

Request for a Private Plan Change to the Auckland Unitary Plan (Operative in Part)

Planning Report

Campana Landowners' Consortium



Details and Version Control

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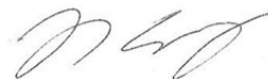
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Acknowledgement of Submission

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Executive Summary

Under Clause 21 of Schedule 1 of the Resource Management Act 1991 (RMA), any person may request a change to a district or regional plan (including a regional coastal plan). Clause 22 of Schedule 1 of the RMA states that the plan change request must be made to the appropriate local authority in writing and:

- Explain the purpose of and reasons for the plan change request;
- Contain an evaluation report prepared in accordance with section 32 of the RMA for the plan change request; and,
- Where environmental effects are anticipated, the plan change request shall describe those effects, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement or plan.

This Planning Report has been prepared in support of a plan change request to the Auckland Unitary Plan (Operative in Part) (**AUP**) on behalf of the Campana Land Owners Consortium (the **applicant**). The plan change area (the **site**) is an approximately 31.5 ha site in Wiri, Auckland. The site comprises five lots within the Future Urban Zone (parts of the Coastal Fringe are also in the General Coastal Marine Zone).

In brief, the plan change request (the **proposal**) seeks to incorporate the site into the Puhinui Precinct of the AUP as a new sub-precinct with Light Industrial Zoning, as was the original intention under the Proposed Auckland Unitary Plan (**PAUP**). The rezoning is supported by updated precinct provisions, including an indicative graphical plan for the site. The proposal was lodged with Auckland Council on 15/03/2024 and was assigned to a consulting planner (Peter Reaburn) for processing. Subsequent to lodgement, Mr Reaburn requested additional information (including additional specialist reports) under Clause 23 of Schedule 1 of the RMA. The cl 23 process has resulted in refinement of the precinct provisions to ensure environmental effects are managed appropriately and the AUP can be implemented effectively.

The PC request is informed by the following specialist reports:

- A Geotechnical Report prepared by Babbage Consultants.
- A Preliminary Site Investigation prepared by Babbage Consultants.
- An Archaeological Assessment prepared by CFG Heritage.



- Ecological Assessment prepared by Viridis.
- A Stormwater Management Plan prepared by Maven.
- An Infrastructure Report prepared by Maven.
- A Traffic Memo for temporary storage activities prepared by Don Mckenzie Consulting.
- An Urban Design Statement prepared by Saddleback Planning.
- An Economic Assessment prepared by Property Economics.
- A Landscape and Visual Assessment prepared by LA4.
- A Coastal Hazard Assessment prepared by Babbage Consultants.
- An Arborist Report prepared by Craig Webb (consultant arborist).

Furthermore, consultation regarding the proposed changes has been undertaken with the following parties:

- Auckland International Airport Limited (**AIAL**).
- Auckland Council.
- Auckland Transport.
- Ngati Tamaoho.
- Ngati Te Ata Waiohua.
- Pui Ying Wong and R & B Wyllie Limited.
- Southern Gateway Consortium (**SGC**).
- Te Akitai Waiohua.
- Waka Kotahi New Zealand Transport Agency.

A section 32 evaluation has been undertaken which has concluded that the proposal will more effectively achieve the existing objectives of the AUP and the purpose of the RMA than any reasonable alternative, including the existing zoning and the Puhinui Precinct as currently drafted. In particular, the proposal will result in a greater degree of certainty about the timeline for light industrial land release in Manukau (which is in short supply) and the environmental effects associated with light industrial zoning. This will allow decision makers exercising functions under the RMA to better give effect to the requirements of Part II of the RMA. In other words, the proposal is “most appropriate” alternative in RMA terms.



An assessment of environmental effects has been undertaken which has concluded that the proposed sub-precinct will not have any significant adverse effects on the environment. In particular, the historic concerns regarding landscape effects on Pukaki Marae and water quality effects on adjacent waterways have been comprehensively addressed and are considered less than minor.

The proposal has also been assessed against all relevant statutory and non-RMA documents and found to be consistent with these documents. In particular, the proposal will bring the AUP into closer alignment with recent developments in national level environmental policy, specifically the National Policy Statement for Freshwater Management 2020 (**NPSFM**) and the National Policy Statement for Urban Development 2020 (**NPSUD**).



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PART ONE: PROPOSAL



1 APPLICANT AND SITE DETAILS

To:	Auckland Council
Application:	Private Plan Change Request to the Auckland Unitary Plan (Operative in Part)
Applicant:	Campana Land Owners Consortium
Address for Service:	Saddleback Planning Limited Unit 302, The Ironbank Building 150-154 Karangahape Road Auckland 1010 Attention: Joe Gray Email: joe@saddleback.nz
Site Address:	5, 10 & 11 Campana Road 467 & 485 SH20B
Legal Description:	Lot 1 DP 402013 Lot 2 DP 402013 Lot 2 DP 71211 Lot 3 DP 71211 Allotment 190 Parish of Manurewa
Site Area:	31.5 ha
Plans:	Auckland Unitary Plan
Zoning:	Coastal - General Coastal Marine Zone Future Urban Zone
Precinct:	Mana Whenua Management [rcp] Puhinui
Overlays:	Natural Resources: Significant Ecological Areas Overlay - SEA-M2-27a, Marine 2 Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Manukau Southeast Kaawa



	Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Manukau Waitemata Aquifer Infrastructure: Aircraft Noise Overlay - High aircraft noise area (HANA), Auckland Airport - high aircraft noise area Infrastructure: Aircraft Noise Overlay - Moderate aircraft noise area (MANA), Auckland Airport - moderate aircraft noise area Infrastructure: Aircraft Noise Overlay - Aircraft noise notification area (ANNA), Auckland Airport - aircraft noise notification area
Controls	Coastal Inundation 1 per cent AEP Plus 1m Control - 1m sea level rise Emergency Management Area Control - New Zealand Refining Pipeline, Infrastructure Macroinvertebrate Community Index - Native Macroinvertebrate Community Index - Rural
Designations:	Designations - 6501, Petroleum Pipeline - Urban Section, Designations, Channel Terminal Services Limited Airspace Restriction Designations - ID 1102, Protection of aeronautical functions - obstacle limitation surfaces, Auckland International Airport Ltd



2 INTRODUCTION



Figure 1: Site.

The site in question is a parcel of Future Urban Zone (**FUZ**) on the Puhinui Peninsula in Manukau, Auckland. While earmarked for light industrial development during the drafting of the PAUP, due to concerns around landscape and water quality effects expressed by mana whenua the site was not live zoned, the intention being that rezoning would be the subject of a future plan change process (which is now being progressed through this application).

While the FUZ had suited the needs of the applicants to this point, with horticultural activities taking place across the site, changes in the agricultural sector have reduced the viability of the site for horticultural activities. This is reflected in the changing land uses across the site.

A plan change is necessary to fully realize the development potential of land while adequately addressing the concerns of mana whenua in regard to potential effects on the adjacent estuary, the potential for discovery of archaeological materials during earthworks and the effects on cultural

landscape values. Appropriate provisions are also necessary to address potential effects on infrastructure networks.



3 BACKGROUND

3.1 Site Description

The site comprises five properties on the northern side of Puhinui Road (SH20B), that are bound by Campana Road to the west and tributaries of the Waiokauri Creek to the north and east. The total area of the site is approximately 31.5 ha split between the following parcels:

- 457 Puhinui Road (Allotment 190 PSH OF Manurewa).
- 485 Puhinui Road (Lot 2 DP 402013).
- 5 Campana Road (Lot 1 DP 402013).
- 11 Campana Road (Lot 2 DP 71211).
- 12 Campana Road (Lot 3 DP 71211).

Current activities onsite

While historically the site has been used for agricultural purposes, and market gardens continue to operate on 5 and 11 Campana Road, there are a number of other activities taking place across the site:

- There is a total of 5 dwellings within the subject site. The two dwellings at 457 and 485 Puhinui Road (SH20B) have direct access to SH20B. The remaining dwellings are accessed via Campana Road.
- The only other established use, which takes place alongside a strawberry farming operation, is a steel warehousing activity within 5 Campana Road. The steel warehousing activity was established following approval of resource consent in 2021 (LUC60383507).
- In September 2023, The Royal New Zealand Society for the Prevention of Cruelty to Animals Incorporated (SPCA) obtained land use consent to construct and establish an animal boarding house facility within 485 Puhinui Road (BUN60415270). The facility will replace the existing Mangere facility and will comprise six single level connected blocks providing all animal-related functions, administration offices, staff facilities and meeting spaces.

The shift away from agricultural land uses reflects changing dynamics in the agricultural sector.

Historically small landholdings were economically viable for horticultural activities due to low labour costs and the proximity to retailers. The economic productivity of small agricultural landholdings has been compromised in recent years due to:



- Increasing labour costs which require greater mechanization.
- Mechanization requiring the large capital investment not viable for small landholdings.

As such, the economic viability of the site for horticultural activities has been compromised and new land uses must be considered.

Land Contamination

The preliminary site investigation attached as Appendix F identifies potential sources of contamination including uncharacterised fill, fuel storage and use, slurry and process wastewater from horticultural activities and a burn pit. These issues are all able to be appropriately managed.

Geology and landform

The geology of the site is generally formed by the Waiokauri Creek and its tributaries that bound the northwest, north and east of the site. The topography falls gradually toward the tributaries that intersect the site at various locations. The maximum height of the site is along Campana Road where the elevation reaches approximately 10m above sea level.

The coastal edge has been accreting in recent years due to the presence of mangrove forests at the toe of the coastal cliffs. Since 1972, the landform has extended out into the Waiokauri Creek by up to 150m

The Geotechnical Assessment attached as Appendix E notes the following in relation to the published geology:

“... most parts of the site are underlain by pumiceous deposits of the Puketoka Formation (tp), described as light-grey to orange-brown, pumiceous mud, sand and gravel, with muddy peat and lignite.

The north-eastern extent of the site is indicated to be overlain by lithic tuff of the Auckland Volcanic Field (avt), being thin graded beds of grey, mud- to sand-sized fragments of comminuted, country rock (mainly sandstone, mudstone, alluvium, micaceous sand) together with basalt and basanite fragments.”

Hydrology

There is no public stormwater infrastructure on site, all sites within the plan change area currently discharge stormwater runoff directly to the adjacent estuary.



The Stormwater Management Plan attached as Appendix I notes the following in relation to the drainage features of the site:

“The site is a peninsula in layout with the runoff catchment contained within the PCA. There are only two permanent streams present within the PCA area with no intermediate stream. Also present in the site are poorly formed ephemeral/overland flow paths or farm drains. Many of the existing watercourses have been modified in the past through historical farming practices and to manage stormwater runoff drainage within the sites.”

Ecology

The ecological value of the site was assessed via desktop review and onsite investigations undertaken by Angela Tinsel on 1 November 2023. Ms Tinsel found that:

- The terrestrial ecological value of the site was generally low due to the agricultural land use. Vegetation within the site largely consists of exotic planted stands and shelterbelts.
- The coastal marine area along the site boundaries as moderate-high value given the Significant Ecological Area (SEA) classification and potential presence of threatened species.
- A number of wetlands were present on the site. Most are very small and degraded, providing low ecological values. The largest wetland provides moderate ecological values.
- Most watercourses on the site are artificial drains. Only one degraded permanent stream is present, and this was assessed by Ms Tinsel as having low ecological value.

A full description of Ms Tinsel’s assessment is included in the Ecology Assessment attached as Appendix H.

The values of mature trees on site were assessed via onsite investigations undertaken by Craig Webb on 24 November 2024. Mr Webb has concluded that none of the trees on site merit inclusion as notable trees within the AUP.



3.2 Cultural heritage landscape

Te Akitai Waiohū Cultural Heritage Assessment 2014

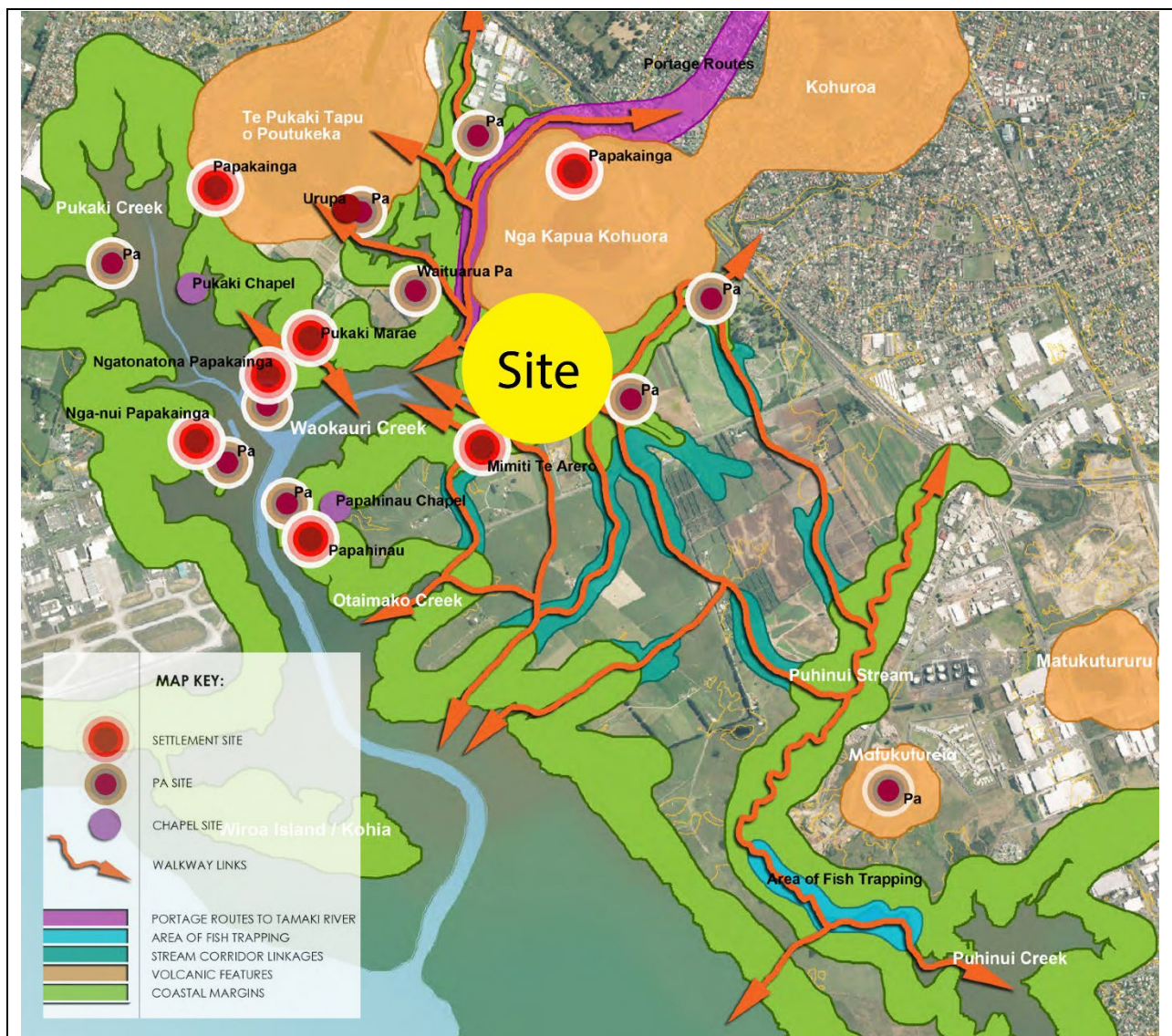


Figure 2: Cultural Context (map by Stephen Brown).

Te Akitai Waiohū have completed a Cultural Heritage Assessment (CHA) for the Puhinui Peninsula attached as Appendix O (we have also included copies of the cultural maps completed in 2016 by Landscape Architect Stephen Brown). This document was prepared as part of the Puhinui Structure Plan and identifies several features significant to Te Akitai Waiohū:

- The peninsula features two prominent maunga, Matukutūreia (McLaughlin's Mountain) and Matukutururu (Wiri Mountain).



- Various volcanic craters, including Te Pūkakitapu o Poutūkeka (Pūkaki Crater), Ngā Kapua Kohuora (Crater Hill) and Kohuora (Kohuora Park).
- Significant estuaries including Pukaki Creek and Waiokauri Creek.
- Waiokauri Creek ('kauri forest' or 'kauri stream') refers to ancient Kauri trees that grew in the area, allowing people to recover kauri gum by digging in the right places. The Waiokauri Creek is also important as a place associated with the people of Taranaki and their struggles during the Land Wars.

As these important cultural features have been degraded significantly as a result of urbanisation, Te Akitai Waiohūa is committed to maintaining and enhancing those remaining features. Specifically, the Waiokauri Creek that bounds the site to the northwest, north and east.

The Pukaki Marae and the associated Papakainga is also located west of the site, opposite the Waiokauri Creek. The Marae is visible from western parts of the site as demonstrated in Figure 3 below.

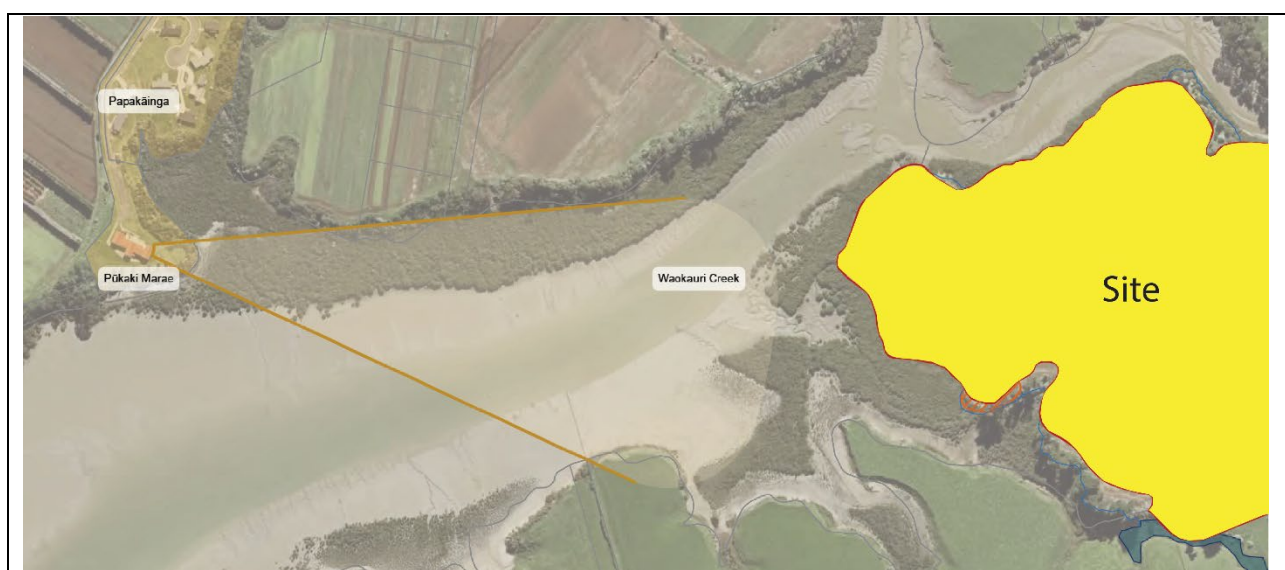


Figure 3: Sightlines from Pukaki Marae.

Archaeology assessment

CFG Heritage undertook a desktop assessment of the heritage values and undertook a survey of the site in November 2023. The assessment identified 3 archaeological sites within the plan change area (R11/2885, R11/1111 and R11/1112). Each of the sites are midden scatters associated with Māori occupation along Waiokauri creek. CFG note that these sites are connected to the wider Waiokauri Creek



landscape and could provide important information regarding pre-European and historic Māori occupation of South Auckland.

3.3 Infrastructure

Wastewater

The site is not currently connected to any public wastewater services and there are no services near the site. The closest wastewater main is the Southwestern Interceptor, which is approximately 800m to the west. The Southwestern Interceptor is a major transmission line and the discharge point is downstream of the Puhinui Precinct.

Advice from Maven on wastewater capacity was submitted to Watercare on 15 November 2023.

Watercare responded on 14 December 2023, concluding that

“... Based on the information available it is considered that there is currently capacity in the Southwestern Interceptor for the proposed flows of 50 l/s from this development. It should also be noted that would be using up most of the available capacity based on the previous assessment back in December 2021, however it is considered the demand by the proposed development can be achieved.”

Water

The site is not currently connected to a water supply network. There is an existing 100mm diameter public water main that is located within SH20B, but east of the site. To meet the demand of future development within the Puhinui Precinct it is understood that Watercare plan to upgrade the water supply network upstream of the site. The planned upgrades include:

- increasing the capacity of the existing watermain beneath the motorway bridge from 180mm to 250mm
- a 150mm diameter secondary watermain on the northern side of SH20B; and
- A 200mm diameter principal main will be extended from the motorway off-ramp, connecting to an existing 200mm ductile principal main on McLaughlin Road.

Advice from Maven on water supply capacity was submitted to Watercare on 15 November 2023.

Watercare responded on 14 December 2023, concluding that



“... Water supply for firefighting FW4 demand can be achieved if the connection is through Puhinui Rd and McLaughlin’s Rd. Either way the Light industrial demand can be supplied in any of the above conditions.”

Stormwater

There is no existing stormwater network within the site. The site is at the bottom of the catchment and stormwater flows generated on the site drain into the adjacent creek.

Current transport infrastructure

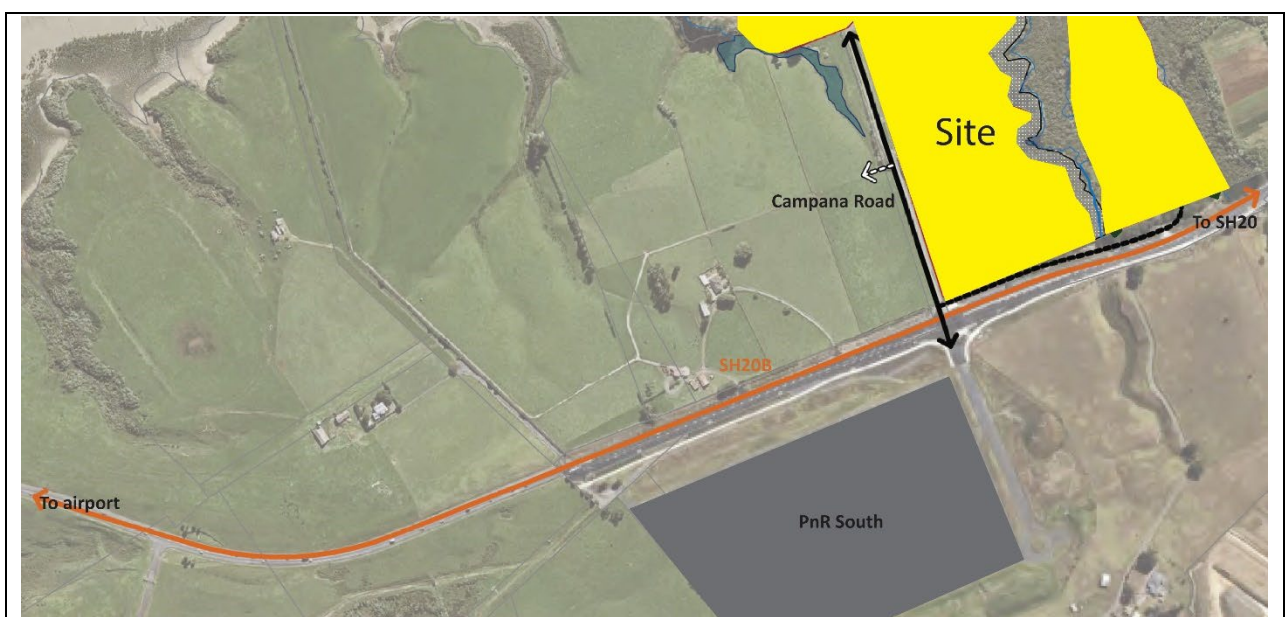


Figure 4: Transport Infrastructure

Campana Road is a no exit local road approximately 400m in length (legal extent) entering the site north of SH20B. Only the first 50m length of Campana Road is sealed. The Campana Road carriageway is approximately 6.0m in width and provides for two-way traffic movement along its largely unsealed length from SH20B into the site.

SH20B provides for one of the two major connections (along with George Bolt Memorial Drive SH20A) between the Southwestern Motorway (**SH20**) and Auckland International Airport. As a classified arterial road, it is not expected to prioritise property access, with such movements to adjoining properties generally catered for via side road intersections (such as Campana Road).

The southern leg of the Campana/SH20B intersection connects with a new AIAL park and ride facility (**PnR South**). It is expected that this intersection will serve as the main connection point for traffic from



the south, via the new Prices Road connection to McLoughlins Road. The works to accommodate these connections are underway and were approved via BUN60331465 (Prices Road extension to McLoughlins Road) and LUC60340552 / DIS60340551 (Park and Ride connection to Prices Road).

SH20 through the intersection with the PnR South and Campana Road is broadly in the form of a four-lane carriageway including a T3 high occupancy transit lane in each direction, plus one general travel lane. Turning movements to and from the side roads are catered for via a combination of separated and shared left and right turning lanes for each of the movements from Puhinui Road. On the eastern side of the intersection, an additional through traffic lane is developed catering for westbound movements towards the airport. Beyond Campana Road, this additional westbound through lane merges back into a single westbound through lane approximately 100m downstream of the signals. In a similar way, the eastbound through movement along Puhinui Road is provided with an additional through lane while the left turn into Campana Road is shared within the kerbside T3 lane. Downstream (to the east) of the intersection, the additional through lane drops resulting in one general traffic lane plus the T3 lane extending through to the Manukau Memorial Gardens intersection and the Puhinui Interchange located approximately 1km to the east of Campana Road.

Bus Rapid Transit – SH20/20B Interchange to Orrs Road

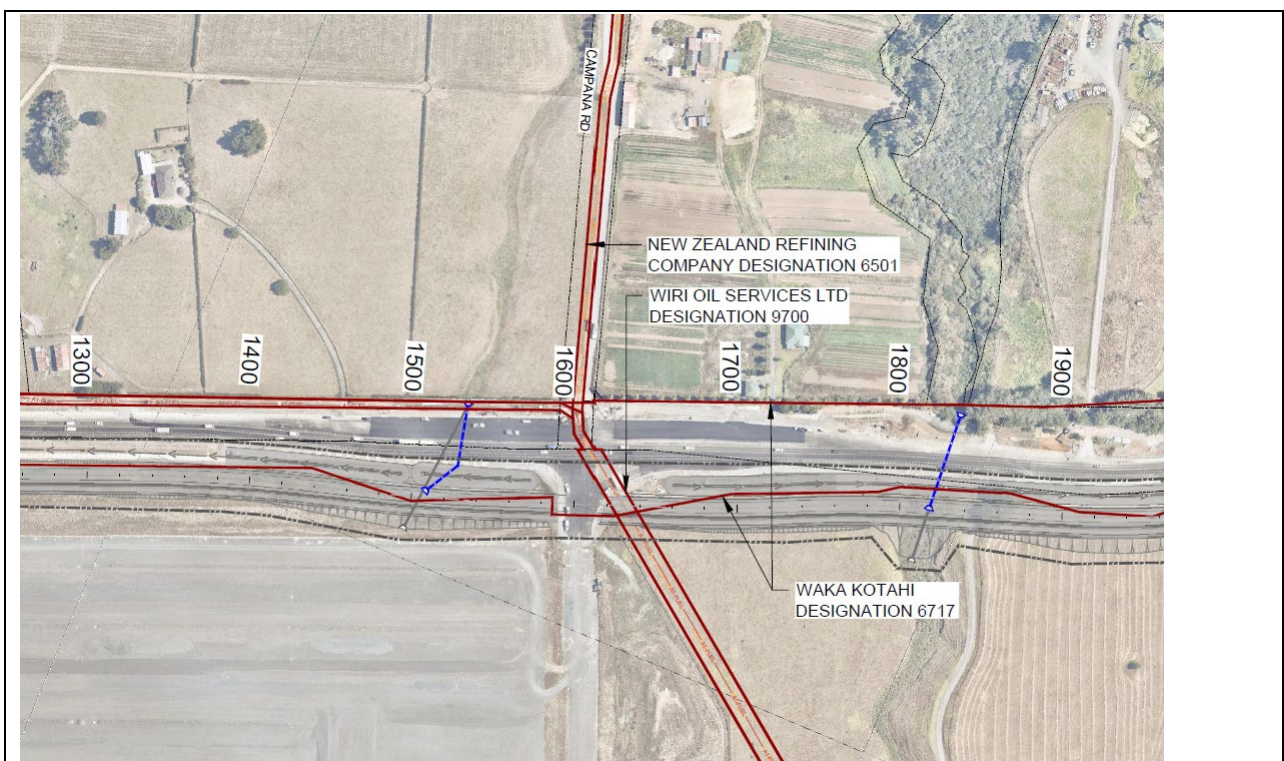


Figure 5: Road widening under NoR for Airport to Botany BRT.

Auckland Transport (**AT**) submitted a Notice of Requirement (**NoR**) on 9 December 2022 to provide for a dedicated Bus Rapid Transport corridor with walking and cycling facilities along SH20. The designation will form part of the Airport to Botany BRT and will include the following key features:

- A dedicated Bus Rapid Transit corridor, centre-running on Puhinui Road through to the Manukau Memorial Gardens intersection (approximately 600m west of SH20/SH20B Interchange) and south running to Orrs Road.
- Walking and cycling facilities on southern side of the corridor.
- Swales.
- An area for construction related activities including yards, site compounds, and bridge and structure works.

The NoR was notified on 10 March 2023 and the Hearing was held between 21-28 August 2023. The NoR was approved in March 2024 subject to appeals and confirmed on 8 November 2024.

3.4 Auckland Unitary Plan (Operative in Part)

Zoning

As noted above, the subject site is located within the FUZ, along with a 20m wide strip of Open Space – Informal Recreation Zone along the eastern boundary of 5 Campana Road 485 Puhinui Road; and Coastal – General Coastal Marine Zone around the coastal edges of the site.

The properties east and west of the site are also zoned FUZ. All the land immediately surrounding the FUZ sites to the east, south and west is zoned Business – Light Industrial. The land to the north of the site, opposite Waiokauri Creek, is generally zoned Rural – Rural Production.



Puhinui Precinct

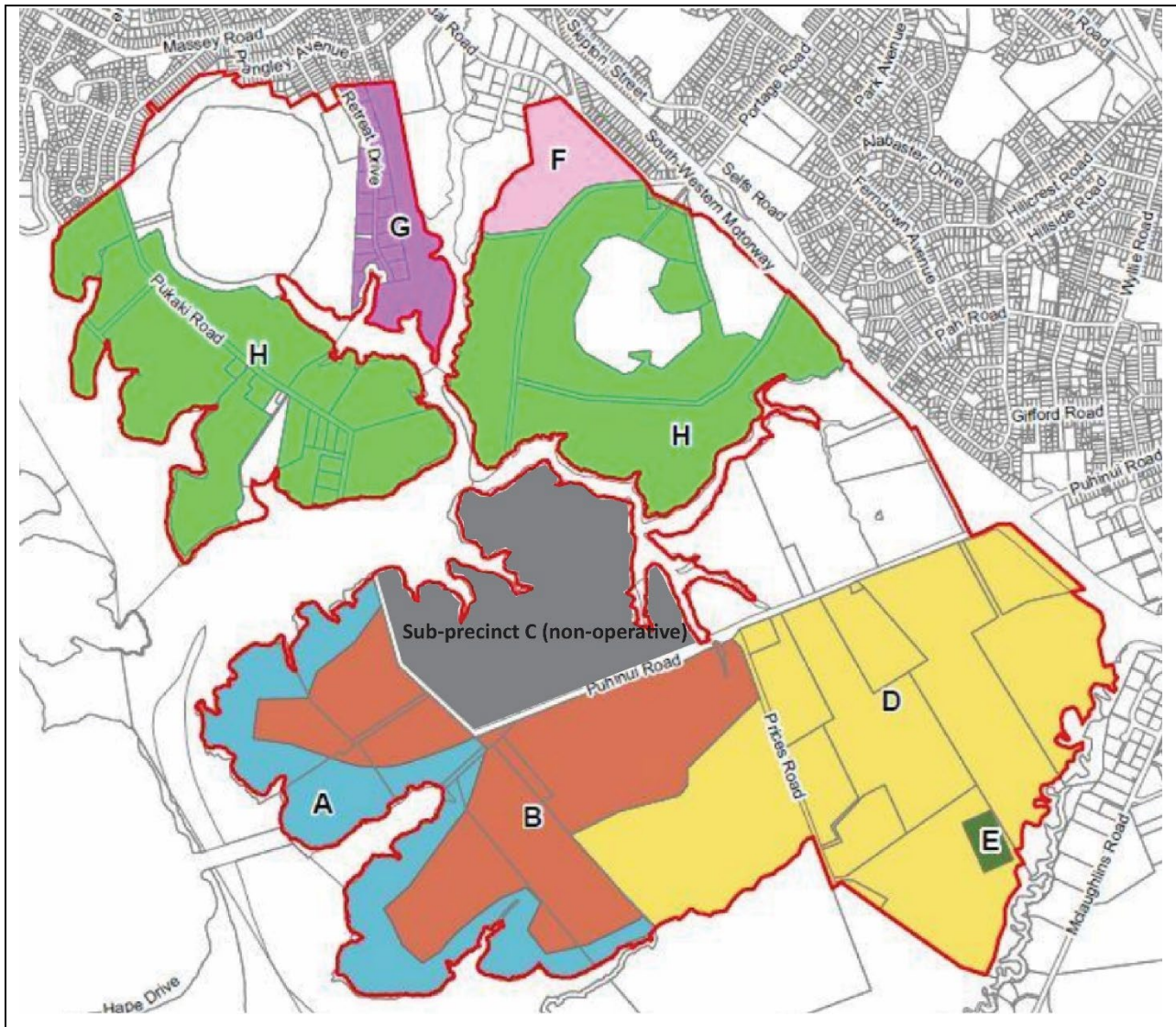


Figure 6: Puhinui Sub-precincts.

The Precinct comprises the land generally bound by Puhinui Stream to the south, the South Western Motorway to the east and Pukaki Lagoon to the north. The purpose of the precinct is to:

- Enable a transition from rural to urban development.
- Recognise the cultural, spiritual and historical values and relationships that Te Ākitai Waiohū have with the land and sea in Puhinui as part of the Māori cultural landscape.
- Minimise adverse effects on the natural coastal environment, and significant ecological areas within the Manukau Harbour, as well as its tributaries.



- Recognise that significant infrastructure upgrades are/were required to enable urban development to progress in certain areas.
- Provide for predominantly light industrial and airport related activities, in addition to rural, large-lot residential, open space and special purposes (Maori, Quarry and Cemetery).

Sub-precincts have been established across the area to accommodate the various land uses. Sub-Precincts A, B, D and E south of the Waioakauri Creek, are already “live zoned”. Sub-precincts A and B cover land owned by Auckland International Airport Limited (AIAL) and all the land within sub-precincts D and E falls within land controlled by the Southern Gateway Consortium discussed on Section 3.6 of this report.

Sub-precinct C was part of the notified version of the AUP and was bound by Waioakauri Creek to the north, Orrs Road to the west and SH20B to the south. However:

- Despite Council’s closing submission in the Auckland Unitary Plan Hearings process that all FUZ land within the Puhinui Precinct should be live zoned to LIZ, the land within Sub-precinct C was excluded from live zoning.
- In excluding Sub-precinct C from live zoning the hearings panel referenced concerns expressed by Te Akitai Waiohau about uncertainties of effects on Pukaki Creek and Waioakauri Creek and potential for future traffic infrastructure being required across Pukaki Creek.
- While the Panel considered that live zoning was “seemingly inevitable” and adverse effects could be appropriately managed through proposed control provisions, the panel concluded that a more cautious approach be taken due to Mana Whenua concerns, referencing s6(e) of the RMA.
- The Panel also noted that the extent of land live zoned to Business – Light Industry Zone in the overall precinct suggested that timing for this area to be developed was not critical. The Panel therefore found that Sub-precinct C should not be live zoned but included in the FUZ so that these matters could be addressed through a later structure plan process.

Mana Whenua Management Precinct

The Mana Whenua Management Precinct is located within the Coastal Marine Area (CMA) of Waioakauri Creek that surrounds northern and eastern boundaries of the site. The precinct seeks to avoid direct discharges of wastewater and control the direct discharge of stormwater and all other contaminants into the precinct from activities undertaken both within and outside the precinct that could adversely affect water quality and the spiritual and cultural values of the Waioakauri Creek.



Overlays

Various overlays impact the site, including:

- Significant Ecological Area (SEA) – M2-27a, Marine 2 (within CMA areas only)
- High-Use Aquifer Management Areas – Manukau Southeast Kaawa and Manukau Waitemata Aquifer; and
- Aircraft Noise Overlays – High and Moderate aircraft noise area.

Controls

The parts of the site along the CMA are affected by the Coastal Inundation 1 per cent AEP Plus 1m Control - 1m sea level rise control. The overlay is generally located along the coastal borders of the site but two fingers extend into 12 Campana Road.

The Macroinvertebrate Community Index – Rural controls apply across the entire site and the Native control applies within some areas adjacent to the CMA.

Designations

The site falls within the Airspace Restriction Designations - ID 1102, Protection of aeronautical functions - obstacle limitation surfaces, Auckland International Airport Ltd. The obstacle limitation surface restrictions extend within site.

The petroleum pipeline designation 6501 that conveys petroleum from Marsden Point to the Wiri oil terminal is located within the site. The pipeline is located along Campana Road and then along the boundary that separates 11 and 12 Campana Road.

3.5 Relevant Non-RMA Documents

Auckland Plan 2050

The Auckland Plan 2050 outlines the issues facing Auckland City and recommends the way in which Aucklanders can respond to these issues. The strategic response to these issues is outlined in six outcomes:

- Belonging and Participation.
- Māori Identity and Wellbeing.



- Homes and Places.
- Transport and Access.
- Environment and Cultural Heritage.
- Opportunity and Prosperity.

These outcomes are to be implemented via a development strategy that describes how Auckland will grow and change. The original development strategy released in 2018 identified four nodes around which urban development would be centred (City Centre, Albany, Westgate and Manukau) as well as dispersed metropolitan and town centres.

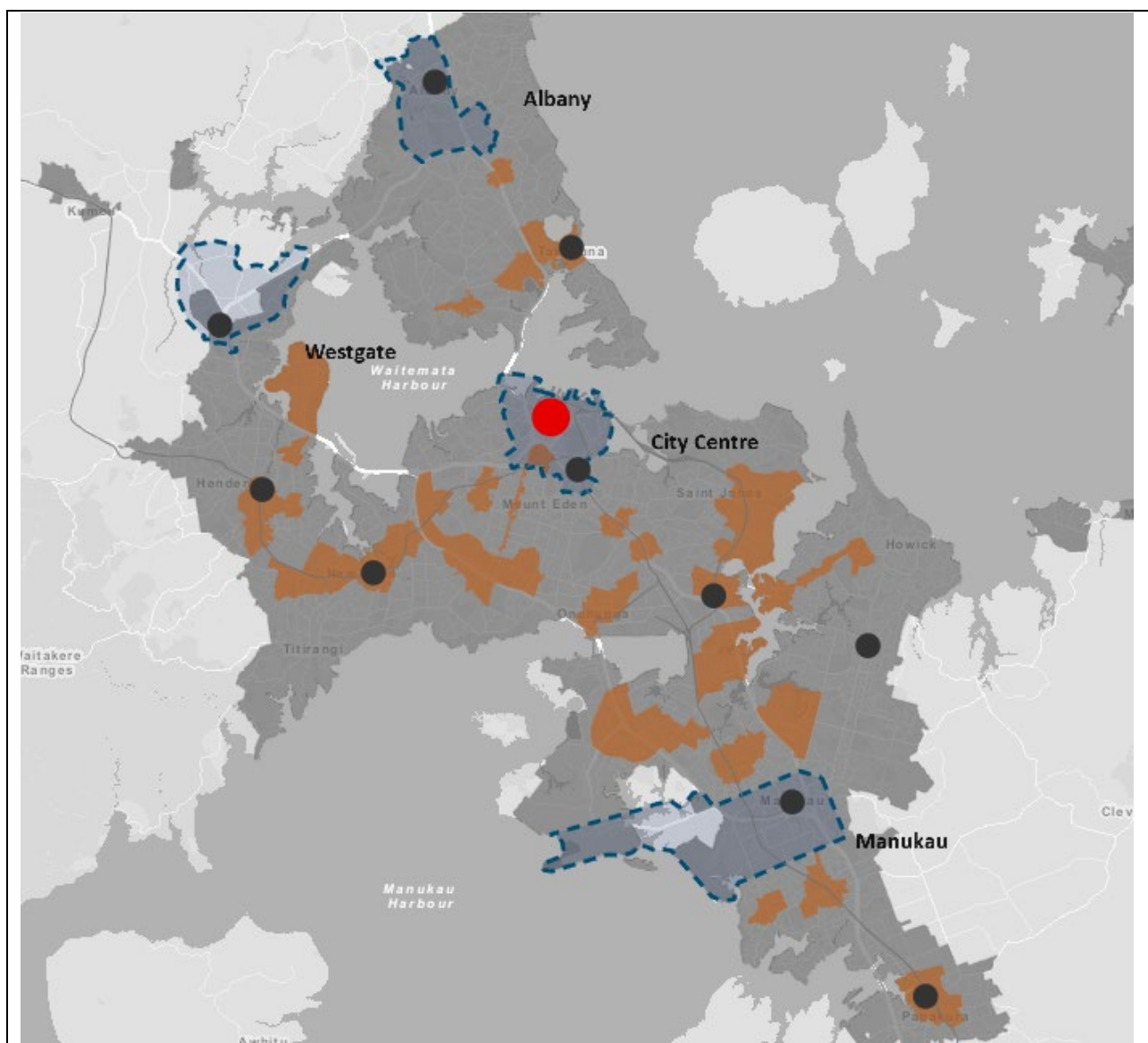


Figure 7: Future Development Nodes



The most recent iteration of the development strategy is the Auckland Future Development Strategy, described below.

Auckland Future Development Strategy 2023-2053

The purpose of the Auckland Future Development Strategy is to manage growth across Auckland over the next 30 years. It seeks to integrate long-term land use and infrastructure planning while meeting future environmental, population, housing and employment needs.

A Consultation Draft of the *Auckland Future Development Strategy 2023-2025* (FDS) was notified in early 2023, made available for public feedback and then formally adopted on 2 November 2023. Figure 13 (page 49) of the FDS identifies that the timing for the Puhinui FUZ is 2030+. This is supported by the “Future Development Strategy – Future urban areas evidence report” for Puhinui (pages 51-52). The evidence report notes that transport infrastructure is not expected to be available to support development until 2030+, which appears to have fundamentally informed the proposed sequencing.

3.6 Interest Groups

Southern Gateway Consortium

The SGC was established by the various landowners within Puhinui Sub-precincts D and E to manage and address the traffic restrictions set out within the sub-precinct rules (discussed below). The SGC covers approximately 183 ha of land on the southern side of SH20B and is made up of the following controlling members and landowners:

- Airface Limited.
- Altrend Properties Limited.
- Fernbrook Property Limited.
- James Stewart Kirkpatrick and Warehouse World Limited.
- Tunicin Investments Limited.
- NZ Storage Holdings Limited.
- Alan James Steele and Joyce Carrick Steele.
- John Robert Cooney and Alison Dianne Cooney.
- Anthony Buttimore.
- 100 Prices Road Limited.



Puhinui sub-precincts D and E are subject to road infrastructure upgrade triggers. The necessary upgrades include:

- A new double lane roundabout on SH20B and widening improvements on the SH20B approach to the SH2/Puhinui interchange, completed by Waka Kotahi in 2021 (“SH20B Early Improvements”).
- An additional right turning lane into Vogler Drive from Roscommon Road, completed in 2020.
- A new connection between SH20B and McLaughlins Road, which is yet to be completed however resource consents are in place (BUN60331465) and works are underway.

Sub-precincts D and E are also subject to a total vehicle movement restriction of 1,035 vehicles per hour (**vph**). The SGC agreement allocates each member a portion of the total vph movements that is proportionate to the total area of the members’ property. The sub-precinct rules do allow the total 1,035 vph to be exceeded, however it must be demonstrated via the resource consent process that any adverse effects on the transport network can be mitigated.

Currently, the established activities within the SGC land are generally limited to storage yards and the continued operation of some grazing and horticulture activities along Prices Road. However, earthworks associated with various earthworks and/or subdivision consents are underway across the remainder of the SGC.

Auckland International Airport Limited

Auckland International Airport Limited (AIAL) owns approximately 166 ha of land west of the SH20B/Prices Road intersection and Orrs Road. The AIAL land sits within Puhinui sub-precincts A and B. Sub-precinct A is located around the edge of the Waiokauri inlet and provides for limited activities due to the coastal environment and cultural significance of the area. Sub-precinct B allows for activities related to the operation and development of the airport.

The most significant development within sub-precinct B is the recent establishment of the airport park-and-ride facility at 454 and 548 Puhinui Road. The park and ride was approved via resource consent in 2019 (LUC60340552 and DIS60340551). The Park and Ride facility provides just under 4,000 car parks, including spaces for the public and airport staff and a passenger pick up / drop off area. The site is currently accessed directly from SH20B, however resource consents are in place to allow a connection to the east via Prices Road (BUN6035089). The Prices Road connection will accommodate traffic coming from the south via to the soon to be completed McLoughlin’s Road connection.



4 PLAN CHANGE REQUEST

4.1 Why a Plan Change is Required

The majority of the site has been used for market gardening activities since the 1980s and as grazing land in the years preceding. While the surrounding area has been developed into intensive urban environments (significantly the airport precinct to the west and the sprawl of Manukau City to the east), infrastructure constraints have limited development within the Puhinui Precinct.

During the consultation, drafting and hearings process of the AUP(OP) the anomalous nature of the Puhinui area (an island of rural land amidst intensive urban development) was recognised and the transition towards an urban character was anticipated and enabled by the provisions of the Puhinui Precinct. While originally included in the precinct as sub-precinct C, the site was ultimately excluded on an interim basis due to concerns expressed by mana whenua around effects on landscape and the adjacent estuary. It is noteworthy that Mana Whenua recognised that the site would ultimately be developed into an urban area but needed more surety regarding potential effects on mana whenua values.

This immediate re-zoning of the site from Future Urban to Light Industry zoning is considered appropriate as:

- The site is bound by Business – Light Industry Zoning to the south and as the surrounding area is developed the site will become a further isolated patch of rural land within a contiguous urban area stretching from the airport precinct through to Manukau City.
- It would be inappropriate and inefficient for the site in question to be developed out of sequence and unintegrated with wider light industrial development across the peninsula which is well underway.
- The Future Urban zoning offers little certainty to the applicant regarding the timing of land release and little incentive to contribute to support infrastructure upgrades across Puhinui.
- While the site remains Future Urban Zone, Mana Whenua will not have any certainty about the character of future development.
- The zoning restricts any temporary use of the site which might represent a more efficient use of land in close proximity to commercial activity across the airport precinct and Manukau City.
- There is currently demand for additional Business – Light Industry Zoned land in the area.



To provide certainty to all parties affected, provide for integrated development across the peninsula and facilitate effective mitigation of effects on Mana Whenua values a reconsideration of the zoning and other plan provisions applying to the site is necessary.

4.2 Purpose (Objective) of Request

The objective of the PC is to provide certainty about the development timeline for the site, and potential effects on mana whenua values and infrastructure networks.

4.3 Changes Requested at Lodgement

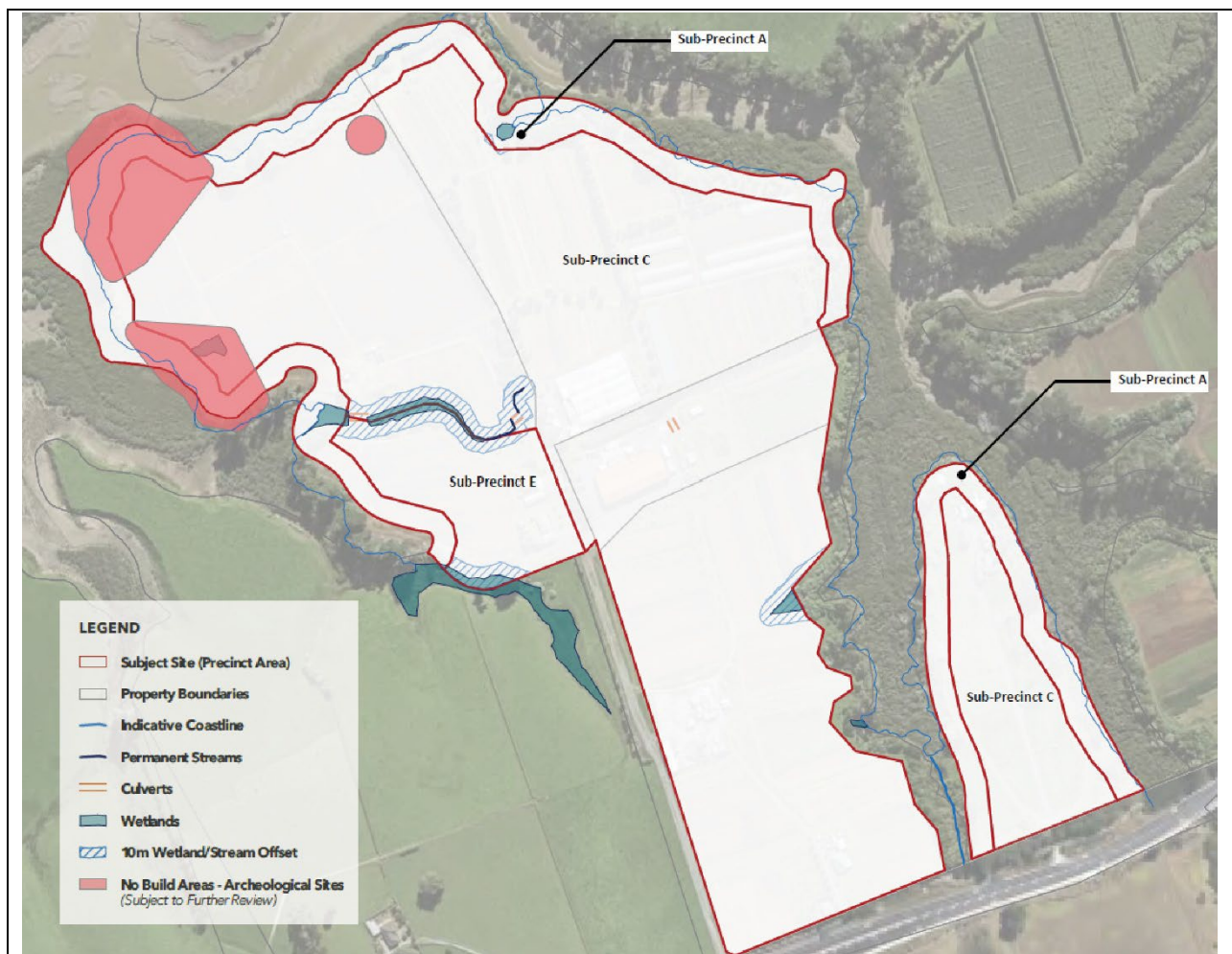


Figure 8: Proposed changes at lodgement.

The following Changes to the DP were requested at lodgement:

- Rezone the site as LIZ.



- Include the site within the Puhinui Precinct as:
 - Sub-precinct C.
 - A second area of sub-precinct E that will provide retail and amenity for all LIZ land north of Puhinui Road.
 - Sub-precinct A around the coastal edges.
- Allow unmanned storage yard activities within proposed Sub-precincts C and E (north) as a permitted activity, subject to additional standards.
- Update Chapter I432 Puhinui Precinct to reflect these changes, including updates to objectives and policies, activity tables and standards.
- Update Chapter I432 Puhinui Precinct to include the proposed Precinct plan 6 and require that development across the site is consistent with this plan.

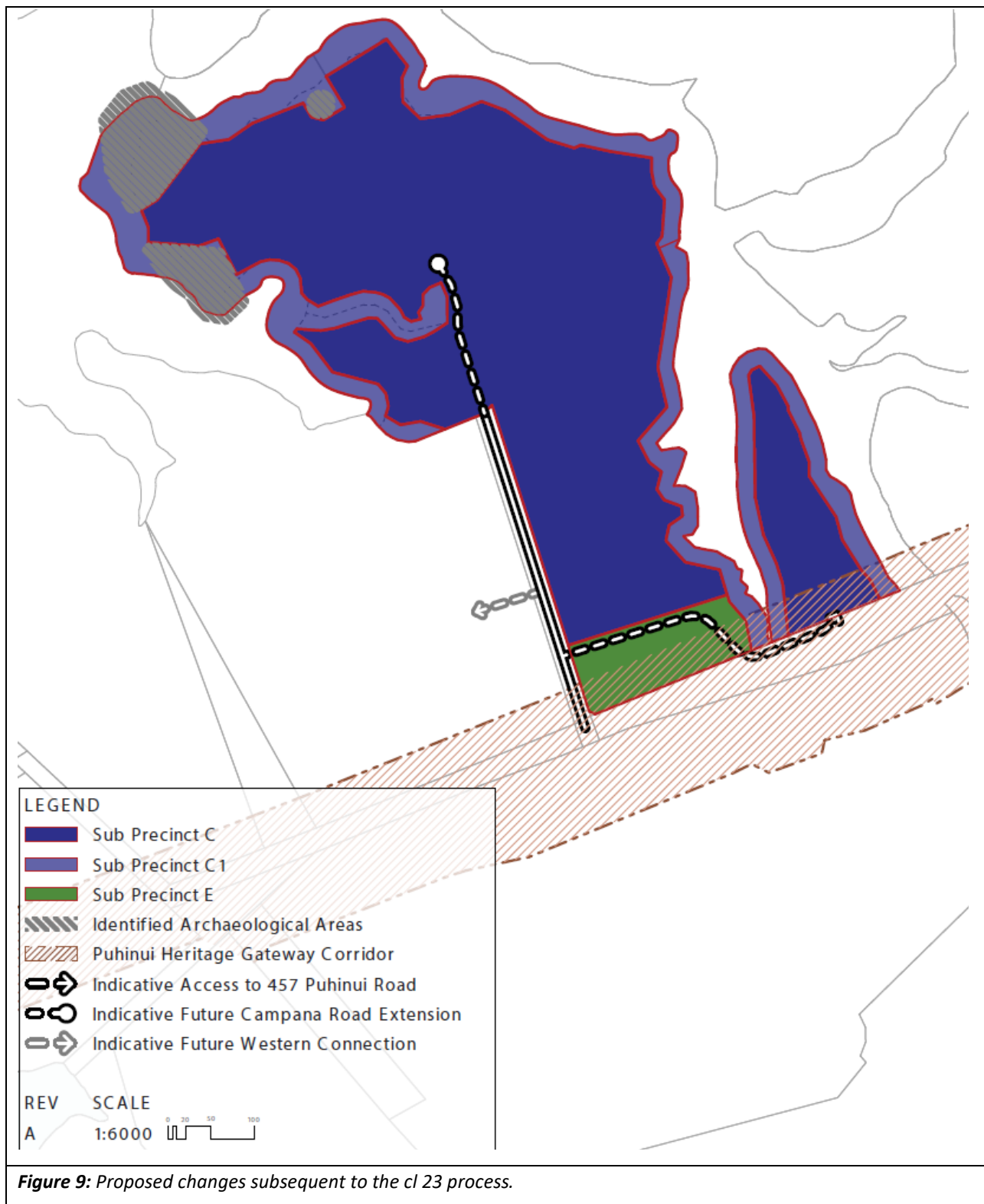
4.4 Clause 23 Correspondence

Subsequent to lodgement of the original plan change request with Council, requests for further information were issued under CI 23 of the RMA. The results of this process have been given in brief below:

- An official request for further information was issued on the 8th of May 2024. General clarifications regarding the submitted information were sought and further specialist reports were requested.
- A comprehensive response to this request was submitted on the 17th of September including a Landscape and Visual Assessment and a Coastal Hazard assessment that were not part of the original application materials. This request and the response can be found in Appendix P. The supporting material from specialists has been added to the relevant specialist reports.
- Another request for further information was issued on the 11th of October. Further clarifications were requested and an Arborist assessment was requested.
- In response to these requests a number of reports were updated, and an Arborist Report was submitted to Council.
- There was further correspondence between Council's traffic specialist and the Applicant's consultant traffic specialist subsequent to the further information request issued on the 11th of October 2024. The full correspondence can be found in Appendix K.
- To my knowledge all information gaps have now been addressed.



4.5 Changes Requested Subsequent to the Clause 23 Process



Subsequent to lodgement of the plan change request, the proposal has undergone revision and refinement in parallel to the cl 23 process. Key changes include incorporating the separate structure plan that was originally proposed into the precinct chapter as precinct provisions and a new Precinct plan 6; shifting sub-precinct E (north) to the southern boundary of the site where it can service users of SH 20B; and, showing indicative access to the eastern finger and land to the west.

The following Changes to the DP have now been requested:

- Rezone the site as LIZ.
- Include the site within the Puhinui Precinct as:
 - Sub-precinct C.
 - Sub-precinct C1 around the coastal edges and over identified archaeological sites.
 - A second area of sub-precinct E that will provide retail and amenity for all LIZ land north of Puhinui Road and for the users of SH 20B.
- Allow unmanned storage yard activities within proposed Sub-precincts C and E (north) as a permitted activity, subject to additional standards.
- Update Chapter I432 Puhinui Precinct to reflect these changes, including updates to objectives and policies, activity tables and standards.
- Update Chapter I432 Puhinui Precinct to ensure development does not occur before infrastructure is available (unless effects can be managed) and subdivision does not compromise future development of light industrial activities. This includes reserving Council's discretion to consider effects by restricting permitted activities across the new sub-precincts proposed.
- Update Chapter I432 Puhinui Precinct to include objectives, policies and rules to manage environmental effects that may occur as a result of the proposal.

A rezoning map and a copy of the proposed updates to the Puhinui Precinct provisions are attached as Appendix C.



5 ENGAGEMENT

5.1 Te Ākitai Waiohua

Pre-lodgement

The proposal was first introduced to Karen Wilson of Te Akitai on 16 June 2023, and the first formal meeting was held on 9 October 2023. The initial meeting was attended by Chloe Trenouth, a planner engaged by Te Akitai. The applicant has been working closely with Te Akitai since this time. In addition to various phone calls and remote meetings, pre-application engagement with Te Akitai has included the following:

- Assisting with the brief to inform the scope of the CFG Heritage assessment, review of findings and feedback.
- Workshop with the project planners, ecologist, civil engineer and urban designers to inform the updated precinct provisions.
- A visit to the grounds of Pukaki Marae to identify potential views of the site from the marae.
- Collaborating on the content of the proposed precinct provisions and Precinct plan 6.

In terms of identifying the potential cultural impacts of the application, Te Akitai hasn't prepared a cultural impact assessment (**CIA**) but has instead indicated that the application package may rely on the original CHA prepared in 2014 and the cultural maps prepared in 2016 (attached as Appendix O), along with Te Akitai's ongoing feedback on the proposal.

Post-lodgement

Te Akitai Waiohua have been provided with ongoing updates, plan amendments and updated precinct provisions. We have held regular meetings with Te Akitai as mana whenua to address specific concerns and queries regarding the immediate and long-term development activities in the area and on the subject properties. Feedback from Te Akitai has provided valuable input to the guiding precinct provisions, including how sensitive archaeological areas are treated through development, and how issues such as stormwater and ecological protections are managed.



5.2 Ngaati Te Ata

Pre-lodgement

On the 16 February 2024, a draft version of the proposed precinct provisions was distributed to Karl Flavell of Ngaati Te Ata Waiohua. In response, Mr Flavell stated that *“Ngaati Te Ata Waiohua requires our CIA report be undertaken in the first instance.”*

As the proposal is being undertaken in close consultation with Te Akitai as mana whenua, the applicant informed Mr Flavell that consultation was being run through Te Akitai in the first instance, while Ngaati Te Ata were encouraged to identify any cultural values that may be impacted from their perspective.

Post-lodgement

Ngaati Te Ata were provided with all post-lodgement documentation, including initial technical reporting and further responses and reporting as requested by Auckland Council. At this point, Ngati Te Ata are still reviewing this material. We are awaiting further engagement and formal responses.

5.3 Ngāti Tamaoho

Pre-lodgement

On the 16 February 2024, a draft version of the proposed precinct provisions was distributed to Ngāti Tamaoho.

Post-lodgement

Ngāti Tamaoho have been provided with all response and further reporting documentation. This includes all technical reports. We have requested their input and feedback on precinct provisions and future development restrictions. Initial concerns centred on treatment of stormwater, which was addressed as a result of their feedback. We are awaiting further engagement and formal responses.



5.4 Auckland Council Plans and Places / Growth and Strategy

Pre-lodgement

Consultation to date with Auckland Council has included the following:

- An initial discussion with members of the Council's Plans and Places team on 14 June 2023 to introduce the proposal. The meeting was attended by Celia Davison, Marc Dendale and David Wong of the Plans and Places team. Because it was early in the process, the Plans and Places team asked to be updated following further discussions with mana whenua, Auckland Transport, Waka Kotahi and Watercare.
- An initial discussion with Dawn Mackay, Manager Growth and Strategy, on 4 July 2023 to introduce the proposal. Ms Mackay's advice was to submit feedback on the draft Future Urban Development Strategy. A submission on the draft FDS was submitted on behalf of the applicant on 31 July 2023. A copy of the submission is attached as Appendix S.
- Provision of proposed updates to the Puhinui Precinct provisions to Celia Davison, Marc Dendale and David Wong for comment on 16 February 2024. A reply was received from Plans and Places on 7 March 2024 informing us of the information requirements for plan change applications however no comments were made on the merits of the provided provisions.

Post-lodgement

Auckland Council has been fully involved in the cl 23 process, and we have continued to collaborate with internal specialists and appointed consultants to refine the proposal.

5.5 Waka Kotahi NZ Transport Agency and Auckland Transport

Pre-lodgement

Consultation to date with Waka Kotahi and Auckland Council has included the following:

- An initial discussion with various representatives of Auckland Transport (**AT**) led by Catherine Absil-Couzins and Evan Keating of Waka Kotahi (**WK**) on 13 November 2023 to introduce the proposal. The pertinent feedback from WK/AT (verbal only) included:
 - Additional traffic modelling would be requested if there were no additional resource consent triggers proposed to manage adverse effects on the traffic network following completion of



the proposed commuter bus lane associated with the Bus Rapid Transit. As a result of this feedback, the new sub-precinct C provisions include the same traffic restrictions that apply to sub-precincts D and E where specified traffic movements are exceeded (refer proposed Standard I432.6.1.2 (4)). Therefore, any additional traffic modelling is not considered necessary for the plan change request.

- Mr Keating suggested that the applicant make provision for a new access to 457 Puhinui Road via the SPCA property to Campana Road, including a new crossing of the tributary that separates 485 and 457 Puhinui Road. Following further discussions between the applicants' representatives and the applicants' consultant team, it was concluded that the construction of the suggested road would not be cost-effective and would likely generate adverse effects (namely ecological and cultural heritage) from the crossing of the tributary. A more cost-effective and appropriate solution is to create a side road adjacent to the northern edge of the Puhinui Road carriageway that would connect to the existing Campana / SH20B intersection. It is understood that any necessary design would be completed as part of detailed design of the Bus Rapid Transit if WK/AT propose to remove the existing access to 457 Puhinui Road.
- The proposed updates to the Transport provisions of the Puhinui Precinct and initial assessment of impacts associated with interim storage yard activity were submitted to Ms Absil Cousins (AT) and Mr Keating (WK) for comment on 20 December 2023.
- The proposed Precinct plan 6, including preferred access arrangements to 457 Puhinui Road, was provided to Ms Absil Cousins (AT) and Mr Keating (WK) for comment on 16 February 2024.

Post-lodgement

Waka Kotahi and Auckland Transport have each been provided with all updated plans, proposed rules, and precinct provisions. The updated reporting was based on extensive engagement with each entity. NZTA and AT requested to be kept updated, with specific questions about how traffic movements are managed in the short to medium term, and how the future transport network might be modelled and provided for. At this point, we have had no further response or feedback from either entity, noting that significant work has been undertaken to establish appropriate rules and restrictions for managing transport and traffic movements. Notwithstanding the above, we understand that AT have been involved in Andre Temperley's (Council's engaged traffic specialist) review of the lodged proposal.



5.6 Watercare

Pre-lodgement

A copy of the Maven wastewater and water supply assessment was submitted to Watercare on 15 November 2023 for comment. Watercare responded on 14 December 2023, confirming that there were no fundamental constraints in terms of wastewater and water supply.

Post-lodgement

Watercare will continue to be updated as the private plan change request advances, noting that all issues regarding water and wastewater infrastructure provision have largely been dealt with to the satisfaction of Watercare.

5.7 Healthy waters

Pre-lodgement

A copy of the draft infrastructure report and SMP was submitted to Healthy Waters on 1 February 2024. Healthy Waters responded on 16 February 2024 with some minor comments on the content of the SMP that have been taken in consideration for the final copy of the SMP.

Post-lodgement

Healthy Waters will continue to be updated as the private plan change request advances.

5.8 Other landowners within the Puhinui Precinct Future Urban Zone

Pre-lodgement

There are two other landowners within the Puhinui Precinct Future Urban Zone, R & B Wyllie Limited (507 and 551 Puhinui Road) and Pui Ying Wong (437 Puhinui Road). Both parties were approached at the outset to contribute to the plan change application, however neither party wished to be involved. 507 and 551 Puhinui Road is currently in pasture and 437 Puhinui Road is used for market gardening.



Post-lodgement

Documentation is to be provided to the two adjacent landowners by hand. From previous attempts to deliver documentation, however there has been limited response from these landowners. We will continue to provide the landowners with all information, noting we have had no response or engagement previously, despite making best efforts.

5.9 Auckland International Airport Limited (AIAL)

Pre-lodgement

Angela Marshall of AIAL was contacted on 22 June 2023 and a request was made to meet. Ms Marshall requested that applicant come back to her once more information was available.

A meeting was held with AIAL on 8 February 2024. At the meeting AIAL requested that all technical reports be passed on.

On 16 February 2024, a package of information was sent to AIAL, including the initial transport assessment relating to the initial storage yard and the proposed precinct provisions. On 29 February 2024, a response was received from Mark Laurenson, Environmental Planning Manager for AIAL. Mr Laurenson expressed concern regarding the potential effects on infrastructure arising from the proposal, however did not provide any reasoning as to what these effects may be. Further attempts were made to better understand AIAL's concerns but no further detail about specific concerns has been received to date.

Post-lodgement

Auckland International Airport Limited (AIAL) has been provided with all updated plans, proposed rules, and precinct provisions as part of the post-lodgement RFI reporting phase. The updated reporting was based on extensive engagement with AIAL.



5.10 Southern Gateway Consortium

Pre-lodgement

All parties involved in the SGC and those landowner on the southern side of Puhinui Road were provided with copies of all plans and documentation as previously lodged with Council. No feedback was received from any party.

Post-lodgement

All parties involved in the SGC and those landowner on the southern side of Puhinui Road were provided with copies of all updated plans and documentation as part of the post-lodgement RFI phase of the request. These documents were sent, along with a request for any feedback or comment from the parties. No responses have been received to date.



PART 2: S32 ASSESSMENT



6 SECTION 32(1)(A)

6.1 Evaluation

Clause 22(1) of Schedule 1 of the RMA states that a plan change request must contain an evaluation report prepared in accordance with s32 of the RMA, addressing the matters described in s32(1)(a) and s32(1)(b). In brief, s32(1)(a) requires that the evaluation report must examine the extent to which the objectives of the proposal being evaluated are the “most appropriate” way to achieve the purpose of the Act. In summary, the objectives of the proposal are to provide certainty about:

- The timeline for light industrial land release within the Puhinui Precinct.
- The potential adverse effects generated by rezoning the site as LIZ, in particular those effects on mana whenua values and infrastructure networks.

The objective of the proposal is also consistent with (if not supported by) those matters listed in Part 2 of the RMA for the reasons given below.

Section 5 Purpose

(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.

(2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment

The objective of the proposal is consistent with (if not supported by) the matters listed above as:

- It will deliver certainty regarding the development timeline of the site (enabling the owners of the site to better provide for themselves economically); while
- Providing certainty about the adverse environmental effects associated with any rezoning, meaning these effects can be addressed and mitigated, safeguarding the life supporting capacity of the environment and either avoiding or mitigating any adverse effects on the environment.



Section 6 Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:*
- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:*
- (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:*
- (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:*
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:*
- (f) the protection of historic heritage from inappropriate subdivision, use, and development:*
- (g) the protection of protected customary rights:*
- (h) the management of significant risks from natural hazards.*

The objective of the proposal is consistent with (if not supported by) s6 as it will enable any persons exercising functions under the RMA to better understand the potential consequences of future development on those matters listed above.

Section 7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

- (a) kaitiakitanga:*
- (aa) the ethic of stewardship:*
- (b) the efficient use and development of natural and physical resources:*
- (ba) the efficiency of the end use of energy:*
- (c) the maintenance and enhancement of amenity values:*



(d) intrinsic values of ecosystems:

(e)[Repealed]

(f) maintenance and enhancement of the quality of the environment:

(g) any finite characteristics of natural and physical resources:

(h) the protection of the habitat of trout and salmon:

(i) the effects of climate change:

(j) the benefits to be derived from the use and development of renewable energy.

The objective of the proposal is consistent with (if not supported by) s7 as it enables any persons exercising functions under the act to better understand any effects on those matters listed above.

Section 8 Treaty of Waitangi

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

The objective of the proposal enables any persons exercising functions under the act to better give effect to the principles of the Treaty of Waitangi, as they will better understand potential effects on cultural values as determined by mana whenua. A key part of the objective of the plan change is to provide certainty around effects on mana whenua values in acknowledgment that the city of Auckland is in partnership with mana whenua in developing an urban environment moulded by a broad spectrum of values and interests. The tacit acknowledgement of mana whenua in the objective of the plan change will ensure that mana whenua are able to participate in the process of incorporating the proposal into the AUP.



7 S32(1)(B) EVALUATION

7.1 Evaluation

Clause 22(1) of Schedule 1 of the RMA states that plan change request must contain an evaluation report prepared in accordance with s32 of the RMA, addressing the matters described in s32(1)(a) and s32(1)(b). In brief, s32(1)(b) requires that the evaluation report must examine whether the provisions in the proposal are the most appropriate way to achieve the objectives, by:

- Identifying other reasonably practicable options.
- Assessing the efficiency and effectiveness of the provisions; and
- Summarising the reason for deciding on the provisions; and

In assessing those matters listed above, the evaluation report must:

- Contain a level of detail that corresponds to the significance and scale of the potential effects of the proposal as required by s32(1)(c); and
- Relate to both the provisions and objective of the proposal AND the objectives of the existing plan (in this instance the AUP) as required by s32(3).

S32(3)(a) Matters

For avoidance of doubt, the objective of the proposal is to provide certainty about:

- The timeline for light industrial land release in the Puhinui Precinct.
- The potential adverse effects generated by rezoning the site as LIZ, in particular those effects on mana whenua values and infrastructure networks.

s32(3)(b) Matters

Those existing objectives of the AUP considered relevant to the objective of the proposal are:

- The objectives of chapter D9 Significant Ecological Areas Overlay.
- The objectives of chapter D24 Infrastructure: Aircraft Noise Overlay.
- The objectives of chapter E1 Water quality and integrated management.
- The objectives of chapter E18 Natural character of the coastal environment.
- The objectives of chapter 27 Transport.



- The objectives of chapter I419 Mana Whenua Management Precinct.
- The objectives of chapter I432 Puhinui Precinct.

Identifying Other Options

For the purposes of assessing whether the proposal is the most appropriate way for achieving the objective of the PC and the relevant objectives of the AUP as required under s32(1)(b) of the RMA, three different scenarios have been evaluated:

- Do nothing: under this scenario the AUP(OP) would remain unchanged.
- Rezone the site as LIZ, relying on the current precinct-wide provisions of the Puhinui Precinct only.
- Rezone the site as LIZ, including additional Puhinui Precinct provisions (the proposal).

Given:

- The extensive work already undertaken as part of the preparation of the AUP;
- That LIZ is the only zoning supported within the precinct-wide objectives and policies of the Puhinui Precinct; and
- The rezoning of the site as LIZ was considered a matter of when not if when the AUP was originally prepared;

These are considered the reasonably practicable options for achieving the objective of the proposal and the relevant objectives of the AUP that will not be altered by the proposal.

7.2 Achieving the Objective of the Proposal

In accordance with the requirements under s32(1)(b) and s32(3)(a) of the RMA this assessment must consider the objective of the proposal. An assessment of the three options against the objective of the proposal has been undertaken below.

Certainty of timeline for light industrial land release

In achieving certainty in regard to the release of light industrial land, the do nothing approach provides no certainty beyond those statements in the FDS that indicate a 2030+ timeline, a vague and uncertain plan given the position of the site within the country's largest urban centre. We are nearly into 2025 and a development timeframe of 2030+ is only some 5 years away. Consenting, together with detailed



design may mean that development only occurs in around that timeframe, even if the Plan Change is approved soon.

Relative to this, rezoning the site with or without additional precinct provisions provides certainty in regard to timing of the upzoning.

Certainty of environmental effects

The do-nothing approach provides little certainty in regard to the environmental effects of any future light industrial development, leaving the process of upzoning to a future plan change process that may not meet the level of completeness of the proposal. And, in the meantime, the ad hoc development of the site may compromise the highest and best use of the site as a distinctly urban light industrial development area. The rezoning of the site as LIZ also creates significant uncertainty around effects given the wide range of development permitted within the LIZ.

Relative to this, upzoning to LIZ with additional precinct provisions narrows the envelope of what can be developed on the site and the stringency of the proposed additional provisions provides a high degree of certainty in terms of the form of future development and the associated level of environmental effects.

7.3 Achieving the Objectives of the AUP

In accordance with the requirements under s32(3)(b) of the RMA this assessment must consider the objectives of the AUP that are relevant to the proposal and would remain if the proposal would take effect. The objectives considered relevant to the identified options are considered below.

D9 Significant Ecological Areas Overlay - SEA-M2-27a, Marine 2

D9.2. Objectives [rcp/rp/dp]

(1) Areas of significant indigenous biodiversity value in terrestrial, freshwater, and coastal marine areas are protected from the adverse effects of subdivision, use and development.

(2) Indigenous biodiversity values of significant ecological areas are enhanced.

(3) The relationship of Mana Whenua and their customs and traditions with indigenous vegetation and fauna is recognised and provided for.





Figure 9: SEA overlay where it overlaps with the site.

Aside from the established local purpose reserve along the eastern boundaries of 485 Puhinui Road and 5 Campana Road, there is currently no protection of ecological features beyond the extent of the SEA overlay. A do-nothing option would mean that horticultural or grazing activities could continue to occur. While the contours within the vicinity of the CMA would continue to limit the ability to undertake rural activities immediately adjacent to the CMA, there would be no incentive to control pest species in the area. Stormwater discharges would remain negligible, however identified wetland features and watercourses would likely continue to be degraded by rural activities. This option is considered fundamentally in conflict with the objectives of 1 and 2.

Rezoning to LIZ with will allow for additional impervious areas across the site and the associated stormwater discharges. Earthworks activities associated with future industrial development also have the potential to disturb or adversely affect freshwater water bodies and Waiokeauri Creek. There are existing provisions within the Auckland Unitary Plan and the NES-F that provide some protection for



these features, however if existing ecological features are not identified within the precinct, future development would not be required to wholistically give effect to the objectives of chapter D9.

The proposed additional precinct provisions would more comprehensively give effect to the objectives of chapter D9, managing adverse effects on the downstream CMA and freshwater environments. For example:

- Sub-precinct C1 buffers future land use activities from the CMA.
- Currently unprotected wetland areas have been identified for protection; and
- Specific stormwater management measures have been proposed to reduce stormwater volumes. These controls could require stormwater to be discharged via soakage or treated before discharging to the Waiohauri Creek / CMA. Additional stormwater management controls have been strongly encouraged by Te Akitai Waiohauri (adoption of these recommendations gives effect to objective 3).

In summary, a do-nothing approach is in conflict with the relevant objectives; and, use of the LIZ requires additional precinct provisions in order to give full effect to the objectives of chapter D9.

D24 Infrastructure: Aircraft Noise Overlay

D24.2. Objectives

(1) Airports and airfields are protected from reverse sensitivity effects.

(2) The adverse effects of aircraft noise on residential and other activities sensitive to aircraft noise are avoided, remedied or mitigated.

The do-nothing option is not likely to involve any activities that are sensitive to noise.

While there is a possibility of noise sensitive activities in the LIZ:

- The High Aircraft Noise Area Overlay (HANA) affects the southern parts of 485 and 467 Puhinui Road. The current overlay provisions already prohibit activities that are sensitive to noise in this area, including worker's accommodation, care centres and hospitals that may establish within a Business – Light Industry Zone. Any other residential accommodation is not provided for in the LIZ.
- The remainder of the site is located within the Moderate Aircraft Noise Area Overlay (MANA). These restrictions only apply to dwellings and other noise sensitive activities.



The current provisions within D24 will continue to provide appropriate protection to the continued operation of AIAL and none of the options are in conflict with the objectives of chapter D24.

E1 Water quality and integrated management

E1.2. Objectives [rp/rcp]

(1) Freshwater and sediment quality is maintained where it is excellent or good and progressively improved over time in degraded areas.

(2) The mauri of freshwater is maintained or progressively improved over time to enable traditional and cultural use of this resource by Mana Whenua.

(3) Stormwater and wastewater networks are managed to protect public health and safety and to prevent or minimise adverse effects of contaminants on freshwater and coastal water quality.

A do-nothing option would mean that horticultural or grazing activities would continue to occur and stormwater discharges would remain negligible. However, identified wetland features and watercourses would likely continue to be degraded by rural activities. This option is considered fundamentally in conflict with the objectives of chapter E1.

Rezoning to LIZ with will allow for additional impervious areas across the site and the associated stormwater discharges. Earthworks activities associated with future industrial development also have the potential to disturb or adversely affect freshwater water bodies and Waiokeauri Creek. There are existing provisions within the Auckland Unitary Plan and the NES-F that provide some protection for these features, however if existing ecological features are not identified within the precinct, future development would not be required to wholistically give effect to the objectives of chapter E1.

The proposed additional precinct provisions would more comprehensively give effect to the objectives of chapter D9, managing adverse effects on the downstream CMA and freshwater environments.

In summary, a do-nothing approach is in conflict with the relevant objectives and use of the LIZ requires additional precinct provisions in order to give full effect to the objectives of chapter E1.

E18 Natural character of the coastal environment

E18.2. Objectives [rcp/dp]



(1) The natural characteristics and qualities that contribute to the natural character of the coastal environment are maintained while providing for subdivision, use and development.

(2) Where practical the natural character values of the coastal environment are restored or rehabilitated.

The coastal margin around the site is typically characterised by steep banks fringed by mangroves and the do-nothing option will continue to maintain the established natural coastal character. However, maintaining the status quo creates little incentive to give effect to objective 2.

LIZ provisions require a 25m setback from the CMA, which would trigger resource consent applications where buildings are proposed within the setback. Resource consent applications for setback infringements would need to consider the above provisions and natural coastal and ecological features would need to be reassessed at resource consent stage. As the future buildings associated with any industrial land use will be setback at least 25m and the elevation generally rises steeply from the CMA, light industrial land use will not significantly impact the natural character.

While the do-nothing approach is not necessarily in conflict with the relevant objectives, rezoning to LIZ with additional precinct provisions is considered to give greatest effect to the objectives of chapter E18. We note that the proposed provisions increase the built form setback to 30m.

E27 Transport

E27.2. Objectives

(1) Land use and all modes of transport are integrated in a manner that enables:

(a) the benefits of an integrated transport network to be realised; and

(b) the adverse effects of traffic generation on the transport network to be managed.

(2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.

(3) Parking and loading is managed to support urban growth and the quality compact urban form.

(4) Parking, loading and access is safe and efficient and, where parking is provided, it is commensurate with the character, scale and intensity and alternative transport options of the location.



(5) Pedestrian safety and amenity along public footpaths is prioritised.

The current transport network by which the site is accessed is characteristic of an agricultural site outside the rural-urban boundary (**RUB**). While this has been fit for purpose to date, the surrounding area is rapidly urbanizing. A do-nothing approach creates a significant risk of the site falling behind in terms of transport infrastructure, and provides no certainty about the future of transport infrastructure across the site. This is in conflict with the objectives of chapter E27 which call for integration of land use and transport infrastructure. Unqualified rezoning to LIZ creates the inverse problem, with transport infrastructure and transport effects potentially outpacing the ability of the wider network to accommodate increased development intensity. Neither of these options give effect to an integrated transport network.

Use of the LIZ with the proposed precinct provisions addresses the long-term integration of the site with future transport infrastructure by providing a clear plan for the form of transport infrastructure across and servicing the site while applying the appropriate breaks on overdevelopment in the short term. This is the only way that the site can comprehensively give effect to the objectives of chapter E27.

I419 Mana Whenua Management Precinct

I419.2. Objective [rcp/dp]

(1) The special relationship, including customary use and responsibilities, Mana Whenua have with Whātāpaka Creek and Pūkaki-Waiokauri Creek, is provided for.

The Waiokauri Creek estuary and its tributaries are significant to Te Akitai Waiohūa and bound the north, northwest and east of the site. Protection of views to and from the Pukaki Marae is also important to Te Akitai.

Aside from the established local purpose reserve along the eastern boundaries of 485 Puhinui Road and 5 Campana Road, there is currently limited protection of these features beyond the extent of the Mana Whenua Management Precinct. A do-nothing option would mean that horticultural or grazing activities would continue to occur. The contours within the vicinity of Waiokauri Creek would continue to limit the ability to undertake rural activities immediately adjacent to the Waiokauri Creek but there would be no incentive to maintain ecological or archaeological features within the site. Adverse stormwater discharge effects would remain low.



Earthworks activities associated with the LIZ have greater potential to disturb or adversely affect freshwater water bodies, the Waiohauri Creek and identified archaeological features within the site. There are existing provisions within the Auckland Unitary Plan and NES-F that provide some protection to ecological features, however if these features are not identified within the precinct this creates a risk of unmanaged adverse effects. There would be limited protection of existing archaeological features without introducing additional provisions. Te Akitai have also raised concerns that the NPSFM and NESF cannot be solely relied upon to protect freshwater environments.

Additional precinct provisions will manage adverse effects on the Waiohauri Creek, freshwater environments and identified archaeological features. For example:

- Sub-precinct C1 will buffer the coastal margins.
- Precinct provisions will mitigate the effects on views to and from the Pukaki Marae.
- The provisions allow for appropriate protection of archaeological features identified within the site.
- Specific stormwater management measures are included in the provisions to help reduce stormwater volumes.

For those reasons given above, the do-nothing approach is not considered to be in conflict with the objective, however rezoning to LIZ with additional provisions is considered to better give effect to the objective.

I432 Puhinui Precinct

I432.2. Objectives (precinct-wide) [rcp/rp/dp]

(1) A range of business and airport related activities are provided for in the precinct to ensure the efficient use and development of the land resource, and recognition of the precinct's proximity to Auckland International Airport.

A do-nothing approach is fundamentally in conflict with objective 1, the future urban zone does not specifically provide for business and airport related activities. LIZ zoning with or without additional precinct provisions gives effect to objective 1.

(2) Mana Whenua cultural, spiritual and historical values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, waahi tapu, and other taonga, in the Puhinui Precinct are identified, recognised, protected, and enhanced.



(3) Subdivision, use and development is managed in an integrated manner to avoid where practicable, or otherwise remedy or mitigate, adverse effects on the natural coastal environment, and significant ecological areas within the Manukau Harbour, as well as its tributaries.

(4) Subdivision, use and development is managed to maintain or enhance water quality within the Puhinui freshwater catchment and receiving coastal environment, including the integration of Mana Whenua values, mauri, matauranga and tikanga associated with fresh water and coastal water resources.

(5) Subdivision, use and development is designed and located to avoid, or otherwise remedy or mitigate, adverse effects on those landscape features identified as Outstanding Natural Features, and areas with high levels of sensitivity to landscape modification in the Māori cultural landscape, which contribute to the ecological, geological, cultural, spiritual and amenity values of the precinct.

(6) The location, scale and form of development is managed within the precinct to avoid, remedy or mitigate adverse effects on cultural, spiritual and landscape values and their relationship associated with the Māori cultural landscape, while recognising the operational requirements of Auckland International Airport.

As demonstrated in the broader assessment against the relevant AUP provisions above, LIZ with additional precinct provisions is preferable to either the do nothing approach or unqualified LIZ rezoning for the purposes of avoiding or mitigating effects on coastal environments, ecological values, landscape values or mana whenua values.

(7) A southern gateway connection to Auckland International Airport is developed, that provides improved connectivity and accessibility for all transport modes, and recognises and provides for the cultural significance of the Puhinui Peninsula to Mana Whenua.

(8) Subdivision and development of land is staged to ensure adequate transport infrastructure capacity is in place prior to land use development.

(9) Subdivision and development establishes a transport network that provides for the safe and efficient movement of all travel modes.

(10) The timing and sequencing of integrated development provides for the efficient and effective provision of all infrastructure including transport networks, stormwater, wastewater drainage networks, water, power, gas and telecommunication supply networks.

(11) Subdivision and/or development within the precinct facilitates a transport network that:



(a) integrates with, and avoids adverse effects on the safety and efficiency of, the surrounding transport network, including any upgrades to the surrounding network; and

(b) facilitates transport choices by providing for pedestrians, cyclists, public transport facilities, and vehicles; and

(c) avoids where practicable, or otherwise remedies or mitigates adverse effects on the environment, including effects on Mana Whenua values.

As demonstrated in the assessment against the objectives of E27 above, LIZ with precinct provisions is the preferable option in achieving transport network integration over the near and long term. In particular, the introduction of specific standards and/or provisions will allow unmanned storage yards as an interim activity, putting the brakes on unmanageable development intensity prior to sufficient transport infrastructure becoming available.

(12) Development demonstrates the integration of green networks (such as natural freshwater and coastal systems, and ecological corridors) with open space and pedestrian networks while providing for improved access and connectivity.

Under a do-nothing approach there is no likely scenario under which green networks and pedestrian networks are integrated into the site and there would be no requirements for these networks under unqualified LIZ rezoning.

LIZ with additional precinct provisions provides specifically for green network integration across the coastal margins and best gives effect to objective 12.

7.4 Economic Efficiency

Assessing the economic efficiency of the identified options for the purposes of s32(1)(b)(ii) is reliant on the conclusions of Tim Heath of Property Economics who has prepared an Economic Assessment attached as Appendix L.

For the purposes of assessing economic efficiency there are only two scenarios useful as a point of comparison, the do-nothing approach and rezoning as LIZ. Relative to the do-nothing approach, Mr Heath has concluded that rezoning the site as LIZ will result in:

- Addressing a shortfall in local industrial land supply (while there is sufficient regional capacity to support industrial growth there is a local shortfall in Manurewa).



- Enablement of economies of scale as the site is contiguous with other industrially zoned land. This also decreases the marginal cost of infrastructure provision.
- A more efficient use of the site.
- An increase Auckland's industrial profile by via increased industrial employment.
- An increase in competition in the industrial land market.

At the cost of:

- Additional infrastructure investment requirements.
- Potential for the redirection of demand away from existing industrial areas.
- Potential adverse environmental effects.

From an economic efficiency perspective, the proposed rezoning has significant benefits relative to a do-nothing approach.

7.5 Consolidated Options Assessment

	Costs	Benefits
Do nothing	• Categorically cannot meet the stated objective of the proposal as no certainty can be provided regarding the timeline for light industrial land release. • The lack of specific provisions within the Puhinui Precinct applying to the site creates significant uncertainties regarding the effects of future development. • Comes into conflict with many of the stated objectives of the AUP. • Rural operations will continue to be constrained due to isolation from rural production infrastructure and high labour costs relative to other rural areas within the region. • The coastal edge and identified wetlands within the site will remain generally unprotected.	• Adverse effects from stormwater discharges and sedimentation to the CMA will remain low, provided appropriate rural production practices are adhered to. • Adverse effects on the traffic network will remain low. • Adverse effects on the operation of Auckland Airport will remain low.



	• There are possible archaeological features within the site that would remain generally unprotected. • No provision can be made to improve green networks and pedestrian access through the site. • Continued reliance on water takes form the aquifer underlying the site. • Constrains the site economically relative to rezoning as LIZ.	
Light Industrial Zoning	• Provides little certainty as to the adverse environmental effects surrounding future development. • Additional stormwater discharges will generate significant adverse effects on freshwater bodies, Waiokauri Creek and Mana Whenua values where resource consents are not required. • Earthworks activities may generate significant adverse effects on freshwater bodies, the CMA and Mana Whenua values if resource consents are not required. • Associated traffic movements may generate significant adverse effects on the traffic network and three-waters infrastructure if resource consent is not required.	• Provides certainty about the timeline of land release, partly giving effect to the objective of the proposal. • Allows landowners to utilise their land for higher-value land uses than the current rural provisions allow. • There are limited controls on future developers or light industry operators, which will lower the cost of development and operation.
Light Industrial Zoning with additional precinct provisions	• Additional controls associated with specific provisions will increase development and operational costs for future light industry operators. • Marginal increase in transport network pressure.	• Fully meets the objective of the proposal, providing both certainty around the timeline for land release AND providing a high degree of certainty surrounding environmental effects. • Allows landowners to utilise their land for higher-value uses than the current rural provisions allow. • Provisions can be included to allow unmanned storage yard as an interim use that would minimise or avoid adverse effects on traffic, water and wastewater infrastructure until necessary upgrades occur. • Provisions can be included to minimise stormwater discharges and sedimentation of freshwater bodies, the Waiokauri Creek and



		associated adverse effects on Mana Whenua values. • Provision can be made to allow appropriate protection of archaeological features identified within the site. • Sub-Precinct C1 can be extended around the coastal edge to protect the natural coastal character and allow provision for future green networks and improved connectivity. • An additional area of sub-precinct E can be introduced to allow local convenience retail activities and amenities to support light industry areas north of Puhinui Road.
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8 CONCLUSION

The objective of the plan change is considered consistent with Part II of the RMA as:

- It will allow landowners to provide for themselves economically while allowing decision makers exercising functions under the RMA to better understand potential adverse effects on the environment.
- It will allow decision makers exercising functions under the RMA to better understand potential effects on identified matters of national importance.
- It provide mana whenua with greater certainty about potential effects on mana whenua values.

Applying the LIZ across the site with additional precinct provisions including the supporting Precinct plan 6 is considered the most appropriate way to achieve the objective of the proposal and the relevant objectives of the AUP as:

- Other likely scenarios do not comprehensively address the objective of the proposal, the do-nothing approach provides no certainty of timeline or effects and unqualified rezoning creates significant uncertainty about potential environmental effects.
- Rezoning the site as LIZ with infrastructure triggers for full development creates a much higher degree of certainty around the timeline of land release than a do-nothing scenario.
- The stringency of the proposed provisions creates a high level of certainty in terms of potential environmental effects.
- A do-nothing approach or LIZ without additional provisions comes into conflict with several of the relevant objectives of the AUP.

Furthermore, applying the LIZ across the site is considered the most economically efficient use of the site.

The comparison of the proposal against both a do-nothing approach and unqualified rezoning is considered sufficient to demonstrate the appropriateness of the proposal for achieving the objective of the plan change. For the avoidance of doubt, it is reiterated that the proposed provisions have been prepared in collaboration with the nominated representative of mana whenua and the relevant infrastructure providers including Watercare, Healthy Waters and Auckland Transport.



PART 3: ASSESSMENT OF ENVIRONMENTAL EFFECTS



9 RELEVANT ENVIRONMENTAL EFFECTS

The following assessment of actual and potential effects on the environment is provided in accordance with Clause 22 of Schedule 1 of the RMA. The following sections provide an overview of the findings of the supporting technical reports. The following effects on the environment are relevant to the Plan Change Request:

- Effects on Mana Whenua Values
- Land Contamination Effects
- Land Stability and Geotechnical Effects
- Heritage Effects
- Ecological Effects
- Water Quality Effects
- Stormwater and Flooding Effects
- Infrastructure and Servicing Effects
- Traffic Network Effects
- Landscape and Visual Effects
- Urban Design Effects
- Economic Effects
- Reverse Sensitivity Effects



10 ASSESSMENT OF EFFECTS

10.1 Effects on Mana Whenua Values

The assessment of effects on Mana Whenua values has been informed by the CHA attached as Appendix N and ongoing input into the precinct provisions by Ms Trenouth, on behalf of Te Akitai Waiohū. The site features that are of importance to Te Akitai Waiohū include:

- the Waiokauri Creek estuary and coastal vegetation that bounds the site to the north west, north and east
- the freshwater bodies and terrestrial vegetation that have been identified in the attached ecological assessment;
- the archaeological features R11/2855, R11/1111 and R11/1112 identified during investigations of the site; and,
- Views to and from the Pukaki Marae.

While Te Akitai have generally accepted that the site will be developed in accordance with the Puhinui Precinct provisions, the key Mana Whenua concerns relate to:

- Protection and sedimentation of downstream water bodies associated with earthworks
- Protection and further assessment to ensure that there are no significant impacts on identified archaeological features
- Management of stormwater to minimise adverse effects from additional impervious areas associated with development;
- Consideration of views to and from the Pukaki Marae; and
- Mana Whenua access to the Waiokauri Creek.

In order to address these concerns, the following measures are proposed:

- Sub-precinct C1 will extend along the edge of the site to create a buffer that will separate future land use activities from the Waiokauri Creek and provide ongoing access along the CMA.
- Where there is potential for adverse effects on a heritage feature, works must be completed in accordance with an Archaeological Management Plan prepared in consultation with Te Akitai Waiohū. Identified heritage features have also been included in sub-precinct C1.
- Wetland areas have been identified for protection within sub-precinct C1.



- Specific stormwater management measures have been included within the precinct provisions to help reduce and treat stormwater. These controls require stormwater to be treated before discharging to the Waiohauri Creek / CMA.
- The precinct provisions require additional earthworks controls (over and above GD05).

10.2 Land Contamination Effects

A PSI has been undertaken, and the results are attached as Appendix F. The PSI was conducted via a desktop study and site visit. The PSI concluded that the site has historically been used for horticultural and pastoral purposes. Furthermore, the site has been subjected to more than one activity on the Hazardous Activities and Industries List (HAIL). Potential contaminants include:

- Organochlorine pesticides (OCPs) and organophosphates (OPPs) from horticultural activity and chemical mixed/storage.
- Asbestos from existing structures.
- Metals, OCPs and polycyclic aromatic hydrocarbons (PAHs) from uncharacterised fill and burn pits.
- PAHs, BTEX (benzene, toluene, ethylbenzene, and xylenes) and hydrocarbons from workshops and fuel storage.
- Nitrogen from domestic wastewater treatment.

The PSI concludes that:

“the conceptual site model indicates that there is a source and pathway link to human/ecological receptors” and, “pursuant to regulation 8(4)(b) of the NESCS, it is likely that there will be a risk to human health if the activity is done to the piece of land”.

The PSI undertaken by Babbage Consultants has identified a range of land contamination risks and resource consents will be required in the future to develop the subject site. As such, the proposal is considered appropriate from a land contamination perspective and will not result in any adverse effects beyond those that will be addressed at resource consent stage.



10.3 Land Stability and Geotechnical Effects

A Geotechnical Assessment has been attached as Appendix E. The assessment was conducted via a desktop study and a site walkover. The report assesses the viability of the proposed plan change on the subject site, with particular regard to the geotechnical features and characteristics of the land.

The investigations found that:

- The site does not have any significant geotechnical issues that would compromise the LIZ. Ground conditions on site are considered suitable to accommodate the anticipated building foundations and earthworks.
- The ground conditions on site are predominantly stiff to hard material in the upper profile, which are generally not susceptible to liquefaction. The report found that any potential lateral spreading could be mitigated effectively using standard design and construction methodologies.
- The site slopes towards the coast, however, the slopes generally well vegetated and protected at the toe by mature mangroves. A 50m long section of the coastal slope shows some signs of instability and erosion, but all other parts of the site show no obvious signs of instability and have coped well in the adverse weather events of early 2023. The coastal slopes will be protected from development by a 30m coastal setback yard which will mitigate against any potential risk posed by coastal erosion or instability of the slopes.

The assessment concludes that the risks to the site in regard to liquefaction, site stability, subsidence and flood risk are considered to be low. Furthermore, provided that adequate setbacks from the coastal slopes are maintained, coastal hazards are also considered to be low risk and the proposed rezoning is appropriate from a geotechnical perspective.

10.4 Heritage Effects

An Archaeological Assessment has been attached as Appendix G which found that the site contains three archaeological features: R11/2855, R11/1111 and R11/1112.

The archaeological features are all considered to have moderate heritage values. In particular, all three features have historical, knowledge and contextual value. Therefore, it is desirable to retain the existing heritage values of the archaeological features on site.

In order to retain and manage the heritage values on site, the following measures are proposed:



- Provisions have been included that require further intrusive investigations within the vicinity of heritage features identified during the cultural heritage site assessment. Where there is potential for adverse effects on a heritage feature, works must be completed in accordance with an Archaeological Management Plan prepared in consultation with Te Akitai Waiohua.
- Full archaeological assessments of the features to determine if an authority to destroy, damage or modify the features must be applied for from HNZPT under s44 of the HNZPT Act 2014.
- Identified heritage features have been included in sub-precinct C1.

10.5 Ecological Effects

An Ecological assessment has been attached as Appendix H. The assessment found that the following features were relevant to the proposal:

- Pest mammals
- Terrestrial vegetation and fauna
- Wetlands
- Watercourses
- Stormwater
- Coastal ecology

Effects related to these features are not considered significant for the reasons given below.

Pest mammals

Although rezoning the site from Future Urban to Business – Light Industry is anticipated to result in increased pest mammal populations, the proposed plan change will have negligible adverse effects in relation to pest mammals for the following reasons:

- Domestic cat numbers are not expected to significantly increase as these pests are generally associated with residential activity, not industrial activity as proposed.
- Common pest species such as possums, rabbits, hedgehogs, rats and mice will be managed via a pest control plan on site. It was identified that most pests on site are likely at carrying capacity at present, therefore, a pest control plan will ensure the decrease of pest species on site.



Terrestrial vegetation

Viridis found that the site does not have widespread vegetation, and the vegetation that does exist on the site is generally exotic vegetation. There is some native vegetation which holds ecological value, and this is predominantly found along the coastal edge or within wetland margins and will be left undisturbed by the proposal. Other vegetation on site is of low value and the removal of shelterbelts, specimen trees, orchards and amenity planting will generate low adverse effects. Proposed landscaping and amenity planting on the site combined with the retention and maintenance of native vegetation, will ensure any adverse effects are effectively mitigated.

Terrestrial indigenous fauna

Given the low adverse effects on vegetation and pest mammals, it is anticipated that the re-zoning of the subject site will result in low adverse effects on terrestrial indigenous fauna. Vegetation within the coastal protection yard will be protected and will continue to provide habitat for lizards, birds and bats.

Any potential adverse effects on terrestrial indigenous fauna as a result of development works will be assessed at the resource consent stage and can be managed via fauna management plans.

Coastal ecology

The coastal environment is protected by the 25m Coastal Protection Yard and Esplanade Reserve requirements, ensuring that developing will be situated away from the coastline and a vegetation buffer is maintained. Any activities that may produce adverse effects on the coastal environment will require an assessment at resource consent stage. It is considered that the resource consent process will effectively manage any adverse effects on coastal ecology from future development.

Watercourses

The ecological assessment identifies three main threats to watercourses as a result of the change in zoning:

1. The riparian yard set back will be decreased from 20m to 10m.
2. The potential for an increase in impervious surfaces as a result of industrial development.
3. The potential for an increase in contaminant runoff as a result of industrial development.



The site has a permanent stream with low ecological value and limited riparian vegetation. Any potential activities that may result in adverse effects on the stream will be appropriately managed during the resource consent and detailed design processes. Additionally, the artificial drains on site have negligible ecological value and will be reclaimed during future works or integrated into stormwater management on site. Therefore, no change in effects is anticipated in this instance.

Wetlands

Five natural inland wetlands have been identified on the site. Additionally, there are two natural inland wetlands adjacent to the site. All natural wetlands are protected from development by the AUP(OP) and NES-F, ensuring that future works within 10m of the wetland (or 100m if it will result in wetland drainage) will require resource consent. It is noted that the urban rezoning of the site will provide pathway via resource consent to reclaim the wetlands under the NES-F.

The identification of wetlands at this stage ensures that there is a high level of knowledge about the status of the wetlands, therefore, future development can be designed around the wetlands to ensure this environment is not degraded. It is considered that any future development that may produce adverse effects will be assessed and managed at the resource consent stage.

Stormwater management

A change from rural to urban land uses must be handled appropriately to ensure freshwater ecological values are protected. Urban land uses increase impervious surfaces and pollutant run off which can amplify stormwater effects via scouring, erosion or high level of contaminant input. Additionally, elevated levels of contaminants are often associated with industrial activities. Heavy metals and hydrocarbons can have negative effects on freshwater flora and fauna.

Industrial activities will be require specific controls relating to the site and activities taking place which can be addressed with resource consents. Therefore, potential effects will be addressed during future consenting processes to ensure that appropriate stormwater management takes place which protects the freshwater ecological values.

10.6 Water Quality Effects

The Infrastructure Report attached as Appendix J provides information regarding stormwater on the site. Additionally, a Stormwater Management Plan (SMP) has been attached as Appendix I. The SMP



outlines that changing the land use from rural to light industrial has the potential to increase the level of contamination and therefore increase adverse effects on the receiving environment. Several water quality treatment tools and devices are proposed on site, in accordance with guidance from Auckland Council (GD01, GD04 and GD05).

The SMP states that:

“traditionally for a light industrial subdivision, each lot will need to provide their own proprietary stormwater devices to treat the stormwater run-off within the site. Each industrial activity may generate different types of contamination. As such, no catchment-wide stormwater treatment devices are proposed for this SMP”.

However, on top of the individual lot-specific stormwater treatment, it is proposed that extensive planting occurs along the riparian margins. In coastal areas, a minimum of 10m riparian planting will be required. Riparian planting enhances water quality by absorbing nutrients and heavy metals within stormwater run-off. Additionally, in alignment with Te Akitai design principles, stormwater treatment via rain gardens, swales and engineered tree pits are proposed in some locations and are the preferred method of stormwater treatment on site. These devices allow contamination to be treated at the source including promoting ground infiltration to mimic the natural water cycle.

10.7 Stormwater and Flooding Effects

The Infrastructure Report and SMP provides information regarding stormwater on the site.

The SMP identifies that the site has a large network of major overland flow paths (OLFPs) and floodplain areas. Although the network is extensive, the SMP found that the flooding risk within the site is low due to the many sub-catchments that all drain directly into the estuary on the border of the site. Only minimal localised ponding occurs on site.

A number of OLFPs will be modified as part of the proposed bulk earthworks. The reclamation and/or diversion of entry and exit points of OLFPs will require resource consent and any associated adverse effects can be managed at that stage. The Infrastructure Report notes that all OLFPs originate within the site, therefore, diversion will have no upstream effects.

The SMP states that in order to manage the potential risks of flooding on site the following must be undertaken:



- All building platforms are to be located outside of the flood plain extent in the 100-year ARI MPD plus 1m sea rise with the climate change scenario.
- Infrastructure to be located outside of the 100-year flood plain area plus 1m sea rise, unless designed to be flood resilient.
- A network of secondary flow paths will be designed to convey future 100-year flows.

The intended urbanisation of the site under the proposal will increase the impervious area and therefore increase stormwater runoff. Existing impervious areas of the site's catchments ranges from 0% - 47%, and this is expected to rise to roughly 70% - 80%. However, given that the site is located at the end of the stormwater catchment that discharges directly into the estuary, the SMP concluded that water quantity mitigation across the site was not required. Regardless, planting of riparian margins is proposed, which will help to slow down surface water velocity.

Additionally, Campana Road, which forms a small part of the site is subject to the SMAF 1 control. The rest of the site is not subject to this control because it discharges into the estuary which has no capacity issues, being part of the coastal environment. Hydrological mitigation in response to the SMAF 1 control is proposed. Stormwater reuse tanks are proposed for all roof areas which will provide a minimum of 5mm retention, and a swale is provided alongside Campana Road.

The site is subject to coastal inundation due to its location and proximity to the estuary of Manukau Harbour. In accordance with the AUP provisions in chapter E36 Natural hazards and flooding, all habitable areas subject to coastal inundation risk shall provide freeboard above the 1% AEP flood level, including 1m sea level rise allowance. The SMP has concluded that the minimum floor level on site shall be 4.45m RL. Given that most of the site is located well above this minimum floor level requirement, there is minimal to no risk of coastal inundation on site. Furthermore, the coastal protection yard setback of 30m helps reduces the risk of coastal inundation.

For avoidance of all doubt, a Coastal Hazard Assessment has been provided as Appendix R which has concluded that a 20m coastal setback is sufficient to protect development. AS such the 30m coastal protection yard is considered more than adequate to address inundation effects.



10.8 Infrastructure and Servicing Effects

The Infrastructure Report provides information regarding the stormwater, wastewater, water supply and other services on site. Specific information regarding stormwater has already been addressed above. The following assessment summarises the key information provided:

Wastewater

The subject site will be provided with wastewater drainage via an extension of the existing network. Consultation with Watercare has confirmed that there is adequate capacity within the Southern Interceptor Wastewater Transmission Line to service the subject site. Initial designs indicates that the main wastewater pump station will be located at the centre of the western portion of the subject site and a smaller pump station will be located on the eastern portion of the subject site. The internal wastewater system will be designed to accommodate peak wet weather flows from future development. Resource consent will be required for the proposed wastewater system and detailed design will be provided at this point, in conjunction with Watercare.

Water Supply

The site will be serviced by an extension to the public water network. The extension will be consistent with the intended upgrades for the area provided by Watercare. The new water supply infrastructure will have the capacity to service the proposed development in regard to potable water and firefighting requirements. The detailed design of the proposed water supply extension will be addressed at the resource consent and engineering plan approval stages.

Utilities

Services such as telecommunications and power are located within close proximity to the site. Upgrades and extensions to the relevant networks will be undertaken to service the future development on site in conjunction with the local utility providers. It is not anticipated that there will be any constraints in providing utilities to the site as long as the relevant upgrades are made. The AUP provisions are considered sufficient to address these utilities and associated upgrades.



Earthworks

Bulk earthworks and recontouring are required to satisfy the design and layout requirements for the proposed industrial land use, Campana Road upgrade and building platforms. As mentioned previously, Babbage Consultants have produced a Geotechnical Report which found that the ground conditions on site were suitable for light industrial development, including earthworks.

Maven Associates have produced a bulk earthworks design that results in maximum finished gradients of 1V:20H to ensure compliant public road gradients throughout the site regardless of horizontal orientation and to demonstrate that the site could be developed for residential purposes in the future.

Sufficient setbacks are planned around the areas of ecological value on site: the coastal area, the existing stream and wetlands.

All earthworks on site will be supported by erosion and sediment control measures to ensure the mitigation of any adverse effects. An Erosion and Sediment Control Plan will be produced for future resource consent applications in relation to earthworks on the site. Earthworks are planning to be staged due to the size of the development, with exposed surfaces progressively stabilised.

Overall, the preliminary earthworks designs are considered suitable and the provisions in the AUP (OP) are considered to be appropriate to manage the effects of earthworks at resource consent stage.

10.9 Traffic Network Effects

The Traffic Memo attached as Appendix K is based on the proposed transport standards of the Puhunui Precinct found in Appendix C. The proposed precinct provisions allow storage and lock up facilities within Sub-precincts C and E (north) as a permitted activity, subject to the following standards:

- The storage and lock up facility shall be unmanned.
- The total traffic movements from the Campana Road / Puhinui Road intersection (excluding movements associated with plan change activities) shall not exceed a maximum of 50 movements per hour.
- The total traffic movements from the existing access to 457 Puhinui Road shall not exceed a maximum of 5 movements per hour.



If an application exceeded the above conditions, it would trigger the same assessment criteria as other sub-precincts within the Puhinui Precinct.

The traffic modelling and analysis completed by Don McKenzie Consulting is based on permitted storage/lock up activities that meet the above standards. The traffic modelling and analysis illustrates that “the additional plan change enabled traffic generation will have limited if any effect on the operation of either PnR South or Puhinui Road through movements during peak hours”. The assessment also concludes that outside of peak hours, traffic generation effects resulting from the plan change are anticipated to be negligible.

The proposed access movements all gain access from Campana Road, via the existing Campana Rd/Puhinui Rd traffic signal. It is considered that access connections that are designed and located in accordance with the Unitary Plan standards will be satisfactory in accommodating the expected levels of traffic movement generated from the plan change enable activities. Modelling and analysis undertaken by Don McKenzie Consulting indicated that no further upgrades to the Campana Rd/Puhinui Rd intersection are required to facilitate the permitted unmanned storage yard activity.

457 Puhinui Road does gain direct access via Puhinui Road, and it is proposed that traffic generation from this access for storage/lock up activities is limited to no more than 5 vehicles per hour, during any hour. The existing accessway on 457 Puhinui Road is considered appropriate to support the proposed traffic generation and clear sight distances are currently available.

While the unmanned storage facilities are permitted, any activities outside of this will be subject to the controls outlined in the Puhinui Precinct transport standards. Of note, before any new land use activities in sub-precinct C, D, and E can take place, substantial transport upgrades (as outlined in the precinct standards) are required. Furthermore, a substantial transport assessment will be needed for any activity beyond the permitted storage/lock up activities to ensure that the new activity meets the various standards included in the Puhinui Precinct.

Travel pattern effects

Data from the 2018 census showcases the average trip length to work in kilometres by origin. The map in Figure 10 illustrates the pattern that travel distances by trip origin increase with distance away from the central area. Residential areas in South Auckland such as Manurewa, Homai, Weymouth and Wattle Downs showcase higher than average trip lengths to work.



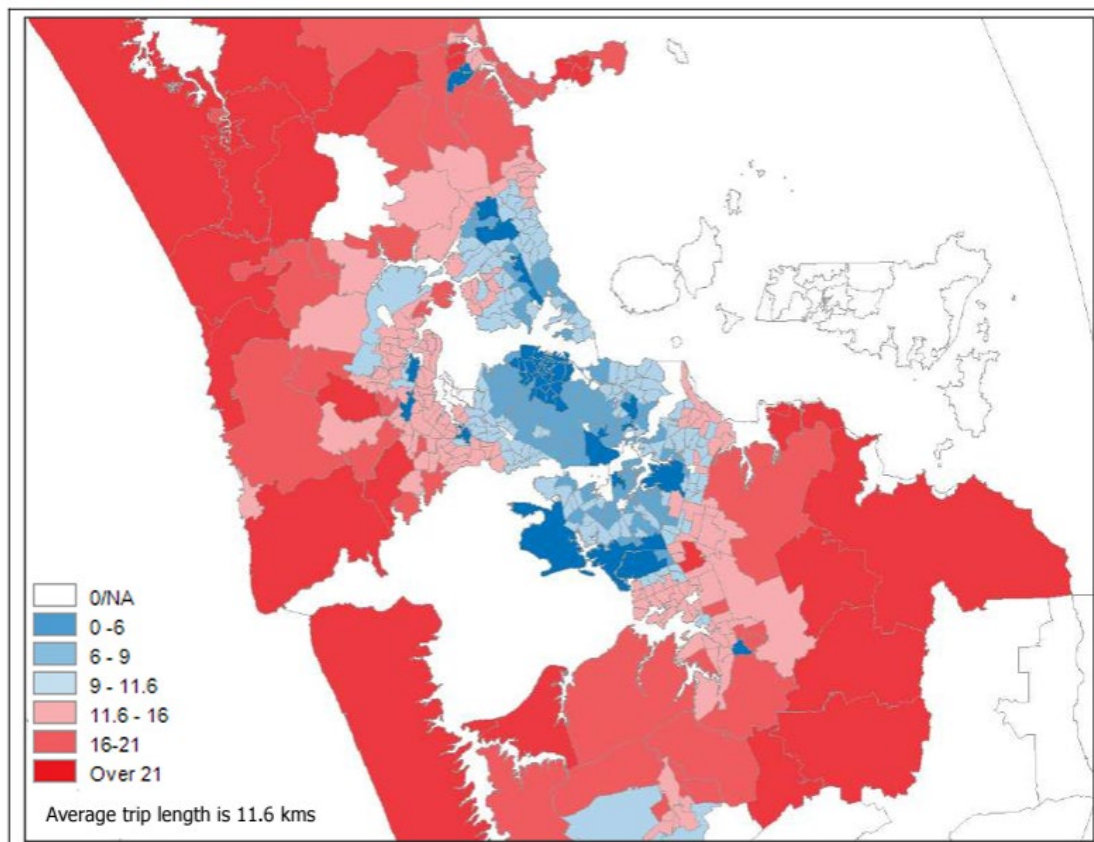


Figure 18.11
Average trip length by origin (kms)

Figure 10. Average trip length.

When looking at the destination of trips originating from the same residential locations (Manurewa, Homai etc), there is a clear pattern. The green areas in the map below show the trip origins and red areas show the trip destinations. Travel to 'local' employment areas such as Auckland Airport (10%), Wiri West (9%) and Manukau Central (9%) account for many trips, however, a significant number of trips are taken to employment areas in Penrose/Mt Wellington (13.5%) and East Tamaki (11%).

South Auckland has a shortage of industrial land which partly contributes to an inability to provide local employment opportunities. As a result, industrial areas such as Penrose and East Tamaki provide vital employment centres for people in South Auckland, but also contributes to greater levels of Vehicle Kilometres Travelled ('VKT'). Compounding these issues is the widespread residential development



occurring in South Auckland at present. Large neighbourhood developments nearby, such as Wiri-hana, will likely increase VKT if local employment opportunities are not provided.

The proposal is considered to provide employment land that will support the existing and anticipated housing in South Auckland. This will allow greater opportunities for people to live and work within close proximity and in turn, reduce vehicle trips and trip length significantly.

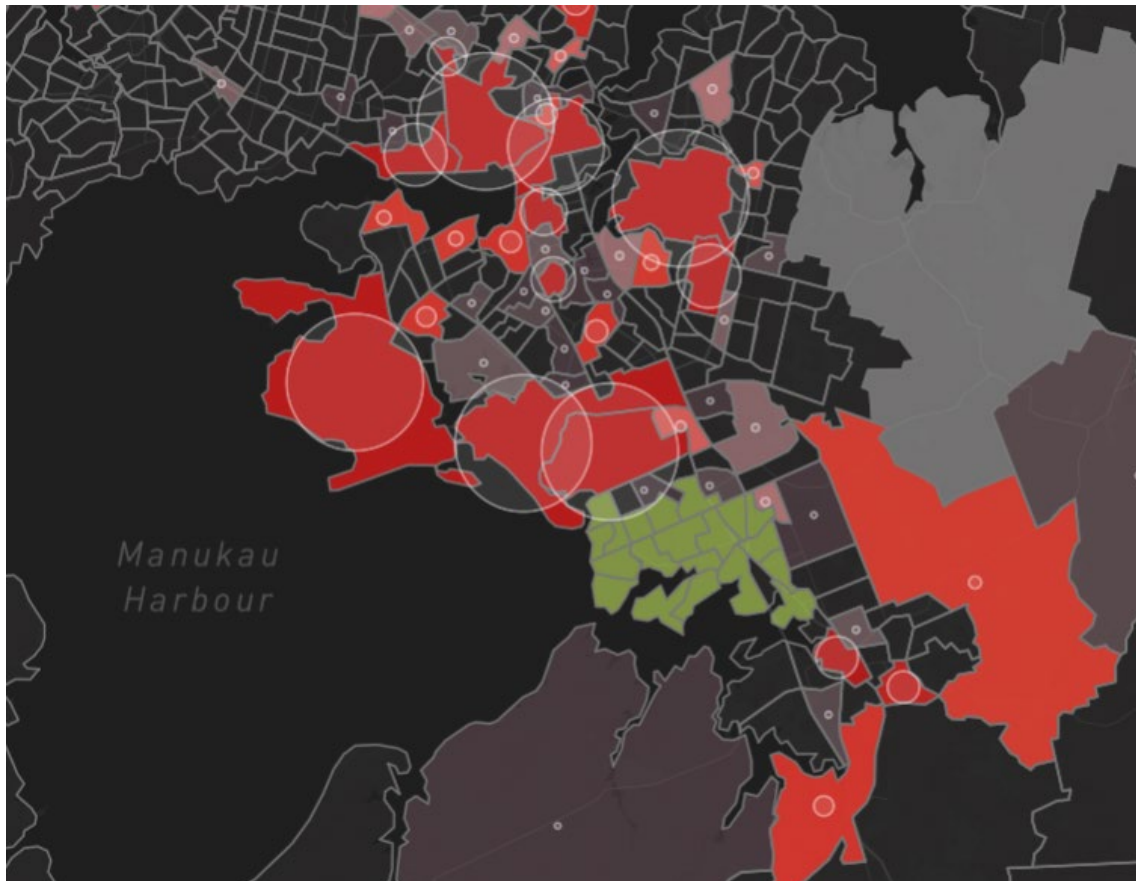


Figure 11.

10.10 Urban Design Effects

Due to the consolidated nature of the site, accessed primarily from Campana Road from a single entry point, the rezoning of the site is not considered to have significant urban design effects implications beyond the site. In terms of internal effects, an Urban Design Statement prepared by the author of the proposed Precinct plan 6 has been attached as Appendix M. This statement has concluded that the



spatial dimensions of the plan in addition to the proposed provisions are sufficient to support good urban design outcomes across the site as:

- Significant natural and heritage features have been identified and protected.
- Any conflict between light industrial development and the natural environment can be managed with buffer areas.
- Open space and amenity will be provided for via sub-precincts C1 and E and a consolidated active travel pathway has been provided for along the coastal margins.
- Outlooks from Pukaki Marae have been preserved via identification of viewshafts.
- Appropriate infrastructure provision including transport connections is relatively straightforward.

10.11 Economic Effects

An Economic Assessment has been attached as Appendix L. The assessment identifies the existing business activity market and the current provision of light industrial land in Auckland. The economic costs and benefits of the proposal are reviewed along with the economic competitiveness of the site, taking into account the location and size of the site.

The assessment states that the continually strong population growth in Auckland is anticipated to increase the level of demand for employment opportunities, including within industrial activities. Although Auckland's existing industrial land capacity is generally seen as sufficient to meet the projected demand, there is also a shortfall of sites that can be used for land extensive activities such as accommodating large scale light industrial businesses.

The site is directly adjacent to the existing Manukau-Wiri industrial area which is one of the largest and most significant industrial clusters in Auckland. The report outlines that the rezoning on the site to Business – Light Industrial would perform as a “natural extension of the existing Manukau-Wiri industrial area, offering significant economies of scale, agglomeration benefits and serviceability efficiencies for light industrial activities”. The locational attributes of the subject site extend beyond its connection to the Manukau-Wiri industrial area. The site is next to New Zealand's most significant transport hub (Auckland Airport), it is highly accessible with connections to SH20 and SH1 and there is a growing population in South Auckland providing industrial labour.

The entire Puhinui industrial area is expected to generate 25,000 jobs at capacity. The site is considered to have the potential to fill the absence of existing retail provisions of the local industrial area via the



proposed small retail/amenity in sub-precinct E. The economic assessment has determined that sub-precinct E is appropriately sized to meet the future demand of the Puhinui industrial area and will enhance the local business environment in the future.

The economic assessment concludes that the proposal will lead to a range of economic benefits such as agglomeration benefits, a more competitive business location and greater industrial sector flexibility. Overall, the benefits are considered to significantly outweigh any economic costs and the proposal is considered to be appropriate from an economic perspective.

10.12 Reverse Sensitivity Effects

The proposal is for LIZ in a predominantly rural area, therefore, there is potential for adverse reverse sensitivity effects. However, while the surrounding environment is of a rural nature currently, the majority of the surrounding environment is zoned LIZ. As mentioned previously in this report, the site and immediate environment have had limited development due to the various infrastructure constraints. This contrasts with the wider surrounding environment which has experienced intensive urban development including the Wiri-Manukau industrial area nearby.

Additionally, the site is next to the Auckland Airport, and this has the potential to generate adverse reverse sensitivity effects. However, the site falls within the High Aircraft Noise Area Overlay (HANA) and the Moderate Aircraft Noise Area Overlay (MANA). The Aircraft Noise Overlays have a range of provisions that prohibit sensitive activities such as worker's accommodation and care centres, which ensures an appropriate level of protection for the continued operation of the Auckland Airport. Overall, an industrial zoning is not considered likely to attract land uses that are sensitive to the Aircraft Noise Overlay.

10.13 Conclusion

The proposal is considered an appropriate use of the land from an effects perspective. Those specific effects which prevented the live zoning of Sub-precinct C as part of the AUP, namely effects on mana whenua values and infrastructure networks, have been identified and appropriately mitigated as part of the proposal.



PART 4: POLICY ASSESSMENT



11 SECTION 75 MATTERS

Under s75 of the RMA district plans must address the following matters.

11.1 Section 75(1)

Under s75(1) district plans must state the objectives for the district, the policies to implement the objectives and the rules to implement the policies.

The proposed changes are considered to be consistent with section 75(1) for the following reasons:

- Rezoning the site to Business – Light Industrial Zone and Open Space – Informal Recreation Zone is consistent with s75(1) as they are existing zones with objectives, policies and rules that control the activities within the zone.
- The inclusion of the site within the Puhinui precinct is consistent with s75(1) as well. The site will fall under the existing sub-precinct E. This precinct has established objectives, policies and rules. Some amendments are proposed for the provisions in sub-precinct E to reflect the changes that are proposed on the site.
- Two new Puhinui sub-precincts will be created as part of the plan change: sub-precinct C and sub-precinct C1. The plan change proposes a range of new objectives, policies and rules for sub-precinct C and sub-precinct C1 to ensure the proposal is in alignment with the requirements for district plans.

11.2 Section 75(2)

Under s75(2) district plans must state:

- the significant resource management issues for the district; and
- the methods, other than rules, for implementing the policies for the district; and
- the principal reasons for adopting the policies and methods; and
- the environmental results expected from the policies and methods; and
- the procedures for monitoring the efficiency and effectiveness of the policies and methods; and
- the processes for dealing with issues that cross territorial authority boundaries; and
- the information to be included with an application for a resource consent; and



- any other information required for the purpose of the territorial authority's functions, powers, and duties under this Act.

The proposed rezoning of the site to Business – Light Industrial Zone and Open Space – Informal Recreation Zone, and the inclusion of the site within the Puhinui Precinct is consistent with the requirements of this section. The land use zone and the precinct are established parts of the district plan and as a result, contain the required content as set out by s75(2).

11.3 Section 75(3)

Under s75(3) district plans must give effect to any national policy statements, New Zealand Coastal Policy Statement, national planning standards and regional policy statements.

National Policy Statement on Urban Development 2020 (NPS-UD)

The NPS-UD recognises the national significance of having well-functioning urban environments that support the social, economic and cultural well-being of all people and communities now and in the future. The NPS-UD also aims to provide sufficient development capacity to meet the needs of all people and communities. Auckland Council, as a Tier 1 authority, receives specific direction under the NPS-UD to ensure development capacity is located in areas with good connections to public transport, business areas and other amenities/services.

The Plan Change aligns with, if not is supported by, many of the objectives and policies of the NPS-UD by proposing additional land supply for business growth in an existing industrial area that is close to an established and growing labour force (fully outlined in Appendix L).

National Policy Statement on Freshwater Management 2020 (NPS-FM)

The NPS-FM provides direction to local authorities on how they should manage freshwater under the RMA. It is considered that the Plan Change will not be contrary to the NPS-FM as wetland/stream areas have been protected from built development and these features will otherwise be protected via the NES-F and Chapter E15 of the AUP. Any development proposals that may affect freshwater features



would otherwise be subject to the resource consent process, during which Council would have discretion to consider the NPS-FM.

National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB)

The NPS-IB provides direction to local authorities on how they should manage indigenous biodiversity under the RMA. It is considered that the plan change will not be contrary to the NPS-IB as

- The stated objective of the NPS-IB is to *“maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date”*. It goes on to list a number of ways to achieve this:
 - *“through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and*
 - *by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and*
 - *by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and*
 - *while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.”*
- The plan change contains robust provisions protecting indigenous biodiversity across the site as all wilderness areas on site will be protected within riparian yards, will be subject to existing protections under Chapter E15 of the AUP and the NES-F and, for avoidance of all doubt have been placed within sub-precinct C1 to avoid the intrusion of any built development into areas with significant future biodiversity value.
- I consider that the proposed changes to the AUP will contribute to the desired end state anticipated by the NPS-IB as the indigenous biodiversity of sub-precinct C1 will be restored and enhanced as the wider sub-precinct C develops due to the requirements for screening planting along the coastal edge. This strikes the right balance, restoring indigenous biodiversity where appropriate while realising the development potential of the site in question.
- Crucially, consistent with the requirements of the NPS-IB, the proposed changes reserve discretion for effects on tangata whenua values to be comprehensively considered and explicitly provides a pathway for tangata whenua involvement in decision making regarding indigenous biodiversity values.



National Coastal Policy Statement (NCPS)

An assessment against the relevant policies of the NCPS has been undertaken below:

Policy	Assessment
Policy 1: Extent and characteristics of the coastal environment	The coastal environment on the edge of the site has been assessed by an ecological specialist to ensure that the extent and characteristics are clearly understood.
Policy 2: The Treaty of Waitangi, tangata whenua and Māori	This project has involved consultation with mana whenua group, Te Akitai Waiohū, to ensure the recognition of important Maori cultural values are recognised and protected within the proposal. The proposal includes a range of provisions to continue the protection and enhancement of the coastal environment which holds significance for Te Akitai Waiohū.
Policy 3: Precautionary approach	The approach taken in this proposal aligns with the precautionary approach through the implementation of sub-precinct C1 along the coastal boundaries of the site and the coastal protection yards standard contained within the Puhinui Precinct Plan. This ensures the natural character of the coastal environment is retained, plus it provides opportunities for enhanced public access along the coastal environment in the future.
Policy 4: Integration	This proposal has involved collaboration with a range of agencies and bodies: Te Akitai Waiohū, Watercare, Auckland Council etc. This has ensured that the management of the coastal environment on the subject site has taken into account the values and perspectives of a wide range of groups.
Policy 6: Activities in the coastal environment	The proposal aligns with 1(i) of this policy by enforcing development set backs (via the precinct's yard standards) from the coastal marine area and other water bodies to ensure the protection of the natural character, open space, public access and amenity values of the coastal environment. Additionally, 1(j) is provided for as coastal protection yards are required to be



	planted with locally source indigenous species for a minimum depth of 20m under the precinct standards.
Policy 7: Strategic planning	The proposed plan change specifically outlines where development can take place on the site. This ensures that any development is located at a buffer from the coastal environment to reduce any associated adverse effects.
Policy 11: Indigenous biological diversity (biodiversity)	Key coastal ecosystems on and adjacent to the site are not subject to adverse effects as a result of this proposal. The coastal protection yards proposed will ensure that any future development on the site manages adverse effects appropriately and the coastal environment can continue to provide high value ecosystems.
Policy 13: Preservation of natural character	The entire coastal margin that surrounds the subject site is fringed by mangroves. The extent of mangroves at the edge of the site varies depending on the location, but their presence is a crucial part of the natural character. The mangroves protect and solidify the steep banks that are found on the coastal edge of the site. The proposal aims to retain the mangroves by limiting development potential around the coastal margins by implementing sub-precinct C1.
Policy 14: Restoration of natural character	Restoration of natural character will be supported by the precinct plan requirements for planting of indigenous species in the coastal margins. This planting will strengthen the steep cliffs on the edges of the site and reduce the level of contaminants running off into the coastal environment.
Policy 15: Natural features and natural landscapes	The proposed plan change will avoid producing adverse effects on the coastal environment and the provisions contained with the updated Puhinui Precinct plan are considered to be appropriate to ensure future development protect the natural features and landscapes of the coastal environment. The natural features of the coastal environment have been identified in the ecological assessment so future developments can adequately respond to the coastal context.



Policy 17: Historic heritage identification and protection	Three archaeological sites are recorded by the NZ Archaeological Association within the coastal edges of the site. It is proposed to add a new standard to the Puhinui Precinct that requires an Archaeological Management Plan be prepared by an archaeologist in consultation with mana whenua, council and Heritage New Zealand Pouhere Taonga before any development can occur in sub-precinct C.
Policy 18: Public open space	The proposal provides opportunity for public open space to be provided along the coastal edges of the site in the future. A potential public walking track along the coastal edge is provided for by the inclusion of sub-precinct C1 and its associated provisions.
Policy 19: Walking access	See comments regarding Policy 18.
Policy 20: Vehicle access	No vehicle access is proposed along the coastal margins in the Campana plan change area.
Policy 21: Enhancement of water quality	The water quality of the adjacent coastal environment is at a reasonable level and is therefore not considered to need priority as part of this proposal. Engagement with mana whenua group Te Akitai Waiohau as part of this proposal has taken place and a range of measure relating to protecting the water quality during development and use of the site have been included.
Policy 22: Sedimentation	The proposed plan change will not deliver an increase in sedimentation on its own. However, sedimentation resulting from future industrial development and use on the site will be managed through strict earthworks sediment management plans and significant buffers between the coastal environment and development sites.
Policy 23: Discharge of contaminants	The discharge of contaminants is not part of this proposal. Any future development and use that potentially leads to the discharge of contaminants to the coastal environment will be managed at the resource consent stage.



Policy 24: Identification of coastal hazards	The geotechnical report prepared in support of this proposal has identified the future coastal erosion for the subject site. This is calculated via a region wide study and provides a useful estimate to future coastal erosion.
Policy 25: Subdivision, use, and development in areas of coastal hazard risk	The future risks of coastal inundation and erosion are not considered to be exacerbated by this proposal. The coastal yard setbacks will provide sufficient protection from inappropriate subdivision, use and development in areas of coastal hazard risk.
Policy 26: Natural defences against coastal hazards	Mangroves and other coastal vegetation provide a natural defence in the coastal environment surrounding the site. The proposal intends to protect and retain the areas of mangroves by including a coastal buffer in the form of sub-precinct C1.

Auckland Unitary Plan – Regional Policy Statement

When preparing or changing a district plan, the Council must give effect to the Regional Policy Statement (RPS). The RPS aims to achieve the purpose of the Resource Management Act 1991 by providing an overview of the resource management issues of the region, and by providing policies and methods to achieve integrated management of the natural and physical resources of the whole region.

An assessment against the relevant objectives and policies of the RPS has been undertaken below:

B2.2.1 Urban Growth and Form Objectives	Assessment
(1) A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and economic growth; (c) better use of existing infrastructure and efficient provision of new infrastructure;	The proposed plan change will contribute valuable land to the existing urban environment of the Manukau-Wiri industrial area. The economic assessment prepared in support of this proposal has indicated that the rezoning will deliver a range of economic benefits and will result in an economically beneficial use of the land.



(d) improved and more effective public transport; (e) greater social and cultural vitality; (f) better maintenance of rural character and rural productivity; and (g) reduced adverse environmental effects.	
(2) Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).	The subject site is anticipated to be within the urban area in the future, however, this plan change proposes the immediate re-zoning of the majority of the site to Business-Light Industry zoning. Given that the surrounding environment is largely Business – Light Industry Zone and there is demand for this land use in the local context it is considered appropriate to allow the rezoning of Future Urban Zone land.
(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.	The proposed plan change will add light industrial land supply to accommodate the anticipated growth of industrial activities, particularly light industrial activities.
(4) Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.	The proposed plan change site is within the Rural Urban boundary.
(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.	The proposal effectively only permits unmanned storage and lock up facilities at this point in time due to a lack of transport infrastructure. Future development opportunities on the site will become available when transport infrastructure is upgraded in accordance with the Puhinui Precinct standards..

B2.2.2 Urban Growth and Form Policies	Assessment
(1) Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years' projected growth in terms of	The rezoning of the majority of the subject site to Business – Light Industrial helps to accommodate an anticipated increase in light industrial land demand over the next 30 years.



residential, commercial and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.	
(3) Enable rezoning of future urban zoned land for urbanisation following structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines.	This proposal has followed a robust plan change process to rezone the site.
(4) Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, and avoid urbanisation outside these areas.	This proposal involves the urbanisation of land that sits within the Rural Urban Boundary ensuring that the urban area of Auckland does not unduly extend in an effort to add more light industrial land capacity.
(7) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following: (a) support a quality compact urban form; (b) provide for a range of housing types and employment choices for the area; (c) integrate with the provision of infrastructure; and (d) follow the structure plan guidelines as set out in Appendix 1.	The subject site aligns with this policy as it is currently zoned future urban and the majority of the site is proposed to become Business - Light Industrial zone. It will provide additional employment opportunities for the local community and development is integrated with the provision of crucial transport infrastructure. Widespread industrial activity cannot take place until the infrastructure is in place.

B2.3.1 A Quality Built Environment Objectives	Assessment
(1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors;	The subject site is surrounded by an urban environment with light industrial zoning, therefore, the proposal responds to the characteristics of the area by changing the zoning on-site to reflect the surrounding environment. The rezoning will add employment opportunities for people in a local and regional context by locating itself in a highly strategic location nearby the existing Wiri-Manukau industrial area and Auckland Airport. By



(c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.	locating adjacent to two major existing employment hubs, the rezoning supports the maximisation of resources and infrastructure efficiency. The site is able to respond and adapt to climate change or other needs due to the various sub-precincts that are provided for in the Puhinui Precinct.
(2) Innovative design to address environmental effects is encouraged.	The assessment of effects (above) has outlined how environmental effects will be addressed. A range of innovative solutions are provided.
(3) The health and safety of people and communities are promoted.	The proposal will support the health and safety of communities via a well-designed plan(Precinct plan 6) and amendments to the existing Puhinui Precinct provisions.

B2.3.2 Urban Growth and Form Policies	Assessment
(1) Manage the form and design of subdivision, use and development so that it does all of the following: (a) supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage; (b) contributes to the safety of the site, street and neighbourhood; (c) develops street networks and block patterns that provide good access and enable a range of travel options; (d) achieves a high level of amenity and safety for pedestrians and cyclists; (e) meets the functional, and operational needs of the intended use; and	The proposal supports the planned future environment by bringing forward the anticipated urban zoning for the site. The rezoning will provide more certainty on what can occur on the site, while also placing emphasis on the surrounding transport infrastructure. The zoning provides opportunities for a variety of future activities should there be change in the future demand for business land.



(f) allows for change and enables innovative design and adaptive re-use.	
(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following: (a) providing access for people of all ages and abilities; (b) enabling walking, cycling and public transport and minimising vehicle movements; and (c) minimising the adverse effects of discharges of contaminants from land use activities (including transport effects) and subdivision.	Precinct plan 6 outlines that the subject site will gain vehicle access from Campana Road which will allow people of all ages and abilities to access the site. The coastal edges of the subject site also have the potential to be used as walking tracks in the future which could be used by the local community.
(3) Enable a range of built forms to support choice and meet the needs of Auckland's diverse population.	The light industrial zoning that is proposed will likely give result to a range of light industrial development. This plan change will help to meet the industrial land needs of Auckland's population.
(5) Mitigate the adverse environmental effects of subdivision, use and development through appropriate design including energy and water efficiency and waste minimisation.	The proposal includes a range of measures to ensure the appropriate management of water. The proposed additions to the Puhinui precinct contain a range of stormwater management and treatment provisions to support this, including requirements for stormwater devices and the use of inert building materials..

B2.5.1 Commercial and Industrial Growth Objectives	Assessment
(1) Employment and commercial and industrial opportunities meet current and future demands.	Auckland currently has a good amount of industrial land to meet current demand, however, it is estimated that over the next 30 years additional light industrial land will be needed to meet demand. This proposal will help to provide that needed light industrial land in the future.



(2) Commercial growth and activities are primarily focussed within a hierarchy of centres and identified growth corridors that supports a compact urban form.	This proposal supports a compact urban form by locating additional light industrial land directly adjacent to the existing Wiri-Manukau industrial area. The proposal does not disturb the hierarchy of industrial centres, if anything, it contributes to the strength of the Wiri-Manukau industrial area.
(3) Industrial growth and activities are enabled in a manner that does all of the following: (a) promotes economic development; (b) promotes the efficient use of buildings, land and infrastructure in industrial zones; (c) manages conflicts between incompatible activities; (d) recognises the particular locational requirements of some industries; and (e) enables the development and use of Mana Whenua's resources for their economic well-being.	The proposed plan change has been shown to deliver economic benefits (see Economic Assessment) and will promote economic development. The location of the site in a coastal environment requires a range of measures to ensure that future industrial development is not located in an area which would damage the coastal environment or reduce the viability of the industrial uses.

B2.3.2 Commercial and Industrial Growth Policies	Assessment
(5) Enable retail activities, where appropriate, on identified growth corridors in business zones, having regard to all of the following: (a) adverse effects on the function, role and amenity of the city centre, metropolitan and town centres, beyond those effects ordinarily associated with trade effects on trade competitors; (b) adverse effects on the quality compact urban form including the existing and planned location of activities, facilities, infrastructure and public investment;	A small area for retail activities to support the wider light industrial area is proposed for the subject site in the form of sub-precinct E (north). The scale of the retail area is small and will therefore not detract from the existing major retail centres in the local area and in Auckland overall.



(c) effects on community social and economic wellbeing and accessibility; (d) the efficient use and integration of land and infrastructure; (e) effects on the safe and efficient operation of the transport network; (f) effects of the development on the efficient use of any industrial land, in particular opportunities for land extensive industrial activities and heavy industry; (g) avoiding conflicts between incompatible activities; and (h) the effects on residential activity.	
(6) Enable commercial activities, where appropriate, in business zones in locations other than the city centre, metropolitan and town centres and identified growth corridors, having regard to all of the following: (a) the matters listed in Policy B2.5.2(5)(a) to Policy B2.5.2(5)(h) above; (b) the extent to which activities would compromise the achievement of policies B2.5.2(1) and B.2.5.2(2); and (c) the extent to which activities would compromise the hierarchy of locations identified in policies B2.5.2(1) to B.2.5.2(5).	As explained above, the small retail area has been included to service and support the light industrial area which includes the subject site. The small scale of the retail area will not compromise commercial growth and development in the major commercial nodes such as city centre and metropolitan centres.
(7) Enable the supply of land for industrial activities, in particular for land-extensive industrial activities and for heavy industry in areas where the character, scale and intensity of the effects from those activities can be appropriately managed.	The proposal adds additional supply of industrial land and directly aligns with this policy. Although it does not provide for heavy industry, it is located in an area which is appropriate for a range of industrial activities due to the existing character of the surrounding environment. The effects of future industrial activities on the site can be managed appropriately as a result.
(8) Enable the supply of industrial land which is relatively flat, has efficient access to freight routes, rail or freight hubs, ports and airports, and can be efficiently served by infrastructure.	The proposal aligns with this policy on numerous counts: the site is proposed to be rezoning Business – Light Industrial, thus providing supply of industrial land; the site is flat; the site is well



	connected to freight routes SH1 and SH20; and the site is located adjacent to Auckland International Airport, New Zealand's most significant airport.
(9) Enable the efficient use of industrial land for industrial activities and avoid incompatible activities by all of the following: (a) limiting the scale and type of non-industrial activities on land zoned for light industry; (b) preventing non-industrial activities (other than accessory activities) from establishing on land zoned for heavy industry; and (c) promoting co-location of industrial activities to manage adverse effects and to benefit from agglomeration.	The proposed rezoning takes place on a site that is located close to the existing industrial area of Wiri-Manukau, therefore ensuring a range of agglomeration and co-location benefits. The Puhinui Precinct provisions ensure that the scale and type of non-industrial activities are limited on the subject site.
(10) Manage reverse sensitivity effects on the efficient operation, use and development of existing industrial activities, including by preventing inappropriate sensitive activities locating or intensifying in or adjacent to heavy industrial zones.	Reverse sensitivity effects are limited due to the surrounding environment being zoned Business-Light Industrial at present. The zoning ensures that incompatible or inappropriate activities are prevented from occurring in the surrounding environment.

B2.7.1 Open Space and Recreation Facilities Objectives	Assessment
(1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.	The proposed plan change provides opportunities to meet the recreational needs of people and communities via sub-precinct C1 along the coastline. There is potential to include publicly accessible walkways along the coast in the future under this sub-precinct.
(2) Public access to and along Auckland's coastline, coastal marine area, lakes, rivers, streams and wetlands is maintained and enhanced.	There is potential to include publicly accessible walkways along the coastline in the future under sub-precinct C1.



(3) Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.	The open space areas are located along the coastline on site. Development on site must comply with the coastal protection yard provisions of the Puhinui Precinct. Therefore, no development can occur within 50m of the coastline and this will provide a sufficient buffer between open space and other land uses.
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B2.7.1 Open Space and Recreation Facilities Policies	Assessment
(1) Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions.	The proposal, via sub-precinct C1, provides an opportunity to add to the existing network of walking tracks and trails across Auckland. This open space allows people to connect with parts of the Manukau Harbour in an area that is currently inaccessible to the public.
(2) Promote the physical connection of open spaces to enable people and wildlife to move around efficiently and safely.	The open space provided is unable to be connected to other open spaces due to the lack of adjacent spaces. However, there is potential for future physical connections to be made if the surrounding coastline is managed in the same way.
(3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.	The open space is located close to residential areas of Papatoetoe and Manukau. It is reasonable to expect people in these communities to access the walking tracks if they were provided on site.
(4) Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.	This part of the Manukau Harbour is lacking in open spaces along the coastline, therefore, sub-precinct C1 provides an opportunity to make up for the existing deficiency.
(7) Avoid, remedy or mitigate significant adverse effects of land use or development on open spaces and recreation facilities.	The open space areas are located along the coastline on site. Development on site must comply with the coastal protection yard provisions of the Puhinui Precinct. Therefore, no development can occur within 50m of the coastline and this will



	provide a sufficient buffer between open space and other land uses.
(8) Avoid, remedy or mitigate significant adverse effects from the use of open spaces and recreational facilities on nearby residents and communities	No significant adverse effects on nearby residents and communities are anticipated from the use of open space.
(9) Enable public access to lakes, rivers, streams, wetlands and the coastal marine area by enabling public facilities and by seeking agreements with private landowners where appropriate.	Public access to the coastline on private land has a higher likelihood of occurring due the implementation of sub-precinct C1 under this proposal.
(10) Limit public access to and along the coastal marine area, lakes, rivers, streams and wetlands by esplanade reserves, esplanade strips or other legal mechanisms where necessary for health, safety or security reasons or to protect significant natural or physical resources.	The coastline along the edge of the site is a significant natural resource and needs to be appropriately managed/protected. The publicly accessible walking tracks are an opportunity rather than a certainty. Before public access is provided to the coastline, the health of the coastal environment will need to be considered, but that is not within the scope of this proposal.

B3.2.1 Infrastructure Objectives	Assessment
(1) Infrastructure is resilient, efficient and effective.	The proposal will not impact the operation or effectiveness of existing infrastructure in the surrounding environment including Auckland Airport.
(2) The benefits of infrastructure are recognised, including: (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	There is sufficient capacity in the network to provide power, telecommunications, stormwater, wastewater and water supply connections to the site and supply the anticipated light industrial activities. Land use and infrastructure planning are directly linked as part of this site. The plan change will only permit unmanned storage and lock up facilities on the site until the required transport infrastructure upgrades can be made. This will ensure that the roading network is not unduly stressed or overloaded from industrial activities requiring frequent vehicle trips to and from the site.



(f) enabling interaction and communication, including national and international links for trade and tourism.	Additionally, the assessment of effects in this report has outlined how the adverse effects of infrastructure are avoided, remedied or mitigated.
(3) Development, operation, maintenance, and upgrading of infrastructure is enabled, while managing adverse effects on: (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.	
(8) The adverse effects of infrastructure are avoided, remedied or mitigated.	

B3.2.2 Infrastructure Policies	Assessment
(1) Enable the efficient development, operation, maintenance and upgrading of infrastructure.	



(2) Recognise the value of investment in existing infrastructure.	The proposal will not impact the operation or effectiveness of existing infrastructure in the surrounding environment including Auckland Airport.
(3) Provide for the locational requirements of infrastructure by recognising that it can have a functional or operational need to be located in areas with 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.	There is sufficient capacity in the network to provide power, telecommunications, stormwater, wastewater and water supply connections to the site and supply the anticipated light industrial activities.
(4) Avoid where practicable, or otherwise remedy or mitigate, adverse effects of subdivision, use and development on infrastructure.	Land use and infrastructure planning are directly linked as part of this site. The plan change will only permit unmanned storage and lock up facilities on the site until the required transport infrastructure upgrades can be made. This will ensure that the roading network is not unduly stressed or overloaded from industrial activities requiring frequent vehicle trips to and from the site.
(5) Ensure subdivision, use and development do not occur in a location or form that constrains the development, operation, maintenance and upgrading of existing and planned infrastructure.	Additionally, the assessment of effects in this report has outlined how the adverse effects of infrastructure are avoided, remedied or mitigated.
(6) Enable the development, operation, maintenance and upgrading of infrastructure in areas with 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 while ensuring that the adverse effects on the values of such areas are avoided where practicable or otherwise remedied or mitigated.	
(7) Encourage the co-location of infrastructure and the shared use of existing infrastructure corridors where this is safe and satisfies operational and technical requirements.	
(8) Avoid, remedy or mitigate the adverse effects from the construction, operation, maintenance or repair of infrastructure.	



(9) Ensure where there is a functional or operational need for infrastructure to locate in areas subject to natural hazards: (a) that buildings accommodating people are located and/or designed to minimise risk from natural hazards; and (b) that risk that cannot be avoided by location or design should be mitigated to the extent practicable.	
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B3.3.1 Transport Objectives	Assessment
(1) Effective, efficient and safe transport that: (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.	Transport infrastructure providing access to the site is effective, efficient and safe. Furthermore, the proposed plan change will not diminish these characteristics. The existing transport infrastructure supports the site's permitted activities.

B3.3.2 Transport Policies	Assessment
(1) Enable the effective, efficient and safe development, operation, maintenance and upgrading of all modes of an integrated transport system.	One of the key objectives of the proposed plan change is to provide certainty about the development timeline for the site, and potential effects on infrastructure networks. The current



(2) Enable the movement of people, goods and services and ensure accessibility to sites.	Future Urban zoning gives little certainty around future transport upgrades and provides little incentive to land owners to contribute towards improving the transport network in the area. This plan change would change this situation, enabling more opportunity and incentive to upgrade the transport infrastructure. SH20B is a key transport route connecting Auckland Airport with areas of South and East Auckland. Public transport connections are proposed for this route in the future too. This plan change enables the movement of people, goods and services along the route by ensuring that major development does not take place on the site until further transport upgrades take place. The light industrial activities that are permitted on the site are not considered to deliver significant adverse transport infrastructure effects because they are unmanned and will not produce many vehicle trips. Light industrial activities will not give rise to reverse sensitivity issues if they are located close to the existing transport network.
(3) Identify and protect existing and future areas and routes for developing Auckland's transport infrastructure.	
(4) Ensure that transport infrastructure is designed, located and managed to: (a) integrate with adjacent land uses, taking into account their current and planned use, intensity, scale, character and amenity; and (b) provide effective pedestrian and cycle connections.	
(5) Improve the integration of land use and transport by: (a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth; (b) encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods; (c) locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement surrounding activities by supporting accessibility to a range of transport modes; (d) requiring proposals for high trip-generating activities which are not located in centres or on corridors or at public transport nodes to avoid, remedy or mitigate adverse effects on the transport network; (e) enabling the supply of parking and associated activities to reflect the demand while taking into account any adverse effects on the transport system; and (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure.	



(6) Require activities sensitive to adverse effects from the operation of transport infrastructure to be located or designed to avoid, remedy or mitigate those potential adverse effects.	
(7) Avoid, remedy or mitigate the adverse effects associated with the construction or operation of transport infrastructure on the environment and on community health and safety.	

B4.2.1 Outstanding natural features and landscapes Objectives	Assessment
(1) Outstanding natural features and landscapes are identified and protected from inappropriate subdivision, use and development.	The site is adjacent to the Crater Hill Outstanding Natural Feature. The provisions of the Puhinui Precinct plan make direct reference to Crater Hill and support its ongoing protection from inappropriate subdivision, use and development.
(2) The ancestral relationships of Mana Whenua and their culture and traditions with the landscapes and natural features of Auckland are recognised and provided for.	Mana Whenua have been consulted with during the plan change process and their values have been included within the proposal. In particular, there are specific measures about works within archaeological sites, protection of coastal environment values and effects on views to Pukaki Marae in the Puhinui Precinct plan.
(3) The visual and physical integrity and the historic, archaeological and cultural values of Auckland's volcanic features that are of local, regional, national and/or international significance are protected and, where practicable, enhanced.	Development on site will be buffered from the volcanic feature of Crater Hill through sub-precinct C1. This open space sub-precinct that (alongside the coastal protection yard standard) ensures development does not occur along the coastal margins of the subject site. This will ensure the visual integrity of Crater Hill is protected.



B4.2.2 Outstanding natural features and landscapes Policies	Assessment
(1) Identify and evaluate a place as an outstanding natural landscape considering the following factors: (a) natural science factors: geology, topography, hydrology, vegetation cover, ecology and natural processes; (b) expressiveness/legibility: including the degree to which the landscape reveals its formative processes; (c) aesthetic values and memorability: including landmarks and significant views; (d) perceptions of naturalness: related to human influences, the presence of buildings and structures or landform modification; (e) transient landscape values: including those related to natural processes, such as seasonal change and the presence of wildlife; (f) shared and recognised values: including the public profile and recognition of particular landscapes; (g) Mana Whenua: the value of the landscape to Mana Whenua; (h) historical: the landscape's known historical associations.	Crater Hill has been identified as an Outstanding Natural Feature as it is one of the two best remaining explosion craters and tuff rings in Manukau City. It also holds significance for Mana Whenua. Te Ākitai Waiohū built settlements, cultivated gardens and buried their dead on and around this natural landmarks. As mentioned above, Crater Hill will be protected from inappropriate development and the adverse effects associated with inappropriate development via development standards that require a significant buffer between development and the coastline.
(3) Protect the physical and visual integrity of Auckland's outstanding natural landscapes from inappropriate subdivision, use and development. Identify, evaluate and protect outstanding natural feature.	
(4) Identify and evaluate a place as an outstanding natural feature considering the following factors: (a) the extent to which the landform, feature or geological site contributes to the understanding of the geology or evolution	



of the biota in the region, New Zealand or the earth, including type localities of rock formations, minerals and fossils; (b) the rarity or unusual nature of the site or feature; (c) the extent to which the feature is an outstanding representative example of the diversity of Auckland's natural landforms and geological features; (d) the extent to which the landform, geological feature or site is part of a recognisable group of features; (e) the extent to which the landform, geological feature or site contributes to the value of the wider landscape; (f) the extent of community association with, or public appreciation of, the values of the feature or site; (g) the potential value of the feature or site for public education; (h) the potential value of the feature or site to provide additional understanding of the geological or biotic history; (i) the state of preservation of the feature or site; (j) the extent to which a feature or site is associated with an historically important natural event, geologically related industry, or individual involved in earth science research; (k) the importance of the feature or site to Mana Whenua.	
(6) Protect the physical and visual integrity of Auckland's outstanding natural features from inappropriate subdivision, use and development.	
(7) Protect the historic, archaeological and cultural integrity of regionally significant volcanic features and their surrounds. Management of outstanding natural landscapes and outstanding natural features	



(8) Manage outstanding natural landscapes and outstanding natural features in an integrated manner to protect and, where practicable and appropriate, enhance their values.

B4.3.1 Viewshafts Objectives	Assessment
(1) Significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development.	Two significant maunga for Te Ākitai Waiohū near the subject site are Te Pūkakitapu o Poutūkeka (Pūkaki Crater) and Ngā Kapua Kohuora (Crater Hill). These maunga do not have significant public views from the subject site due to the land being private. However, the coastal margins of the subject site provide an opportunity to develop publicly accessible walking tracks which may provide a view towards the two maunga in the future.
(2) Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use and development.	Views to the Pukaki marae have been an important consideration as part of this plan change proposal. Development within the Puhinui Precinct must comply with a range of provisions that restrict development that is harmful to views from Pukaki Marae to the coastal environment and significant maunga for Te Ākitai Waiohū.

B4.3.2 Viewshafts Policies	Assessment
(3) Protect significant views to and between maunga by: (a) avoiding subdivision, use and development that would: (i) result in significant modification or destruction of view; or (ii) significantly detract from the values of the view; and	The Puhinui Precinct does not permit any development to impede the Pūkaki Marae –Matukutūreia local viewshaft thus protecting the significant views between the marae and the maunga.



(b) avoiding where practicable, and otherwise remedying or mitigating, adverse effects of subdivision, use and development that would: (i) result in the modification of the view; or (ii) detract from the values of the view.	
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B5.2.1 Historic Heritage Objectives	Assessment
(1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.	The subject site contains three known archaeological sites and potentially other undiscovered archaeological material. These known sites have been identified and before works can take place within sub-precinct C, an Archaeological Management Plan is required to be prepared. The management plan will help to ensure that the historic heritage sites are protected and managed appropriately.
(2) Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.	

B5.2.2 Historic Heritage Policies	Assessment
(1) Identify and evaluate a place with historic heritage value considering the following criteria: (a) historical: the place reflects important or representative aspects of national, regional or local history, or is associated with an important event, person, group of people, or with an idea or early period of settlement within New Zealand, the region or locality; (b) social: the place has a strong or special association with, or is held in high esteem by, a particular community or cultural	The three archaeological sites have been assessed according to the criteria in Chapter D17 of the AUP and follows the Auckland Council Methodology for Evaluating Historic Heritage Significance (2019). All three sites have high historical value, high knowledge value and high contextual value. Additionally, if the physical condition of the sites are intact, then the sites would also have moderate physical and aesthetic values too.



group for its symbolic, spiritual, commemorative, traditional or other cultural value; (c) Mana Whenua: the place has a strong or special association with, or is held in high esteem by, Mana Whenua for its symbolic, spiritual, commemorative, traditional or other cultural value; (d) knowledge: the place has potential to provide knowledge through archaeological or other scientific or scholarly study, or to contribute to an understanding of the cultural or natural history of New Zealand, the region, or locality; (e) technology: the place demonstrates technical accomplishment, innovation or achievement in its structure, construction, components or use of materials; (f) physical attributes: the place is a notable or representative example of: (i) a type, design or style; (ii) a method of construction, craftsmanship or use of materials; or (iii) the work of a notable architect, designer, engineer or builder; (g) aesthetic: the place is notable or distinctive for its aesthetic, visual, or landmark qualities; (h) context: the place contributes to or is associated with a wider historical or cultural context, streetscape, townscape, landscape or setting.	
(2) Define the location and physical extent of a significant historic heritage place, having considered the criteria in Policy B5.2.2 (1) to identify: (a) the area that contains the historic heritage values of the place; and (b) where appropriate, any area that is relevant to an understanding of the function, meaning and relationships of the historic heritage values.	The location and physical extent of the archaeological sites have been defined in Precinct plan 6 to ensure the sites are clearly identified and understood by all current and future users of the subject site.



(6) Avoid significant adverse effects on the primary features of significant historic heritage places which have outstanding significance well beyond their immediate environs including: (a) the total or substantial demolition or destruction of any of the primary features of such places; (b) the relocation or removal of any of the primary features of such places away from their original site and context.	Before any works can take place on or near the archaeological sites, an Archaeological Management Plan must be prepared in accordance with the precinct standards. This plan will be prepared in consultation with mana whenua.
(7) Avoid where practicable significant adverse effects on significant historic heritage places. Where significant adverse effects cannot be avoided, they should be remedied or mitigated so that they no longer constitute a significant adverse effect.	
(8) Encourage new development to have regard to the protection and conservation of the historic heritage values of any adjacent significant historic heritage places.	
(9) Provide for the occupation, use, seismic strengthening, development, restoration and adaptation of significant historic heritage places, where this will support the retention of, and will not detract from, the historic heritage values of the place.	

B6.2.1 Recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation Objectives	Assessment
(1) The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised and provided for in the sustainable management of natural and physical resources including ancestral lands, water, air, coastal sites, wāhi tapu and other taonga.	Mana Whenua (Te Ākitai Waiohūa) have been engaged with during the plan change proposal process and have contributed significant input. Their participation has ensured that mana whenua values such as the sustainable management of natural resources on and adjacent to the site have been taken into



(2) The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised through Mana Whenua participation in resource management processes.	account. The principles the Treaty of Waitangi/Te Tiriti o Waitangi have been recognised for by the continued involvement of Te Ākitai Waiohū throughout the development of this proposed plan change.
(3) The relationship of Mana Whenua with Treaty Settlement Land is provided for, recognising all of the following: (a) Treaty settlements provide redress for the grievances arising from the breaches of the principles of Te Tiriti o Waitangi by the Crown; (b) the historical circumstances associated with the loss of land by Man Whenua and resulting inability to provide for Mana Whenua well-being; (c) the importance of cultural redress lands and interests to Mana Whenua identity, integrity, and rangatiratanga; and (d) the limited extent of commercial redress land available to provide for the economic well-being of Mana Whenua.	
(4) The development and use of Treaty Settlement Land is enabled in ways that give effect to the outcomes of Treaty settlements recognising that: (a) cultural redress is intended to meet the cultural interests of Mana Whenua; and (b) commercial redress is intended to contribute to the social and economic development of Mana Whenua.	



B6.2.2 Recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation Policies	Assessment
(1) Provide opportunities for Mana Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga in a way that does all of the following: (a) recognises the role of Mana Whenua as kaitiaki and provides for the practical expression of kaitiakitanga; (b) builds and maintains partnerships and relationships with iwi authorities; (c) provides for timely, effective and meaningful engagement with Mana Whenua at appropriate stages in the resource management process, including development of resource management policies and plans; (d) recognises the role of kaumātua and pūkenga; (e) recognises Mana Whenua as specialists in the tikanga of their hapū or iwi and as being best placed to convey their relationship with their ancestral lands, water, sites, wāhi tapu and other taonga; (f) acknowledges historical circumstances and impacts on resource needs; (g) recognises and provides for mātauranga and tikanga; and (h) recognises the role and rights of whānau and hapū to speak and act on matters that affect them.	Mana Whenua (Te Ākitai Waiohūa) have been engaged with during the plan change proposal process and have contributed significant input. Their participation has ensured that mana whenua values such as the sustainable management of natural resources on and adjacent to the site have been taken into account. The principles the Treaty of Waitangi/Te Tiriti o Waitangi have been recognised for by the continued involvement of Te Ākitai Waiohūa throughout the development of this proposed plan change.
(2) Recognise and provide for all of the following matters in resource management processes, where a proposal affects land or resources subject to Treaty settlement legislation:	



(a) the historical association of the claimant group with the area, and any historical, cultural or spiritual values associated with the site or area; (b) any relevant memorandum of understanding between the Council and the claimant group; (c) any joint management and co-governance arrangements established under Treaty settlement legislation; and (d) any other specific requirements of Treaty settlement legislation.	
(3) Where Mana Whenua propose an activity on Treaty Settlement Land, the benefits for the wider community and environment provided by any property specific protection mechanism, such as a covenant, shall be taken into account when considering the effects of the proposal.	
(4) Enable the subdivision, use and development of land acquired as commercial redress for social and economic development.	
(5) Enable Mana Whenua to access, manage, use and develop cultural redress lands and interests for cultural activities and accessory activities.	

B6.3.1 Recognising Mana Whenua values Objectives	Assessment
(1) Mana Whenua values, mātauranga and tikanga are properly reflected and accorded sufficient weight in resource management decision-making.	Consultation with Te Ākitai Waiohūa has identified the importance of views to and from the Pukaki marae, the health of Waiokauri Creek, freshwater environments and identified



(2) The mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall.	archaeological features. The plan change reflects this through the following: • Sub-precinct C1 will buffer the coastal margins. • Proposed provisions will mitigate the effects on views to and from the Pukaki Marae. • The provisions allow for appropriate protection of archaeological features identified within the site. • Specific stormwater management measures are included in the provisions to help reduce stormwater volumes.
(3) The relationship of Mana Whenua and their customs and traditions with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, natural resources or historic heritage values is recognised and provided for.	

B6.3.2 Recognising Mana Whenua Values Policies	Assessment
(1) Enable Mana Whenua to identify their values associated with all of the following: (a) ancestral lands, water, air, sites, wāhi tapu, and other taonga; (b) freshwater, including rivers, streams, aquifers, lakes, wetlands, and associated values; (c) biodiversity; (d) historic heritage places and areas; and (e) air, geothermal and coastal resources.	As part of the engagement with Te Ākitai Waiohū, the Cultural Heritage for Puhinui Peninsula report (written in 2014), has been used to identify the cultural heritage values of the Puhinui peninsula from a Te Ākitai Waiohū perspective. The report identifies a range of values associated with maunga, waterways, ancestral lands and other sites of cultural heritage that are important to mana whenua.
(2) Integrate Mana Whenua values, mātauranga and tikanga: (a) in the management of natural and physical resources within the ancestral rohe of Mana Whenua, including: (i) ancestral lands, water, sites, wāhi tapu and other taonga; (ii) biodiversity; and	The Mana Whenua values identified in the Cultural Heritage report have been incorporated into the Puhinui Precinct provisions. This ensures that the future development of the site does not produce long term adverse effects on the historical, cultural and spiritual values of maunga, freshwater bodies or other cultural heritage sites on or adjacent to the subject site.



(iii) historic heritage places and areas. (b) in the management of freshwater and coastal resources, such as the use of rāhui to enhance ecosystem health; (c) in the development of innovative solutions to remedy the long-term adverse effects on historical, cultural and spiritual values from discharges to freshwater and coastal water; and (d) in resource management processes and decisions relating to freshwater, geothermal, land, air and coastal resources.	
(3) Ensure that any assessment of environmental effects for an activity that may affect Mana Whenua values includes an appropriate assessment of adverse effects on those values.	This report has included an assessment of environmental effects on Mana Whenua values. A range of measures have been included to address the points, issues and concerns raised by Te Ākitai Waiohū.
(4) Provide opportunities for Mana Whenua to be involved in the integrated management of natural and physical resources in ways that do all of the following: (a) recognise the holistic nature of the Mana Whenua world view; (b) recognise any protected customary right in accordance with the Marine and Coastal Area (Takutai Moana) Act 2011; and (c) restore or enhance the mauri of freshwater and coastal ecosystems.	Mana Whenua have been involved in the proposed plan change and the integrated management of natural and physical resources. The importance of the natural environment, particularly the coastal environment, is recognised by the strong protections provided within the Puhinui Precinct.
(5) Integrate Mana Whenua values, mātauranga and tikanga when giving effect to the National Policy Statement on Freshwater Management 2014 in establishing all of the following: (a) water quality limits for freshwater, including groundwater; (b) the allocation and use of freshwater resources, including groundwater; and	Mana Whenua values in relation to freshwater have been identified via engagement with Te Ākitai Waiohū. These values have been given effect to on site. The stormwater management plan reflects the mana whenua values as do the provisions in the Puhinui Precinct which do not allow development of land near the coastal environment or fresh water bodies unless they meet the required setbacks.



(c) integrated management of the effects of the use and development of land and freshwater on coastal water and the coastal environment.	
(6) Require resource management decisions to have particular regard to potential impacts on all of the following: (a) the holistic nature of the Mana Whenua world view; (b) the exercise of kaitiakitanga; (c) mauri, particularly in relation to freshwater and coastal resources; (d) customary activities, including mahinga kai; (e) sites and areas with significant spiritual or cultural heritage value to Mana Whenua; and (f) any protected customary right in accordance with the Marine and Coastal Area (Takutai Moana) Act 2011.	This report has included an assessment of environmental effects on Mana Whenua values. A range of measures have been included to address the points, issues and concerns raised by Te Ākitai Waiohū.

B6.4.1 Maori economic, social and cultural development Objectives	Assessment
(1) Māori economic, social and cultural well-being is supported.	The proposed plan change will support Maori economic, social and cultural well being by taking into account the identified cultural heritage values of Te Akitai Waiohū.
(2) Mana Whenua occupy, develop and use their land within their ancestral rohe.	Te Akitai Waiohū have participated in this plan change proposal which has allowed them to support the development of land within their ancestral rohe.



B6.4.2 Maori economic, social and cultural development Policies	Assessment
(1) Provide for papakāinga, marae, Māori customary activities and commercial activities across urban and rural Auckland to support Māori economic, social and cultural well-being.	The subject site has views to and from the existing Pukaki marae of Te Akitai Waiohū. These views have been taken into account during the design of the plan change to ensure that this plan change supports the ongoing use of the marae for Te Akitai Waiohū.
(2) Enable the integration of mātauranga and tikanga Māori in design and development.	The Puhinui Precinct contains a range of references to matauranga and tikanga Maori. The provisions of the Puhinui Precinct therefore support the integration of matauranga and tikanga Maori into the design and development of future land uses on the subject site.
(3) Enable the occupation, development and use of Māori land for the benefit of its owners, their whānau and their hapū.	The subject site is not Maori Land; however, the proposed rezoning of the subject site will not prevent Mana Whenua from occupying, developing and using Maori Land in the surrounding environment.
(4) Enable Mana Whenua to occupy, develop and use Māori Land (including for papakāinga, marae and associated developments) with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, natural resources, coastal environment, historic heritage and special character, provided that adverse effects on those resources are avoided, remedied or mitigated.	

B6.5.1 Protection of Mana Whenua cultural heritage Objectives	Assessment
(1) The tangible and intangible values of Mana Whenua cultural heritage are identified, protected and enhanced.	As part of the engagement with Te Akitai Waiohū, the Cultural Heritage for Puhinui Peninsula report (written in 2014), has



(2) The relationship of Mana Whenua with their cultural heritage is provided for.	been used to identify the cultural heritage values of the Puhinui peninsula from a Te Ākitai Waiohūa perspective. The report identifies a range of values associated with maunga, waterways, ancestral lands and other sites of cultural heritage that are important to mana whenua. The Mana Whenua values identified in the Cultural Heritage report have been incorporated into the proposed Puhinui Precinct provisions. This ensures that the future development of the site does not produce long term adverse effects on the historical, cultural and spiritual values of maunga, freshwater bodies or other cultural heritage sites on or adjacent to the subject site.
(3) The association of Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected and enhanced.	
(4) The knowledge base of Mana Whenua cultural heritage in Auckland continues to be developed, primarily through partnerships between Mana Whenua and the Auckland Council, giving priority to areas where there is a higher level of threat to the loss or degradation of Mana Whenua cultural heritage.	
(5) Mana Whenua cultural heritage and related sensitive information and resource management approaches are recognised and provided for in resource management processes.	

B6.5.2 Protection of Mana Whenua cultural Policies	Assessment
(1) Protect Mana Whenua cultural and historic heritage sites and areas which are of significance to Mana Whenua.	The features of importance for Te Ākitai Waiohūa have identified during consultation and a range of measures have been included as part of the plan change proposal. In particular, protection of the coastal environment, wetlands, archaeological sites and Pukaki Marae have specific measures which will support their protection.
(2) Identify and evaluate Mana Whenua cultural and historic heritage sites, places and areas considering the following factors:	As part of the engagement with Te Ākitai Waiohūa, the Cultural Heritage for Puhinui Peninsula report (written in 2014), has been used to identify the cultural heritage values of the Puhinui peninsula from a Te Ākitai Waiohūa perspective. The report identifies a range of values associated with maunga,



(a) Mauri: ko te mauri me te mana o te wāhi, te taonga rānei, e ngākaunuitia ana e te Mana Whenua. The mauri (life force and life-supporting capacity) and mana (integrity) of the place or resource holds special significance to Mana Whenua; (b) Wāhi tapu: ko tērā wāhi, taonga rānei he wāhi tapu, arā, he tino whakahirahira ki ngā tikanga, ki ngā puri mahara, o ngā wairua a te Mana Whenua. The place or resource is a wāhi tapu of special, cultural, historic, metaphysical and or spiritual importance to Mana Whenua; (c) Kōrero Tūturu/historical: ko tērā wāhi e ngākaunuitia ana e te Mana Whenua ki roto i ōna kōrero tūturu. The place has special historical and cultural significance to Mana Whenua; (d) Rawa Tūturu/customary resources: he wāhi tērā e kawea ai ngā rawa tūturu a te Mana Whenua. The place provides important customary resources for Mana Whenua; (e) Hiahiatanga Tūturu/customary needs: he wāhi tērā e eke ai ngā hiahia hinengaro tūturu a te Mana Whenua. The place or resource is a repository for Mana Whenua cultural and spiritual values; and (f) Whakaaronui o te Wa/contemporary esteem: he wāhi rongonui tērā ki ngā Mana Whenua, arā, he whakaahuru, he whakawaihanga, me te tuku mātauranga. The place has special amenity, architectural or educational significance to Mana Whenua.	waterways, ancestral lands and other sites of cultural heritage that are important to mana whenua.
(4) Protect the places and areas listed in Schedule 12 Sites and Places of Significance to Mana Whenua Schedule from adverse effects of subdivision, use and development by avoiding all of the following: (a) the destruction in whole or in part of the site or place and its extent; (b) adverse cumulative effects on the site or place; (c) adverse effects on the location and context of the site or place; and	There are no places and areas in the Schedule 12 Sites and Places of Significance to Mana Whenua Schedule in the surrounding environment. Therefore, this plan change will not produce any adverse effects on these places and areas.



(d) significant adverse effects on the values and associations Mana Whenua have with the site or place; taking into account in such circumstances whether or not any structures, buildings or infrastructure are present and the adverse effects are temporary.	
(5) Protect places and areas in the Schedule 12 Sites and Places of Significance to Mana Whenua Schedule from the adverse effects of subdivision, use and development by all of the following: (a) avoiding where practicable, or otherwise remedying or mitigating adverse effects on the values and associations of Mana Whenua with the site, place or area; (b) requiring a protocol to be followed in the event of accidental discovery of kōiwi, archaeology or artefacts of Māori origin; and (c) undertaking appropriate actions in accordance with mātauranga and tikanga Māori.	There are no places and areas in the Schedule 12 Sites and Places of Significance to Mana Whenua Schedule in the surrounding environment. Therefore, this plan change will not produce any adverse effects on these places and areas.
(6) Protect Mana Whenua cultural heritage that is uncovered during subdivision, use and development by all of the following: (a) requiring a protocol to be followed in the event of accidental discovery of kōiwi, archaeology or artefacts of Māori origin; (b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and (c) requiring appropriate measures to avoid, remedy or mitigate further adverse effects.	The plan change includes a requirement for pre-emptive consideration of potential archaeological finds rather than relying on the accidental discovery protocols in the AUP and authorities under the Heritage New Zealand Pouhere Taonga. Exploratory investigations must occur on an archaeological site as part of the first stage of development and findings shall be shared with Te Ākitai Waiohū. This approach provides for better management of the cultural values of these sites in particular the intangible values.
(7) Include a Māori cultural assessment in structure planning and plan change process to do all of the following: (a) identify Mana Whenua values associated with the landscape;	As part of consultation with Te Ākitai Waiohū, a copy of the Te Ākitai Waiohū Cultural Heritage Assessment for Puhinui Peninsula (2014) was provided to inform the plan change. At this stage, Te Ākitai Waiohū does not seek to prepare a further Cultural Values Assessment.



(b) identify sites, places and areas that are appropriate for inclusion in the Schedule 12 Sites and Places of Significance to Mana Whenua Schedule for their Mana Whenua cultural heritage values as part of a future plan change; and (c) reflect Mana Whenua values.	
(8) Encourage appropriate design, materials and techniques for infrastructure in areas of known historic settlement and occupation by the tūpuna of Mana Whenua	The provisions of the Puhinui Precinct support and encourage the use of appropriate design, materials and techniques for infrastructure on the subject site.

B8.2.1 Natural character Objectives	Assessment
(1) Areas of the coastal environment with outstanding and high natural character are preserved and protected from inappropriate subdivision, use and development.	The coastal environment is protected from inappropriate subdivision, use and development through sub-precinct C1. This sub-precinct restricts development from occurring directly adjacent to the coastal environment. Additionally, the coastal protection yard standard also restricts development from locating near the coastal environment.
(2) Subdivision, use and development in the coastal environment are designed, located and managed to preserve the characteristics and qualities that contribute to the natural character of the coastal environment.	
(3) Where practicable, in the coastal environment areas with degraded natural character are restored or rehabilitated and areas of high and outstanding natural character are enhanced.	Enhancement of natural character will be supported by precinct provisions that require planting of indigenous species in the coastal margins which will strengthen the steep cliffs on the edges of the site and reduce the level of contaminants running off into the coastal environment.
B8.2.2 Natural Character Policies	Assessment
(1) Identify and evaluate areas of outstanding natural character or high natural character considering the following factors: (a) natural elements, processes and patterns;	The ecological assessment has evaluated the natural environment in terms of their ecological value. The coastal environment is considered to have moderate-high value given the habitat it provides for threatened species and the classification of the wider coastal environment as a Significant Ecological Area (SEA). It



(b) biophysical, ecological, geological and geomorphological aspects; (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; (d) the natural movement of water and sediment; (e) the natural darkness of the night sky; (f) places or areas that are wild or scenic; and (g) experiential attributes, including the sounds and smell of the sea, and their context or setting.	should be noted that the subject site and the surrounding environment are not classified as areas of outstanding natural character or high natural character under the AUP.
(4) Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on natural character of the coastal environment not identified as outstanding natural character and high natural character from inappropriate subdivision, use and development.	The coastal environment is protected from inappropriate subdivision, use and development through sub-precinct C1. This sub-precinct restricts development from occurring adjacent to the coastal environment. Additionally, the coastal protection yard standard also restricts development from locating near the coastal environment.

B8.3.1 Subdivision use and development objectives	Assessment
(1) Subdivision, use and development in the coastal environment are located in appropriate places and are of an appropriate form and within appropriate limits, taking into account the range of uses and values of the coastal environment.	The coastal environment is protected from inappropriate subdivision, use and development through sub-precinct C1. This sub-precinct restricts development from occurring adjacent to the coastal environment. Additionally, the coastal protection yard standard also restricts development from locating near the coastal environment.
(2) The adverse effects of subdivision, use and development on the values of the coastal environment are avoided, remedied or mitigated.	This report has included an assessment of environmental effects on coastal environment values. A range of measures have been included to ensure the adverse effects on the coastal environment are avoided, remedied or mitigated.



(4) Rights to occupy parts of the coastal marine area are generally limited to activities that have a functional need to locate in the coastal marine area, or an operational need making the occupation of the coastal marine area more appropriate than land outside of the coastal marine area.	There are very few permitted activities within sub-precinct C1 (that exists along the entire coastal edge of the subject site). The permitted activities are all appropriate for the environment and generally have a functional need to be located in this area e.g., informal recreation spaces and public amenities.
(5) Uses and developments that have a need to locate on land above and below the mean high water springs are provided for in an integrated manner.	The content of the Puhinui Precinct plan ensures that any use or development that is located near the coastal environment is provided for in an integrated manner.
(7) In areas potentially affected by coastal hazards, subdivision, use and development avoid increasing the risk of social, environmental and economic harm.	There is potential for coastal hazards such as inundation and erosion to affect parts of the subject site. However, the future risks of coastal inundation and erosion are not considered to be exacerbated by this proposal. The coastal setbacks are retained and will provide sufficient protection from inappropriate subdivision, use and development in areas of coastal hazard risk.

B8.3.2 Subdivision use and development Policies	Assessment
(1) Recognise the contribution that use and development of the coastal environment make to the social, economic and cultural well-being of people and communities.	Sub-precinct C1 offers an opportunity to improve the social and cultural wellbeing of people and communities. Public access to the coastal environment could be provided along sub-precinct C1 via a walking track.
(2) Avoid or mitigate sprawling or sporadic patterns of subdivision, use and development in the coastal environment by all of the following: (a) concentrating subdivision, use and development within areas already characterised by development and where natural character values are already compromised;	The coastal environment is protected from sprawling or sporadic patterns of subdivision, use and development through sub-precinct C1. This sub-precinct restricts development from occurring adjacent to the coastal environment. Additionally, the coastal protection yard standard also restricts development from locating near the coastal environment.



(b) avoiding urban activities in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal, historic heritage and special character; and (c) ensuring that subdivision, use or development involving land above and below the mean high water springs can provide for any associated facilities or infrastructure in an integrated manner.	
(5) Adopt a precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown or little understood, but could be significantly adverse.	The approach taken in this proposal aligns with the precautionary approach through the implementation of sub-precinct C1 along the coastal boundaries of the site and the coastal protection yards standard contained within the Puhinui Precinct Plan. This ensures the natural character of the coastal environment is retained.
(7) Set back development from the coastal marine area, where practicable, to protect the natural character and amenity values of the coastal environment.	The implementation of sub-precinct C1 along the coastal boundaries of the site and the coastal protection yards standard contained within the Puhinui Precinct Plan ensures that development will be set back from all coastal areas.

B8.4.2. Public access and open space Policies	Assessment
(1) Subdivision, use and development in the coastal environment must, where practicable, do all of the following: (a) maintain and where possible enhance public access to and along the coastal marine area, including through the provision of esplanade reserves and strips; (b) be designed and located to minimise impacts on public use of and access to and along the coastal marine area;	There is potential to include publicly accessible walkways along the coastline in the future under sub-precinct C1.



(c) be set back from the coastal marine area to protect public open space values and access; and (d) take into account the likely impact of coastal processes and climate change, and be set back sufficiently to not compromise the ability of future generations to have access to and along the coast.	
(2) Provide for a range of open space and recreational use of the coastal environment by doing all of the following: (a) identifying areas for recreational use, including land-based facilities for those uses, where this ensures the efficient use of the coastal environment; (b) enabling the provision of facilities in appropriate locations that enhance public access and amenity values; (c) enabling Māori cultural activities and customary use; and (d) managing uses to avoid conflicts and mitigate risks.	
(3) Restrict public access to and along the coastal marine area, particularly walking access, only where it is necessary to do any of the following: (a) protect public health and safety; (b) provide for defence, port or airport purposes; (c) protect areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal, historic heritage and special character; (d) protect threatened indigenous species; (e) protect dunes, estuaries and other sensitive natural areas or habitats; (f) have a level of security necessary to carry out an activity or function that has been established or provided for;	The coastline along the edge of the site is a significant natural resource and needs to be appropriately managed/protected. The publicly accessible walking tracks are an opportunity under this plan change rather than a certainty. Before public access is provided to the coastline, the health of the coastal environment will need to be considered, but that is not within the scope of this proposal.



(g) provide for exclusive use of an area to carry out an activity granted an occupation consent under section 12 of the Resource Management Act 1991; (h) enable a temporary activity or special event; or in other exceptional circumstances sufficient to justify the restriction	
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B10.2.1 Natural hazards and climate change Objectives	Assessment
(1) Communities are more resilient to natural hazards and the effects of climate change.	The largest risks on the subject site result from coastal inundation and erosion. All habitable areas subject to coastal inundation risk shall provide freeboard above the 1% AEP flood level, including 1m sea level rise allowance. There is also a large coastal protection yard setback requirement for all development in the Puhinui Precinct.
(2) The risks to people, property, infrastructure and the environment from natural hazards are not increased in existing developed areas.	
(3) New subdivision, use and development avoid the creation of new risks to people, property and infrastructure.	
(4) The effects of climate change on natural hazards, including effects on sea level rise and on the frequency and severity of storm events, is recognised and provided for.	
(5) The functions of natural systems, including floodplains, are protected from inappropriate subdivision, use and development.	The coastal environment adjacent to the subject site offers natural protection from coastal hazards. Mangroves exist along the coastal edges of the site, and they provide an important natural barrier for the subject site land. The mangroves and other natural coastal systems are protected from inappropriate subdivision, use and development due to the requirements of sub-precinct C1 and the coastal protection yard.



(6) The conveyance function of overland flow paths is maintained.	The site has a large network of major overland flow paths (OLFPPs). To ensure the conveyance function of OLFPPs is maintained, a network of secondary flow paths will be designed to convey future 100-year flows.
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B10.2.2 Natural hazards and climate change Policies	Assessment
(1) Identify areas potentially affected by natural hazards, giving priority to those at high risk of being affected, particularly in the coastal environment.	The coastal hazards to the subject site have been assessed, with coastal inundation and coastal erosion having the potential to take place. The site is within an Area Susceptible to Coastal Instability and /or Erosion (ASCIE) on Auckland Council databases. This assessment takes into account recent data and also make erosion predictions for the 2130 RCP8.5 scenario and the 2130 RC8.5+ scenario. However, provided that adequate setbacks from the coastal slopes are maintained, coastal hazards are also considered to be low risk (including when the potential effects of climate change are taken into account). This is due to the low energy environment, the mangrove vegetation and the fact the slopes are fronted by an infilling estuary. The estimates provided on the Auckland Council database as considered highly conservative and coastal erosion is not anticipated to result in a 20m loss of land. However, sub-precinct C1 and the coastal protection yard standard will ensure that development is not located within 50m+ of the coastal slopes. This precautionary approach has been taken as it is difficult to say with certainty what the likely effects will be in 100 years. Additionally, this approach has been taken to ensure that development or use within the coastal margins does not accelerate or exacerbate coastal erosion or inundation.
(2) Undertake natural hazard identification and risk assessments as part of structure planning.	
(3) Ensure the potential effects of climate change are taken into account when undertaking natural hazard risk assessments.	
(4) Assess natural hazard risks: (a) using the best available and up-to-date hazard information; and (b) across a range of probabilities of occurrence appropriate to the hazard, including, at least, a 100-year timeframe for evaluating flooding and coastal hazards.	
(5) Manage subdivision, use and development of land subject to natural hazards based on all of the following: (a) the type and severity of potential events, including the occurrence natural hazard events in combination;	



(b) the vulnerability of the activity to adverse effects, including the health and safety of people and communities, the resilience of property to damage and the effects on the environment; and (c) the cumulative effects of locating activities on land subject to natural hazards and the effects on other activities and resources.	
(6) Adopt a precautionary approach to natural hazard risk assessment and management in circumstances where: (a) the effects of natural hazards and the extent to which climate change will exacerbate such effects are uncertain but may be significant, including the possibility of low-probability but high potential impact events; or (b) the level of information on the probability and/or impacts of the hazard is limited.	
(7) Avoid or mitigate the effects of activities in areas subject to natural hazards, such as earthworks, changes to natural and built drainage systems, vegetation clearance and new or modified structures, so that the risks of natural hazards are not increased.	
(8) Manage the location and scale of activities that are vulnerable to the adverse effects of natural hazards so that the risks of natural hazards to people and property are not increased.	
(9) Encourage activities that reduce, or do not increase, the risks posed by natural hazards, including any of the following: (a) protecting and restoring natural landforms and vegetation; (b) managing retreat by relocation, removal or abandonment of structures;	



(c) replacing or modifying existing development to reduce risk without using hard protection structures; (d) designing for relocatable or recoverable structures; or (e) providing for low-intensity activities that are less vulnerable to the effects of relevant hazards, including modifying their design and management.	
(10) Encourage redevelopment on land subject to natural hazards to reduce existing risks and ensure no new risks are created by using a range of measures such as any of the following: (a) the design and placement of buildings and structures; (b) managing activities to increase their resilience to hazard events; or (c) change of use to a less vulnerable activity	
(11) Strengthen natural systems such as flood plains, vegetation and riparian margins, beaches and sand dunes in preference to using hard protection structures.	
(12) Minimise the risks from natural hazards to new infrastructure which functions as a lifeline utility by: (a) assessing the risks from a range of natural hazard events including low probability but high potential impact events such as tsunami, earthquake and volcanic eruptions; (b) utilising design, location and network diversification to minimise the adverse effects on infrastructure and to minimise the adverse effects on the community from the failure of that infrastructure.	
(13) Require areas potentially affected by coastal hazards over the next 100 years to do all of the following:	



(a) avoid changes in land use that would increase the risk of adverse effects from coastal hazards; (b) do not increase the intensity of activities that are vulnerable to the effects of coastal hazards beyond that enabled by the Plan; (c) in the event of redevelopment, minimise natural hazard risks through the location and design of development; and where it is impracticable to locate infrastructure outside of coastal hazard areas, then ensure coastal hazard risks are mitigated.	
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B10.3.1. Land – hazardous substances Objectives	Assessment
(1) The environment is protected from adverse effects associated with the storage, use, disposal and transport of hazardous substances.	The resource consent stage is considered to be appropriate to manage any adverse effects arising from the identified contamination risks, therefore, the proposed plan change is considered to be appropriate from a land contamination perspective.
(2) The storage, use, disposal and transport of hazardous substances are provided for and the social and economic benefits of these activities are recognised.	The light industrial zoning proposed does provide a pathway for storage, use, disposal and transport of hazardous substances to be carried out on site.

B10.3.2 Land – hazardous substances Policies	Assessment
(1) Manage the use and development of land for hazardous facilities and industrial or trade activities to avoid adverse	The resource consent stage is considered to be appropriate to manage any adverse effects arising from the identified



effects on human health and the environment and remedy or mitigate these effects where they cannot be avoided.	contamination risks, therefore, the proposed plan change is considered to be appropriate from a land contamination perspective.
(2) Manage the use and development of land for hazardous facilities: (a) so that such facilities are resilient to the effects of natural hazards; (b) to avoid, remedy or mitigate adverse effects on people and property; (c) to avoid as far as practicable the contamination of air, land, and water; and (d) to minimise risks caused by natural hazards.	
(3) Manage the effects associated with use and development of land for hazardous facilities by all of the following: (a) restricting the establishment of sensitive activities near hazardous facilities or areas identified for hazardous facilities if the activities are likely to be adversely affected by a hazardous facility or if they have the potential to limit the operation of the hazardous facility; (b) ensuring new hazardous facilities are not located near sensitive activities unless significant adverse effects, including cumulative effects, are avoided and other adverse effects are mitigated; and providing areas for hazardous facilities away from sensitive activities so that the facilities may carry out their operations without unreasonable constraints.	

B10.4.1 Land – contaminated Objective	Assessment
(1) Human health and the quality of air, land and water resources are protected by the identification, management and remediation of land that is contaminated.	The resource consent stage is considered to be appropriate to manage any adverse effects arising from the identified contamination risks, therefore, the proposed plan change is



	considered to be appropriate from a land contamination perspective.
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B10.4.2 Land – contaminated Policies	Assessment
(1) Identify land that is or may be contaminated based on: (a) sites known to have supported contaminating land use activities in the past; (b) sites with a significant potential risk to human health; or (c) sites having significant adverse effects on the environment.	The subject site has been assessed in relation to potential contamination and range of contamination sources have been identified. The site is considered to have support contaminating land uses in the past and there is potential risk to human health if a new land use activity is proposed to take place.
(3) Manage or remediate land that is contaminated where: (a) the level of contamination renders the land unsuitable for its existing or proposed use; or (b) the discharge of contaminants from the land is generating or is likely to generate significant adverse effects on the environment; or (c) development or subdivision of land is proposed.	The level of contamination on site does not restrict the proposed zoning of the site. The resource consent stage is considered to be appropriate to manage any adverse effects arising from the identified contamination risks, therefore, the proposed plan change is considered to be appropriate from a land contamination perspective.

11.4 Section 75(4)

Under s75(4) a district plan must not be inconsistent with a water conservation order or a regional plan for any of the matters listed in s30(1).

As the AUP consolidates regional and district plans, the assessment against the relevant objectives and policies of the AUP under section 7.3 of this report is considered sufficient to demonstrate consistency with regional plan provisions.



12 NON-RMA DOCUMENTS

In addition to the requirements under Section 75, when changing a district plan a territorial authority shall, under s74(2)(b)(i) have regard to management plans and strategies prepared under other acts. An assessment against the relevant non-RMA documents has been undertaken below.

12.1 Future Development Strategy

I consider there to be two limbs of the FDS that require consideration:

- The informing principles of the FDS being reduction of GHG emissions, adapting to climate change, making efficient infrastructure investments, protecting and restoring the natural environment and enabling sufficient business growth in the right pace and time.
- The sequencing for land release in the Puhinui Peninsula.

Regarding the first limb, the proposal almost perfectly aligns with the guiding principles of the FDS:

- The proposal addresses greenhouse gas emissions by:
 - Intensifying an existing urban area, if a storage yard is not established on the site in the near term it will have to be established elsewhere, further from the regional productivity hub in central Auckland. The same can be said for the light industrial activities that will be established once transport infrastructure is available (Principle 1(a)).
 - The proposal creates a framework for accessing the coastal margins of the site via indicative connections in Precinct plan 6 and the introduction of sub-precinct C1 (Principle 1(b)).
- The proposal will bring jobs and home closer together in the medium to long term by locating light industrial development in proximity to the residential neighbourhoods of Central and South Auckland (Principle 1(c)).
- The proposal will adapt the site to climate change risk by:
 - Avoiding built development within coastal hazard areas via sub-precinct C1 (validated with the provided Coastal Hazard Assessment) (Principle 2(a)).
 - Acknowledging the value of ecosystems services and using them as a basis for green infrastructure solutions (on-site freshwater values have been identified and protected for use in a future stormwater management strategy) (Principle 2(b)).
- The proposal will allow infrastructure providers to make better value investments by providing business land within the urban boundary (with all the attendant efficiency benefits) that would



otherwise have to be provided in another location outside the urban boundary (costly and inefficient) (Principle 3). Note that the interim storage yard solution makes the best use of existing transport infrastructure for land that will otherwise likely sit fallow in accordance with Principle 3(b).

- The proposal will protect and restore the natural environment by:
 - Protecting the ecological and freshwater values on the site into the future via sub-precinct C1 noting that there are currently no statutory protections in place other than those that generally apply (Principle 4(a)).
 - Noting that the only mechanism left in place to connect the disparate ecological sites and values of the Puhinui Peninsula is a coastal yard, sub-precinct C1 is the only sub-precinct within the overall Puhinui Precinct that gives meaningful effect to consolidating and connecting these sites and values (Principle 4(b)).
- The proposal is considered to supply business land at the right place and time as the Airport Precinct and South Auckland are undoubtedly focus points of infrastructure and business investment in the Auckland Region. The proposal is therefore undoubtedly the right time and place for enabling growth given it will allow for the highest and best use of the site in the near term, and in the long term will enable efficient establishment of light industrial activities on the site as soon as infrastructure is available (Principle 5).

Regarding the second limb, given the 2030+ timeline given for development of FUZ in the Puhinui Peninsula (just 5 years away), infrastructure planning and investment will begin happening very soon, and the plan change aligns with the FDS by:

- Allowing a reasonable use of the site in the near term that will not compromise growth or the Puhinui Peninsula generally.
- Allowing for full development as soon as the necessary infrastructure is available, as envisioned by the FDS.

I would reiterate here that this is an uncontroversial approach already adopted across the rest of the peninsula, and the plan change merely corrects an anomalous parcel of FUZ land in an area that is otherwise zoned light industrial.

12.2 Auckland Plan 2050

Key relevant Outcomes of the Auckland Plan:



- *Māori Identity and Wellbeing:*

A thriving Māori identity is Auckland's point of difference in the world – it advances prosperity for Māori and benefits all Aucklanders

- *Transport and Access:*

Aucklanders will be able to get where they want to go more easily, safely and sustainably.

- *Environment and Cultural Heritage:*

Aucklanders preserve, protect and care for the natural environment as our shared cultural heritage, for its intrinsic value and for the benefit of present and future generations.

- *Opportunity and Prosperity:*

Auckland is prosperous with many opportunities and delivers a better standard of living for everyone.

The proposal is considered to give effect to these outcomes as:

- Mana whenua have collaborated with the applicant on the proposal to ensure effects on mana whenua values are addressed and mitigated.
- The proposal provides for transport network integration and certainty around effects in both the near and long term.
- Provision has been made to protect the heritage values of the site including archaeological sites and the existing natural heritage of the coastal margins.
- The proposal has clear economic benefits for the local area and as a consequence for the wider Auckland region.

12.3 Ōtāra-Papatoetoe Local Board Plan 2023

Relevant principles of the local board plan:

- *Our environment*

We care, protect, and enhance our natural environment and built heritage. A Māori world view to treasure and protect taonga tuku iho (our natural environment) is key. Our communities, businesses and organisations act as stewards of the natural environment, make sustainable choices, and chose sustainable lifestyles. We act today to protect and preserve our environment for future generations.

- *Our community*



Everyone has fair and easy access to council services and facilities, regardless of their circumstances. Mana whenua, mataawaka, organisations and neighbourhood groups maintain strong relationships, influence decisions, and actively contribute to local programmes.

- *Our places*

Our growing and changing community is well served and supported with high-quality and attractive spaces. New developments are well designed and have our present and future communities in mind. Connections within the local and surrounding areas are easy, effective, and reliable.

- *Our economy*

Locals thrive through being supported to develop and achieve their education, career, and business

The proposal is considered consistent with these principles as:

- Mana whenua have collaborated with the applicant on the proposal to ensure effects on mana whenua values are addressed and mitigated.
- Precinct provisions have been prepared with consideration of a broad range of interest groups that have been supplied with the provisions pre-application and invited to comment.
- The proposal has clear economic benefits for the local area and as a consequence for the wider Auckland region.



13 CONCLUSION

It is concluded that the proposal is not in conflict with any of the relevant statutory documents prepared under the RMA and gives effect to the policy direction signalled by the Auckland RPS, it is also consistent with all the relevant Auckland Council Plans and strategies prepared under other acts.

It is recommended that the Council accept the Plan Change Request.



Appendix A **Records of Title**



Appendix B **Existing Consents**



**Appendix C Proposed Changes to
the Auckland Unitary Plan
(Operative in Part) 2016**



Appendix D **Graphic Information**
Package



Appendix E **Geotechnical**
Assessment



Appendix F **Preliminary Site
Investigation**



**Appendix G Archaeological
Assessment and cl 23 Addenda**



Appendix H Ecological
Assessment and cl 23 Addenda



Appendix I Stormwater
Management Plan and cl 23
Addenda



Appendix J Infrastructure Report



Appendix K **Traffic Memo and cl**
23 Addenda



Appendix L **Economic**
Assessment and cl 23 Addenda



Appendix M Urban Design
Statement and cl 23 Addenda



**Appendix N Cultural Heritage
Assessment and Cultural Maps**



Appendix O **Correspondence with Stakeholders**



Appendix P **CI 23 Letters and
Response**



Appendix Q **Landscape and Visual Assessment**



Appendix R **Coastal Hazard
Assessment**



Appendix S **Arborist Report**

