique physical characteristics, location and context of the plan change area.



When considering an application for resource consent within the plan change area, a decisionmaker must have regard to the provisions of the Glenbrook 4 Precinct, which will include objectives, and linked policies and rules that will give effect to the proposed objectives. It is only the precinct rules and standards that will take precedence over zone and Auckland-wide rules. The proposed objectives for the Glenbrook 4 Precinct will need to be considered alongside any other objectives of the AUP(OP) that are relevant to a proposal.

It is within this context that the below objectives of the Glenbrook 4 Precinct have been drafted.

The proposed objectives for the Glenbrook 4 Precinct are as follows:

1. *Subdivision and development are undertaken in general accordance with the precinct plan.*
2. *Subdivision and development achieves an attractive, safe and healthy environment for living with good access to the public realm including parks, riparian margins and roads.*
3. *Subdivision and development occurs in a manner that achieves the coordination and delivery of infrastructure including roading, wastewater, water supply and stormwater services.*
4. *The precinct is supported by a well-connected, safe, efficient, and legible movement network with low-speed internal streets and appropriate connections to existing and future urban areas surrounding the precinct.*
5. *Subdivision and development encourages a choice of transport modes including walking and cycling, and provides strong, legible connections within and through the precinct.*
6. *Subdivision and development maintains and enhances the freshwater values of intermittent streams and the natural wetlands within the precinct.*
7. *Subdivision and development achieves attractive and well-designed residential developments that support a range of housing densities and typologies that increase variety and housing choice.*
8. *Subdivision and development achieves integration of built form within the precinct, with the existing Glenbrook Beach settlement, and with the Kahawai Point Special Housing Area.*
9. *Freshwater resources are protected, with the effects of stormwater runoff on the receiving environment and freshwater systems avoided to the extent practical or otherwise mitigated using water sensitive design principles.*
10. *Stormwater is attenuated to manage downstream flood effects in a manner that integrates stormwater management with subdivision and development to make efficient use of the land.*

The proposed objectives for the Glenbrook 4 precinct closely reflect those for the Glenbrook 3 precinct. This is because many of the resource management issues, and the outcomes that are sought, are similar.

The proposed objectives for the Glenbrook 4 precinct seek to achieve the following outcomes:

- The provision of transportation connections within and through the precinct, including walking and cycling pathways.
- The roundabout shown in the Glenbrook 3 precinct provisions on McLarin Road is provided for in the proposed Glenbrook 4 precinct provisions.



- Good connectivity with and between existing public open spaces, including the coast, with existing community facilities, and with the planned local centre on McLarin Road.
- The provision of a wider variety of housing typologies and choices than presently exists within the Glenbrook Beach settlement.
- Subdivision and development that incorporates and integrates with intermittent streams and natural wetlands.
- Subdivision and development that is adequately serviced for water and wastewater by publicly available reticulated infrastructure networks.
- Stormwater is attenuated to manage effects on the downstream network during peak storm events and mitigate flooding on downstream properties, as the existing downstream stormwater network is likely to be under capacity to service development envisaged by the proposed plan change.
- Maintaining and enhancing identified freshwater values through site appropriate riparian margins and setbacks.
- Stormwater is adequately managed by applying water sensitive principles 'offline' of watercourses and wetlands.
- A full set of precinct provisions, including policies, development standards, and associated matters of discretion and assessment criteria are proposed to achieve the objectives for the Glenbrook 4 precinct. The proposed precinct provisions are attached in **Attachment C**; a summary of the key issues addressed by the provisions is provided below.

a) *Interim rural activities*

The proposed precinct provisions will ensure that land can be used for pastoral farming purposes as a permitted activity until the land is developed under the MHS and precinct provisions.

b) *A residential neighbourhood that enables housing choice*

The MHS provisions will ensure that a variety of housing typologies and intensities can occur and will form part of the anticipated character of the neighbourhood.

No changes are proposed to the maximum height standard (H4.6.4) and no height limits in the precinct provisions are proposed that would override this. H4.6.4 anticipates a predominantly two-storeyed built form comprising of standalone, duplex, terrace and apartment units. This will increase the choice of dwellings available within Glenbrook Beach while also managing effects on neighbourhood character relating to scale, form, appearance and building intensity, through existing assessment criteria in the MHS zone and proposed assessment criteria in the precinct.

Objectives and policies for the Glenbrook 4 Precinct complement those for the MHS zone. Developments of four or more dwellings require resource consent under the precinct provisions for a restricted discretionary activity but will not override resource consent requirements under the MHS zone (H4.4.1(A4)). Developments of four or more dwellings that comply with the precinct standards are encouraged by mirroring the MHS provisions that prevent such resource consent applications from being publicly notified unless special circumstances exist.

No changes are proposed to Part E38 (Urban Subdivision). Vacant lot subdivision on sites of 1ha or more within the Glenbrook 4 precinct will therefore be subject the Auckland-wide standards that control access, shape, and minimum and average lot size (320m<sup>2</sup> and 400m<sup>2</sup> respectively). When read together, Parts E38 and H4 of the AUP(OP) encourage subdividing around a consented land use development because no density limits apply. This will encourage a variety of dwelling typologies without requiring modifications to the density limits and other standards within Part E38.

The provisions for Intergenerational Homes, Group Housing and Papakainga Housing that are contained within the Glenbrook 3 precinct were required to overcome the density limits that apply in the Residential – Single House zone. The MHS provisions inherently provide for such housing and no modifications are required.

Retirement villages are provided for as restricted discretionary activity under H4.4.1(A8) – integrated residential development.

c) *Residential amenity*

The Glenbrook 4 precinct is intended to predominantly be a residential area that relies upon the existing provisions of the MHS zone to achieve a reasonable standard of amenity both onsite and offsite. No additional standards are proposed in the precinct to override the MHS standards that pertain to achieving a minimum level of onsite amenity or maintaining a reasonable standard of amenity for the owners and occupants of adjacent sites.

However, the Glenbrook 4 precinct does contain provisions to achieve high amenity outcomes in future subdivision design and layout (e.g. off-site amenity), including achieving a cycling/walking link between the coast and the Glenbrook Beach Recreation Reserve and the future local centre on McLarin Road and ensuring that the riparian margins of intermittent streams and natural wetlands are planted to establish amenity assets for the community.

d) *Non-residential Activities*

Non-residential land uses will be solely assessed against the MHS and Auckland-wide provisions. No additional provisions are proposed in the precinct to manage the adverse effects of non-residential land uses. No provisions are proposed to encourage commercial activities as land zoned Business – Local Centre has been identified for a local centre on the east side of McLarin Road to provide for the day-to-day needs of the Glenbrook Beach community. However, if there is future demand for additional commercial activities that cannot be accommodated within the identified local centre, appropriate activities can obtain a resource consent under the existing provisions.

e) *McLarin Road interface and integration with the established character of the Glenbrook Beach settlement*

Anticipated development within the MHS zone will generally be more intensive than exists on land immediately to the north and west of the Glenbrook 4 precinct, which is mostly comprised of single storeyed, detached dwellings.

There are many parts of Auckland where MHS zoned land is situated on the opposite side of land zoned Residential – Single House zone and precinct provisions that require specific treatment along the McLarin Road edge are not needed. The existing MHS provisions can adequately manage the effects of development on the character of the Glenbrook Beach settlement, particularly as there are matters that Council must consider when assessing effects that proposals of four or more dwellings may have on neighbourhood character (H4.8.1(2)(a)).

Furthermore, there are objectives and policies within Part E38 (Urban Subdivision) that compel Council to consider the size and shape of the proposed residential lot and the number and location of vehicle crossings, which can affect neighbourhood character. (For instance, Policies E38.2(12), (13), and (15)).

No additional building set-backs or other design standards/controls are proposed for development that fronts McLarin Road and faces rural zoned land to the east of the precinct. Here, a hard urban boundary is anticipated and provided for to encourage compact and contained urban form at Glenbrook Beach.

*f) Passive surveillance of public open space and public roads*

Precinct provisions support a safe road, walking and cycling network by encouraging low height fencing to encourage overlooking of the street, public open space and riparian margins.

The proposed fencing standard within the Precinct overrides the fencing standard that applies to the MHS zone in H4.6.14.

Additionally, Objective IXXX.2(2) and Policy IXXX.3(4) seek to encourage development and subdivision that promotes an active interface with the Glenbrook Recreation Reserve and this is emphasised in Figure 1 of the Glenbrook 4 Precinct provisions as well as in the proposed assessment criteria (for instance, IXXX.9.2(b) applying to development of four or more dwellings)).

Developments of three or less dwellings will require resource consent for a restricted discretionary activity (RDA) with discretion restricted to matters relating to onsite amenity and Crime Prevention through Environmental Design (CPTED) principles (amongst other things). It is considered that the RDA matters and supporting assessment criteria will provide flexibility for Council to consider proposals that infringe the standards.

It is anticipated that most residential development will proceed as proposals for four or more dwellings, rather than proposals for three or less dwellings. Outcomes sought by the standards relating to the percentage of glazing and garage doors have been incorporated into RDA matters for proposals of four or more dwellings. These provisions, along with the MHS matters that apply to H4.4.1(A4), will manage the interface with roads and public open spaces.

The fencing standard replicates that which applies to properties in the Glenbrook 3 precinct that are adjacent to the 'green fingers' that contain public pathways following streams. Pathways are also anticipated to be located within local road corridors to make efficient use of the available land and to provide a more direct route between origins and destinations.

It is not considered that the freshwater features within the Glenbrook 4 precinct have an amenity value that justifies 'locking in' a pathway alignment in the precinct provisions; the alignment can be determined at the time of subdivision and development.

*g) Treatment of riparian margins*

The watercourses and natural wetlands within the Glenbrook 4 precinct do not trigger a requirement to provide an esplanade reserve under Section 230 of the RMA. Therefore, watercourses, wetlands and riparian margins can be located within private residential lots if they are not vested as a reserve at subdivision stage. Standard IXXX.7.3(1)(c) allows riparian margins to be either protected by a consent notice, covenant or vested at Council's request.

No changes to H4.6.7 are proposed and buildings will be required to be located at least 10m from the edge of an intermittent stream. IXXX.7.3(1)(a) will ensure that the 10m setback is applied from the edge of a natural wetland.

Under this framework, earthworks and vegetation clearance within a riparian yard is subject to E12.6.2 and E15.4.1(A19). The alteration and removal of vegetation with 20m of a natural wetland would continue to apply.

IXXX.7.3(1)(b) requires that a minimum 5m riparian yard is planted adjacent to intermittent streams, and around natural wetland, with native species at a density of 20,000 plants per hectare. (i.e., Every 0.5m). This is an appropriate spacing for low growing bankside vegetation, such as rushes and sedges. No fences are permitted within 5m of an intermittent stream or natural wetland under IXXX.7.4(2).

All residential land use and subdivision activities will be required to comply with the riparian requirements or an additional reason for consent will be triggered under IXXX.4.1(A4) and IXXX.5.1(A10).

#### *h) Traffic and Access*

The Traffic Impact Assessment report has not identified any upgrades that would be required to facilitate development anticipated by the MHS zone provisions apart from a future roundabout intersection south of the Business – Local Centre zoned land on McLarin Road. The roundabout is also a requirement of the Glenbrook 3 precinct. Subdivision and development within the Glenbrook 4 Precinct will also need to provide for this roundabout to comply with the precinct plan, otherwise resource consent for a discretionary activity will be required.

No changes to Part E27 (Transportation) and Part E38 (Urban Subdivision) are proposed. Amongst other things, Parts E27 and E38 regulate the number, width, and proximity of vehicle crossings to one another. E27.4.1(A5) and E27.6.4.1(3) apply to manage effects on traffic safety that may result from installing a vehicle crossing within 10m of an intersection and within 2.0m of vehicle crossings on adjacent sites.

No changes are proposed to H4.8.1(2)(a), of which the effect that the design and location of parking and access has on neighbourhood character and residential amenity is listed as a matter over which Council has restricted its discretion.

The objectives and policies for the Glenbrook 4 Precinct seek to ensure that the transport network within the Precinct provides for the safe and efficient movement of motor vehicles, pedestrians, and cyclists. These objectives and policies seek to secure the opportunity to provide increased connectivity between Glenbrook Beach and the Kahawai Point development (Glenbrook 3 Precinct), and this is reinforced in the RDA matters and supporting assessment criteria that apply to the assessment of subdivision and development proposals of four or more dwellings within the precinct.

The Glenbrook 3 precinct cross-sections for local roads and McLarin Road have been included in the Glenbrook 4 precinct provisions to integrate development with the established character of the Glenbrook Beach settlement. The cross-sections show that on-street parking will be provided for on all local roads, with on-street parking spaces provided in between tree pits and alongside a swale on McLarin Road.

#### *i) Coordinating development with wastewater and water infrastructure*

Watercare Services Limited (Watercare) advise that publicly available reticulated wastewater will not be available until mid-2026. This is a significant constraint to unlocking the development enabled by the proposed plan change within the Glenbrook 5 Precinct. The same delays to a connection being available are not present in the provision of publicly available reticulated water, or public utilities. No upgrades to the downstream network will be required to facilitate development.



The provisions for the Glenbrook 4 Precinct strongly encourage development to proceed when connections to a publicly available reticulated wastewater and water services are available. Resource consent will be required for a non-complying activity to establish or inhabit residential units or subdivide land. This direction is supported by objectives and policies that “require” publicly available reticulated wastewater and water networks to be available.

A development standard will enable Council to consider a subdivision or land use consent application with written confirmation from the service provider that reticulated services are suitably advanced and capable of serving proposed subdivision and development. However, under this standard, the consented buildings cannot be occupied until publicly reticulated water and wastewater networks are available.

j) *Stormwater management*

Subdivision and land use proposals establishing four or more dwellings will be subject to Policies IXXX.3(8)-(10). These policies seek to attenuate peak storm events and to manage stormwater by applying water sensitive principles, while integrating with development and making efficient use of the land.

These policies are in addition to the existing region-wide provisions of the AUP(OP) relating to the diversion and discharge of stormwater in Part E8 and the Stormwater Management Area – Flow 1 (SMAF1) overlay provisions that will apply to the site.

Stormwater management measures are likely to include measures on private residential lots (e.g., retention and/or detention tanks) and communal devices (e.g., ponds and swales) within land vested with Council or in common ownership. The precinct provisions allow for the exact mix to be determined at subdivision stage. Resource consent applications to subdivide land and develop four or more dwellings will be assessed against RDA matters relating to stormwater management, and these matters will provide Council with the opportunity to assess stormwater aspects against the SMP and the AUP(OP) and to impose reasonable conditions to mitigate adverse effects arising from stormwater.

Stormwater runoff from new impervious surfaces during a 1% Annual Exceedance Probability (AEP) storm event will need to be attenuated to avoid and mitigate downstream flooding events. This is because the existing downstream stormwater network is likely to have inadequate capacity to convey runoff once the site has been developed. Objective IXXX.2(10) specifically refers to this matter. Furthermore, development in the southern corner of the site will need to be considered under E36 of the AUP(OP) in terms of the identified flooding and coastal inundation hazards.

The SMAF1 provisions will endure once the plan change area has been subdivided and developed, and the stream within the developed area effectively becomes an ‘urbanised’ stream where the overlay applies elsewhere within the Auckland region. Resource consent will be required whenever 50m<sup>2</sup> of new impervious surfaces are proposed or 50m<sup>2</sup> of existing impervious surfaces are redeveloped. This will ensure that future development establishes adequate hydrology mitigation measures.

## **2.2 ASSESSMENT OF OBJECTIVES AGAINST PART 2 OF THE ACT**

Section 32(1)(1) of the Resource Management Act 1991 (the ‘Act’) requires an evaluation to examine the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the Act.

The purpose of the Act is to promote the sustainable management of natural and physical resources and recognise and provide for matters of national importance and have particular regard to specified matters.

The plan change involves rezoning land that has been identified as being appropriate for urban purposes, as it has been zoned 'Future Urban' and these provisions were tested when the Auckland Unitary Plan was drafted, and through the submissions and hearing processes. The Future Urban zone provisions are operative, and the site's zoning is not subject to an appeal. Thus, the urbanisation and loss of productive land have already been deemed to achieve the purpose of the Act.

Similarly, no changes are being proposed to the MHS zone provisions (Part H4) or the SMAF1 provisions (Part E10), and presumably because these provisions are operative, they are also an appropriate way to achieve the purpose of the Act.

The objectives for the Glenbrook 4 precinct that will be inserted into the AUP(OP) as part of this plan change are consistent with Section 5 of the Act for the following reasons:

- The plan change provides mixed housing opportunities for all ages and household types. This will enable people and communities to provide for their social and economic well-being.
- The plan change promotes the efficient use of a scarce land resource.
- Increased population is likely to make commercial activities more economically viable on the land that is zoned 'Business – Local Centre'.
- The plan change will maintain freshwater assets of the site and enhance freshwater and ecological values for future generations.
- The Auckland-wide stormwater provisions will mitigate the potential adverse effects relating to stormwater runoff and maintain the life-supporting capacity of the receiving freshwater and coastal environs.
- Improved walking and cycling facilities between Glenbrook Beach, the Kahawai Point development and the future local centre that will provide an alternative to using vehicles for short, local trips.

In terms of the matters of importance that are set out in Section 6 of the Act:

- The plan change area presents limited ecological features other than exotic trees, an intermittent stream and small natural wetlands that will be protected under the National Environmental Standard for Freshwater Management 2020 (NES:FM). Adverse effects on ecological values can be maintained through the Auckland-wide provisions combined with the proposed specific stormwater provisions of the Glenbrook 4 precinct.
- There is no recorded or identified archaeology in the area, and it is considered highly unlikely that archaeology exists within the area or landscape. This means that effects on archaeology will be avoided.
- The proposed plan change will support the retirement of the land from continued grazing and farming/rural activities and will enable progress towards urbanisation that can make more efficient use of the land area with opportunities to preserve/enhance freshwater and ecological values of the land. This will recognise and provide for the matters in Section 6(a), noting that the plan change provisions will not preclude the waterbodies from being positively integrated as part of future development and providing ecological, recreational and amenity values, as well as enhanced public access in a manner consistent with Section 6(d).

- There are no identified outstanding natural features or landscapes within the proposal extent in relation to Section 6(b) or significant indigenous vegetation or significant habitats of indigenous fauna in relation to Section 6(c).
- The proposal does not compromise the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga in relation to Section 6(e).
- At this stage there are no known issues with respect to the matters listed in Section 6(f) or no known customary rights issues with respect to Section 6(g) within the site.
- There are no unmanageable hazards identified on the site that could preclude the proposed rezoning accommodating future industrial growth in respect of Section 6(h).

The proposed plan change provisions respond to the “other matters” in Section 7 of the Act that must be given particular regard to, for the following reasons:

- In terms of Section 7(a), the proposed plan change will have regard to protection of the natural environment, noting that appropriate stormwater management will be incorporated into the future development of the site.
- In terms of Section 7(b), the proposal will enable the efficient use and development of the land, noting that:
  - The land will accommodate residential growth in Glenbrook Beach and provide connectivity between the development at Kahawai Point and Glenbrook Beach with planned walking and cycling upgrades within the precinct.
  - The MHS zoning will provide the flexibility required to efficiently develop the site and respond to market conditions and site constraints.
- In terms of Section 7(c), the proposed plan change will unavoidably result in a change in character from rural to urban; however, urban growth is an anticipated outcome of the Future Urban zone of the AUP(OP) and the change will generally occur within the timeframes indicated within Auckland Council’s Future Urban Land Supply Strategy (FULSS) and with Watercare delivery of a publicly available reticulated wastewater network for the area. The transition between the proposed residential area and existing residential areas will be primarily managed by applying the existing MHS provisions. Precinct provisions will respond with the ‘edges’ defined by McLarin Road, the Glenbrook Beach Recreation Reserve, and Future Urban zoned land to the south.
- Regard will be had to climate change in the design of infrastructure and the location of buildings and habitable spaces relative to watercourses, natural wetlands and stormwater management areas. The land has been earmarked for urbanisation in the AUP(OP) and will contribute towards the number of dwellings anticipated in the FULSS for all Future Urban zoned land in the FUZ. While most amenities can only be accessed by private motor vehicle, the plan change incorporates provisions to reduce reliance on vehicles for local trips and will make local day-to-day activities more financially viable.

It is considered that the proposed plan change will be consistent with the principles of the Treaty of Waitangi (Section 8). The plan change does not contradict the content of the Cultural Values Assessment (CVA) prepared by Ngai Tai Ki Tamaki.

Overall, it is considered that the objectives of the plan change are appropriate in terms of achieving the purpose of the Act.

## 3.0 THE APPROPRIATENESS OF THE PLAN CHANGE PROVISIONS

### 3.1 AN ASSESSMENT OF ALTERNATIVE ZONING OPTIONS

We have identified that there are three reasonably practicable alternative zoning options to achieve the objectives of the proposed plan change. These are discussed below:

#### 3.1.1 OPTION 1: APPLYING THE RESIDENTIAL – SINGLE HOUSE ZONE PROVISIONS

This option would involve rolling out the existing (i.e., unchanged) Residential – Single House zone provisions in Part H3 of the AUP(OP) across the entire site and relying upon the current urban subdivision rules within Part E38 of the AUP(OP).

This option involves no precinct plan overlay.

This option would:

- Enable approximately 7.897 ha of Future Urban zoned land to be developed for residential purposes once the land has been subdivided into vacant lots in accordance with the standards that apply in Part E38 of the AUP(OP). This includes a 600m<sup>2</sup> minimum lot size requirement and a requirement for each residential lot to be capable of containing an 8m x 15m rectangle (i.e. site shape factor).
- Likely result in a uniform style of urban development, based almost exclusively upon detached dwellings across the entire site. The Residential – Single House zone provisions would therefore forego the opportunity to develop a more intensive residential development form, particularly within the northern portion of the site where the land is flatter and possibly more suitable for more intensive residential, being closer to land that is zoned Business – Neighbourhood Centre. By design, the Single House zone would not encourage a range of dwelling types, including standalone, duplex, and terraced housing options that would support a mixed community and full life-cycle housing for all age groups and households.
- Through the density limits of the Single House zone and Part E38 of the AUP(OP), generally achieve an urban form that would result in a less efficient use of a scarce land resource intended to form part of the urban environment, in a manner that is contrary to what is expected by a Tier 1 authority under the National Policy Statement – Urban Development (NPS-UD). Resource consent would be required for a non-complying activity to establish two dwellings on the one site under H3.4.1(A6).
- Be contrary to the direction of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act which seeks to promote additional housing supply and to improve housing choice by enabling up to three houses per site as a permitted activity.
- Require resource consent for a discretionary activity to establish intensive typologies, such as supported residential care (over 10 people per site), and integrated residential development.
- Require almost all resource consent applications to be subject to the normal notification tests of the Resource Management Act 1991.



- Have fewer development standards to comply with than the other urban residential zones, given that amenity related effects can generally be better managed on larger sites and at a lower intensity. Larger lots would also inherently provide more space to cater for parking requirements off street.
- Provide an opportunity for overland flow paths, streams, wetlands, and associated riparian/ buffer planting, to be integrated into larger residential lots away from building platforms. For example, H3.6.8.1 requires buildings to be located at least 10m from the edge of intermittent streams. The area within the riparian setback can be used to offset building coverage and impervious surface coverage maximum thresholds.
- Preclude the placemaking opportunity that exists to set development principles through an overlay. (For instance, ensuring pedestrian and cycleway connections through the site).
- Preclude ensuring that the roundabout intersection on McLarin Road (south of the Business – Neighbourhood Centre land), is constructed as the precinct land is developed and subdivided.
- Not be required to maintain or enhance an identified amenity value, based on special character or informed by the past. There are no trees, stands of vegetation, or heritage values that would compel Council to apply the Single House zone. The site is located more than 120m from coastal esplanade reserves and to the south of residential developments on lots that are significantly smaller than the minimum 600m<sup>2</sup>.

Overall, the Single House zone would not achieve the plan change objective or deliver outcomes that are consistent with government policy on increasing housing supply and choice within urban areas. The Single House zone provisions would need to be overhauled to achieve these outcomes or separate overlay controls would be implemented to override the density provisions. For example, the Glenbrook 3 precinct provides for much smaller residential lot sizes than the Single House zone.

### **3.1.2 OPTION 2: APPLYING THE RESIDENTIAL – MIXED HOUSING SUBURBAN ZONE PROVISIONS**

This option would involve rolling out the existing (i.e., unchanged) Residential – Mixed Housing Suburban zone provisions in Part H4 of the AUP(OP) across the entire site and relying upon the current urban subdivision rules within Part E38 of the AUP(OP).

This option would involve no precinct plan overlay.

This option would:

- Enable approximately 7.897 ha of Future Urban zoned land to be developed for residential purposes. The MHS provisions provide for a range of development typologies and styles, without precluding the development of detached dwellings on large lots.
- Enable a mixture of densities to establish without 'split zoning' the site. For example, larger properties can be established on the steeper portions of the site while more intensive development can be established on the flatter parts of the site that are closest to the land zoned for neighbourhood centre/ commercial purposes. The existing MHS provisions provide a high degree of flexibility to respond to constraints and meet market demand.
- Meet the needs of the community and provide choice in housing typologies without requiring separate rules that provide for minor dwellings and intergenerational housing.

- Enable similar yard setbacks and coverage requirements to the Single House zone, which will facilitate a transition in character from existing neighbourhoods and retain a reasonable standard of amenity for a suburban neighbourhood.
- Retain 10m riparian yards from intermittent streams. (Riparian yards can be incorporated within residential lots but there is no requirement to plant native species within the riparian yard).
- Not guarantee the construction of a roundabout on McLarin Road, the provision of pedestrian and cycle connections through the site or support active interface and surveillance of roads and public open space without either changes to the standards that apply or by introducing overlay controls or objectives and policies.

### **3.1.3 OPTION 3: SPLIT ZONING OF THE LAND**

This option involves establishing the MHS zone on the northern, flatter portion of the site and the Single House zone on the southern, steeper portion of the site.

This option would involve no precinct plan overlay.

This option would:

- Prescribe the style and density of residential development that appropriately responds to site constraints and therefore provide a degree of certainty for the public in terms of the type of development that would be enabled by the MHS and Single House zone.
- Encourage a development layout and typology that would follow zone boundary lines. Future property boundaries are likely to align with the zone boundary to minimise the number of residential sites with a split zoning. Zone boundaries typically follow cadastral boundaries or are defined by roads or other physical features, which are not present on the land that is subject to the PPC.

Overall, it is considered that the outcomes under Option 3 could be achieved without a split zoning approach that could be cumbersome to administer.

The MHS zone provides for detached and attached (e.g., duplex and terrace) typologies and this provides sufficient flexibility to respond to contextual constraints without split zoning the site.

### **3.1.4 OPTION 4: SPLIT ZONING - MHS ZONE AND OPEN SPACE ZONE**

The option also involves establishing an Open Space zoning in the southern corner of the site and along the intermittent stream.

This option would involve no precinct plan overlay.

This option would continue the “green fingers” approach to providing open space zoned land along intermittent streams, as has occurred within the Glenbrook 3 precinct/ Kahawai Point Special Housing Area (SHA). (In this regard, it is noted that no firm decision has been made by Council’s Parks, Sport and Recreation team around the location or purpose of any future reserves on the site).

Open space zone zoning is not required as land can be vested under the Reserves Act 1977 while retaining a residential zoning. The amount of land vested to Council is likely to be small and for a specific purpose (such as drainage). It is more efficient to determine the size of these spaces once land has been subdivided and vested for this purpose. There is no benefit in identifying land that is to be used for reserve purposes through a plan change.

Furthermore, based on our discussions with Council's Parks Sport and Recreation team, it is unlikely that the vested land would be developed or used in a manner that would compel Council to impose a separate open space zoning and associated regulatory framework.

### **3.1.5 OPTION 5: EXPANSION OF GLENBROOK 3 PRECINCT PROVISIONS**

This option would involve expanding the existing Glenbrook 3 precinct provisions to include the site that is subject to this plan change.

Option 4 would involve expanding the Precinct Plan (I453.9), which is a detailed plan that shows the indicative location of roads, stormwater management ponds, existing streams to be preserved, walkways, etc.

It is important to note that the Glenbrook 3 precinct was introduced to the AUP(OP) via the Housing Accords and Special Housing Areas Act 2013 (HAASHA), which included affordable housing provisions that are not a mandatory requirement under the RMA, and that have not been incorporated into the AUP(OP).

The HAASHA was also a vehicle for Council to simultaneously consider a plan change request and a Qualifying Development resource consent application. Accordingly, a lot of detail about the development was included within the precinct provisions and this level of detail is not available for this plan change request.

The Glenbrook 3 precinct provisions were also prepared prior to a decision being made on the AUP(OP). This means that to some extent the stormwater management measures that apply in the Glenbrook 3 precinct duplicate the region-wide provisions that followed processes under the HAASHA.

This option would:

- Manage the residential use and development of 80 McLarin Road in conjunction with the Single House zone and Open Space: Informal Recreation zone provisions. (The Glenbrook 3 precinct provisions override the zone provisions).
- Embody the Te Aranga principles throughout the Glenbrook 3 development.
- Ensure that subdivision and development is undertaken in accordance with the precinct plan. (Development and subdivision not in accordance with precinct plan is assessed as a non-complying activity).
- Require reticulated wastewater and water to be available to service any subdivision or development and require development to be staged so that the road improvements (as identified in the precinct plan), are undertaken to mitigate traffic safety effects. (The Traffic Impact Assessment prepared by Traffic Planning Consultants Ltd for this plan change request concludes that most of the improvements to the local road network that were needed to support development within the Glenbrook 3 precinct have been completed).
- Increase housing supply and choice (including through the provision of affordable housing). (The affordable housing provisions kick-in for every development or subdivision that creates fifteen or more dwellings or residential lots).
- Limit density to 1 dwelling per 550m<sup>2</sup> or 1 affordable dwelling per 300m<sup>2</sup> provided that the number of sites between 300m<sup>2</sup> and 500m<sup>2</sup> does not exceed 20% of the sites created at any stage of the project. (The Glenbrook 3 precinct provisions therefore provides for a higher density than the Single House zone without the precinct plan).

- Provide for intergenerational housing on lots smaller than 800m<sup>2</sup>. (As far as we are aware, the Glenbrook 3 precinct is the only precinct in South Auckland that provides for intergenerational housing).
- Encourage the subdivision and development of a well-connected, adaptable, safe, attractive, healthy, and pleasant environment for living, through the objectives, policies and standards that apply. One way the precinct achieves this is by having rules that relate to the height and style of fencing on boundaries shared with reserves, roads and land zoned for open space purposes. The precinct also has design controls that are intended to improve passive surveillance of esplanade reserves and walking tracks.
- Encourage walking and cycling through the site with a mix of objectives, policies and standards that seek specific walking and cycling outcomes alongside the permanent and intermittent streams that are identified within the precinct plan. The Glenbrook 3 precinct requires a pedestrian/ cycle path to be located adjacent to a 10m planted riparian strip. (The precinct plan also states that the riparian planting requirements cannot be used to offset/ environmental compensation requirement associated with works or structures in a stream).
- Require the riparian margins (either side of the stream), and the adjacent walking/ cycling path to either be planted and vested at no cost to Council or protected by a consent notice on the title.

Overall, it is considered that the Glenbrook 3 precinct provisions would require significant and complicated amendments if it were to apply to the land that is subject to this plan change request. The objective of the plan change could be better achieved by creating new precinct provisions as opposed to making such extensive and complicated amendments to the Glenbrook 3 precinct.

Many of the Glenbrook 3 precinct provisions do not apply to the plan change area for reasons that include:

- The density limits/ minimum lot size provisions of the Glenbrook 3 precinct are unnecessary if the Residential – Single House zone is not applied as an underlying zone. Parts H4 (MHS zone) and E38 (Subdivision) can be relied upon to achieve a mixture of dwelling typologies, densities, and lot sizes.
- The provisions relating to intergenerational housing, papakainga housing and retirement villages in the Glenbrook 3 precinct are necessary because most of the precinct area is zoned Residential – Single House zone, which isn't as flexible as the MHS zone in terms of housing typologies and densities.
- The Auckland-wide provisions of the AUP(OP) can be relied upon to achieve the same stormwater management outcomes of the Glenbrook 3 precinct. Developers will need to demonstrate how stormwater runoff will be attenuated and treated as part of the resource consent process, and this could be through providing communal devices (e.g. ponds) and/ or retention tanks serving individual residential properties. Precinct specific stormwater management measures are not needed.
- The Glenbrook 3 provisions require a network of cycleways and footpaths to follow intermittent and permanent streams. These provisions require a 10m wide grassed margin alongside a 10m wide planted riparian margin. The site that is subject to this plan change request only contains one intermittent stream of low ecological value and the resulting riparian margins would not directly connect to a coastal esplanade reserve to provide a linked-up "green" network. A 20m wide riparian margin in this location could result in an inefficient subdivision/ development layout and may not achieve a direct connection from the Glenbrook



Beach Recreation Reserve to the zoned Business – Local Centre land on McLarin Road. We conclude that, at this stage, it is better to keep the precise location and alignment of a cycleway/ pathway flexible and to be considered at resource consent stage.

### 3.1.6 THE REASONS FOR DECIDING ON THE PROVISIONS

We have concluded that Option 5 is the most appropriate approach for achieving the objectives of the plan change because the zoning, precinct plan and provisions are all interlinked, and all require updating in order to fully achieve the objectives of the plan change.

## 3.2 COST - BENEFIT ASSESSMENT

This section provides an assessment of the costs and benefits of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposed plan change provisions as required under sections 32(2)(a) and (b) of the Act.

<b>TABLE 1: COST BENEFIT ANALYSIS IN ACCORDANCE WITH SECTION 32(2) OF THE ACT</b>		
	<b>BENEFITS</b>	<b>COSTS</b>
Environmental	<p>Benefits associated with retiring the land from agricultural land use, including reduced nutrient loading into receiving waterways and groundwater (through a reduction in fertiliser use) and reduced soil erosion (that would be associated with horticultural or agricultural activities).</p> <p>Introduction of stormwater treatment to improve the quality of water entering receiving waterways and the coastal/marine environment.</p> <p>Opportunities to enhance the condition of natural wetlands and intermittent stream, including riparian margins.</p> <p>Opportunities to introduce locally sourced native vegetation through street planting and riparian planning.</p> <p>The potential to create local walking and cycle connections between Glenbrook Beach and the Kahawai Point development, which would include the land that has been zoned Business – Local Centre. This will reduce the amount of vehicle trips required within the Glenbrook Beach settlement.</p>	<p>The proposal will result in the loss of productive soils, although it is noted that the site has been identified by Council as being suitable for urban development through the operative FUZ zoning.</p> <p>While the ecology report prepared by PDP has assessed the existing terrestrial and freshwater ecological values of the site as being 'low,' the shelterbelt and vegetation does provide some habitat value and there are no proposed or existing provisions within the AUP(OP) that would protect the habitat values that they provide. We have determined that it is not practical to retain the existing shelterbelts while encouraging a landform and layout that makes efficient use of the land that is subject to this plan change request.</p> <p>Enabling new impervious surfaces that will both increase the volume of stormwater being generated as well as the level of contaminants within the stormwater (associated with roads, driveways and parking areas). This has the potential to enter the receiving waterways</p>

**TABLE 1: COST BENEFIT ANALYSIS IN ACCORDANCE WITH SECTION 32(2) OF THE ACT**

	BENEFITS	COSTS
		<p>and coastal/marine area if not managed appropriately, which would then cause increased stream erosion and a reduction in water quality.</p> <p>Soil erosion associated with land modification required to develop the site for residential use.</p> <p>Adverse effects on the local transportation network from traffic arising during the construction period and from the resulting dwellings.</p>
Economic (including employment)	<p><u>Viability of retail and other services</u></p> <p>The proposed residential use of the land would increase the financial viability of establishing businesses on the zoned local centre land. As stated in the Market Economics report, some businesses require a reasonably sized walk-up residential population to become viable.</p> <p><u>Infrastructure Efficiency</u></p> <p>The plan change area would be serviced by the same water and wastewater services that would be needed to serve development on adjacent future urban zoned land and proposed rezoning would provide more customers to offset the cost of trunk wastewater infrastructure for the wider region (the Southwest Wastewater Servicing project).</p> <p>It is envisaged that the development will largely be self-sufficient with respect to stormwater infrastructure provided to mitigate the effects of the development.</p> <p><u>Economic Stimulus of Construction</u></p> <p>It is envisaged that development enabled by the plan change would create local employment during the construction period, which includes site-wide land development and the construction of buildings on created residential lots.</p>	<p>The financial cost of the plan change process to enable the proposal.</p> <p>The financial cost of providing the necessary infrastructure to support the proposal. This includes the necessary upgrades to provide water, wastewater, and stormwater services along with the necessary upgrades that are required for the transport network. This may also include costs associated with increasing the capacity of public facilities, such as schools.</p> <p>Opportunity cost associated with the loss of productive soils (albeit that the plan change area has been used for grazing).</p> <p>Opportunity cost of providing riparian planting, cycleways and on street parking to developing more housing with the associated economic benefits.</p>

**TABLE 1: COST BENEFIT ANALYSIS IN ACCORDANCE WITH SECTION 32(2) OF THE ACT**

	<b>BENEFITS</b>	<b>COSTS</b>
Social	<p>Benefits arising from additional job creation and employment opportunities during the construction phase.</p> <p>Cycleways and footpaths encouraged by the plan change will build upon the existing network within the Glenbrook Beach settlement. In particular, the cycleways and footpaths within the plan change area will connect the 'old' Glenbrook Beach community to the 'new' Glenbrook Beach community at Kahawai Point.</p>	<p>The financial cost of the infrastructure may be borne by Auckland Council (and ratepayers) although a significant proportion within the application site is expected to be funded by developers. This may preclude spending on other Council projects or initiatives that would derive a social benefit.</p>
Cultural	<p>Mana whenua engagement has been undertaken with only Ngati Te Ata confirming that they require a Cultural Values Assessment (CVA). A CVA has been prepared and no sites of cultural or archaeological significance were identified.</p> <p>Further engagement has been undertaken with the finalised specialist reports.</p>	<p>To be confirmed following the outcomes of further mana whenua engagement.</p>

### 3.3 EFFICIENCY AND EFFECTIVENESS

This section of the report assesses the efficiency and effectiveness of the provisions in achieving the objectives of the plan change.

The proposed provisions for the Glenbrook 4 Precinct will enable the efficient use of a valuable and scarce land resource that has been identified for urban expansion of Glenbrook Beach and that is strategically located and well suited to residential use, notably:

- The MHS provisions will achieve a compact 'urban' form at Glenbrook Beach to accommodate growth and minimise encroachment into the versatile/ prime soils that surround the plan change area.
- The plan change provides adequate flexibility to respond to market and site conditions. Prescriptive overlays have not been applied to encourage more intensive residential typologies on some parts of the PPC land, such as near the Business – Local Centre land. The MHS zone inherently provides for an appropriate density near the future local centre and provides for a mixture of housing typologies and densities.
- The plan change will enable the land to be developed when a publicly available reticulated wastewater connection is available. Indicative completion dates for the wastewater updates generally correlate with the timeframes provided by the FULSS for the land to be 'development ready'. Timely rezoning of the land will

enable subdivision design and layout to be consented in a comprehensive manner with land use activities ahead of connections to a public reticulated wastewater network being available by mid-2026.

- The plan change provides connections to open space and does not foreclose the opportunity to provide open space in either private or public space when the site is either developed or subdivided.
- Stormwater will be managed in accordance with existing Auckland-wide provisions and in a manner that integrates freshwater resources and stormwater devices into future development.
- The site can be adequately serviced for residential development once the planned reticulated wastewater network has capacity to serve the development. Only minor localised improvements to the road network are required to avoid and mitigate effects on its safe and efficient functioning. Water supply is available now to service development.

The provisions are effective because:

- They appropriately coordinate the development of land in single ownership and provide an indicative connection to neighbouring landholdings that include Future Urban zoned land south of the site.
- They do not require changes to the MHS zone or Auckland-wide provisions to achieve the objective of the plan change. The precinct approach has been adopted on other plan change areas to achieve specific outcomes and to address context specific resource management issues.
- The precinct plan has been based on best practise urban design principles whilst also delivering a pattern that is flexible to accommodate a wide range of residential uses.
- The adoption of updated road cross sections enables a roading hierarchy to be achieved within the precinct. Roads are appropriate for the relatively small size of the plan change area and are consistent with those being constructed within Kahawai Point under the Glenbrook 3 precinct. These roads can accommodate the volume of traffic they are intended to accommodate (and thereby avoiding either over designed or inadequate infrastructure provision).
- Stormwater will need to be addressed at subdivision and land use consent stage. The application will need to set out the upgrades that are necessary to avoid and mitigate effects from stormwater. This approach is preferred to establishing precinct-specific stormwater requirements. It also allows for stormwater management decisions to be based on the most up to date information available at the time, avoiding any ineffectiveness that may arise from inflexible and predetermined stormwater performance standards.

### 3.4 THE RISK OF NOT ACTING

Section 32(2)(c) requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the plan change.

We are of the view that the information that supports this plan change request is sufficient and not uncertain. The request has been prepared following stakeholder, mana whenua and community engagement.

We also note that the plan change request involves land that has an operative 'Future Urban' zoning in the AUP(OP) and has been identified in the Future Urban Land Supply Strategy 2017 (FULSS) as being 'development ready' between 2023 and 2027 and

accommodating a yield of 207 dwellings with the other FUZ land at Glenbrook Beach. Therefore, there is a high degree of certainty that the land will be urbanised, and there is also a high degree of certainty that the land will be zoned for residential use.

The request has then been supported by technical assessments including transport, ecology, urban design, infrastructure, archaeology, geotechnical, contamination, and economic assessments. These form a robust evidence base for the request and as such, we are of the view that sufficient information has been collated and that the risk of acting on this information is less than not acting.

## 4.0 CONCLUSION

The objectives of this proposed private plan change request are to achieve the co-ordinated expansion of the Glenbrook Beach settlement.

This assessment has demonstrated that:

1. The objectives of the proposal are appropriate in achieving the purpose of the Act;
2. The provisions of the plan change are an appropriate way of achieving the objective of the proposal and preferred to alternative options;
3. The overall benefits of the proposal outweigh the costs on the community, the economy and the environment; and
4. The provisions are an efficient and effective way of achieving the objectives.

## 5.0 LIMITATIONS

This report is for the use by HD Project 2 Ltd only and should not be used or relied upon by any other person or entity or for any other project.

This report has been prepared for the particular project described to us and its extent is limited to the scope of work agreed between the client and Harrison Grierson Consultants Limited. No responsibility is accepted by Harrison Grierson Consultants Limited or its directors, servants, agents, staff or employees for the accuracy of information provided by third parties and/or the use of any part of this report in any other context or for any other purposes.