

ATTACHMENT 1A

ADDITIONAL INFORMATION REQUEST

PLANNING

This attachment sets out the questions and responses to the clause 23 request (request for additional information) from the Council on the original plan change. This addresses the matters related to planning. .

This attachment sets out the topic, Council's question, the technical expert who prepared the response and the additional information sought by the Council.

TOPIC: YIELD

Specific request

Please clarify the calculation made for potential yield.

Reasons for request

Assumed yield enabled by the plan change is important as a basis to then analyse potential effects arising from future development. This includes effects on infrastructure, including transport, open space and community facilities, as well as other community needs such as access to retail and employment. While assumptions for calculating yield have been given (8.1 of the AEE) there is uncertainty about how those assumptions have then been used to arrive at assumed yield.

Please include details of:

1. Total site area over which the analysis has been undertaken
2. What areas have been excluded (m2 of spine roading, m2 of open space, anything else)
3. Define "land efficiency" – what, comprises the 25% excluded.
4. Detail what housing typology mix has been used for the assumptions.
5. Describe, using the areas enabled for housing and the heights proposed, where the assumed housing typology numbers could be applied across the precinct (i.e. breakdown of possible numbers around the precinct).

We would like to see the assessment clearly showing the geographic areas over which the calculations have been applied, ideally corresponding to some sort of table that shows the different ratios and assumptions that have been applied to each stage of the calculation to produce the final dwelling yield. Sufficient information is required to be able to replicate the same calculations on the identified mapped areas and therefore be able to test the sensitivity of the final dwelling yields to the assumptions applied.

An example table is below (containing dummy information) that demonstrates the type of information sought. It should contain a

separate row for each area within the precinct which has a different height limit or built height and dwelling typology assumed so that the calculations can be replicated. For example, block A has been split into two areas developed at different densities. Therefore, there it is shown as two separate rows in the table to be able to demonstrate the different densities and yields within each sub-area. I note that this information may be provided slightly differently for horizontally-attached dwellings (e.g. 2-3 level walk-up terraced housing) where individual sections may be first established and then dwellings constructed. This is fine, as long as it contains all of the information to be able to replicate and test the assumptions applied.

Map Area Reference	Typology	Gross Zoned Area (ha)	Developable Area (1) (ha)	Ratio to Parcelled Area (2)	Net Parcelled Area (ha)	Site Cover Ratio (3)	Site Cover (m2)	Height Limit (storeys)	Built Height (storeys)	Total Floorspace (m2)	Av. Dwelling Size (m2)	Est. Dwellings	Av. Land Per Dwelling (net) (m2)
A	Terraced	100	75	80%	60	50%	300,000	3	2	600,000	120	5,000	120
A	Vertically-Attached	20	18	75%	13.5	60%	81,000	6	6	486,000	80	6,075	22
B	Terraced	25	15	80%	12	50%	60,000	3	3	180,000	110	1,636	73
B	Vertically-Attached	30	15	75%	11.25	60%	67,500	8	6	405,000	80	5,062	22
B	Vertically-Attached	35	25	75%	18.75	60%	112,500	8	8	900,000	75	12,000	16

(1) This is the area which has undevelopable areas removed such as larger areas of open space (i.e. those areas that would often have an Open Space zoning in other situations), wetlands, etc.

(2) This is a separate ratio, applied subsequently to (1). It is the ratio applied to estimate the share of the developable area that would result in actual privately-owned parcelled area once public roads, reserves, etc have been removed. It is the usual 68%-70% ratio applied to greenfield areas, but realise this will be lower in this case due to the existence of main roads, etc.

(3) This is the % of the final parcelled area that is covered by floorspace.

Applicant response provided by

John Duthie of Tattico

Applicant response

- 1 This question effectively seeks a copy of the model used to calculate likely residential yield within the precinct.
- 2 The model is attached to this response. This model has been generated as a planning tool to obtain an overview of possible yield on the site, alongside this plan change. In this regard the following needs to be understood:
 - (a) The model does not reflect the intentions or plans of any of the site developers (the Rōpū of Ngā Mana Whenua o Tāmaki Makaurau). As discussed below, it extrapolates its results from a series of assumptions about potential yield based on land area, the existing and proposed zoning and height areas, typologies and urban form.
 - (b) Each of the site developers are preparing their own development plans which will vary from the model (except to the extent the model incorporates the existing resource consents).
 - (c) The model is not intended to give precise information on any one block. Rather its value is to provide an average development scenario that encompasses the entire development. Specifically, the block layout is for the purpose of assessing yield, and does not represent any proposed subdivision plan, including as the zoning changes

proposed through this plan change will influence the future layout, if confirmed. As land is developed subdivision will occur.

- (d) Each future development proposal will trigger resource consent. At that stage the Council will be able to assess the effects of a specific development, including the impact on infrastructure.
- 3 The basis of the calculations are set out below. The model and index map is attached to this reply. The model follows a similar approach to Council's example, but at a finer grained level.
- 4 The Crown land within the precinct has been broken down into different blocks based on a possible subdivision pattern and topography, solely for the purpose of generating yield assumptions.
- 5 The blocks relate to the attached map. Each block is ascribed a number which corresponds to the left-hand column within the model.
- 6 The model demonstrates a theoretical capacity of 4,618 dwellings. We have then run a density assessment based on each of these blocks.
- 7 The following key assumptions apply to the model:
- (a) For the proposed open space areas identified within proposed Precinct plan 1, there is no residential yield.
 - (b) The Former Oakley Hospital Building is a heritage building. The assessment assumes the conversion of a portion of this building to residential development (the other parts of the building being assumed for other adaptive reuse such as retail and professional offices). However, these assumptions, as with the model as a whole, involve the adoption of generic assumptions that do not represent actual plans.
 - (c) No account is being taken in this calculation of the Mason Clinic. This is a specialist health care facility and is being dealt with through Plan Change 75.
 - (d) No account has been taken of Unitec. This is a specialist tertiary education institute.
 - (e) Both the Crown land and the privately held Ngāti Whātua Whai Rawa blocks are included in the model. These holdings represent the land available for residential and mixed use development within the precinct, according to the current and proposed zoning. As with the rest of the model, the analysis of the Ngāti Whātua Whai Rawa land is a desktop assessment. The Crown has no particular knowledge of the intentions for this land.
 - (f) Three consents under the fast-track system have been granted for this area. The model has been updated to assume the yield as approved under these consents.
 - (g) The model assumes an averaging approach.
 - (h) The model includes the Taylors Laundry site (Sub-precinct B) and assumes this will be developed for residential purposes. This is a likely outcome but only in the longer term, given the property is leased for the medium term.
 - (i) Terrace Housing is based on an average site of 250m² gross land area. Assuming a double loaded road / access provision, which delivers about an average 180m² net for

end and mid-block sites. These assumptions reflect the yield in the granted fast-track consent for terrace housing within the south of the precinct.

- (j) Land efficiency takes account of the local roading network, infrastructure and potential open space that will be part of the overall subdivision and land development of the land. This is land that will not be part of a private development title.
 - (k) Site efficiency is the percentage of a site that will be developed for building footprint. The remainder of the land is in access, at grade parking, private open space, outlook areas and general landscaping.
 - (l) Building efficiency in apartment buildings is set at 80%. The other 20% is in corridors, vertical circulation space (lifts and stairwells) and services.
- 8 The model assumes 4059 apartments (including walkups) and 559 terrace houses. As discussed above, this does not represent the exact number of dwellings, or proportion of these typologies, that will be developed within the precinct. It provides an approximate measure which has informed the development of the precinct provisions that we propose be created through the plan change.
- 9 The tabulated form of the model is set out below.

KEY
ADAPTIVE USE
APARTMENT
WALKUP
TERRACE
OFFICE
OPEN SPACE

NOTE:

1* Height & GFA reflects existing heritage building. Assumes mixed use building
2* Due to the narrower footprint, it is assumed the equivalent of 1 floor is lost in lobbies, service rooms and communal amenity spaces
3A* Adopts existing FTCA consent
5* Site limitation by contour
6A* Adopts existing FTCA consent
7* Assumes business or community use of building
8* Blocks 8 and 9 treated as one development site
11* Assumes retention and adaptive reuse of pump house for business use
17C* Assumes continuation of office use and conference centre
21* Adopts existing FTCA consent and tabled architectural plans
22* Assumes retention of Penman House

For apartments it is assumed half a floor is lost in lobbies, service rooms (infrastructure, waste management bike parking and plant)

Typically, walkups have a higher efficiency at 55% due to factors including reduced parking

Premium apartments offering enhanced outlook have a average GFA of 100sqm

Where in the model different sub numbers are used in the block number e.g. 3B-1, 15B, they refer to a change in typology within the block. They are not bound to a geographic

TOPIC: TYPOLOGIES AND POPULATION

Specific request

Household types and expected population

P(F)1 Please provide further clarification of the mix of household types that could logically be expected to establish in the precinct, as revised. Please also provide an estimate of the total population that may be expected as a result of this housing mix.

Reasons for request

Information has been provided on the possible number of apartments and terrace houses. However, without further information, such as bedroom numbers, it is difficult to assess what population may be expected to establish, including how that may compare to what is enabled in the current precinct provisions. For instance, a simple dwelling number analysis does not enable a good comparison where the composition of the current dwelling mix includes 1,000 student units – which it is assumed would be only one person units.

Applicant response provided by

John Duthie of Tattico

Applicant response

This response addresses first, housing typologies, and second, likely population. These are based on general planning assessments. The Ministry of Housing and Urban Development (HUD) will not be the actual developer of the land. Developments will be undertaken by others, as detailed in the plan change application. However, a general assessment can be made and is attached to the application at xx. Furthermore, it is informed by the three applications which have already been granted within the precinct, being two resource consents for Marutūāhu and a resource consent for Ngāti Whātua, which demonstrate potential future typologies.

1. Typologies

The precinct is likely to be developed for a combination of social, affordable, and full market housing.

Response P1 sets out the Applicant's yield model, which has been developed for HUD to assess likely yield and density across the precinct.

This model identifies the likely development for a range of typologies including:

- Two and three level terrace house development.
- Walk-up apartments.
- Apartment buildings.

In addition, some sites are being considered for specialist housing including kaumātua housing or some form of specialist housing for the elderly.

In terms of dwelling size, it is also anticipated that there will be a range of different product focused in the two and three bedroom typology, but with a range from one to four bedroom.

However, as is typical across the region and particularly within other large residential and B-MU zoned brownfield sites, individual projects will be advanced and developed depending on different needs and requirements and owner aspirations at the time. Nevertheless, the mix of properties and the range of planning controls is likely to lead to a reasonably diverse range of typologies across the precinct.

2. Population

The existing precinct anticipated development of approximately 2,500 dwellings and 1,000 specialist accommodation units, which were originally associated with the Unitec campus and were intended to comprise a mix of student, staff and PhD/tutor accommodation.

Typical densities were applied to the existing precinct, i.e. based on 2.8 person average occupancy per dwelling and 1.2 person occupancy for the Unitec accommodation. The 1.2 ratio identified that the majority of those units would be student accommodation with the likelihood of single person occupancy. The staff and PhD/tutor accommodation was more likely to be in the 2.0-2.8 range.

Based on these assumptions, the development enabled by the existing precinct was assessed at 8,200 anticipated population.

The development enabled by the proposed precinct provisions has been assessed at between 4,000-4,500 dwellings across the range of typologies.

Applying an average of 2.8 person occupancy per dwelling, this would give a range of 11,200-12,600 population.

If housing for the elderly or kaumātua housing is introduced, this would have a typical occupancy rate of 1.5 persons per dwelling. This would reduce the overall population.

The expectation is that the population will eventually be in the range of 10,000-12,500 people when the precinct is fully developed.

TOPIC: COMMUNITY CONSULTATION

Specific request	Summary of community consultation outcomes
Reasons for request	It is understood the Applicant is undertaking local community consultation. It will be helpful to have information on the outcomes of that consultation.
Applicant response provided by	John Duthie of Tattico
Applicant response	

In addition to the Albert-Eden Local Board and stakeholder consultation outlined in the application, HUD has undertaken the following community consultation.

Public Drop in Sessions

- 1 Drop-in sessions were held in February 2023. Two sessions were held two weeks apart with a 3pm to 7pm timeframe. The time spread was intended to provide an afternoon and / or evening opportunity for people to visit the precinct, to question the HUD's consultant team, and to view a summary of the plan change material, including the Precinct plans. This also included information in respect of the existing precinct provisions and plans for comparison.
- 2 Approximately 25-30 members of the community attended on the first drop-in session, with around 50-60 attending the second session.
- 3 A broad range of the community attended including:
 - (a) residents;
 - (b) people who worked in the area;
 - (c) people studying in the area;
 - (d) people with children at primary schools in the area;
 - (e) local business owners;
 - (f) people coming on behalf of public interest groups; and
 - (g) Local Board members.
- 4 The key themes raised are set out below.
- 5 *Transport:*
 - (a) Traffic to and from the south and how this would be controlled to prevent through traffic in residential streets / the maintenance of the existing cul-de-sacs in the southern section of the development.
 - (b) Volumes of cars and the effects of increased traffic in surrounding streets.
 - (c) Integration with Auckland Transport's (AT) Carrington Road upgrade.
 - (d) Related upgrades and whether these were planned, including the Woodward Road Railway Crossing.
 - (e) Roading connectivity to and from the east, i.e. integration between the precinct and Mount Albert streets on the other side of Carrington Road.
 - (f) The feasibility of extending the Carrington Road upgrade east of Woodward Road (narrower corridor, steeper land adjacent) and how the rail and motorway overbridge pinch points would be dealt with.
 - (g) Concern about parking in surrounding suburbs by residents of the new "low car" development and whether a residents' parking scheme would be supported by AT.

- (h) Support for the alternative expanded cycleway network and connections to the Northwestern and Southern Cycleway to Mount Albert. Higher density considered to be supported by this network.
- (i) Support for the cycling initiatives in the plan change.
- (j) Questions about the new connection to the Northwestern Cycleway in light of the proposed connection, as shown on the operative Wairaka Precinct plans, being removed through the Mason Clinic plan change.
- (k) Support for provision of public walking through the precinct and connectivity to the surrounding neighbourhoods.

6 *Business – Mixed Use zone:*

- (a) The type of expected development e.g. housing typologies, the anticipated mix between public, affordable and market housing, the potential for a large number of apartments.
- (b) Provision of a masterplan.
- (c) Questions regarding whether there would be enough retail and hospitality provision for the local community, or would the future residents need to drive to services. Members of the community supported walkable opportunities for base convenience retail e.g. supermarket, dairy, hairdresser etc. without having to get in a car.
- (d) Interest by residents in the surrounding community in respect of accessing – via walking / non-car based mobility – retail and hospitality venues provided within the new community BMU. Noted loss of recent access to local dairy / walkable retail amenity.
- (e) Questions about the future of Taylor’s Laundry.

7 *Stormwater:*

- (a) Retention, detention and attenuation including how much on-site management of stormwater was anticipated.
- (b) January storm events and impacts across the precinct.
- (c) Effects on the neighbouring area including to the eastern side of Carrington Road (noting this is a different catchment).
- (d) Whether there are sufficient pervious areas planned within the precinct.

8 *Open Space and Community Facilities:*

- (a) Type and extent of open space.
- (b) Whether public or private.
- (c) Interest in any plans around community facilities.
- (d) Sanctuary gardens – what will happen to them.

9 *Trees:*

- (a) Protection for trees in the plan.
- 10 *Height:*
- (1) Permitted heights across the precinct, particularly along the Carrington Road frontage.
 - (2) Impact of Plan Change 78 and nature of change / further development opportunity in the surrounding residential area.
- 11 *Timing of the development:*
- (a) Timing of development, including interest in seeing development progress to help bring a future community to support the Point Chevalier town centre and its retailers.
 - (b) Timing of Carrington Road upgrades.
 - (c) Interest in opportunities to buy dwellings for themselves or family members.
- 12 *Former Oakley Hospital Building and Heritage:*
- (a) Interest in Building 1 (the Former Oakley Hospital Building) and its future.
 - (b) Request for the Pumphouse to be returned to a publicly accessible operating café / bar / restaurant.
- 13 *School:*
- (a) Whether a primary school is planned within the precinct and whether it could be added later if not included now.
- 14 *Housing tenures:*
- (a) Future home ownership tenures i.e. who will own the land, will it be leasehold, will there be public housing, will there be many rentals.
 - (b) Support for "rent to buy" possibilities.
- 15 HUD considers that the relevant matters raised at these sessions have been comprehensively addressed in the plan change application materials and clause 23 responses.

The Tree Council

- 16 HUD met separately with The Tree Council and a copy of the relevant parts of the plan change (i.e. the protected tree schedule) were provided. The Tree Council wanted assurance that the plan change was not altering the level of protection in the Auckland Unitary Plan (Operative in Part) (AUP) for either the identified trees in the precinct or the notable trees in the AUP. This assurance was given.
- 17 The Tree Council was also keen for future public space areas to encompass significant trees (as is the case with the notable trees, a proposal which they were supportive of).

Unitec's Ngā Kaitiaki Committee

- 18 Discussions were held with Unitec’s Ngā Kaitiaki Committee, which comprises a mix of Unitec staff and student representatives – primarily those associated with Unitec’s Te Noho Kotahitanga Marae, as well as some community representatives.
- 19 Discussions were had about the precinct name (with support for leaving it as “Wairaka”), the future of the Former Oakley Hospital Building, height controls, and biodiversity. The group requested the opportunity to walk around the precinct and discuss key locations identified in the plan change locations, which was agreed by HUD and occurred on 25 May 2023.

TOPIC: REGIONAL POLICY STATEMENT

Specific request Please provide an analysis of the proposed plan change in relation to AUP RPS chapters B3 – Infrastructure, Transport and Energy; B4 - Natural heritage; B5 – Built heritage and character; B6 Mana Whenua; B7 Natural Resources; B8 Coastal Environment and B10 Environmental Risk.

Reasons for request Required for a full understanding of the proposed plan change under the RPS.

Applicant response provided by John Duthie of Tattico

Applicant response

20 As stated in the plan change application, the plan change will give effect to the Regional Policy Statement, as required by s 75(3).

21 The attached table sets out the requested assessment of the plan change against chapters B3-B8 and B10 of the Regional Policy Statement.

RPS Chapter and provisions	Assessment in respect of plan change
B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao – Infrastructure, transport and energy	
<p>B3.2 Infrastructure</p> <p>B3.2.1 Objectives</p> <ol style="list-style-type: none"> (1) Infrastructure is resilient, efficient and effective. (2) The benefits of infrastructure are recognised, including: <ol style="list-style-type: none"> (a) providing essential services for the functioning of communities, businesses and industries within and beyond Auckland; (b) enabling economic growth; (c) contributing to the economy of Auckland and New Zealand; (d) providing for public health, safety and the well-being of people and communities; (e) protecting the quality of the natural environment; and (f) enabling interaction and communication, including national and international links for trade and tourism. (3) Development, operation, maintenance, and upgrading of infrastructure is enabled, while managing adverse effects on: <ol style="list-style-type: none"> (a) the quality of the environment and, in particular, natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; (b) the health and safety of communities and amenity values. (4) The functional and operational needs of infrastructure are recognised. (5) Infrastructure planning and land use planning are integrated to service growth efficiently. (6) Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development. (7) The national significance of the National Grid is recognised and provided for and its effective development, operation, maintenance and upgrading are enabled. 	<ol style="list-style-type: none"> 1. Development enabled by the plan change will be integrated, as far as possible, with the network infrastructure upgrades planned in this part of the city. However, as there was originally the possibility for some misalignment in the timing of the Carrington Road upgrades, the Crown has funded Auckland Transport to complete this upgrade for dedicated walking, cycling and public transport connections, which will now be delivered in good time (between 2025 and 2027) to ensure public transport and alternative modes are available as the new community is establishing. 2. The current major wastewater upgrade Watercare is undertaking, through building of the Central Interceptor, and the effect of this in terms of wastewater infrastructure capacity effectively provides a resilient wastewater network on its forecast completion in 2026. 3. Other network infrastructure upgrades will also benefit this development, particularly Watercare’s Sutherland Bulk Supply Point (potable water), and the City Rail Link. The Sutherland bulk water supply is within the Watercare AMP and budgeted for completion within the next few years (currently 2024, but not critical to this project until later). The City Rail Link will enhance public transport options particularly for residents in the southern part of the precinct. 4. There is no impact on regional infrastructure. The primary regional infrastructure through the precinct is the Ōrākei Main which is not impacted by this plan change. 5. The key natural resource is the Te Auaunga stream (Oakley Creek) and the protected trees with in the precinct. This plan change retains the additional yard setback of 10m to Oakley Creek as required under the current Precinct provisions. This is designed to enhance protection of the Te Auaunga stream environs. The plan change also retains the same list of protected trees.

RPS Chapter and provisions	Assessment in respect of plan change
(8) The adverse effects of infrastructure are avoided, remedied or mitigated.	
<p>B3.3 Transport</p> <p>B3.3.1 Objectives</p> <p>(1) Effective, efficient and safe transport that:</p> <ul style="list-style-type: none"> (a) supports the movement of people, goods and services; (b) integrates with and supports a quality compact urban form; (c) enables growth; (d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community. 	<ol style="list-style-type: none"> 1. Consistent with the above response in relation to infrastructure, effective, efficient and safe transport will be provided in an integrated manner, in accordance with the precinct provisions proposed in the plan change. 2. The precinct is uniquely located in terms of the walkway and cycleway network, bus network, and, particularly for the southern portion of the precinct, access to trains. 3. The transport links, across several modes and improving with the planned upgrades, between the Mount Albert and Point Chevalier town centres assists in the integration between these two growth nodes. 4. As a result, the plan change, and development enabled by it, will provide significant transport choices.
B4 Te tiaki taonga tuku iho - Natural heritage	
B4.2 Outstanding natural features and landscapes	<ol style="list-style-type: none"> 1. There are no outstanding natural features or landscapes within the precinct.
<p>B4.3 Viewshafts</p> <p>B4.3.1 Objectives</p> <p>(1) Significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development.</p> <p>(2) Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use and development.</p>	<ol style="list-style-type: none"> 1. Existing viewshafts over the precinct are protected by the Auckland Unitary Plan (Operative in Part) (<i>AUP</i>) overlay provisions. 2. There is no change to these provisions through this plan change. 3. No height standard proposed through the plan change will impinge on any existing viewshaft. 4. This plan change fully protects the volcanic viewshaft that crosses the southern part of the precinct.
<p>B4.5 Notable trees</p> <p>B4.5.1 Objectives</p> <p>(1) Notable trees and groups of trees with significant historical, botanical or amenity values are protected and retained.</p>	<ol style="list-style-type: none"> 1. There are no changes to notable trees as part of this plan change. 2. The Council has recently reviewed the tree schedule within the region. This culminated in Proposed Plan Change 83 (<i>PC83</i>) looking at notable trees.

RPS Chapter and provisions	Assessment in respect of plan change
	<ol style="list-style-type: none"> 3. PC83 proposed to amend the description of the only notable group of trees in the precinct (ID 173) from 6 to 5 trees. HUD has made no comment on this plan change as it accepted the Councils changes. 4. However, due to a notification error, this amendment has been withdrawn from PC83 and we understand will be included in a subsequent Council plan change. 5. The withdrawal of the proposed amendment has no effect on the plan change. 6. In addition to the notable trees, the precinct provides a schedule of specifically protected trees. Again there is no change to those provisions as part of this plan change. 7. This plan change is consistent with the regional policies on notable trees.
B5 Ngā rawa tuku iho me te āhua – Historic heritage and special character	
<p>B5.2 Historic heritage</p> <p>B5.2.1 Objectives</p> <ol style="list-style-type: none"> (1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development. (2) Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation. 	<ol style="list-style-type: none"> 1. Heritage protection is provided through the overlay provisions within the AUP. In particular, these provisions identify the Former Oakley Hospital Building as a protected heritage building. 2. There is no change to the protection of this building or its extent of place as part of this plan change. 3. There are no changes to any of the heritage or character provisions or operative precinct provisions that encourage the retention and adaptation of the Former Oakley Hospital Building. 4. In addition, a new policy is proposed in the precinct provisions through the plan change to encourage adaptive re-use of existing buildings with historic value for retail activities.
B6 Mana Whenua	

RPS Chapter and provisions	Assessment in respect of plan change
B6.2 Recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation	<ol style="list-style-type: none"> 1. This chapter of the Regional Policy Statement sets out a series of objectives and policies relating to partnership with mana whenua. 2. Fundamentally, this plan change is supporting the provision of Treaty redress in part settlement of historical Treaty of Waitangi grievances by the Crown, as set out in the provisions of the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed and Act which contain the terms which underpin this plan change proposal. It, therefore recognises Treaty of Waitangi/ te Tiriti o Waitangi partnerships and participation. 3. As the development will be undertaken by the iwi collectives (Rōpū), its outcomes will reflect their participation in urban development, in partnership with the Crown.
B6.3 Recognising Mana Whenua values B6.4 Māori economic, social and cultural development B6.5 Protection of Mana Whenua cultural heritage	<ol style="list-style-type: none"> 1. These objectives are all directly related and relevant to this plan change. 2. Particular objectives and policies are introduced into the plan change which promote Māori economic development and the cultural values of this land. 3. This plan change enables the three Rōpū comprising 13 iwi to advance their own economic development aspirations and to do this in a manner which protects and enhances their cultural values for this place. 4. This plan change is fully consistent with, and gives effect to, these regional objectives. In particular, it has been drafted to support Rōpū aspirations for the precinct, and the proposed provisions have been agreed with them.
B7 Toitū te whenua, toitū te taiao – Natural resources	
B7.2 Indigenous biodiversity B7.3 Freshwater systems	<ol style="list-style-type: none"> 1. The natural resource provisions are reflected in the Auckland-wide provisions of the AUP. This plan change does not seek any changes to these Auckland-wide provisions.

RPS Chapter and provisions	Assessment in respect of plan change
	<ol style="list-style-type: none"> <li data-bbox="1093 247 2045 347">2. The operative precinct adopts in full all the objectives, policies, rules and assessment criteria of the Auckland-wide provisions, and this is not proposed to be changed through this plan change. <li data-bbox="1093 387 2045 448">3. In that regard, this plan change is fully consistent with the Regional Policy Statement by virtue of adopting the Auckland-wide provisions of the AUP.
B8 Toitū te taihenua – Coastal environment	
	<ol style="list-style-type: none"> <li data-bbox="1093 515 2045 719">1. The precinct is not on the coast and therefore does not directly relate to these policies. The regional and Auckland wide policies on Water quality and land disturbance provide appropriate methods to manage the effects of development and the impact on the coastal environment. These policies and related provisions are all applicable with in the precinct. This plan change does not seek to alter any of those provisions.
B10 Ngā tūpono ki te taiao - Environmental risk	
B10.2 Natural hazards and climate change B10.3 Land – hazardous substances B10.4 Land – contaminated	<ol style="list-style-type: none"> <li data-bbox="1093 890 2045 991">1. The Regional Policy Statement addresses natural hazards and climate change, land hazardous substances, land contaminated, and genetically modified organisms. <li data-bbox="1093 1031 2045 1091">2. The provisions which flow from these objectives are set out in the Auckland-wide objectives, policies and rules of the AUP. <li data-bbox="1093 1131 2045 1232">3. The precinct fully adopts those Auckland-wide provisions. It does not seek to delete or change any objective, policy, method or assessment criteria relating to environmental risk. <li data-bbox="1093 1272 2045 1300">4. There are no known natural hazards that apply to the precinct.

RPS Chapter and provisions	Assessment in respect of plan change
	<p>5. There are overland flow paths that traverse through the precinct. These are fully addressed in the Stormwater Management Plan for the precinct which has been adopted by Council. This demonstrates how stormwater management and localised flooding and overland flow is to be managed on site.</p> <p>6. Significant portions of this work are well advanced. This includes works consented and delivered including the daylighting of the Wairaka Stream, and Outfall 6.</p> <p>7. In addition, the Mason Clinic development is advancing the management of certain overland flows and stormwater in the northern portion of the precinct.</p> <p>8. The land does have isolated pockets of historical land contamination.</p> <p>9. For the central and northern portion of the precinct, a global land contamination consent has already been obtained. This sets up the process to monitor and manage these effects. The process for investigation and management of any contaminants is set out within that consent.</p> <p>10. Areas of land not covered by this global land contamination consent, are subject to separate applications under the Auckland-wide provisions as addressed in clause 23 response P7.</p> <p>11. Any hazardous substances stored on site within the precinct would be subject to the objectives, policies, rules and standards of the relevant Auckland-wide provisions.</p> <p>12. In terms of environmental risk, the regional objectives and policies are embodied in the Auckland wide provisions. These provisions are adopted in full within this precinct. There are no environmental risk features inherent to this precinct that warrant provisions beyond the Auckland wide controls.</p>

TOPIC: IWI MANAGEMENT

Specific request	Please provide an analysis of the proposed plan change in relation to any applicable iwi management plan.
Reasons for request	Required for a full understanding of the proposed plan change in relation to any relevant iwi management plan.
Applicant response provided by	John Duthie, Tattico

Applicant response

- 1 While iwi management plans have been produced, at various times, for the Wairaka Precinct there are no iwi management plans that apply specifically to this plan change.
- 2 While this plan change has been put forward by HUD, it is in the context of Treaty settlement obligations that apply to the Crown over the site, which were agreed as part of the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed arrangements. As part of those arrangements, the Crown is working closely with the three Rōpū parties to the Collective Redress Deed: Marutūāhu, Ngāti Whatua and Waiohua-Tāmaki who will take ownership of the land and undertake development, in partnership with HUD. The thirteen iwi constituting those three Rōpū are:

Marutūāhu Rōpū:

- (a) Ngāti Maru.
- (b) Ngāti Pāoa.
- (c) Ngāti Tamaterā.
- (d) Ngaati Whanaunga.
- (e) Te Patukirikiri.

Ngāti Whātua Rōpū:

- (f) Ngāti Whātua Ōrākei.
- (g) Te Rūnanga o Ngāti Whātua.
- (h) Ngāti Whātua ki Kaipara.

Waiohua-Tāmaki Rōpū:

- (i) Ngāi Tai Ki Tāmaki.
- (j) Ngāti Tamaoho.
- (k) Ngāti Te Ata.
- (l) Te Ākitai Waiohua.

(m) Te Kawerau ā Maki.

- 3 Two other groups are identified in the Auckland Council database as having an interest in this land, Te Ahiwaru (Makaurau Marae) and Waikato-Tainui. Both those additional groups have been written to but, given the Treaty settlement context noted above, comments have not been received and are not expected.
- 4 The HUD consultation has been with the three Rōpū and the representatives of the iwi.
- 5 All of the Rōpū have been consulted over the details of the plan change and have supported it. All cultural elements have been built into this plan change with their support. Each will bring their individual cultural perspectives to the development.

TOPIC: RELATIONSHIP TO LONG TERM PLAN

Specific request Please provide an analysis of the proposed plan change in relation to the Auckland Council Ten Year Budget / Long Term Plan 2018-2028

Reason for request Required for a full understanding of the proposed plan change in relation to the demands of development enabled by the plan change and what is / what is not provided for in Council's LTP.

Applicant response provided by John Duthie, Tattico

Applicant response

- 1 The question relates to funding of infrastructure and how this plan change relates to Council's planned expenditure.
- 2 While the question is confined to the Council's Long Term Plan (*LTP*) (noting that the current LTP is for 2021-2031), Auckland Transport's (*AT*) funding plan (Regional Land Transport Plan 2021-2031) and Watercare's funding plan 2021-2031 are also relevant to funding of infrastructure required to service the precinct.
- 3 The LTP's most significant budget centre is for the funding of transport functions into AT.
- 4 Watercare are self-funding necessary infrastructure through its user-pays regime.
- 5 The Crown's funding of the Carrington Road upgrades and the funding of the cycle lane extensions within the precinct means that this development will have some, but a proportionally low, regional impact on transport funding through the existing LTP. Rather, the proposed development has facilitated a funding stream to pay for a major regional project that will help enable intensification within this part of the city - being the Carrington Road upgrade.
- 6 An assessment of the different types of network infrastructure required to service the precinct and relevant funding streams is set out in the table below.

Network infrastructure	Funding scenario	Relevant services
<p>Transport</p> <p>Core regional transport infrastructure relating to public transport, funded through Council's LTP</p>	<p>To the best of HUD's knowledge, the bus and train services the plan change relies upon are either already funded, with that funding due to continue, or in some cases service levels are due to be enhanced. This is particularly the case for the rail corridor with the opening of the City Rail Link (CRL).</p> <p>The Crown has provided \$113.2 million for the Carrington Road upgrade, which AT nominated as the budget for an upgrade for its full length (Great North Road to New North Road).</p> <p>Presumably when the Council and AT next update the LTP and AT funding plans, it will factor in both the funding, and timing of the works, for the Carrington Road upgrade. However, regardless of what appears in the plans, the Crown has funded the work to AT's estimates on budget and it is for the Council to now manage and deliver the project. Funding is no impediment to delivery.</p>	<p>Development of the precinct as enabled by the plan change will rely on a high quality public transport system. The Carrington Road corridor is well serviced by the Link service at good frequency. Other bus services in the Great North Road corridor, and the train services through the Mt Albert and Baldwin Road stations, provide important public transport connections for the northern, central, and southern parts of the precinct. These include northern services to Great North Road and Point Chevalier, western services (and some southern) across the Waterview overbridge to Great North Road, central, eastern and some southern services to the Carrington Road services and the train stations).</p> <p>Carrington Road widening for public transport and alternative modes is a major upgrade which for some time has been in the Regional Land Transport Strategy but deferred due to budgetary constraints. \$55 million was allocated in the previous Regional Land Transport Strategy.</p>
<p>Transport</p> <p>Core regional transport infrastructure relating to walking and cycling funded through Council's LTP</p>	<p>The plan change will deliver an additional, separated, dedicated cycling link between Mount Albert / the Waterview Shared Path and the Northwestern Cycleway, through the precinct, as well as dedicated cycling links East/West between the Oakley Creek overbridge and Carrington Road. There is no cost to either the AT or Auckland Council funding plans from these works.</p>	<p>The land benefits from being close to the junction of the Northwestern Cycleway and the Waterview Shared Path which connects to the Mount Albert cycleway.</p>

Network infrastructure	Funding scenario	Relevant services
<p>Wastewater</p> <p>Funded through Watercare’s budget and Infrastructure Growth Charges (<i>IGC</i>)</p>	<p>The Central Interceptor is fully funded through Watercare budgets and well into construction (due to complete in 2026).</p> <p>IGCs will be paid by the development, part of which will be a contribution towards the cost of that work.</p> <p>Wastewater requirements will have no impact on the Council LTP and, in terms of Watercare’s network, the project will be a contributor through IGCs to the upgrade of wastewater and water supplies.</p>	<p>The wastewater servicing of the precinct in the middle and latter stages relies on the completion of the Central Interceptor that is forecast to be complete by the end of 2026.</p> <p>The assessment criteria within the Auckland Unitary Plan (Operative in Part) make it clear that each subdivision must be capable of being serviced by wastewater infrastructure.</p>
<p>Water</p> <p>Funded through Watercare’s budget and IGCs</p>	<p>Water infrastructure upgrade costs are within the Watercare budget and so are available to fund the Sutherland Bulk Supply Point (<i>BSP</i>) upgrade.</p> <p>The proposed works by Watercare will change the location of the main water supply to the precinct to free up demand for other developments outside the precinct.</p> <p>The necessary extension and upgrade to public water mains connecting the project to the Sutherland BSP will be funded through the development enabled by the plan change.</p> <p>IGCs from the development enabled by the plan change will also contribute to the funding for the BSP infrastructure.</p> <p>This will have no impact on the Council’s LTP.</p>	<p>Water servicing of the precinct is subject to an upgrade to the Sutherland BSP.</p>

Network infrastructure	Funding scenario	Relevant services
<p>Open space</p> <p>Funded through the LTP</p>	<p>HUD has been in discussions with Council officers in relation to the funding of open space and understands from these discussions that:</p> <p>There is no particular allowance within the LTP for open space purchases within the precinct. However, there are general budget allocations that could be used to fund the neighbourhood park acquisition.</p> <p>There is a significant uplift in housing yield that will generate additional income into the development contributions open space budget, and should therefore enable Council to complete the open space purchases.</p>	<p>This development provides 5.1ha of open space or 15% of the HUD land area.</p> <p>The Mason Clinic provides for its own open space internally given the nature of their facility.</p> <p>Unitec has its facilities within its own campus area.</p>
<p>Community facilities</p> <p>Funded through the LTP</p>	<p>There is a significant uplift in housing yield that will generate additional income into the community facilities budget, and should therefore enable Council to invest in community facilities either within the precinct or in the vicinity.</p>	<p>There are no public community facilities provided as part of this development directly. The plan change and underlying zoning enables community facilities. Facilities necessary to serve the community may develop within the precinct over time given the enabling framework.</p>

TOPIC: RELATIONSHIP TO ALBERT-EDEN LOCAL BOARD PLAN

- Specific request** Please provide an analysis of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020.
- Reasons for request** Required for a full understanding of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020.
- Applicant response provided by** John Duthie, Tattico

Applicant response

- 1 The Local Board Plan 2020 (*Local Board Plan*) has six key outcomes. The response below explains how the plan change makes a contribution to each of these outcomes.

Outcome 1: resilient connected and empowered communities who value diversity

- 2 Spatially, and in its objectives, the plan change is intended to ensure that the future community is connected into the adjacent neighbourhoods of Mount Albert, Point Chevalier and Waterview. This is realised both practically through the roads, walking and cycling paths that are updated through the plan change to reflect the extended network being built, and in provisions that recognise the need for a variety of community facilities and opportunities for the community to socialise, work, undertake learning, and recreate within the precinct, as well as acknowledging the hierarchy of the Mount Albert and Point Chevalier town centres as hubs for the wider suburban area.
- 3 The range of housing typologies, and mix of social, affordable, and market housing that will be delivered through the development that will be enabled by the plan change will contribute to creating a diverse community.

Outcome 2: neighbourhoods that reflect and value our heritage and unique identity now and into the future

- 4 The plan change increases the emphasis given to the priorities of the Rōpū, who together represent 13 iwi/hapu of Tāmaki Makaurau, including through amendments to the objectives and policies to provide for contributing to Māori cultural promotion (I334.2(10)(f) and I334.3(4)(e)).
- 5 The plan change also includes a specific policy seeking to encourage the adaptive reuse of the existing buildings with heritage values for retail activities (I334.3(30A)), which is intended to assist in their preservation. The plan change is intended to enable a future community with a higher density urban form but also seeks to minimise the impact of additional development height on the existing neighbouring suburbs by focusing provision for this height away from these areas. (Refer also the planning report and clause 23 responses on heritage.)

Outcome 3: high-quality natural environments and sustainable lifestyles

- 6 The plan change provides for a network of ~9.5 hectares of inter-connected open space and road reserve that will provide scope for extensive native planting, and reinforce existing natural corridors between the precinct, the Wairaka Stream and Te Auaunga/Oakley Creek. The increase in height proposed in the plan change enables additional housing without amending the current standards relating to impervious surfaces. It reinforces the extended walking and cycling networks being built, providing the future community with choices in transport mode and excellent options for accessibility.

Outcome 4: a strong local economy with thriving town centres

- 7 The plan change continues the strategy in the operative precinct provisions of supporting the Mount Albert and Point Chevalier town centres, by providing for a supporting level of retail activity within the precinct.
- 8 It will also assist to enhance the local economy by providing additional housing, and therefore population to support the existing town centres, being well-located for accessibility to both

Mount Albert and Point Chevalier, as well as generating supporting commercial and retail activity and employment within the precinct.

Outcome 5: parks and community facilities meet a wide range of needs

- 9 The Local Board Plan states that the Albert-Eden Local Board “will advocate for adequate open space and community services where there will be large scale developments at the ex-Unitec Institute of Technology site in Mount Albert”. The plan change contains a significant public open space proposal, and discussions with Council and the Albert Eden Local Board on this proposal have been regular and are ongoing.

Outcome 6: safe, easy and sustainable options for moving around

- 10 As noted above, the plan change updates the walking and cycling networks within the precinct, including to reflect the more extensive provision proposed. Alongside the open space networks, which will also connect pedestrians within and through the precinct, the plan change supports and enables alternative transport modes.

TOPIC: NATIONAL ENVIRONMENTAL STANDARDS FOR ASSESSING AND MANAGING CONTAMINANTS IN SOIL TO PROTECT HUMAN HEALTH

Specific request Please provide an analysis of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

Reasons for request Required for a full understanding of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

Applicant response provided by John Duthie, Tattico

Applicant response

- 1 The information request is for an analysis of the proposed plan change in relation to the National Policy Statement on National Environmental Standards for Assessing and Managing Contaminants in Soils to Protect Human Health 2011 (NESCS).
- 2 The purpose of the NESCS is to provide a nationally consistent approach to the assessment and management of contaminants in soil for the protection of human health.
- 3 The NESCS identifies the matters that will be taken into account when consent is required under the NESCS.
- 4 In relation to the precinct, extensive assessment of site investigation and soil sampling has already taken place over the central and northern parts of the precinct, as set out below. The applicant accepts that future consenting will be required in some areas to undertake reporting and testing prior to development of the land where that land is not already the subject of approved consents under the NESCS. At this stage, no further assessment under the NESCS is required.

Global land contamination consent

- 5 The Marutūāhu and Waiohua-Tāmaki Rōpū have obtained a global land contamination consent for the entire HUD properties. This does not include the Whai Rawa, Unitec or Mason Clinic land, but those land owners may have previously undertaken a Preliminary Site Investigation (PSI). (It is understood at least Unitec has.) This plan change does not seek any rezoning of those sites (Unitec, Whai Rawa, Mason Clinic).
- 6 The global land contamination consent application was supported by a Detailed Site Investigation (DSI) by Beca, including a Contaminated Site Management Plan (CSMP) and Remediation Action Plan (RAP).
- 7 That consent included a detailed assessment under both the NESCS and the Auckland Unitary Plan (Operative in Part) (AUP).
- 8 The DSI identified there were substantial portions of the HUD properties that had no discernible contaminants above trigger levels. There were a number of buildings which had asbestos. There were some locations of potential future contaminants, e.g. coal bunkers on the Taylors Laundry site.
- 9 The existing consent sets out an approved process for the management of land contamination in various parts of the precinct. In certain identified areas it also requires additional investigative work.
- 10 That consent is relied on as part of this plan change request. It provides a comprehensive management regime for all land contamination issues on-site.
- 11 That consent forms part of Council's records, including the consent itself, assessment under the NESCS, CSMP, and RAP.
- 12 To assist reporting officers in their consideration, I reference the consent number, which is BUN 60388418.
- 13 In summary, the Council, in determining the global consent, found that the land contamination matters on the property were appropriately managed through the conditions of consent and the process outlined within the consent such that the effects would all be less than minor.

Balance of precinct land

- 14 For the area of the precinct not subject to the global contamination consent, and for which consents are not already held, individual resource consents will be sought at the time of development in accordance with the NESCS and AUP provisions, which are not proposed to be amended through this plan change.
- 15 That approach has been adopted by Ngāti Whātua in seeking consent under the NESCS as a component of its fast-track consent application for development in the south of the precinct. A PSI and DSI were carried out to inform that application, and a CSMP and RAP prepared and provided as part of the application.¹

¹ Unitec Residential Development – Wairaka Stage 1, Application materials available here: <https://www.epa.govt.nz/fast-track-consenting/listed-projects/wairaka-stage-1/the-application/>.

TOPIC: HEIGHT VARIATION CONTROL

Specific request Please explain why the applicant has elected not to use the height variation control in the B-MU zone in conjunction with the precinct provisions.

Reasons for request Council's preference is not to introduce bespoke provisions in precincts when other tools are already available.

Applicant response provided by John Duthie, Tattico

Applicant response

- 1 This question relates to the appropriate method for setting height controls within the precinct.
- 2 The question states that the Council's preference is not to introduce bespoke provisions in precincts when other tools are already available.
- 3 The question is asked as to why the applicant has elected not to use the Height Variation Control in the Business – Mixed Use zone in conjunction with the precinct provisions.
- 4 The applicant considered the available Auckland Unitary Plan (Operative in Part) (AUP) methods for providing for alternate height within the precinct before deciding to propose Precinct plan 3 – Te Auaunga Additional Height and associated precinct provisions. Of relevance:

AUP tools

- (a) The Height Variation Control in the AUP is designed to work alongside zonings:²

Zones are identified on the planning maps. In addition, zone rules which have a spatial component such as the Height Variation Control are identified on the planning maps.
- (b) The Height Variation Control is therefore used to identify where a variation to the standard zone provisions, i.e. regarding height, applies.
- (c) In contrast, where a precinct is applied, that already acts as an indicator that bespoke provisions apply to that area of land:³

Precincts 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.
- (d) Different methods are used within precincts to set alternative height standards. Some achieve this by reference to sub-precincts,⁴ whereas others include a separate precinct plan identifying the different height standards that apply in different areas within the precinct.⁵ While there are some limited instances where the Height Variation Control has been applied within a precinct, the applicant understands the

² AUP, Chapter A Introduction: A1.6.4. Zones.

³ AUP, Chapter A Introduction: A1.6.5. Precincts.

⁴ For example, the sub-precincts within the Albany 10 and Hobsonville Point Precincts.

⁵ For example, Precinct Plan 2 in the Three Kings Precinct.

above approaches to be the more common method of providing for alternate height within a precinct under the AUP; as additional height provided for within a precinct is necessarily linked to the outcomes sought to be achieved, and activities that are provided for, in that particular precinct; together with the particular assessment criteria contained in the relevant precinct to assist in achieving the stated outcomes.

Plan change approach adopted

- (e) When considering what approach to apply within the existing Wairaka Precinct, it was relevant to consider the existing precinct provisions alongside the outcomes sought to be achieved to provide for the future community within the precinct.
- (f) In the operative Wairaka Precinct, sub-precincts are used for a specific purpose – to identify areas within the precinct where particular objectives apply to enable activities specific to that area within the precinct. Height is addressed separately in the operative precinct provisions.⁶
- (g) It would therefore not be suitable to use the sub-precinct mechanism to set the different height standards sought to be provided for within this plan change.
- (h) Accordingly, the applicant has elected to adopt the approach of providing a separate precinct plan to identify the height sought to be enabled within the precinct in different areas to provide for its future community, recognising that this is a tool that has been used elsewhere within the AUP precinct framework, as set out above.
- (i) Precinct provisions enabling the assessment of development in these areas are proposed with reference to proposed Precinct plan 3.
- (j) That approach is of particular relevance in Height Area 1, where a flexible height arrangement is allowed with three towers enabled up to varying heights. This is not a case of a single set height across this entire part of the precinct. Rather, heights can vary by building in different locations.
- (k) Critical to the workability of the maximum height control in Height Area 1, is the combination of maximum height and maximum diagonal dimension controls. The two standards work together to achieve the desired planning outcome. It is more logical and operationally significantly easier to collocate these provisions within the precinct standards.

How Height Variation Control could be used

- (l) While it could be possible to manage height in other areas of the precinct through the application of the Height Variation Control, that would result in two separate frameworks applying within the precinct, which the applicant considers would be an unnecessarily confusing outcome, given that other established tools exist within the AUP. The applicant considers the approach taken in this plan change to be a more straightforward method of identifying the height standards that apply to different areas within the precinct, and the particular provisions that apply to the assessment of building of this height in the different areas.
- (m) The alternative would be applying the Height Variation Control, including with a cross reference to the Wairaka Precinct provisions with respect to Height Area 1, given the particular provisions that apply in this area. However, that would be the first time

⁶

AUP, I334 Wairaka Precinct: I334.6.4. Height.

that approach is used in the AUP. Hence the applicant's preference to manage all height controls through the precinct provisions as proposed in the plan change.

- 5 In summary, the applicant considers the approach it has taken in this plan change to identifying the various height standards sought to be applied within the precinct to be the most appropriate AUP tool to enable development to provide for the future community within the precinct.

TOPIC: YIELD COMPARISON

Specific request

In relation to residential yield it would be helpful to have a comparison with a calculation of what yield is considered reasonably enabled by the current precinct provisions. This will better enable a comparison between current and future assumed needs for, for instance, retail and open space. In that respect it is of concern that the plan change appears to propose maintenance of current levels of retail and open space which may not address the extra demands arising from a significantly higher population. This is not included as an RFI, as it relates to the current rather than proposed provisions. However the applicant is encouraged to provide this information.

Applicant response provided by

John Duthie, Tattico

Applicant response

- 1 This is a non-clause 23 response.
- 2 The Council has requested a comparison of yield between the existing operative Wairaka Precinct and new requested precinct provisions. The request particularly asks for an assessment of whether the proposed open space area and retail provision are adequate in light of the proposed increase in density that will be enabled by the plan change.
- 3 The author was directly involved in the development of the Wairaka Precinct and advancing those provisions through the Auckland Unitary Plan (Operative in Part) (AUP) process, working initially for Unitec and subsequently for the Wairaka Land Company. This included securing all resource consents for the core campus development, developing the draft Wairaka Precinct provisions and appearances through the Proposed AUP submission process.
- 4 The information set out in this response relating to the historical development of the precinct is drawn only from reports, evidence and summary material tabled through the Proposed AUP hearing process or related publicly available information.

Original yield: Wairaka Precinct

- 5 The original Wairaka Precinct comprised the following components:
 - (a) The Mason Clinic and Taylors Laundry site were included within sub-precincts with yield treated on a "status quo" basis.

- (b) The provisions applicable to the core Unitec campus provided for the expansion of the educational facilities with no residential development enabled on the land zoned Special Purpose - Tertiary Education zone under the former Wairaka Precinct. Unitec did envisage extensive student accommodation on the western part of the campus on the land now proposed to be rezoned from Special Purpose - Tertiary Education to Business - Mixed Use (*BMU*) as part of its plan change request.
- (c) The provisions applicable to the Ngāti Whatua Whai Rawa Limited land were intended to enable redevelopment comprising terrace house and apartment buildings, but to be led by Whai Rawa independent of the Wairaka Land Company initiatives. (Note, there is no change to the intention that Ngāti Whatua Whai Rawa Limited will make the decisions for their land, independent of this plan change.)
- (d) Provisions applicable to the Former Oakley Hospital Building were intended to enable a mix of community facilities, professional offices and residential apartments. This mix was envisaged as part of the adaptive reuse and conservation of this building. The significant majority of the floor space was intended to be residential, but obviously limited to the two / three levels of the existing building.
- (e) The provisions applicable to the northern and central lands were intended to enable redevelopment for residential activities (and a retail node on the Carrington Road frontage adjacent to Gate 3).
- (f) Rezoning of the land along the southern boundary between the tertiary institution and the neighbourhood to the south were intended to enable terrace house development.
- (g) The 'B blocks' adjacent to the Carrington Road frontage between Gate 3 and Woodward (part of the land requested to be rezoned *BMU* under this plan change) were intended to be used for business development in support of the Unitec programme. Unitec, as an applied learning institution, sought to co-locate critical businesses that could provide work experience, and accordingly leverage off their location adjacent to a technical tertiary institution for academic purposes.
- (h) The 'F block' land adjacent to the Spine Road (the other part of the former Unitec land subject to this plan change request) was intended as a location for student accommodation associated with Unitec. Unitec was targeting between 1,000 and 1,500 student apartments: with a combination of local students and international students, which was a growing opportunity at that time.
- (i) Consequently, the yield in the Wairaka Plan Change as placed before the Hearings Panel comprised:
 - (i) an expectation of ~ 2,500 dwellings on the Wairaka Land Company area;
 - (ii) an expectation of ~ 1,000-1,500 student accommodation on the F blocks;
 - (iii) Whai Rawa developing as per their current entitlement; and
 - (iv) the Mason Clinic being a specialist self-contained area.
- (j) This gave a yield of between 3,500 and 4,000 dwellings if fully developed, plus the Whai Rawa land.

Yield comparison

- 6 As noted above, the original proposal gave a yield of between 3,500 and 4,000 if fully developed. This proposal, over the same land area for the purposes of direct comparison, is for 4,000-4,500 dwellings. This represents an increase of up to 500 dwellings in a comparison between the high scenario of Wairaka Land Company versus the high scenario now (with the same difference in the low versus low scenarios), or an increase of 1,000 dwellings if one compares the low range under the Wairaka Precinct with the high range under the Te Auaunga Precinct.

Context

- 7 Under this plan change request:
- (a) The Crown has purchased the B and F blocks off Unitec to repurpose them for residential housing. These are shown on the attached plan to assist in understanding the location of this land.
 - (b) The B blocks will retain a mixed use function but the reality is that a higher percentage of residential uses will occur, when contrasted against the full business future envisaged under the original Wairaka Precinct.
 - (c) The Taylor's Laundry site has been purchased by the Crown. This will remain in its current industrial uses until the lease is relinquished or expires in the medium term, but at that time it will transition to residential.
 - (d) The F blocks will retain their residential function. The assumption is that a stormwater pond originally envisaged in this location is no longer required (due to changes in the Council's approach to stormwater management). Instead of being a very high percentage of one bedroom apartments with a small number of family accommodation targeted at PHD students; the F blocks have been modelled for a range of different housing typologies including one, two and three bedroom apartments.
 - (e) The increase in height has obviously provided for additional yield.
- 8 In addition it should be noted the Crown transferred approximately 3ha of land to Te Whatu Ora – Waitematā (previously the Waitematā District Health Board), for additional mental health service facilities at the Mason Clinic. That land would otherwise be available for housing and related private open space. Effectively the 1.7ha block in the north was land previously available for residential development. The 1.3ha in the south was originally intended to be private open space, as shown on Wairaka Precinct plan 1. HUD has agreed to exchange this private open space land for indicative public open space within the Crown land holdings. The net effect is that 3ha of land which was previously available for housing is now committed to mental health services and/or indicative public open space. The 3ha lost to residential is the 1.7ha of land in the northern part of the Mason Clinic and need to substitute 1.3 ha of otherwise residential land to offset the private open space lost from the Mason Clinic site
- 9 The Mason Clinic planning controls are subject to Plan Change 75.

Land area comparison

- 10 In respect of the current and plan change land areas proposed:

- (a) The operative Wairaka Precinct provides:
- (i) 19.9ha of residential land able to be built for apartment typologies to 27m as a permitted height;
 - (ii) 0.9ha of land in the north-western corner;
 - (iii) 1.1ha at an 18m height (excluding the 8m road widening on Carrington Road from this calculation under both scenarios);
 - (iv) 4.4ha of Residential – Terrace Housing and Apartment Building (*THAB*) land on the Whai Rawa site; and
 - (v) 5.1ha of terrace house product in the Residential – Mixed Housing Urban zone along the southern boundary.
- (b) By contrast, the proposed Te Auaunga Precinct provides for:
- (i) 15.4ha of residential land able to be built for apartment typologies to 27m as a permitted height;
 - (ii) 5.6ha of land zoned with a 35m permitted height;
 - (iii) 0.9ha of land intended to accommodate three high rise apartment buildings.
 - (iv) 4.4ha of THAB land on the Whai Rawa site;
 - (v) 5.1ha of terrace house product along the southern boundary.

11 The table below sets out a direct comparison:

	Wairaka Precinct	Te Auaunga Precinct
18m Height Limit	1.1 ha	-
Height Area 4	19.9 ha	15.37 ha
Height Area 2	-	4.36 ha
Height Area 1	-	0.88 ha
Height Area 3	-	2.0 ha
Former Oakley Hospital Building	1.8 ha	1.83 ha
Residential – Terrace Housing and Apartment Building zone	1.4 ha	1.42 ha
Residential – Mixed Housing Urban zone	3.6 ha	3.67 ha

Whai Rawa	4.4 ha	4.36 ha
Total	32.2	33.8

12 With respect to the land area comparison above, the following points are of particular relevance:

- (a) The Taylors Laundry site lease (which provides for an industrial activity on that site) is due to expire in the medium term. HUD has purchased the land. Post this lease being relinquished or expiring, it is assumed that it will be developed for housing. This analysis assumes that the owner of that property would also have developed it for its best commercial return at that stage, which would be housing.
- (b) The 35m height limit is an area of approximately 6.6ha allowing a theoretical additional two storeys of development within this area. The yield analysis under clause 23 response P1 shows how only part of this land will be available for actual housing and not all will likely be an apartment typology. Even if it were all developed as an apartment typology, this would add an extra approximately 62 dwellings above existing heights (applying the assumptions in clause 23 response P1).
- (c) The diagonal dimension controls and restrictions on the high rise give a comparator in this location under the current precinct of 280 dwellings versus the new precinct of 307 dwellings. (Based on the yield assumptions and calculations, refer clause 23 response P1.)
- (d) The most significant land area change is the inclusion of the B blocks for housing, although this is partially offset by the loss of 3ha of land to the Mason Clinic.

Open space

13 This element of the request seeks comment on whether the yield enabled by the plan change will result in an appropriate provision of open space.

14 The open space responses are fully addressed at **Attachment 5**. That is not repeated here. In summary:

- (a) The operative Wairaka Precinct provisions provide for 2,500 dwellings within the Wairaka Land Company area based on the provision of a 3,000-5,000m² (or 0.3 – 0.5ha) public neighbourhood park (but recognising Phyllis Reserve was immediately on the southern boundary and provided good functionality to that part of the precinct).
- (b) The plan change provides for 5.1ha (or 51,000m²) of open space all of which is proposed to vest in the Council as either public open space or stormwater management area. The specific areas and function of open space is addressed in clause 23 response OS8. The stormwater management areas are the artificial ponds within the precinct. These are not counted as public open space but contribute to the landscape amenity of the area (recognising Phyllis Reserve remains on the southern boundary and continues to provide good functionality to that part of the precinct)
- (c) The open space areas are distributed between the north, central and southern part of the precinct. When the Phyllis Reserve is taken into account, all dwellings are within 400m of a public park (subject to the outcome of negotiations with Council).

- (d) The open space provides a wide variety of functionality as set out in the response to clause 23 requests as set out in **Attachment 5**.
- 15 Whether the yield uplift is considered at 500 or 1,000, the increase in public open space as part of this plan change is considerable.

Retail

- 16 The question has been raised as to whether there is sufficient retail in the precinct. Mr Heath has addressed this issue from an economic perspective at clause 23 response EA1.
- 17 This plan change does not seek to amend the overall cap on retail floor space. This follows the Council's key focus at the Proposed AUP hearings that it wanted to support the Point Chevalier and Mount Albert town centres by limiting the gross floor area of permitted retail development within the precinct to 6,500m². Furthermore, retail was distributed between:
- (a) that associated with the campus;
 - (b) a core retail node around Gate 3; and
 - (c) the provision for retail within the Former Oakley Hospital Building to assist in the adaptive reuse of this building and to assist with the connection to Point Chevalier.
- 18 From a planning perspective, I make the following observations:
- (a) The northern portion of the precinct is within the walkable catchment of the Point Chevalier town centre. For the first time, Point Chevalier town centre will have a residential population in its southwestern quadrant. This will increase its catchment. A walkable catchment to a town centre helps reinforce the economic sustainability of the centre.
 - (b) The new retail hub adjacent to Gate 3 provides a good service area to the central part of the precinct and to the properties on the eastern side of Carrington Road. It creates retail services within a good walkable catchment of this part of the precinct. It is also the prime access to the central part of the precinct for vehicles. It sits on the major public transport corridor of Carrington Road. There will also be a dedicated cycleway that connects through the precinct to this retail area.
 - (c) While further away, the southern end of the precinct is within a reasonable walking distance of the Mount Albert shopping centre.
 - (d) The BMU zone does provide for small dairy and food and beverage type operations within the zoning. Immediate top-up shopping provision can be made elsewhere in the precinct if there is a demand.

TOPIC: SPATIAL DISTRIBUTION OF FUTURE LAND USE ACTIVITIES

Specific request P9

Spatial Distribution of future land use activities. It will be noted that a number of the Council's specialists (including under UD9 and EA1) have raised concern that the plan change, while identifying the location of some activities (e.g. open space on the precinct plan and retail in the provisions) and limitations on where industrial activities may be located) does not provide clarity on whether the location of non-residential activities in particular may be located in respect of the needs of the future community, and effects on the residential community. It is also difficult to appreciate how various land use activities may be connected to each other and to places beyond the precinct. Further, the retail activity locations are similar to those in the current precinct and may not be best located for the nodes of new development enabled by the proposed provisions. The Applicant is invited to reconsider whether what is proposed provides sufficient clarity in relation to these concerns. In that respect, while a master plan may not be a requirement of the plan change itself, it can nevertheless illustrate the vision sought for the site. There has clearly been much consideration of this already, and perhaps further planning that is underway. The Applicant is invited to share as much of that planning as possible, as it may alleviate some of the concerns that are and could still be expressed about how the Precinct could develop, particularly in a way that does not address context and the needs of the community as a whole.

Specific request P10

The approach that has been taken in the plan change is to amend the current precinct provisions, rather than take a fresh look at how it is intended this future community will look (the vision) and what better way there may be to plan, through the AUP, for that future community. As an example, Objective 1 still refers to provision of a tertiary institution. While that will still be a major presence in the future community, what is intended to be enabled is more a higher density residential community – of 10,000 or more residents. Whether that ultimate urban outcome is adequately portrayed in the objectives and policy framework proposed is questionable. The Applicant is invited to reconsider whether the proposed provisions provide sufficient clarity in relation to these concerns.

Applicant response provided by

John Duthie, Tattico

Applicant response

- 1 These are non-clause 23 matters.

Modification to an existing precinct

- 2 As noted in the comments, this plan change is a modification to an existing precinct. It is not a new precinct.
- 3 The existing precinct has been through an extensive process of assessment and scrutiny as part of the introduction of the Auckland Unitary Plan (Operative in Part) (AUP) provisions.

- 4 Generally, the precinct provisions are working well and the applicant considers, with some amendments, they will deliver the outcomes all parties seek for the precinct. There are however some identified provisions where changes are warranted in order to deliver the overall strategy and direction for the precinct. This plan change provides for those key elements as set out in paragraph 1.12 of the Planning Report including section 32 assessment dated 21 December 2022.
- 5 The AUP Independent Hearings Panel recommended, and the Council adopted, the operative Wairaka Precinct provisions. It is not necessary or appropriate to revisit all aspects of the original precinct through this plan change. Rather, the section 32 analysis and these clause 23 responses focus on the impact of the changes proposed and how these meet the tests of section 32.
- 6 Clause 23 request P10 raises the example of objective 1 referring to Unitec and the view that the precinct is now largely residential. While there are changes to the respective proportions of land allocated to tertiary and residential uses, Unitec remains a major part of the precinct and an important tertiary educational institution for Auckland, and needs and warrants particular precinct provisions. The HUD and consultant team view is that the precinct provisions not proposed to be modified by this plan change remain appropriate and fit for purpose.

Spatial distribution

- 7 The clause 23 request raises issues of spatial distribution on the precinct. In that regard:
 - (a) The tertiary institution at the Unitec core campus is retained, remains on its existing site and will be progressively developed in accordance with the long-term plan for that institute (now part of Te Pūkenu). The only effect of this plan change is to change the zoning of land purchased by the Crown from Unitec.
 - (b) The Mason Clinic remains on its existing site but is expanded. That is subject to a separate Plan Change 75 process.
 - (c) The retail hub remains in its current location. That location was identified and supported by assessments during the AUP process. That process:
 - (i) identified the gross floor area cap for retail;
 - (ii) allocated a core retail area as part of the campus (food and beverage, bookshop opportunities etc);
 - (iii) allocated the core location for the hub to service the precinct and local community;
 - (iv) identified the importance of locating this retail hub between the Mount Albert town centre and Point Chevalier town centre so as to reduce the impact on those two centres and maximise convenience for the precinct (as it is approximately at the precinct's midpoint);
 - (v) identified the importance of locating the retail hub on the public transport route giving it the ability to service both the new Te Auaunga neighbourhoods, the tertiary staff and students, and the neighbourhoods east of Carrington Road; and

- (vi) located the retail hub adjacent to the Farm Road intersection, at the top of the future public shared exit / entrance for both the residential neighbourhood and Unitec, because this provides good connections to both the Unitec campus and the residential neighbourhood.
- (d) Notwithstanding the changes proposed to distribution of land uses through the plan change and increase in overall dwelling scale that will be enabled, Mr Tim Heath has confirmed his response to the economic clause 23 requests that the above factors continue to apply to, and support, the proposed retail distribution within the precinct.
- (e) Unitec is an applied learnings tertiary institution. A significant component of the facility is practical training. During the AUP process Unitec sought a range of semi-industry or service type activities within its zone to assist in that learning process. Major IT service centres, veterinary clinics, electronics and construction activities are examples of what has been used currently or in the past to complement the Unitec courses.

This plan change preserves that opportunity. However, while that opportunity currently exists through the majority of the precinct (excluding the southern interface), this plan change ensures these uses are located away from the Carrington Road frontage. The combination of the new control, and the existing control, ensures that these types of activities are removed from existing established residential areas. New residents moving into the precinct understand that they are living within a mixed-use area.

- (f) Community facilities are enabled within the residential neighbourhoods. The level of community facilities is expected to be relatively modest but it is not practical to predetermine the extent or location. The intention is to embed these within the precinct. The Pumphouse is an example of what could either be a retail food and beverage facility or a community facility, or both.
- (g) The vast majority of the HUD land is intended for residential development. To the extent practical, the spatial distribution on the precinct is known and established. The precinct plan, through the sub-precincts, identifies the location of:
 - (i) the Unitec campus;
 - (ii) the Mason Clinic;
 - (iii) Taylors Laundry and the industrial activity associated with that leasehold land, while this activity remains;
 - (iv) the low rise development along the southern boundary;
 - (v) the heritage precinct in the north (identified through the overlays within the AUP);
 - (vi) the area of protected trees;
 - (vii) the open space; and
 - (viii) the areas of increased height.
- (h) In a land use spatial distribution sense these key elements are defined to the extent appropriate through Precinct plan 1.

Masterplan

- 8 This question again raises the issue of the masterplan. That is addressed in clause 23 response UD9. In summary:
- (a) The two previous masterplans for the precinct have been major informers of the Precinct plans and the form of development enabled within the precinct. The Reference Masterplan and Strategic Framework in particular is expected to continue to inform the development as it progresses.
 - (b) However, it is the precinct provisions which set the regulatory controls and mechanisms.
 - (c) Every new development is a restricted discretionary activity and is subject to an extensive assessment.
 - (d) The tests of section 32 and the level of analysis required under that legislation, should not be conflated with the assessment for a resource consent.
 - (e) The current masterplans for the precinct have performed the required functions necessary to inform this plan change.