

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question

L20

Specific request

It is noted that Matter of Assessment (5)(d)(vi) addressing buildings that fail to meet the precinct boundary set back control limits the assessment of effects to “neighbouring sites, building scale and dominance (bulk and location), and outlook and privacy.” This does not consider effects on the wider public domain, including local streetscapes, the town centre and Te Auaunga.

Reasons for request

Breaches of the precinct boundary set back have the potential to affect far more than just adjoining open spaces and residential properties. However, the current Matters of Assessment are very limited in this regard. They should address a range of matters that impact on both the public and private domains.

Applicant response provided by

Matt Riley, Boffa Miskell; and John Duthie, Tattico

Applicant response

- 1 Assessing the effects of an infringement of the precinct boundary setback standard I334.6.6 is not limited to I334.8.1(5)(d)(vi). This clause is part of wider matters of discretion (I334.8.1(5)) that, via I334.8.1(5)(a), provide to Council the discretion to assess an infringement of I334.6.6 under Auckland Unitary Plan (Operative in Part) Rule C1.9(3).
- 2 Matter of discretion I334.8.1(5) is carried over from the operative Wairaka Precinct and is the provision within that operative precinct which specifies the matters to which Council's discretion is restricted in assessing proposed developments and/or subdivision within the precinct that do not comply with listed standards, including I334.6.6 Precinct boundary setback.
- 3 As is discussed in detail in response to clause 23 request L13, the ability to use Rule C1.9(3) in the assessment of an infringement of a standard listed in I334.8.1(5), which includes standard I334.6.6, provides to Council a broad discretion to consider the potential effects of the infringement, including those potential effects referred to in clause 23 request L20. It is not considered necessary to change the approach used in the operative precinct in the plan change to refer to a subset of specific matters, for example, those listed in this clause 23 request, as these are already encompassed within these broad matters of discretion, and – as noted in the clause 23 L13 response – neither is this the approach used within other operative precincts more generally.

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Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	L21
Specific request	It is noted that over-height development is proposed to be assessed against Policies I334.3 (14A) & (14B) which actively support 'taller buildings', rather than providing a foundation for critical evaluation of such structures.
Reasons for request	Policies I334.3 (14A) & (14B) provide clear support for exceptionally tall built forms. However, they do not address the degree of 'fit' that such proposals would have in relation to their surrounds (and existing development, such as the Oakley Hospital Building) or the effects that they might generate.
Applicant response provided by	Matt Riley, Boffa Miskell; John Duthie, Tattico

Applicant response

- 1 The foundation for a balanced critical evaluation of both the potential positive and adverse effects of height infringing tall buildings is provided for in the precinct provisions. As detailed in the other clause 23 responses, it is considered that the precinct is an appropriate location for taller buildings, and therefore it is appropriate that the provisions provide active policy support for these buildings.
- 2 The provisions enable the effects of taller buildings in Height Area 1, and height infringing buildings more generally, to be evaluated via two pathways: matter of discretion I334.8.1(1B) and matter of discretion I334.8.1(5).

Matter of discretion I334.8.1(1B)

- 3 Assessment criterion I334.8.2(1B), which stems from matter of discretion I334.8.1(1B), enables assessment of the potential effects of the three taller height compliant buildings in Height Area 1 (of 43.5m, 54m and 72m height, as specified on Precinct plan 3) *and* also any building which exceeds the heights specified for the Height Areas in Precinct plan 3.
- 4 The criterion refers to Policies I334.3(13), (14), (14A), (14AA) and 14(B). Policies I334.3(14A) and (14B) set the foundation for the positive effects of taller buildings in the north western part of the precinct and increased height in the central and northern parts of the precinct. These policies are balanced against Policies I334.3(13), (14) and (14AA), which, together, enable an evaluation of the extent to which the potential adverse effects of this greater height are appropriately mitigated through place-responsive design. In summary:

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- (a) Policy I334.3(13) requires new buildings to be designed in a manner which recognises landscape values and, where appropriate, enhances the streetscape and gateway locations of the precinct;
- (b) Policy I334.3(14) requires new buildings adjoining or adjacent to Te Auaunga to provide appropriate native landscaping and contemporary high-quality design which enhances the precinct's built form and natural landscape; and
- (c) New Policy I334.3(14AA), introduced in response to clause 23 request H7, requires new high rise buildings adjacent to the former Oakley Hospital scheduled historic heritage building to provide sympathetic contemporary and high quality design which enhances the precinct's built form.

Matter of discretion I334.8.1(5)

- 5 Matter of discretion I334.8.1(5) is an additional pathway for assessing height infringing buildings. It provides Council with discretion to assess the effects of 'any development and/or subdivision' that does not comply with specified standards, including I334.6.4 Height. This includes an assessment of potential effects of a height infringing building against Auckland Unitary Plan (Operative in Part) (*AUP*) rule C1.9(3) (via I334.8.1(5)(a)) and the potential effects on the amenity values of open spaces and adjoining residential areas (via I334.8.1(5)(d)(iv)).
- 6 *AUP* rule C1.9(3) allows a broad assessment of the potential effects of an infringement of the height standard, enabling Council to consider matters including: any objective or policy which is relevant to the standard; any special or unusual characteristic of the site which is relevant to the standard; the effects of the infringement of the standard; and where more than one standard is infringed, the effects of all infringements considered together.
- 7 Assessment of a height infringing building through rule C1.9(3) would, for example, allow consideration of the extent to which the building is consistent with the over-arching outcomes sought for development within the precinct by Objective I334.2(10). This objective anticipates that buildings will contribute to the creation of an integrated urban environment which incorporate high quality design, and that the precinct is developed in a comprehensive manner which complements and fits within the landscape and character of the surrounding environment.

Conclusion

- 8 In summary, it is considered that the precinct provisions appropriately address the 'fit' (as referred to in the clause 23 request) of taller buildings within the precinct to their surrounds through a balanced foundation at objective and policy level, and through matters of discretion that enable a broad assessment of potential effects of taller buildings and of any height infringing building.

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Question	E1
Specific request	Please provide a map identifying the spatial extent and area (m2) of vegetation types, streams and wetlands.
Applicant response provided by	Jason Smith – Morphum Environmental Limited

Applicant response

- 1 A new map has been provided showing the requested updates, please refer to Appendix 1.
- 2 Note that areas of rank grass previously mapped have not been included as this area has been modified and as of 31/03/2023 and is now largely a construction site and has been denuded of vegetation.
- 3 Refer Appendix 1.

Question	E2
Specific request	Please provide fuller descriptions of the diversity (flora and fauna communities) and structure (canopy, subcanopy, ground cover) of identified areas of ecological value and categorise, where appropriate, in accordance with Auckland Council's indigenous ecosystem types (e.g e.g. WF4, WF8, Singers et al. 2017).
Applicant response provided by	Jason Smith – Morphum Environmental Limited

Applicant response

- 1 Owing to the historical modifications of the precinct (see the photo-series provided in Appendix 2) the vegetation remaining on-site is not reflective of any naturally occurring vegetation community.
- 2 The majority of the vegetation on-site is comprised of individual exotic trees. Singers et al. (2017) provides 2 categories for where exotic vegetation dominates: Exotic Forest (EF) and Exotic Scrub (ES). Given these species would normally comprise a canopy these areas would be best described as EF, which is described as: Forest vegetation with >50% cover of exotic species in the canopy. The isolated mature trees are generally without a sub-canopy with a groundcover of mown grass. This would include the willows (*Salix* spp.) that had been considered in the 'Exotic riparian vegetation'.

- 3 Where vegetation has not been maintained for amenity purposes, including the 'Mature mixed canopy', the canopy is comprised of individual specimens of pohutakawa (*Metrosideros excelsa*) and kahikatea (*Dacrycarpus dacrydioides*), there are also mature specimen trees likely planted and being maintained as ornamentals including large puriri (*Vitex lucens*), Norfolk Island pines (*Araucaria heterophylla*), magnolia and Moreton Bay fig (*Ficus macrophylla*). The understory is comprised of self-seeded natives, largely karamu (*Coprosma robusta*), karo (*Pittosporum crassifolium*), tarata (*Pittosporum eugenioides*), and less commonly, juvenile nikau (*Rhopalostylis sapida*), karaka (*Corynocarpus laevigatus*) and kawakawa (*Piper excelsum*). Groundcover is majority leaf litter with a garden bed of *Agapanthus* alongside Mt Albert Road. Owing to the dominance of exotics, the area would be most appropriately captured by the EF: in Singers et al 2017.
- 4 For the vegetation categorised as 'Native riparian vegetation', the canopy is limited to a mixture of manuka (*Leptospermum scoparium*) and kanuka (*Kunzea ericoides*), the understory, where present is comprised of large flax and karamu. Owing to the dominance of manuka, such areas would be best captured by the Singers et al. 2017 category of VS3: Manuka, kanuka scrub.
- 5 A Current Ecological Value Assessment utilising the EIANZ assessment framework has been set out for each vegetation type in Appendix 3. Note that in disaggregating the values assessment across the different vegetation types gives three different values; overall these average 'Low' ecological value which is consistent with the EcIA and commensurate with the extent of each different vegetation type.
- 6 Refer Appendix 1, Appendix 2, Appendix 3.

Question	E3
Specific request	Further to E2 (above), please provide commentary on the potential presence of rock forest with descriptions of substrate where vegetation cover is mapped in RFI E1 (above).
Applicant response provided by	Jason Smith – Morphem Environmental Limited

Applicant response

- 1 There is no rock forest present within the plan change area. References to rock forest in the riparian margins of Te Auaunga/Oakley Creek are noted from the literature review, there are records of rock forest in the riparian margins of Te Auaunga, notably in Phyllis Street and Harbutt Reserves which are to the south of the plan change area. There are two exposed rock outcrops within the plan change area which are either unvegetated or covered with exotic grasses. Elsewhere exposed rock has been fashioned into a rock wall to the south of the Central Wetland.

Question E4

Specific request Please provide an updated database review of indigenous bird species to account for potential and intermittent presence of At Risk or Threatened species, particularly aquatic species around the wetland, where vegetation will have matured since the Boffa Miskell assessment. Please also provide commentary on the effects of the proposed plan change on any additionally identified species, with respect to urban intensification, increased building height and reduction in extent of open space.

Applicant response provided by Jason Smith – Morphum Environmental Limited

Applicant response

- 1 The desktop review for avifauna has been updated and expanded to include a wider area, please refer to Table 1 in Appendix 4.
- 2 The only significant changes to the vegetation community within the precinct since the Boffa Miskell Assessment (2014) is the maturation of the planting associated with the stormwater management device alongside the Trades Building/Farm Road; and the removal of individual large specimen trees or amenity garden vegetation from the northern half of the precinct.
- 3 The vegetation currently present was planted during the construction of the 'Stormwater Management Device' and includes kowhai (*Sophora microphylla*), flax (*Phormium tenax*) and cabbage trees (*Cordyline australis*) interspersed amongst a ground cover of oioi (*Apodasmia similis*). The area also features a range of pest plants that have colonised the area including wattle species (*Acacia* spp.), dock species (*Rumex* spp.), inkweed (*Phytolacca octandra*), black nightshade (*Solanum nigrum*), broad-leaved fleabane (*Erigeron bonariensis*), wild carrot (*Daucus carota*) and exotic grasses (*kikuyu*, *Cenchrus clandestinus*) in the terrestrial margin.
- 4 The vegetation community on the riparian margin of the 'Central Wetland' is comprised of the native riparian vegetation community described above, generally only a single pole deep. Raupo has establish in the near-shore margin.
- 5 The surface water within the stormwater management devices are covered in a mixture of aquatic weeds such as both willow weed (*Persicaria maculosa*) and water pepper (*Persicaria hydropiper*).
- 6 Whilst the desktop review includes a wider range of native avifauna, the stormwater management devices would not be considered to provide habitat for the majority of these coastal species.
- 7 The At Risk or Threatened species noted from the desktop review could conceptually include banded rail (At Risk – Declining) and gull species (At Risk or Threatened depending on species).

- 8 However, the riparian margin is a relatively small area, and isolated from areas of similar habitat by stream reaches that lack overhead cover which banded rail would utilise as movement corridors. Furthermore, given the exposed nature of the small area (being largely surrounded by mown grass and in close proximity to existing urban development) the area is unlikely to provide habitat for banded rail.
- 9 Gull species have adapted to forage within a wide range of urban environments. The vegetation near the stormwater management devices will comprise a very small portion of similar low-quality nesting/foraging habitat within the home range for any gull species.
- 10 Refer Appendix 4.

Question

E5

Specific request

Please justify why the likelihood of bat roosting habitat is considered 'negligible' if potential roost habitat along Te Auaunga is considered to hold potential and given that native bats have very large home ranges. Further, if potential bat habitat is acknowledged as possible within the precinct, please comment on the potential effects of the plan change, including urban intensification (including increased light levels, building height) and reduction in open space on access by bats to potential foraging, flight and roost habitat (e.g. mature tree groves), noting that bats use open spaces and wetlands and other water bodies.

Applicant response provided by

Jason Smith – Morphum Environmental Limited

Applicant response

- 1 Bat habitat within the precinct has been considered as negligible on the basis that the vegetation within the precinct has been managed over a significant period of time for amenity purposes and as such lacks the hollows and cavities that would provide bat roosts. This is exemplified by the photographs provided in Appendix 5 that demonstrate how lower or fallen limbs have been anthropogenically removed to prevent the occurrence of hollows.
- 2 The potential for bats to utilise such trees is further reduced by the isolated nature of the individual trees within the precinct, and the existing urban development.
- 3 Should Auckland Council take an alternative view, it is noted that the plan change seeks to vary existing precinct provisions (as set out in section 3 of the EcIA) which already provide for significant development within the precinct, and therefore which would not substantially alter the current planning provisions that would impact on bat values given these existing provisions and the current urbanisation of the catchment which includes the north-western motorway, Great North Road and the associated fly-overs.
- 4 There is a greater extent of higher quality bat roosting and foraging habitat outside of the plan change area, within the riparian margin of Te Auaunga, where vegetation has not been actively maintained. The exotic canopy trees (including copses of pines, oaks and gum spp. would have the loose bark and hollows for bat roosts).

5 Refer Appendix 5.

Question E6

Specific request Please provide evidence to illustrate that both of these wetlands individually are classified as “a deliberately constructed wetland”, and therefore are excluded from the definition of “natural inland wetland” as defined in the NPS-FM.

Update Map in Appendix 1 of the Ecological Report accordingly.

Applicant response provided by Jason Smith – Morphum Environmental Limited

Applicant response

- 1 The ‘Stormwater Management Device’ is deliberately constructed. As evident from the photo-series provided in Appendix 2, there is no natural watercourse in this location preceding the construction of the stormwater management device in (2015 – 2017).
- 2 The earliest aerial imagery available for the area of the ‘Central Wetland’ (1940) is after any natural vegetation has been cleared and the catchment transformed for agricultural purposes. The historic aerial imagery is interpreted to show that a drain has been created in this area, evidenced by the straight, linear and well-defined watercourse. The area lacks any darker colouration in the immediately area surrounding the watercourse that would indicate a wetland.
- 3 The artificial nature of the ‘wetland’ aspect is elaborated on in the memorandum from Auckland Council prepared for Unitec’s resource consent application for damming of water and use of an existing dam on the bed of a tributary of Oakley Creek for stormwater treatment in 2015 and attached as Appendix 6. This memorandum considers that the Central Wetland was formed deliberately as a dam for constructing and demonstrating stormwater ponds.
- 4 Note that this is not considered to be a natural wetland as defined in the NPS:FM; however, given the previous occurrence of a waterway in this location it could still be considered a modified element of a natural watercourse (stream) for the purposes of the Auckland Unitary Plan and Resource Management Act.
- 5 The plan change does not propose any amendments to the provisions of E3 (streamworks) in the AUP nor any activities that would detract from the value, or opportunity to restore these waterbodies.
- 6 Refer Appendix 2, Appendix 6.

Question	E7
Specific request	Map and describe the natural wetland referred to in the ecological report at the confluence with Te Auaunga. Please update Map in Appendix 1 of the Ecological Report accordingly.
Applicant response provided by	Jason Smith – Morphum Environmental Limited

Applicant response

- 1 Through the Mason Clinic, the Wairaka Stream remains heavily incised and lined by rock and would be considered to reflect a stream environment.
- 2 As the Wairaka Stream exits the Mason Clinic site, within the riparian vegetation as the stream reaches the lower relief of Te Auaunga, it would appear that the stream frequently floods. There is an isolated stand of Purei (*Carex secta*) on the true left bank and where groundcover exists it is dominated by alligator weed.
- 3 Based on the previous site investigations (as this area is off-limits to the public for public safety), this area could pass the rapid test for wetland vegetation depending on the sample location.
- 4 Refer to Figure 2 in Appendix 7 for an indicative site photograph, which was taken from the point marked Photo point 2 in the map provided as Appendix 1.
- 5 This is outside of the plan change area, and the plan change does not propose any amendments to the provisions of the AUP nor any activities that would detract from the value, or opportunity to restore this area.
- 6 Refer Appendix 1, Appendix 7.

Question	E8
Specific request	Please provide a description of the habitat immediately above the Coastal Marine Area (CMA), with an assessment against the criteria of a natural inland wetland (as set out in the NPS-FM).
Applicant response provided by	Jason Smith – Morphum Environmental Limited

Applicant response

- 1 The CMA, in this area is defined in the AUP as the seaward side of Great North Road (ID: 159; NZTM Point X: 1751960.23, NZTM Point Y: 5917779.09).

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- 2 The riparian area immediately above Great North Road is not consistent with the definition of a natural inland wetland in the NPS:FM (as of April 2023) as it would not meet the first criterion. The area is not a wetland (as defined in the Act). In this location Te Auaunga is well defined by the heavily incised stream bed/banks, with the stream approximately 2 m below the floodplain comprised of a similar vegetation community as of the rest of the riparian margin of Te Auaunga (a mixture of exotics in the tree canopy, and a native understory; ground cover is comprised heavy of leaf litter, alluvial deposits that are likely to have been deposited after recent heavy rainfall, ground cover vegetation where present was the exotic pest plant Hedera helix (Ivy) and Tradescantia.
- 3 The area is not a wetland. It is also noted that this area is outside of the plan change extent.
- 4 Refer Figure 3, Appendix 8.

Question E9

Specific request Please provide a map of the section of Wairaka Stream that has been / is proposed for daylighting.

Update Map in Appendix 1 of the Ecological Report accordingly.

Applicant response provided by Jason Smith – Morphum Environmental Limited

Applicant response

- 1 This was shown in the map provided as Appendix 1 of the original EcIA. Please refer to Appendix 1 map of EcIA.
- 2 Note that, as shown in Figure 4 in Appendix 9, a section of the daylighting has already occurred.
- 3 An updated stream length of potential daylighting opportunity is shown in Appendix 1. Approximately 2/3rds of daylighting remain.
- 4 Refer Appendix 1, Appendix 9.

Appendix 1: Map



Note: Trees not otherwise classified are individual mature specimen trees or have recently been removed.

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- Rock Outcrop
- Vegetation Area**
 - Exotic riparian vegetation (2,605 m²)
 - Native riparian vegetation (3,085 m²)
 - Mature mixed canopy (5,807 m²)
- Watercourses**
 - Piped Section
 - Wairaka Stream
 - Stormwater Management Device
 - Wairaka Precinct

Client: Ministry for Housing and Urban Development

Project: **TE AUAUNGA**



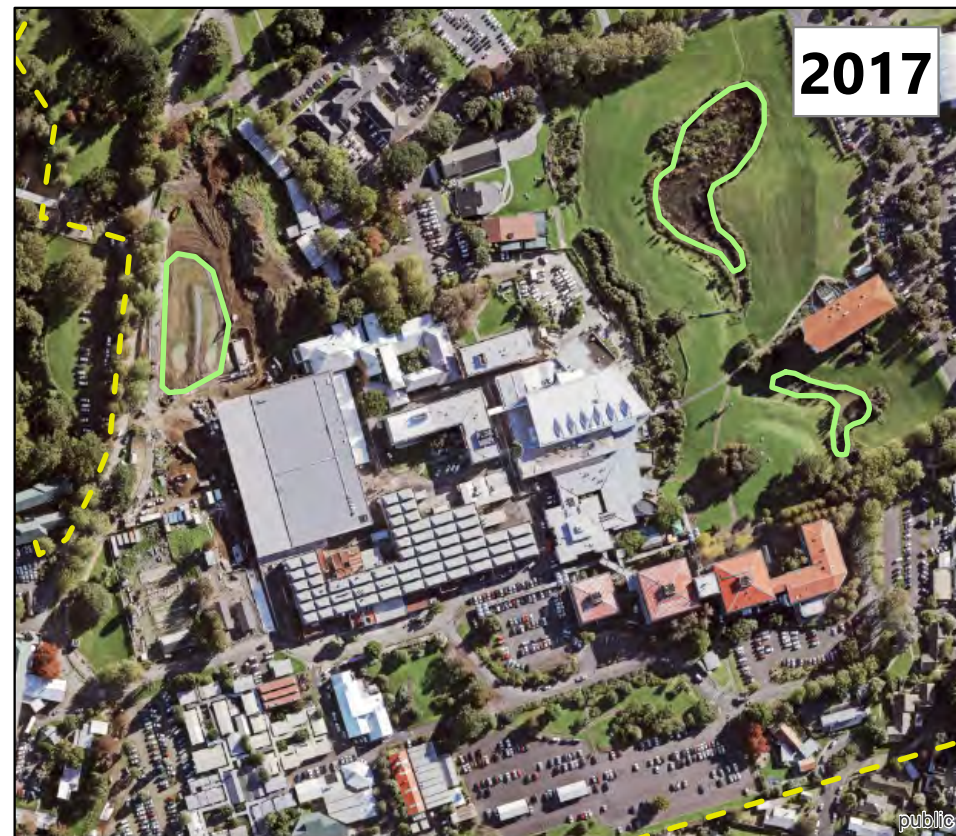
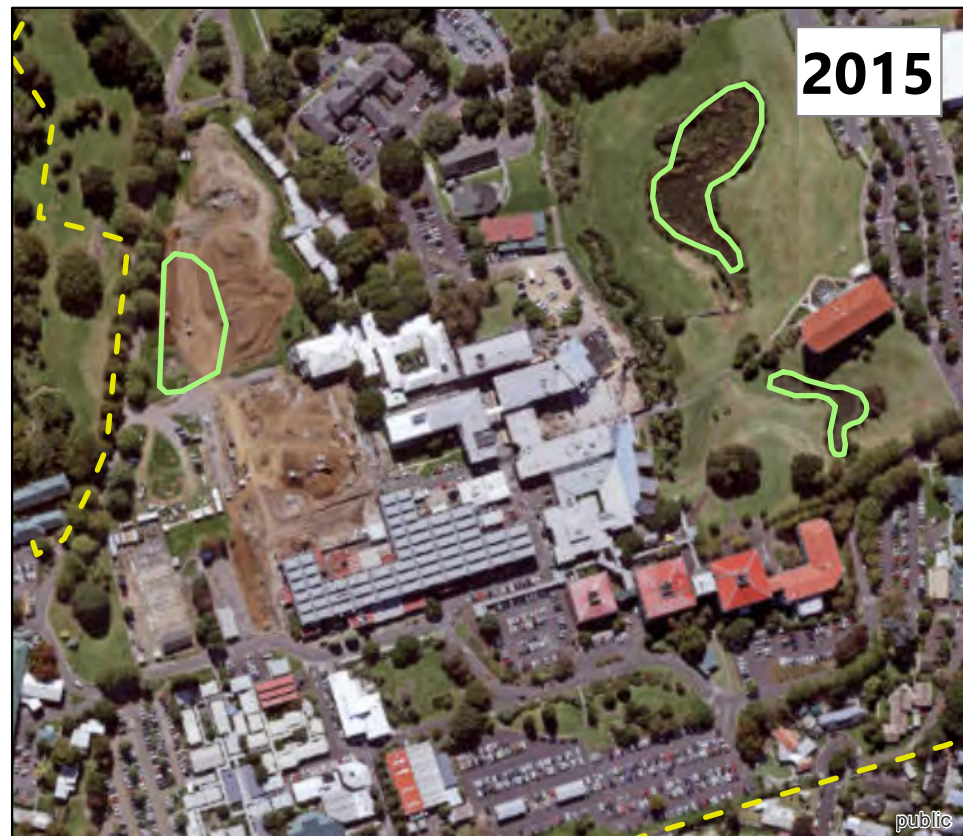
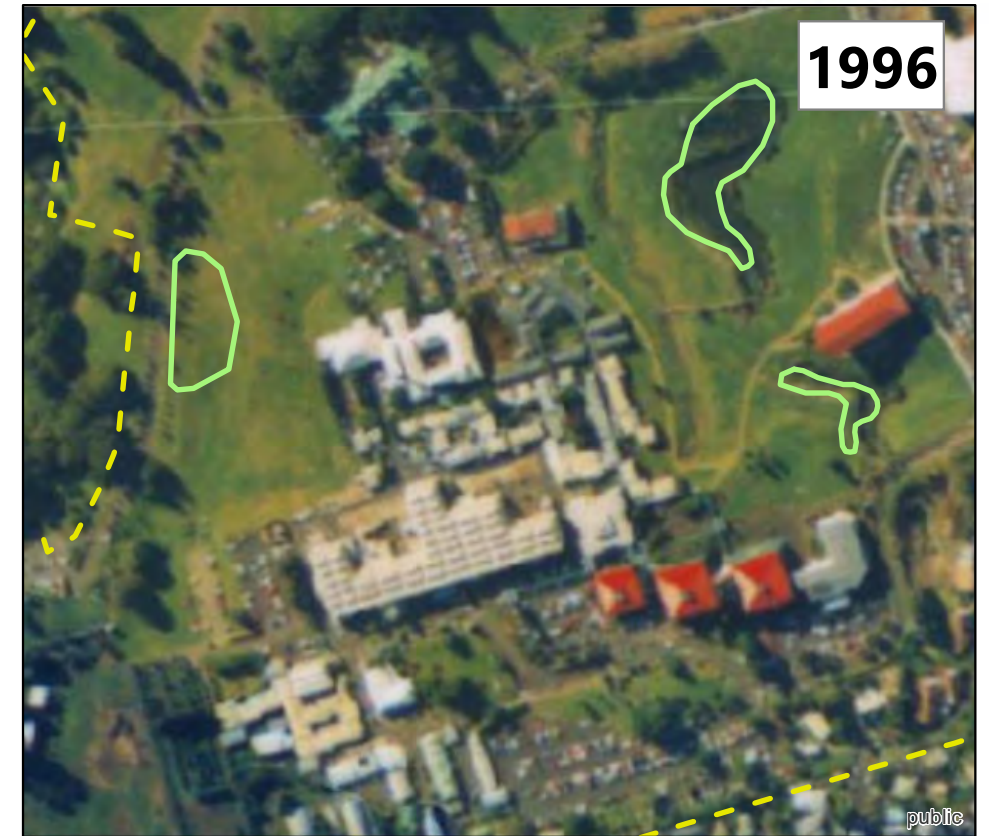
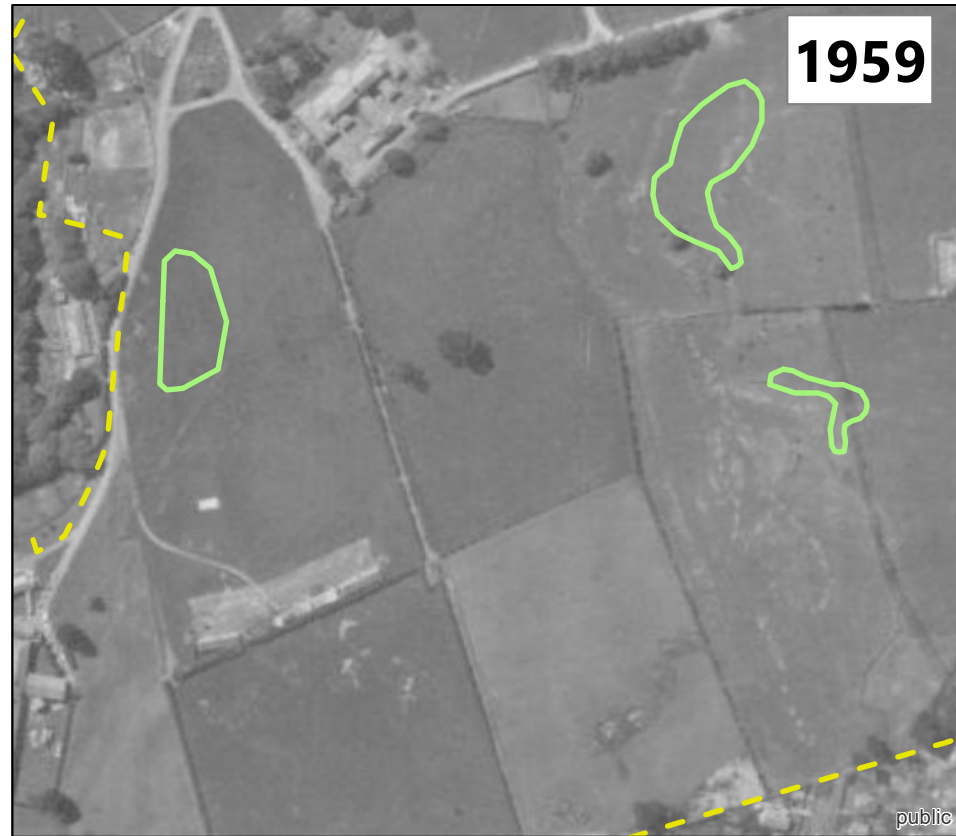
Project no. P02916
Date 4 Apr 2023



Drawn CU
Approved JS

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Appendix 2: Photo-schedule

HISTORIC IMAGERY SHOWING UNITEC WETLANDS



-  Wairaka Site Boundary
-  'Wetlands'

Client **MINISTRY FOR HOUSING AND URBAN DEVELOPMENT**
 Project **TE AUAUNGA**

Project no. P02916
 Date 3 Apr 2023



Drawn CU
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Appendix 3: Ecological Values Assessment

Vegetation Type	EIANZ (2018) Assessment matter	Assessed value	Reasoning
Exotic riparian vegetation	Representativeness	Very Low	Vegetation with typical structure and composition that would be found in a community of exotic trees in urban Auckland. Exotic species dominate.
	Rarity/distinctiveness	Very Low	Common, exotic species commonly encountered in urban Auckland.
	Diversity and pattern	Very Low	A low species diversity of common exotic species
	Ecological context	Low	Although not of individual species merit, the riparian nature of this vegetation provides importance ecological service functions, albeit to a limited degree. Important functions include stepping stone for native fauna moving across the wider landscape and a degree of shade and overland filtration for the streams
	Overall	Negligible	
Native riparian vegetation	Representativeness	Low	Vegetation is not of the typical structure and composition that would be found in a natural vegetation community. Reflects the planted nature of this vegetation and commonality across urban Auckland.
	Rarity/distinctiveness	Moderate	As a myrtle, manuka threat status has been recently revised to 'At Risk', vegetation is not otherwise rare or distinct. Manuka/kanuka scrub has a regional IUCN threat status of least concern.
	Diversity and pattern	Low	Diversity is well below what would naturally have occurred in manuka/kanuka scrub historically and pattern is limited to a single ecotone along the riparian margin

Vegetation Type	EIANZ (2018) Assessment matter	Assessed value	Reasoning
	Ecological context	Moderate	The riparian nature of this vegetation provides importance ecological service functions, albeit to a limited degree. Important functions include stepping stone for native fauna moving across the wider landscape and a degree of shade and overland filtration for the watercourses. Value has increased to reflect the habitat provisioning and foraging opportunities for native fauna
	Overall	Moderate	
Mature mixed canopy	Representativeness	Very Low	The vegetation type here is not reflective of any natural vegetation community.
	Rarity/distinctiveness	Moderate	As a myrtle, pohutakawa threat status has been recently revised to 'At Risk'. The specific species assemblage is of species commonly found throughout Auckland, even in urban environs.
	Diversity and pattern	Very Low	The vegetation communities within the precinct are not considered to represent a natural diversity of species or habitat types.
	Ecological context	Low	The vegetation potentially provide foraging, nesting habitat functions, mainly for disturbance tolerant species, given proximity to road way.
	Overall	Low	

Appendix 4: Bird Records

Table 1: (31/03/2023)

Common name	Scientific name	Threat Status (Robertson et al. 2016)
Species noted previously (2022)		
Australian Magpie	<i>Gymnorhina tibicen</i>	Introduced and naturalised
Common Myna	<i>Acridotheres tristis</i>	Introduced and naturalised
Eurasian Blackbird	<i>Turdus merula</i>	Introduced and naturalised
House Sparrow	<i>Paser domesticus</i>	Introduced and naturalised
New Zealand Kingfisher	<i>Todiramphus sanctus vagans</i>	Not Threatened
North Island Fantail	<i>Rhipidura fuliginosa placabilis</i>	Not Threatened
Pukeko	<i>Porphyrio melanotus melanotus</i>	Not Threatened
Skylark	<i>Alauda arvensis</i>	Introduced and naturalised
Song Thrush	<i>Turdus philomelos</i>	Introduced and naturalised
Spur Wing Plover	<i>Vanellus miles</i>	Not Threatened
Welcome Swallow	<i>Hirundo neoxena neoxena</i>	Not Threatened
Additional records (2023) – Within Wairaka Precinct		
Silverye	<i>Zosterops lateralis lateralis</i>	Not Threatened
Tui	<i>Prosthemadera novaeseelandiae novaeseelandiae</i>	Not Threatened
Goldfinch	<i>Carduelis carduelis</i>	Introduced and Naturalised
Common pheasant	<i>Phasianus colchicus</i>	Introduced and Naturalised
Black-backed gull	<i>Larus dominicanus</i>	Threatened – Nationally Critical
Mallard	<i>Anas platyrhynchos</i>	Introduced and Naturalised
Additional records (2023) – from outside Wairaka Precinct		
Pied shag	<i>Phalacrocorax varius</i>	At Risk - Recovering
White faced heron	<i>Egretta novaehollandiae</i>	Not Threatened
South Island pied stilt	<i>Haematopus finschi</i>	Not Threatened
Red-billed gull	<i>Chroicocephalus novaehollandiae</i>	At- Risk
New Zealand Pigeon	<i>Hemiphaga novaeseelandiae</i>	Not Threatened
Pied stilt	<i>Himantopus leucocephalus</i>	Not Threatened
Little shag	<i>Microcarbo melanoleucos</i>	Not Threatened
*Bar-tailed godwit	<i>Limosa lapponica</i>	At Risk

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Buff-banded rail	<i>Gallirallus philippensis</i>	At Risk – Declining
*Variable oyster catcher	<i>Haematopus unicolor</i>	At Risk - Recovering
*Wrybill	<i>Anarhynchus frontalis</i>	Threatened - Nationally Vulnerable
Harrier hawk	<i>Circus approximans</i>	Not Threatened
Paradise duck	<i>Tadorna variegata</i>	Not Threatened
*Caspian tern	<i>Hydroprogne caspia</i>	Threatened - Nationally Vulnerable
Royal spoonbill	<i>Platalea regia</i>	At Risk – Naturally Uncommon
*White fronted tern	<i>Sterna striata</i>	Threatened – Naturally Critical
*Far eastern curlew	<i>Numenius madagascariensis</i>	Non-resident Native - Vagrant
*New Zealand dotterel	<i>Charadrius obscurus</i>	At Risk – Recovering
Black billed gull	<i>Chroicocephalus bulleri</i>	Threatened – Naturally Critical

*Denotes coastal species unlikely to be found in the plan change area.

Appendix 5: Actively managed vegetation



Figure 1: Pine that would otherwise be considered potential roosts, note scars that have healed over where lower vegetation has been removed.

Appendix 6: NRSI memo

Notification determination and resource consent decision report for a discretionary activity under the Resource Management Act 1991

Subject: To authorise the damming of water with and use of an existing dam on the bed of a tributary of Oakley Creek, Mt Albert for stormwater treatment.

To: Greg Murphy, Team Leader: Water Allocation

From: Stephen Crane, Senior Consents & Compliance Advisor

Date: 12 August 2015

1.0 APPLICATION DESCRIPTION

Application and Property Details

Applicant Name: Unitec Institute of Technology

Consent Application Number: 33526

File Number: 8256

Activity: Discretionary

Site Address/Location: 1 Carrington Road, Mt Albert, Auckland

2.0 PROPOSAL, SITE AND LOCALITY DESCRIPTION

2.1 Reason for application

Consent is required under the Proposed Auckland Unitary Plan (PAUP) rule H.4.17.1 and Rule 6.5.62 in the Auckland Council Regional Plan: Air Land and Water.

The dam does not comply with rules 6.5.52 and 6.5.56 because the catchment area is greater than 40 ha, and although the dam is a stormwater dam in an urban area, it is not required to meet the conditions of a consent to divert and discharge stormwater required under chapter 5 of this plan.

2.2 Proposal and site description

The applicant owns a 51.5 ha property, on the west side of Carrington Road, Mt Albert. The applicant has made an application no. 33526 to replace existing consent no. 8256 (file Kr 928256) to dam water with a 5m high on-stream dam located on a

tributary of Oakley Creek, 530m upstream of the confluence with the main stem, granted in April 1992, and expiring on 31 December 2006. The dam is for a stormwater detention / quality pond and located on Lot 2 DP 406935 (CT 424414).

A full description of the proposal is provided in the application titled Application for Resource Consent to dam surface water, received 7 December 2006 prepared by Glenn Huggard (hereby referred to as the Application Report).

The existing dam has been in place since 1992 however consent for the damming of water expired in 2006. The dam was constructed for demonstration stormwater ponds. The embankment and spillway designs were developed following extensive hydrological analysis of present and future flood flow conditions. The design calculations by Beca Carter Hollings and Ferner dated March 1991 are held on file 8256. Also on file is the report "Maintenance Manual, Carrington Polytechnic Sediment Stormwater Ponds, August 1992" prepared by Beca Carter Hollings & Ferner Ltd.

The dam and impoundment has the following specifications:

The 5m high dam is well finished with a grassed embankment. The dam crest is approximately 3m in width at its maximum height of RL 20.6m. From this point the width of the downstream toe of the dam is approximately 47m to the invert of the downstream watercourse at RL 15.6m. The length of the dam crest is approximately 130m as measured along the length of the pond at its outlet end (eastern). The slope of the downstream embankment is 1V: 10H.

The invert of the 11m wide flood spillway is at RL 20.0m (600mm deep below the dam crest). The invert of the outlet weir to the 1050mm diameter service spillway pipe, and normal pond water level, is at RL 19.5m with 500mm freeboard.

There have been no changes to the dam since its construction in 1992. The original water permit however had calculated the dam height at 3.1m. This measurement was taken from the RL of the outlet pipe and not at the invert of the watercourse to which the pipe structure discharged into. As a result the height of the dam has been recalculated at 5m. The impoundment surface area is 5300 m² and the volume is 7500 m³. The catchment area is 42 ha.

The dam is located on-stream.

A site visit to the dam proposed location was completed by AC sediment control advisor Matt Byrne On 20 July 2009.

2.3 Catchment description

The Oakley Creek catchment is in the AC Waitemata surface water management area. The AC has no surface water allocation management plan for this management area of stream catchments. No minimum flow or water availability for this stream

catchment, or any other stream catchment in the Auckland region, has been set in the Auckland Council Regional Plan: Air, Land and Water 2010.

The Oakley Creek catchment is one of several stream catchments which discharge into the Waitemata Harbour. The Oakley Creek catchment rises to an elevation of 100m at the Hillsborough Road ridge. The western area of the Oakley Creek catchment is comprised of Waitemata Group sandstone while the catchment to the NE of the creek is dominated by basaltic lava flow derived from Mt Albert. The interface of the two lithology generally forms the Oakley Creek stream channel.

All building on the Unitec campus have numbers. The dammed watercourse (with no official stream number) flows northward under the campus Farm Road and to the west of the sports fields, is piped for 100m between buildings 033 and 035, flows through the separate Mason Clinic property of Waitemata Health Ltd, and discharges into the main stem of Oakley Creek at map reference NZTM 1751955mE 5917570mN. The stream is not denoted as Natural Stream Management Area in chapter 3 and maps of the Auckland Council Regional Plan (Air, Land and Water).

The dam impounds the lower of two stormwater detention and quality ponds located on the Unitec campus. The campus site is comprised of office buildings with classrooms with car parks, sports fields and meeting houses / buildings located across the campus. The immediate area surrounding the two ponds is currently moderately sloped banks which are grassed while the ponds themselves have a healthy abundance of native vegetation normally associated with stormwater ponds and wetlands.

The catchment above the ponds is comprised of a residential area of Mt Albert running back up to New North Road at 50m above msl. Piped stormwater from parts of this area is reticulated and discharged at the head of the ponds. Additional stormwater from the surrounding campus roads, buildings and pervious areas also contribute to pond flows.

The area of the catchment where the dam and stormwater ponds were constructed comprises basalt overlain by alluvium. Alluvial material from the stream channel was removed prior to construction of the dam.

The dam discharges water to the remaining stream channel which, when studied during the site visit, was approximately 1m wide with an average depth of 0.3m. Flows observed during the site visit 20 July 2009 were abundant with the visual colour and clarity of the stream appearing good. The stream from the discharge point of the dam meanders through the campus and is occasionally piped beneath road crossings and campus buildings. Its length from the dam to the receiving environment of Oakley Creek is approximately 530m.

There is another small unnamed stream (also with no official stream number), flowing through a small part of the Unitec campus, that arises at a spring known as Te Wai Unuroa o Wairaka (The long drink of Wairaka) located at map reference NZTM

1752255mE 5917000mN adjacent to Building #180. The spring fed stream discharges into the dammed stream about 200m downstream of the spring source.

Fig 1 Oakley Creek and Dam site



The Unitec e-Learning site provides the following information about the spring which is of significance to iwi: "The numerous subterranean streams and tunnels around the Mt Albert region and extending to Riu ki Uta (Three Kings) was known as the Ara Tomo O Ruarangi (tunnel entrance of Ruarangi) and was used extensively by a people known as Turehu (a supposed light skinned race who came early to Aotearoa) or Patupaiarehe to escape from their enemies.

When Mataatua canoe made its way north from Whakatane with Puhi in command, they made landfall near the Whau River. With him was his younger brother, priestly sister Muriwai and niece Wairaka. Wairaka was already famous when she acted

quickly and saved the Mataatua canoe from the rocks at the mouth of the Whakatane River. Before swimming out to the canoe, she uttered the statement Kia whakatane au i ahau (let me act like a man) hence the name, Whakatane. Wairaka's home here was Te Pou of Wairaka, now known as Owairaka or Mt Albert. Wairaka's people stayed on here and intermarried with the people of Rakataura (Tainui) and Ohomairangi (Te Arawa).

Springs surfaced everywhere around Mt Albert, including the spring that gushes out on campus. When Wairaka was thirsty, she demanded water and stamped her foot on the ground. Fresh water gushed out of the ground. This spring is known as Te Wai Unuroa o Wairaka (The long drink of Wairaka). Some iwi refer to Rakataura as being the rangatira who led the 'Turehu' people at the time, whilst others refer to Ruarangi. Regarding nga wai unuroa o Wairaka (the long drink of Wairaka) – the ancestress from Ngati Awa, some iwi refer to Nga wai o Raka-taura (the waters of Rakataura).

The spring here on campus was highly valued for drinking and for the rituals of thanks-giving and ceremonials. It offered relief to the sick, as well as for healing, bathing, irrigation and was a constant provider of food. To locate the spring follow the stream past the Marae, Puukenga, and Red Lecture Theatre. The spring lies just past the bridge that spans the stream”.

Stream flows

Stream minimum flows, dam bypass flows, and water availability are commonly expressed in terms of the stream mean annual low flow (MALF or $Q_{2.3}$). This is the flow that the stream would naturally recess to on average only once every 2.3 years. It is calculated from an analysis of continuous long term flow records at a site, often measured with a weir. The MALF and other flow statistics in stream catchments with few flow records can be assessed from comparison with other catchments that do have such long flow records. The specific discharge (SD) is the flow per unit area of catchment expressed in litres per second per square kilometre ($l/s/km^2$). It can be used to predict flows in other stream catchments.

There is no regular summer manual flow gauging site on the stream that runs through the Unitec campus site. Determining a MALF for the stream requires reference to records from other streams. Stream flow specific discharges tend to reflect the underlying geology. The surface geology of the dam catchment comprises Mt Albert basalt flows. On the main stem of Oakley Creek there is the AC Oakley Creek @ Richardson Rd continuous flow measuring site with a catchment area of $6.2 km^2$. The site was installed in September 2012. With such a short flow record it is not possible to calculate an accurate MALF from the record.

There is also a flow site Meola @ Motions Rd on the adjacent Meola Creek with a catchment area of $12.9 km^2$. The MALF for this site is 41 l/s and MALF specific discharge $SD_{2.3}$ $3.2 l/s/km^2$. The flow at this site recessed to the MALF about 18 to 24 February and 6 to 14 March 2014. The concurrent flow at AC Oakley Creek @ Richardson Rd site in these periods was about 25 l/s. This suggests that the MALF

for this site is about 25 l/s and MALF specific discharge $SD_{2,3}$ for the 6.2 km² catchment area is 4 l/s/km².

There will be infiltration from the basalt geology catchment into the stormwater pipes upstream of the applicant's dam in summer conditions. The catchment area at the applicant's dam site is 0.42 km², and the natural mean annual low flow, based on a specific discharge of 4 l/s/km², is therefore estimated as 1.7 l/s.

2.4 Background

In 1992, the Auckland Regional Council (ARC) granted consent for a Water Permit to Carrington Polytechnic (Unitec Institute of Technology) to dam an unnamed tributary of the Oakley Creek, Mt Albert. The purpose of the water permit was to create a dam associated with the creation of two stormwater quality / detention ponds at the Carrington Polytechnic campus. This water permit expired on 31 December 2006. Associated consents are stormwater discharge no. 8257 (file Br 928246) and streamworks no. 28690 (file Lu 17268).

In August 2006, Unitec applied for a replacement consent to authorise the existing dam. After a lengthy correspondence period, a site visit was undertaken by representatives of the then ARC on 20 July 2009, in order to assess the existing stormwater ponds and the dam structure. Further assessment of an associated stormwater discharge permit no.8257 (file 928246) which expires 31 December 2027, was also undertaken in order to assess the appropriateness of granting a replacement consent for the existing damming of water.

A comprehensive stormwater discharge consent no. 24973 (file 10752) was granted in June 2001 for the whole Oakley Creek catchment, and expires December 2032.

2.5 Other activities considered

There are no other activities being considered with this application.

3.0 NOTIFICATION ASSESSMENT

3.1 Assessment of permitted baseline

The permitted baseline only applies to permitted activities on the subject site. If the baseline is applied, then the relevant permitted baseline is ACRP:ALW Rule 6.5.52 "The damming of water with an existing dam as at 23 October 2001 on the bed of a permanent stream subject to conditions including that the dam structure shall be no greater than 4m in height and catchment no greater than 40 ha".

This constitutes the permitted baseline and these adverse effects may be discounted as the level of adverse effect arising from those permitted activities has been deemed to be acceptable. It is only any other or further adverse effects arising from the proposal over and above the permitted baseline which are to be assessed.

The dam has a catchment area of 42 ha and crest height of 5 m, and is therefore greater than the permitted activity. Most water in a dam is held in the top 1-2m. Due to the potential of this dam impoundment to hold a substantially greater amount of water, and the potential complexity of effects associated with the proposed activity, the permitted baseline does not provide a useful comparison for the purpose of discounting effects.

3.2 Assessment of effects on the environment Section 95(2)(a)

The following assessment of the adverse effects of the activity on the environment addresses the activity's actual and potential effects, and any mitigating factors. Where appropriate the assessment criteria of the Auckland Council Regional Plan: Air, Land, Water (ACRP:ALW) policy 6.4.42 and 6.4.45 regarding damming water are used as the context for assessing the potential adverse environmental effects arising from the proposal. The stream at the dam location has permanent flow and so the dam is an on-stream dam.

Values of Oakley Creek

In terms of chapters 2 and 3 of the ACRP:ALW values and management Areas, the Oakley Creek stream does not have any Wetland management areas; and is not a Natural Stream, Water Supply or High Use Stream Management Area. It is an Urban Stream management area.

Effects on fish passage

Dams pose barriers that can prevent fish from accessing habitat necessary for specific life-cycle stages.

There is currently poor fish passage into the ponds as there is a vertical concrete wall constructed as part of the pond's outlet structure. It is expected however that limited fish passage is available to some native climbing species since fish passage from Oakley Creek to the discharge outlet of the pond appears suitable.

Fish passage on this dam is not required since, although there is a large catchment, there is no length of permanent stream upstream of the dam impoundment. There is no habitat upstream of the dam because it is fed by reticulated stormwater. A stormwater pipe discharges just upstream of the dam. While the dam impoundment is poor quality fish habitat, the stream downstream would provide better habitat.

Effects on stream flows, habitat and water quality

Damming water can reduce water levels and change flow regimes (including the natural flow variability) downstream. These changes can result in: an increase in the frequency and duration of low flows; poorer water quality including decreased dissolved oxygen concentrations and increased stream water temperatures; and a

reduction in available in-stream habitat, including that attributable to the drowning or inundation of the section of stream behind the dam.

Passing of low flows is required due to the moderate habitat quality of the main stem of Oakley creek. Based on the 42 ha dam catchment area, and a mean annual low flow specific discharge for the Oakley Creek catchment of 4 l/s/km², the mean annual low flow is therefore estimated as 1.7 l/s.

No water is taken from the dam, and so maintaining the service spillway will suffice for passing low flows, since water that flows into the impoundment also flows out and downstream less any evaporation and seepage loss. There are no surface water take consents or other dams in the stream catchment.

Therefore a bypass flow of all natural inflow is required. This may be achieved by flow through the service spillway.

The dam has been in existence for approximately 21 years and the current wetland plantings that occupy the margins of the stormwater quality / detention pond provide adequate shading. The dam's margins wide sward of native plants adds to the visual amenity of the property, as well as providing habitat for bird life. It is considered that the dam does not create a negative impact on the surrounding properties amenity values.

Effects on dam safety, flooding, erosion and drainage

The damming of water carries with it a risk that the dam will fail, with potential damage to the downstream environment, including freshwater ecosystems, property, people, communities and infrastructure. The maintenance and enforcement of standards on dam design, construction, operation and maintenance will reduce the risk of dam failure. The dam hazard category was determined using the Dam Safety Guidelines (TP109, ARC, 2000). The ARC dam hazard category is "Low". Monitoring and management of the dam structure will avoid any effects of the dam caused by potential structural failure.

The applicant has provided details of the monitoring and maintenance program that is regularly carried out on the dam. Provided this monitoring and maintenance program continues to be administered, no further measures to avoid, remedy or mitigate adverse effects are considered necessary.

There are no downstream wetlands to be affected. The watercourse downstream of the dam to Oakley Creek is almost wholly contained on the Applicants property. The dam is fed by reticulated stormwater from the contributing catchment. There is no open stream above the dam. Overflow travels downstream through an unnamed tributary of the Oakley Creek for approximately 530m before discharging into the main stem (stream no. 081200) of the Oakley Creek at the property boundary.

A visual inspection of the downstream environment was undertaken on 20 July 2009 and at that time no adverse effects on the stream channel as a result of the dam were

noted. The damming of surface water within the pond attenuates upstream flows and provides regularly managed flows into the stream channel below the dam. The outflow from the dam discharges via a 1050mm diameter culvert onto a concrete apron and rip rap. Based on visual observation of the channel downstream of the dam, it is considered that the present scenario does not result in channel geomorphology effects that are more than minor.

Conclusion

With regard to the above criteria, consideration must be given to the fact that the existing dam has been in place for 21 years. A healthy margin of native riparian vegetation has established along the banks of the dam's associated stormwater pond and wetland type plants have also established within the ponds. The stormwater ponds attenuate up-catchment flows and when available, provide for continuous flows to the downstream environment. While fish passage is not ideal, some passage is available, albeit limited to climbing species. Furthermore, given the dam's existing state, it is not considered practicable to include any requirements for installation of a low flow by-pass structure, to require decommissioning or removal of the dam, to require any financial contributions or to require any other mitigation measures.

The current application for a replacement consent does not propose to alter in any way the dam, its associated structures or the stormwater quality / detention ponds.

It is considered that any actual or potential adverse effects of the proposed activity on the environment as identified above will be less than minor. This conclusion is based on undertaking the proposed measures to ensure that the dam operation meets current standards for dam safety, and passing of low flows is implemented, to avoid, remedy or mitigate potential effects in accordance with the application documents and subject to adherence with the recommended conditions of consent.

3.3 Request or rule: Sections 95A to 95E

Pursuant to Section 95A(2)(b), (c), and (3)(a), the applicant has not requested public notification and no National Environmental Standard or rule in the Regional Plan requires or precludes public or limited notification.

Pursuant to Section 95A(4) there are no special circumstances to warrant public notification.

Pursuant to Section 95C(2) and (3) further information as requested was provided by the set deadline, and a report was not commissioned.

3.4 Identification of affected parties

Pursuant to section 95E it is determined that no other persons are considered adversely affected by the activity.

There is a small unnamed stream (also with no official stream number), flowing through a small part of the Unitec campus, that arises at a spring known as Te Wai Unuroa o Wairaka. The spring is of significance to iwi. The dam is not located on, and will not affect this spring-fed tributary.

A low flow bypass condition is included to ensure that the damming does not cause cumulative effects on the receiving environment.

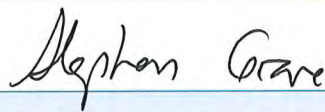
The stream discharges into the flat floodplain of an open grassed park-like grounds of the Unitec campus, immediately downstream of the dam on the applicant's own property. There are no buildings or structures in this immediate area, other than those of the applicant. The property of Waitemata Health Ltd is 400m downstream of the dam. No other person will be adversely affected by the application to dam water with the on-stream dam. Therefore written approvals were not required from any person by the Council.

3.5 Recommendation on notification

It is recommended that this application be processed on a non-notified basis because:

- The adverse effects on the environment of the activity for which consent is sought will be no more than minor.
- There are no persons considered adversely affected by the granting of this consent.
- The applicant has not requested public notification and no National Environmental Standard or rule in the Regional Plan requires public or limited notification.

Stephen Crane



Senior Consents and Compliance Advisor, Natural Resources and Specialist Input, Resource Consents.

Date:

12/8/2015

3.6 Notification determination

Acting under delegated authority, and for the reasons set out in the above assessment and recommendation, this application shall be processed on a non-notified basis.

Andrew Benson

AP Benson

**Team Manager: Water
Natural Resources and Specialist Input, Resource Consents**

Date:

13 / 8 / 15

4.0 ASSESSMENT OF APPLICATION

4.1 Assessment of effects on the environment: Section 104(1)(a)

The assessment of adverse effects undertaken for the purpose of the notification decision concluded that adverse effects were no more than minor. That assessment is also relevant for the purpose of the assessment required under s104(1)(a). In addition the following positive environmental effects have been identified: the damming of water provides stormwater treatment for the applicant's property and upstream.

4.2 Statutory considerations: Section 104(1)(b)

Auckland Council Regional Plan : Air Land and Water

The following objectives and policies of the Auckland Council Regional Plan (Air, Land and Water) are considered relevant to the damming of water: 6.3.2, 6.3.5, 6.3.7, 6.4.1, 6.4.2, 6.4.40, 6.4.42, 6.4.45, and 6.4.47.

Comments

With adequate mitigation the proposal will not have more than minor adverse effects on the environment. Policy 6.4.42 and 6.4.45 sets out appropriate mitigation for damming proposals. In this case, passing of low flows, and dam maintenance measures are considered as appropriate required mitigation. Financial contributions and further wetland creation are not considered appropriate in this case. Dam removal is not considered necessary.

The proposal is consistent with maintaining the stream natural values. The effects of the dam on fish passage upstream are minor because, although there is a large catchment, there is no length of permanent stream upstream of the dam impoundment. There is no habitat upstream of the dam because it is fed by reticulated stormwater. A stormwater pipe discharges just upstream of the dam.

The dam was specifically designed for a stormwater detention / quality pond, and will therefore enhance the water quality in the Oakley Creek stream.

Sufficient flow will be passed down the service spillway pipe to attract and allow passage of fish up into the dam impoundment. The dam is designed to improve

rather than reduce water quality down-stream of the dam. It is not proposed that there be new tall riparian vegetation on the stream downstream of the dam since that would not be consistent with the open grassed park-like grounds of the Unitec campus.

Maintenance of downstream flow regimes will be provided for, due to the consent condition requirement to pass low flows through the service spillway pipe, and that no water is being taken from the dam. There are no downstream lawful water users to be adversely affected.

It is therefore considered that there is no unmitigated impact on the natural character of the environment or effects on flora and fauna. The proposal is consistent with Tangata Whenua values identified in the Regional Plan.

One of the matters that applications for damming shall be assessed against (policy 6.4.42 (f) and 6.4.45(d)) is remedial measures and ongoing operation and maintenance to ensure those dams' safety performance standards are being met. The dam structure has been inspected by engineers who report that the dam overall hazard rating is low. No dam remediation (repairs) are required, although ongoing maintenance and monitoring are required by the recommended consent conditions 8 to 12 to minimise the potential for the dam to be a safety concern.

The recommended monitoring is consistent with the hazard rating for the dam. Flooding as a result of the structure is not considered to be an issue. Bed aggradation or impeded drainage on adjacent properties is unlikely. This dam application is being considered individually, since there are no cumulative effects of other existing dams in the catchment.

Land instability/bank erosion is not a concern. The dam is not expected to have effects more than minor on hydrological flows or water quality, subject to implementing mitigation. Therefore there would be no more than minor adverse effect on people, communities or habitat. No wetlands have been identified in the vicinity of the dam. A review condition is recommended in line with policy 6.4.44.

There were no adverse effects on any wetland, wāhi tapu or archaeological site.

It is concluded that the proposed activity is consistent with the provisions of the ACRP: ALW, subject to compliance with the recommended conditions of consent. In particular it is noted that the dam design, construction, operation and maintenance, has been addressed through conditions. Sufficient water will be retained in the natural water body to protect instream values, tangata whenua traditions (e.g. mahinga kai) and natural character and amenity values.

Consideration of the provisions of the Proposed Auckland Unitary Plan (PAUP)

For the damming of surface water and use of a dam on the bed of rivers and streams, the relevant objectives and policies of the Proposed Auckland Unitary Plan

(PAUP) are contained in Part 2, Chapter C, Sub section 5.15.2 – Water quantity, allocation and use, Policies 11 to 16; Part 2 Chapter E Sub section 7.3 - Overlay objectives and policies High Use Stream and Natural Stream Management Areas, and Part 5 Appendix 5.2 Table 1 River and stream minimum flow and availability. The relevant regional rules are contained in Part 3 Chapter H: Natural Resources sub section 4.17- Taking, using, damming and diversion of water and drilling.

In summary, the intent of the policies of the PAUP is quite similar to those of the ACRP: ALW.

Overall, I have applied greater weight to the operative plan provisions in my assessment.

Other statutory documents

An assessment has been undertaken of the proposed activity against the relevant provisions of the:

- National Environmental Standard
- National Policy Statement: *Freshwater Management 2011*
- Auckland Council Regional Policy Statement
- Proposed Auckland Unitary Plan.

It is concluded that the proposed activity is consistent with the relevant provisions of the plans and policy statements, subject to compliance with the recommended conditions of consent.

4.3 Other relevant matters: Section 104(1)(c)

There are no other matters considered relevant and reasonably necessary to determine the application.

4.4 Consideration of Part 2 matters

Policy to address the potential adverse effects of damming water on a permanent stream have been set in the ACRP: ALW. Consultation was undertaken with Iwi in the development of this Plan. As the proposed mitigation is consistent with the Plan policy, it is concluded that the proposal will not adversely affect matters of national importance, including the relationship of Maori with the water resources under s 6(e).

As the adverse effects of the proposed activity on the environment can be satisfactorily avoided, remedied or mitigated, and as the proposal is consistent with and not contrary to the statutory direction, it is concluded the proposal meets the purpose and principles of the RMA and is a sustainable 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 wellbeing

and 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.

Having considered the Matters of national importance, Other matters, and the requirement to take into account the principles of the Treaty of Waitangi, it is concluded that the proposal will not adversely affect any of those matters.

4.5 Duration of consent: Section 123

Policy 6.4.13 of the ACRP: ALW provides for the setting of concurrent duration and review dates of consents within a catchment or aquifer, to allow management of water damming, takes and discharges in an integrated manner. The applicant did not did not apply for a specific duration of consent.

Most of the related water take consents in the same AC Auckland Isthmus surface water management area expire in 2021 and will likely be replaced with a term of 15 years to expire in 2036. It is considered appropriate to set a term of 21 years for this consent so that the expiry date will be consistent with the future 2036 expiry date of other surface water consents in the same management area.

A term of 21 years is considered an appropriate balance between the likelihood of change in the activity and water requirements over the term of consent, and the need to provide security of tenure to reflect investment in infrastructure.

The consent will therefore expire on 31 May 2036 with provision to review the conditions in June 2016 and at not less than five yearly intervals thereafter. This recommendation is made in accordance with policy 6.4.13 of the ACRP: ALW. The review condition allows the AC to take into account a range of information, including results of previous monitoring and changed environmental knowledge, in determining whether or not the conditions of consent should be changed.

5.0 RECOMMENDATION

5.1 Adequacy of information:

The above assessment is based on the information submitted as part of the application. It is considered that the information submitted is sufficiently comprehensive to enable the consideration of the above matters on an informed basis:

- a. The level of information provides a reasonable understanding of the nature and scope of the proposed activity as it relates to the relevant district and/or regional plan.
- b. The extent and scale of any adverse effects on the environment are able to be assessed.
- c. Persons who may be adversely affected are able to be identified.

5.2 Recommendation

It is recommended that pursuant to Sections 104, 104B, and 108 of the RMA, consent is granted to the discretionary activity application by Unitec Institute of Technology to dam water with and use an existing dam on the bed of a tributary of Oakley Creek, Mt Albert for stormwater treatment at 1 Carrington Road, Mt Albert, Auckland being consent application 33526.

The reasons for this decision are as follows:

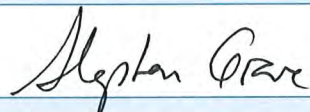
1. It is considered that the overall adverse effects on the receiving environment are no more than minor. Subject to the imposition of conditions, the effects can be further avoided, remedied or mitigated.
2. The proposal is considered to be consistent with the relevant provisions of the NES, Regulations, NPS, ACRPS, ACRP:ALW, PAUP, and in particular, the integrated management of the Region's natural and physical resources.
3. The proposal will be consistent with Part 2 of the Resource Management Act 1991 by promoting the sustainable management of natural and physical resources. Overall it is considered that the cumulative safeguards of Section 5(2)(a) to (c) have been met and the proposal thereby meets the purpose of the RMA.

5.3 Conditions

Recommended conditions of consent are provided following the draft Reason for decision.

5.4 Report by:

Stephen Crane



Senior Consents and Compliance Advisor, Natural Resources and Specialist Input, Resource Consents.

Date:

12/3/2015

RESOURCE CONSENT 33526 SECTION 104 AND 108 DECISION

Application Description

Consent to dam water

Application and Property Details

Consent Holder: Unitec Institute of Technology

Consent Application Number: 33526

File Number: 8256

Site Address: 1 Carrington Road, Mt Albert, Auckland

Legal Description: Lot 2 DP 406935

DECISION UNDER DELEGATED AUTHORITY

Acting under delegated authority pursuant to Sections 104, 104B and 108 of the RMA, consent is granted to the discretionary activity application by Unitec Institute of Technology to dam water with and use an existing dam on the bed of a tributary of Oakley Creek, Mt Albert for stormwater treatment.

Signed under Delegated Authority

Andrew Benson



**Team Manager: Water
Natural Resources and Specialist Input, Resource Consents**

Date:

13 / 8 / 15

Reasons for this decision

The reasons for this decision are as follows:

1. It is considered that the overall adverse effects on the receiving environment are no more than minor. Subject to the imposition of conditions, the effects can be further avoided, remedied or mitigated.
2. The proposal is considered to be consistent with the relevant provisions of the NES, Regulations, NPS, ARPS, ACRP: ALW, PAUP, and in particular, the integrated management of the Region's natural and physical resources.
3. The proposal will be consistent with Part 2 of the Resource Management Act 1991 by promoting the sustainable management of natural and physical resources. Overall it is considered that the cumulative safeguards of Section 5(2)(a) to (c) have been met and the proposal thereby meets the purpose of the RMA.

CONDITIONS

Pursuant to Section 108 of the RMA, this consent shall be subject to the following conditions:

General conditions

Activity in accordance with plans

1. The damming of water with and use of an existing dam on the bed of a tributary of Oakley Creek, Mt Albert on land legally described as Lot 2 DP 406935 (C.T. 414414) for stormwater treatment shall be carried out in accordance with the plans and all information submitted with the application, detailed below and all referenced by Council as Resource Consent Application 33526.

All charges paid

2. This consent (or any part thereof) shall not commence until such time as the following charges, which are owing at the time the Council's decision is notified, have been paid in full:
 - (a) All fixed charges relating to the receiving, processing and granting of this resource consent under section 36(1) of the Resource Management Act 1991 (RMA); and
 - (b) All additional charges imposed under section 36(3) of the RMA to enable the Council to recover its actual and reasonable costs in respect of this application, which are beyond challenge.
3. The consent holder shall pay any subsequent further charges imposed under section 36 of the RMA relating to the receiving, processing and granting of this resource consent within 20 days of receipt of notification of a requirement to pay the same, provided that, in the case of any additional charges under section 36(3) of the RMA that are subject to challenge, the consent holder shall pay such amount as is determined by that process to be due and owing, within 20 days of receipt of the relevant decision.
4. The consent holder shall pay the council any further monitoring charge or charges to recover the actual and reasonable costs incurred to ensure compliance with the conditions attached to this consent/s.

Advice Note:

The initial monitoring charge is to cover the cost of inspecting the site, carrying out tests, reviewing conditions, updating files, etc., all being work to ensure compliance with the resource consent. In order to recover actual and reasonable costs, inspections, in excess of those covered by the base fee paid, shall be charged at the relevant hourly rate applicable at the time. The consent holder will be advised of the

further monitoring charge or charges as they fall due. Such further charges are to be paid within one month of the date of invoice. Only after all conditions of the resource consent have been met, will the council issue a letter confirming compliance on request of the consent holder.

Access to property

5. That the servants or agents of the Council shall be permitted access to the relevant parts of the property at all reasonable times for the purpose of carrying out inspections, surveys, investigations, tests, measurements or taking samples.

Specific conditions dam water consent 33526

Term of consent / duration

6. The damming of water permit 33526 shall expire on 31 May 2036 unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

Works

7. The dam shall be constructed and maintained in accordance with the following dimensions and standards:
 - A 5 metre high earth fill dam, crest length 130 metres, crest width 3 metres.
 - A maximum impoundment surface area of 5300 square metres and approximate impoundment volume of 7500 cubic metres.
 - Flood spillway trapezoidal shape 11 metres wide base and 0.60 metres freeboard below dam crest.
 - A flood spillway capable of safely passing a 1% Annual Exceedance Probability (AEP) flood flow with minimal damage to the flood spillway.

Significant remedial works

8. In the event of any significant remedial works being required as a result of damage or safety improvements to the dam, spillways, low flow bypass or fish passage, then works shall be completed as soon as possible. Within 20 working days of completion of the remedial works a certificate from a suitably qualified engineering professional shall be supplied to the Team Leader Consents and Compliance – Water Allocation certifying that the engineer has supervised the remedial works, that the works have been satisfactorily completed and that the design intent of the remedial works have been met.

Advice Note:

Other consents such as stream works consents may be required before any remedial works can be undertaken. In addition, there may be other regional or district plan provisions that may apply – for example sediment control measures in the Proposed Auckland Unitary Plan and Regional Plan: Sediment Control. It is the Consent

Holder's responsibility to determine what other consents are required and to obtain these before undertaking any works.

Passing of Low Flows

9. All natural dam inflow shall be passed downstream of the dam at all times.

Dam safety and maintenance

10. The dam, spillways, low flow bypass and associated structures shall be operated and maintained to ensure that, at all times, they are structurally sound, pose no undue risk to human life, property, or the natural environment, and are able to perform satisfactorily to their approved design standard.

Advice Note:

Tasks associated with the maintenance of the dam include those necessary to minimise damage (including wave lap, vegetation and stock management), scour, and erosion along with any structural maintenance of the dam and associated facilities. Trees or large vegetation can weaken the structural stability of the dam, create seepage pathways and impede visual inspection and hence should not be allowed to grow on the dam. If the crest of the dam is to be used as a stock race, then the dam will need protecting with suitable measures such as covering the crest of the dam with gravel, fencing the sides of the crest, and diverting stormwater away from the upstream and downstream dam faces.

Dam Inspection

11. The dam, spillway, low flow bypass and associated structures shall be inspected at six monthly intervals and during/after extreme weather events in accordance with the "Maintenance Manual, Carrington Polytechnic Sediment Ponds, prepared by BCH&F Ltd, August 1992" and Check Sheet appended to that manual.

Advice Note:

A sample inspection sheet is attached in Appendix 1 of this consent to provide guidance to the Consent Holder as to the type of matters that should be addressed when an inspection is carried out. Inspections by a suitably qualified engineering professional should be undertaken if there are any significant changes to the dam, spillways, low flow bypass or associated structures.

Professional Dam Inspection

12. The dam, spillway, low flow bypass and associated structures shall be inspected by a suitably qualified engineering professional in 2020 and 2030 to check the structural integrity and functioning of the dam and associated structures, and to advise on any upgrade or maintenance works that are required. A copy of the inspection report is to

be provided to the Team Leader Consents and Compliance Water Allocation within 30 days of the inspection.

Five Yearly Report

13. A report (including photographs) shall be submitted to the Team Leader Consents and Compliance Water Allocation by 30 June 2020 and subsequently at intervals of not more than five years thereafter. The report shall contain: Inspection records of the dam, low flow pass and other associated structures; Any maintenance works carried out during the previous five years and plans for any future works.

Review

14. Pursuant to Section 128 of the RMA, the conditions of this consent may be reviewed by the Team Leader at the Consent Holder's cost:
- (a) In June 2016 and subsequently at intervals of not less than five years thereafter in order to:
 - (i) deal with any adverse effect on the environment which may arise or potentially arise from the exercise of this consent and which it is appropriate to deal with at a later stage or
 - (ii) vary the operating, monitoring and reporting requirements, mitigation measures and performance standards in order to take account of information, including the results of previous monitoring and changed environmental knowledge, on: water flow and level regimes, including bypass flow requirements; water quality; instream biota, including the functioning of aquatic ecosystems and fish passage; dam safety performance;
 - (b) In the case of a coastal, water or discharge permit, to provide compliance with rules in any regional plan relating to use of water, water or air quality etc. (refer section 128(1)(b) of the RMA) that have been made operative since the commencement of consent.
 - (c) In the case of a coastal, water or discharge permit, to provide compliance with any relevant National Environmental Standard that has been made since the commencement of consent.
 - (d) At any time, if it is found that the information made available to the council in the application contained inaccuracies which materially influenced the decision and the effects of the exercise of the consent are such that it is necessary to apply more appropriate condition.

Appendix 1: Example Routine Visual Inspection Checklist for an Embankment Dam

Item No.	Description	Observation/Comment
E1	Record reservoir level (e.g. metres above mean sea level)	
E2	Is there reservoir shoreline instability or erosion?	
E3	Is the upstream face showing any erosion, instability, depression or cracking?	
E4	Is the dam crest showing any deformation, misalignment, depressions or cracking?	
E5	Is the left abutment showing any instability or seepage, including where the dam embankment contacts with the abutment?	
E6	Is the right abutment showing any instability or seepage, including where the dam embankment contacts with the abutment?	
E7	Is the downstream face showing any instability, deformation, depression, cracking or seepage?	
E8	Is the dam toe showing any erosion or seepage?	
E9	Measure the total dam seepage (e.g. time to fill 1 litre container, or mm head over a 90 degree v-notch weir)	
E10	Is the service or flood spillway entrance obstructed? Is the spillway, including the outlet, damaged or eroded?	
Other Comments and Observations (e.g. unusual events since last inspection, vegetation issues, operating issues etc).		

ADVICE NOTES

1. The consent holder shall obtain all other necessary consents and permits, including those under the Building Act 2004, and the Historic Places Trust Act 1993. This consent does not remove the need to comply with all other applicable Acts (including the Property Law Act 2007), regulations, relevant Bylaws, and rules of law. This consent does not constitute building consent approval. Please check whether a building consent is required under the Building Act 2004. Please note that the approval of this resource consent, including consent conditions specified above, may affect a previously issued building consent for the same project, in which case a new building consent may be required. If not all resource consents have been applied for, it remains the responsibility of the consent holder to obtain any and all necessary resource consents required under the relevant requirements of the Resource Management Act 1991.
2. If you disagree with any of the above conditions, or disagree with the additional charges relating to the processing of the application you have a right of objection pursuant to Sections 357A or 357B of the RMA. Any objection must be made in writing to Council within 15 working days of notification of the decision.
3. Section 138 RMA specifies the conditions relating to surrender of a resource consent. A consent authority may refuse to accept the surrender of part of a resource consent where that may: affect the integrity of the consent; affect the ability of the consent holder to meet other conditions of the consent; or lead to an adverse effect on the environment. There also remains some liability to the person surrendering the resource consent under (3)(a) and (b) of this section. This liability relates to breaches of conditions of consent occurring before surrender and to the completion of work required to give effect to the consent. The Council would be unlikely to allow the surrender of this consent under section 138(2)(c) without supporting information indicating that no on-going risk was posed to human health and safety, or the environment. The consent holder is advised that before the consent can be surrendered, the dam will have to meet the requirements of the permitted activity rules in the ARC's relevant regional plan.

DEFINITIONS

ACRPS:	means Auckland Council Regional Policy Statement
Council:	means The Auckland Council
HGMPA:	means Hauraki Gulf Marine Park Act 2000
NES	means National Environmental Standard
NPS	means National Policy Statement
NZCPS:	means New Zealand Coastal Policy Statement 2010
RMA:	means Resource Management Act 1991 and all amendments
Team Leader:	means Auckland Council Team Leader (Water Allocation) or nominated Auckland Council staff acting on the relevant Team Leader's behalf

Appendix 7: 'Wetland' near the confluence of the Wairaka and Te Auaunga



Figure 2: Wairaka Stream through the Mason Clinic

Appendix 8: Te Auaunga

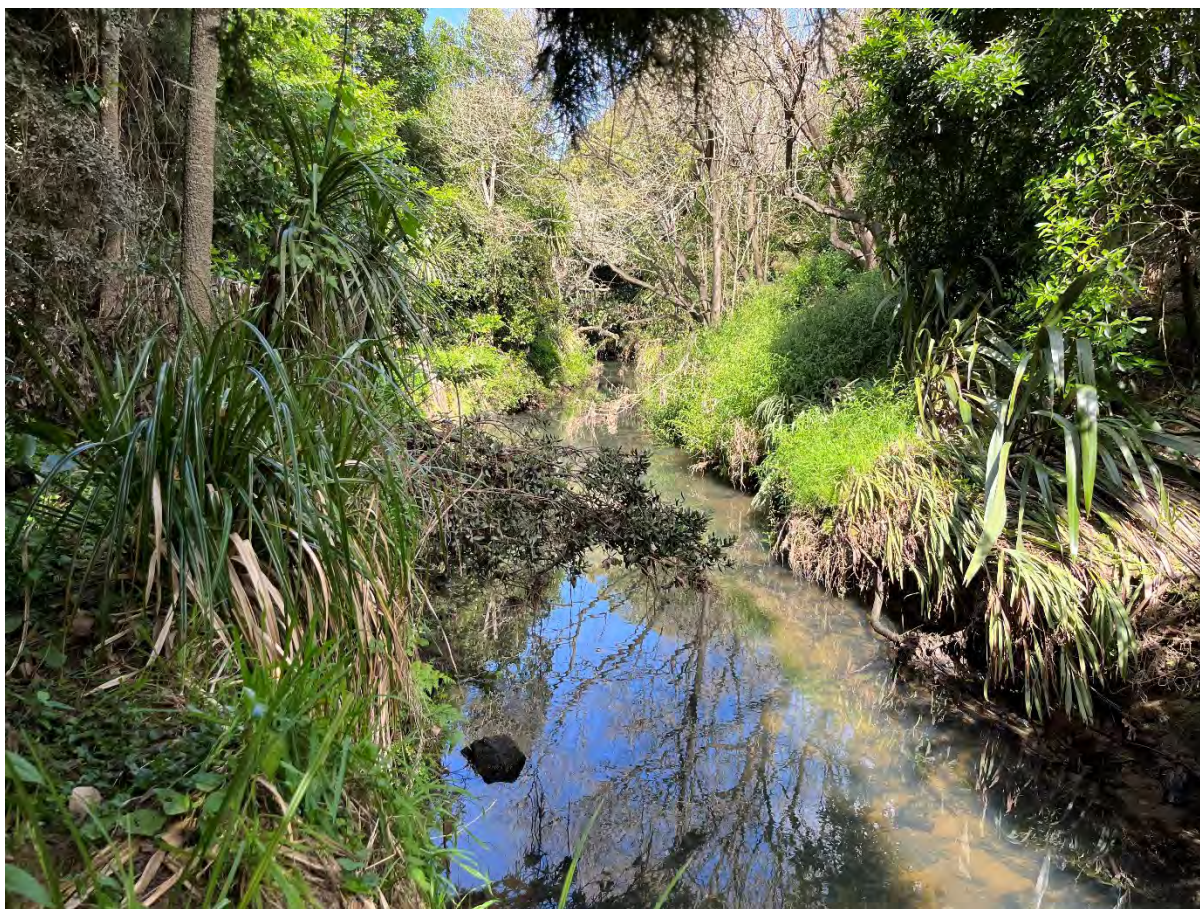


Figure 3: Te Auaunga immediately upstream of Great North Road culvert.

Appendix 9: Daylighting opportunity photographs



Figure 4: Recently (post-March 2021) daylight reach of Wairaka



Figure 5: Remaining daylighting opportunity

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	E10
Specific request	Please provide an assessment of the Plan Change Request against the NZCPS, including an assessment of effects on the Significant Ecological Area – Marine, immediately adjacent to the site.
Reasons for request	Section 75 of the RMA states that a district plan must give effect to the New Zealand Coastal Policy Statement (NZCPS). As the Plan Change area is located within the coastal environment, the provisions of the NZCPS are relevant matters for consideration for a Plan Change Request.
Applicant response provided by	John Duthie of Tattico

Applicant response

Background

- 1 This clause 23 request asks for an assessment of this plan change against the National Policy Statement on Freshwater Management (*NPS:FW*).
- 2 This response should be read in the context of the information set out in the Morphum response to clause 23 requests E1-E9.
- 3 This response relies on the ecological assessment, including the identification of streams and wetlands. Tattico have taken this ecological analysis and assessed that in the context of the *NPS:FW*, including an analysis against whether the National Environmental Standards on Freshwater Management (*NES:FW*) apply.
- 4 The Morphum report identifies that:
 - (a) The only stream/river within the precinct is the Wairaka Stream which runs from the southern central portion of the precinct at the Puna, first flowing north and then west to join into Te Auaunga/Oakley Creek.
 - (b) There are no other streams or natural wetlands within the precinct.
- 5 There is an artificial wetland in the southern portion of the precinct. This was created in circa 1960s by Unitec as part of an environmental research study into stormwater management techniques.

- 6 There is also an artificial wetland on the western side of the Unitec campus within the Crown owned land. This was intended to treat stormwater run-off from the new Unitec Trades building. However, Council changed its preferred method for treating stormwater, generally preferring other methods within the treatment train process. This included using non-contaminating roofing and cladding materials on the Unitec Trades building. Identification of this artificial stormwater pond on Precinct plan 1 is accordingly proposed to be removed as part of this plan change.
- 7 This plan change does not seek to modify any of the Auckland-wide provisions or overlay provisions. All the standard controls on streams, wetlands, water quality and significant ecological areas, to the extent that they are relevant, continue to apply within the precinct.
- 8 In addition to these Auckland-wide rules, the precinct provisions maintain the existing open space classifications over the Puna and Wairaka Stream, as shown within Precinct plan 1. This is unchanged by the plan change.
- 9 As referenced above, the only stream within the precinct is the Wairaka Stream. The plan change does not propose any amendment to any provisions in the Auckland Unitary Plan (Operative in Part) (*AUP*) relevant to the protection of Wairaka Stream. Furthermore, the backbone consent, which the Marutūāhu and Waiohū-Tāmaki Rōpū have obtained, gave approval to the daylighting of the portion of Wairaka Stream immediately west of the Spine Road, where it ran within a box culvert through both the Crown and Te Whatu Ora – Health New Zealand owned land parcels. These works have been completed on the Crown land, with the stream now partially daylighted and the significant landscape revegetation in place.
- 10 The artificial stormwater wetland in the east comprises two ponds, a small pond in the south which drains into the larger wetland in the more central part of the precinct. The central wetland is an artificial wetland. Notwithstanding that it is artificial, it is retained under this plan change and identified within an area of “open space” on Precinct plan 1.

NPS:FW

- 11 The NPS:FW sets a range of policies designed to protect rivers, streams and natural wetlands. It sets a hierarchy of objectives with *the health and well-being of water bodies and freshwater ecosystems* listed as the first priority. Wairaka Stream is retained and protected through the various AUP provisions (including the precinct). This primary objective is therefore satisfied.
- 12 The NPS:FW relevant policies are set out below:

Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.

Policy 2: Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.

Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.

Policy 4: Freshwater is managed as part of New Zealand's integrated response to climate change.

Policy 5: Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.

Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.

Policy 7: The loss of river extent and values is avoided to the extent practicable.

Policy 8: The significant values of outstanding water bodies are protected.

Policy 9: The habitats of indigenous freshwater species are protected.

13 The plan change will give effect to these policies. In particular:

- (a) The Puna and Wairaka Stream are protected through the AUP wide provisions and the open space identification on Precinct plan 1.
- (b) Objective 10, as proposed to be amended through the plan change, states:

An integrated urban environment is created, which:

...

- (b) Recognises, protects and enhances the environmental attributes of the precinct in its planning and development;
- (c) Virtually all built development (with very limited exceptions) and all subdivisions will trigger resource consent to enable appropriate Council assessment of development.
- (d) The Rōpū have been involved in the development of the plan change and in the identification of the open space areas protection of the Wairaka Stream and Puna.
- (e) The Wairaka Stream is considered in the context of the Stormwater Management Plan adopted by Council for the whole precinct.
- (f) There is no loss of natural streams through this plan change. In fact, the daylighting of part of the stream has enhanced its ecology in terms of the planting of native vegetations along the stream margins and creating a more natural stream bed and banks.

14 In addition, while identification of the smaller artificial wetland within the precinct is proposed to be removed, the largest artificial wetland is retained.

NES:FW

15 The NES:FW primarily relate to development consents and the resource consent process. They are not directly relevant to the plan change.

- 16 Having said that, the development within the precinct undertaken to date clearly demonstrates the workings of the NES:FW in that the Marutūāhu and Waiohua-Tāmaki Rōpū resource consent sought approval for daylighting of the Wairaka Stream, and also for a water-sensitive design for the new Outfall #6, which provided for above-ground conveyance of stormwater within a large planted swale. These works have been completed and put in place to a high standard.

Summary

- 17 As set out above, demonstrably this plan change is consistent and, to the extent required, retains mechanisms to protect the Wairaka Stream in accordance with the objectives of the NPS:FW. This is set out in both the objectives and policies in the precinct provisions and the relevant open space identification provisions of Precinct plan 1.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question

EA1

Specific request

Please provide an expert's assessment of the appropriate level of retail space and distribution within the precinct, including the proposed supermarket.

NB: The response to this question may be combined with the RFI in UD6.

Reasons for request

There has been a sizeable increase in the proposed number of dwellings (and their location) since the earlier retail assessment that informs the existing retail caps. It is important to understand what level of retail activity would adequately serve the likely future residents (and other retail demand arising within the precinct) and be appropriate within the context of the surrounding urban centres hierarchy. It is important this takes account of any updated yield information. Changes to the appropriate spatial distribution of retail within the precinct (from the previous assessment) may occur as a result of both changes to the proposed distribution of land uses within the precinct as well as increases to the overall dwelling scale (and consequent retail demand).

Applicant response provided by

Tim Heath, Property Economics and John Duthie of Tattico

Applicant response

- 1 This proposed plan change is advanced on the basis of adopting without change, the current retail cap and core retail location within the existing Wairaka Precinct.
- 2 The retail issues were extensively worked through at the time that the precinct was introduced into the Auckland Unitary Plan (Operative in Part). Here the appropriate balance between providing for local servicing for the new Te Auaunga community, Unitec and the residential dwellings east of Carrington Road, while retaining the economic viability of Point Chevalier and Mount Albert town centres, was carefully worked through.
- 3 That resulted in establishing a retail cap within the precinct as a permitted activity of 6,500m² gross floor area and a supermarket cap inclusive within the 6,500m² of 1,500m² gross floor area (GFA).

Responses to Auckland Council RMA cl 23 Requests | EA1 & EA2 | 2

- 4 Property Economics have undertaken a high level analysis of the current provisions to determine the validity or otherwise of those standards. Their professional opinion, summarised below, is that the level of retail opportunity remains appropriate and the location of a retail hub at the Farm Road Gate 3 area is the preferred location.
- 5 This plan change request effectively keeps the same cap on retail, the same limit on a supermarket and the same core location.
- 6 The plan change request does involve a reallocation between the campus use and general retail use due to the change in type and location of development within the precinct, i.e. a reduction in the campus and an increase in general residential.
- 7 To assist determining the appropriateness of the proposed retail floorspace cap (up to 6,500sqm, including supermarket of up to 1,500sqm) within the Te Auaunga Precinct, Property Economics has forecast the level of convenience retail spend and sustainable GFA utilising its Retail Growth Model.
- 8 The retail cap of 6,500sqm is small in retail market terms and would predominantly provide convenience retail store types and commercial service activities. These store types in practise would not be able to draw customers from a wide catchment due to superior offers in close proximity (Point Chevalier, Mount Albert, St Lukes and Stoddard Road). Therefore, the stores would primarily be servicing local Te Auaunga Precinct residents, workers, and visitors.
- 9 The supermarket potential within the Te Auaunga Precinct is limited given the surrounding supermarket network.
- 10 As such, a smaller 1,500sqm GFA supermarket (i.e., the operative supermarket cap) is considered appropriate to cater for the day-to-day, frequently required 'top-up' food requirements of residents within the precinct.
- 11 The location of the supermarket, specifically accessible through the Farm Road intersection, is considered suitable due to the presence of Te Auaunga / Oakley Creek to the precinct's west side. This natural barrier would hinder the accessibility and visibility of the supermarket. By locating it adjacent to the Farm Road intersection, a relatively central position within the precinct, it would enable a more efficient functioning of the supermarket and enhance its integration with the neighbouring residential areas and the existing Unitec campus.
- 12 The Property Economics analysis indicates the operative retail floorspace cap of 6,500sqm GFA would be more than sufficient to cater for the convenience retail and commercial service requirements of an 'at capacity' residential yield of 4,000 – 4,500 dwellings within the Te Auaunga Precinct, and there is likely to be flexibility in the 6,500sqm provision for non-commercial tenancies such as community facilities and other amenity and social based activities.
- 13 The analysis shows the operative 6,500sqm retail floorspace cap is appropriate to cater to the local demand, without affecting the growth potential, role, and function of the adjacent commercial centres, particularly given the 1,500sqm supermarket cap.

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- 14 Under I334.8.1 the Council will restrict its discretion to several matters when assessing a restricted discretionary activity resource consent application within the precinct. This includes restricting its discretion to “the effects on the needs of the Campus and servicing the local demand within the precinct, the role, function and amenity of the Point Chevalier and Mount Albert town centres” (5(d).ii). This means that the potential detrimental impact (if any) of retail activities within the precinct on the campus and other centres can be assessed at that time.

- 15 Additionally, considering economic efficiency, Property Economics considers that a majority of the GFA (circa +70%) should be concentrated within the core location for the retail hub. Any remaining retail floorspace in other locations should be limited in scale and primarily focused on providing convenience-based offerings. Therefore, Property Economics considers that the proposed allocation of retail space, as outlined in the Retail threshold standard I334.6.2 (i.e., a GFA cap of 4,700sqm within the Business - Mixed Use Zone and a cap of 1,800sqm within the Special Purpose - Tertiary Education Zone), is appropriate.

Question	EA2
Specific request	Please provide an expert's assessment of the likely level and take up of other commercial activity within the precinct and its alignment with Auckland's intended pattern of business growth.
Reasons for request	This is important to understand the likely level of other (non-retail) business development within the precinct and how this aligns with Auckland's intended patterns of business growth. This includes understanding the projected uptake of business capacity provided within the precinct. Other business activity enabled within the precinct may also overlap with the types of activities locating within the surrounding urban centres hierarchy. Employees and businesses within the other (non-retail) business activity will also generate additional demand for retail, hospitality and services within the precinct.
Applicant response provided by	Tim Heath, Property Economics
Applicant response	<ol style="list-style-type: none">1 In Property Economics view, considering the consented 4,000 – 4,500 dwellings, the sustainable non-retail commercial development within the precinct would be circa 1,400 – 1,700sqm, depending on the scenario used. This is similar to the non-supermarket convenience retail provision as these are typically of similar proportion in local convenience centres.2 The uptake of this 'business' provision, like the retail provision, is likely to be commensurate with population and dwelling growth within the Te Auaunga Precinct. This growth will occur as the wider local catchment also grows to support the other centres in the surrounding catchment. As identified earlier, this level of business provision is commensurate with the 'at capacity' future market requirements and can be realised without compromising the growth potential, role and function of any other centre in the network.3 In respect of whether this aligns with the intended patterns of business growth across Auckland, these business growth patterns need to reflect where residential development occurs, or is planned, to ensure an economically efficient distribution of business activity is provided across Auckland.4 Providing business opportunities (employment, convenience retail and commercial services activities) is more efficiently delivered to the market closest to the source of that demand. In this instance this is within the Te Auaunga Precinct.5 The higher the level of employment internalisation in a growth node, the more efficient the growth is from a business and retail perspective. The Te Auaunga Precinct provision is more than sufficient to accommodate this demand without compromising the surrounding centre or their growth.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

- Question** T1, T2, T3, T4 & T5
- Applicant response provided by** Max Robitzsch, Stantec & Don McKenzie (sub-consultant to Stantec)
- Overview of applicant Response**
- 1 This is a combined response for questions T1, T2, T3, T5 & T5.
 - 2 These questions largely focus on the ITA document (Stantec, June 2020, approved by Auckland Council March 2021).
 - 3 While the approved ITA remains relevant for the plan change application, significant parts – including matters such as the queried development assumptions and trip generation rates – have since changed, and instead are referenced in the Te Auaunga Plan Change - Transport Assessment & Traffic Modelling Report, referenced herein as the “TMR” (Stantec, December 2022). The TMR also identified which of the previous ITA assumptions remain valid (such as the overall transport environment and related principles). Thus both documents have to be read together to assess the plan change application. These documents were included in the package of documents contained in Appendix 5 to the plan change request: “Te Auaunga Precinct 2022: Integrated Transport Assessment”.
 - 4 As such, we will refer to the updated statements made in the TMR, rather than those in the original ITA being queried in the responses to these questions.

Specific request T1 With reference to ITA Section 5.8 and Appendix E please provide evidence to confirm consistency of the new heights proposed under the PC with trip generation assumptions in the ITA, including correlation between building height and gross floor area / development yield, and in turn, trip generation.

Please also provide an alternative higher trip generation scenario, in the event that higher development yields could be achieved under the new permitted height limits (see Planning P1 below).

**Reasons for request
T1**

The AEE / Section 32 Report refers to areas within the precinct where increased height is to be permitted, to in turn enable additional growth. However, it is not clear as to how this has informed the assessment of trip generation potential within the ITA, in Section 5.8 and Appendix E, with regards to correlating increased building heights with corresponding increases in gross floor area, numbers of residential apartments and other related land-use metrics.

Further analysis of the correlation between building heights, development yield and consequent trip generation potential is therefore considered appropriate in order to understand the full potential longer-term transport effects of the proposal.

Please note that this analysis should be informed by any updated yield information as a result of RFI P1 below.

Applicant response

Consistency of new heights with trip generation assumptions

- 1 Regarding the influence of added height on trip generation, there is no direct influence of this on the traffic modelling, as the traffic model is fundamentally based on a number of dwellings, rather than building heights. As such, while changes in height proposed do play a role in changing the number of dwellings that HUD considers can be provided, traffic modelling is solely based on assessing the impacts created by the targeted number of residential dwellings (and other activities, where relevant).
- 2 As heights are not changing to the same level across the whole precinct, changes in height enabled by the plan change could in practice lead to changes in traffic distribution *within* the precinct - with more traffic originating, as a percentage of all precinct traffic, from some areas than before.
- 3 For clarity, it is acknowledged that when the traffic-modelled number of dwellings was increased from the ITA assumptions to the TMR (plan change) assumptions, the increase was distributed linearly (i.e. all internal areas were factored to the same degree).
- 4 This was done in this more simplified manner because HUD and the development partners cannot yet identify the exact numbers of dwellings for the various areas within the centre and north of the precinct, only the overall maximum assumption being sought – these being the scale of dwellings and associated trip generations used in the TMR modelling (superseding the ITA).
- 5 However, the precinct is spatially relatively small – excluding the southern zones (disconnected in motor vehicle terms from the central and northern areas), the maximum distances are around 800m. The central and northern areas are also interconnected for motor vehicle purposes, and their only links to the wider network are via the same “gates” all connecting onto Carrington Road.

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- 6 Small changes in the “centre of gravity” might be caused by local height changes being more substantial in one area compared to another area, or one area seeing slightly more intensive development than the other. However, for the above reasons, they will tend to quickly redistribute themselves within the precinct based on traffic conditions at the “gates” (path of least resistance based on congestion and roading design). All such traffic in any case will travel along the same external route (Carrington Road). As such, the slight simplification is not considered to have any material impacts on the assessment of traffic impacts undertaken within the TMR.
- 7 It should also be noted that a significant part of the “added development” now being traffic modelled is not in fact additional proposed density created by either zoning changes or permitted height changes – rather a large part of the added density represents a simple extension of the modelling horizon to a point where more of the already permitted density is assumed to have been constructed. Further discussion on the difference between the yield enabled by the operative provisions and the new plan change requested precinct provisions has been provided by John Duthie in clause 23 response P8B.

Alternative higher trip generation scenario

- 8 Regarding the request for an “alternative higher trip generation scenario”, this is not considered necessary, as the ITA / TMR already sets effective traffic-related limits of development via the maximum development assessed (as per Section 3 of the ITA, for 2,049 dwellings by 2028, respectively as per Section 2 of the TMR, for 4,000 dwellings by 2031 – plus the relevant other non-dwelling activities within the precinct for each scenario).
- 9 If HUD, or one of the development partners in the precinct, proposed to substantially change or exceed these assumptions in the future, this would then not be in accordance with the ITA, including the TMR. Accordingly, this would then lead, at that time, to a requirement to provide a new or revised assessment to exceed those levels (and/or an updated ITA / traffic model), as required by the proposed precinct provisions.
- 10 As such, an “alternative higher trip generation scenario” for potential “higher yields” has relevance only if such a proposal for more development is made in the future. It is not a scenario that HUD seeks direct or indirect approval for with this plan change application.

Specific request T2

Please provide further clarity for the choice of trip rate reductions cited in section 5.8.2.1 of the ITA, namely:

- 10% reduction in tertiary education Trip Rates, based on ‘likelihood of remote learning’
- 30% reduction in tertiary education trips, due to behavioural change influenced by network congestion

And similarly for the choice of trip rate reduction cited in section 5.8.3.3:

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- 25% reduction in residential trip rates in the North-west, northern and Carrington Zones, due to congestion driving a stronger mode shift (compared to 20% agreed with AT)

The above percentage reductions should be supported by appropriate quantitative evidence, for example, in relation to the impacts of remote learning on education trip generation, or the influence of severe congestion on encouraging modal shift.

Please also confirm whether these percentage reductions have been agreed with AT.

Reasons for request T2 In the absence of reasonable evidence to support the proposed reductions, and confirmation of their agreed use with the Road Controlling Authority (AT), it is not possible to verify that a fair and robust assessment of trip generation and transport network performance has been undertaken.

Applicant response

Trip rate reductions

- 1 Section 3.6. Table 5 of the TMR contains a summary of the trip generation rate changes between the ITA traffic model and the TMR traffic model.
- 2 Before addressing specific rates, it is useful to set out the overall approach to trip generation rates.
- 3 Having identified a specific level of development sought (which is largely enabled by the zoning and enabled heights even before the plan change; refer discussion in T1), traffic and transport work in preparation for the plan change focussed as much on reducing (car) traffic generation as on accommodating it. This is in line with both the precinct's policies¹, the approved ITA's transport vision² and Government policy.³
- 4 However, in the review of traffic models and their assumptions, there is often an approach of assuming "conservative" trip generation rates as a default, to be "on the safe side" - or to undertake modelling with such higher rates (i.e. as sensitivity tests) which then become treated as "de facto" impacts being discussed.
- 5 HUD, advised by Stantec, acknowledges that using conservative rates historically generated by Auckland developments – even some apartment developments – would lead to significantly higher traffic (congestion and parking) impacts than described in the TMR.

¹ Auckland Unitary Plan Operative in Part, 1334.3 Policy 22 – *"Manage the expected traffic generated by activities in the precinct to avoid, remedy and mitigate adverse effects on the safety and efficiency of the surrounding transport network, particularly at peak times..."*.

² Section 4.1 of the approved ITA – *"...the ITA envisages that the Precinct... will have a transport environment that: Avoids excess vehicle dominance (whether for movement or car parking)..."*.

³ New Zealand Government Emissions Reduction Plan 2022, Summary Document – *"... reduce the total kilometres light vehicles travel by 20 per cent by 2035..."*.

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- 6 These impacts would likely result in a need to either reduce the proposed development, significantly increase vehicular capacity on surrounding roads, or accept higher levels of congestion. Clearly, none of the three outcomes are desirable. In practice, significant capacity increases for private motor vehicles would also be prohibitively expensive / impractical, and arguably would run contrary to overarching policies such as the ones cited above.
- 7 However, as set out in the ITA and TMR, the precinct is very well-suited to medium-high density residential development from a transport perspective. It will see significantly reduced traffic impacts overall for Auckland averages – both in terms of trips generated and trip lengths (VKT created) – than the same number of dwellings created in greenfields locations on Auckland's fringe. This is even before acknowledging the reduced mode share for public transport and active modes possible in such further-out greenfield locations.
- 8 As such, any discussion about trip generation assumptions for the precinct that may be considered as "aspirational" by reviewers should focus not on increasing the trip generation "to be safe".
- 9 Instead, discussion should focus on what measures (physical, operational or in terms of review conditions) – "carrots and sticks" – are necessary to give authorities confidence that the trip generation rates assumed will eventuate in reality.
- 10 The applicant team considers that such significant measures are already being proposed, with strict car parking constraints being the most immediate ("stick"), and improvements to non-car modes being the other main change ("carrot").

Education trip rates

- 11 Regarding the specific education trip rate query, we consider that the question seems to mis-identify the (most relevant) rates being applied in the TMR.
- 12 It is correct that a 10% reduction to historically appropriate tertiary education trip generation rates is proposed for the 2024 Scenario A of the ITA, rising to a reduction of 30% by the 2028 Scenario B.
- 13 However, the TMR further reduces this - reducing the original 0.11 trips / student during the peak hour to 0.07, a reduction of about 36% in total, or roughly one third reduction (see Section 5.8.2.1 of the ITA and Section 3.6 of the TMR).
- 14 While this is obviously a significant and aspirational change, this reduction is a combination of many various "carrot and stick" factors on the (driving) behaviour of Unitec's students – not just one factor in isolation. The influences include:
 - (a) Remote learning: The current tertiary education realignment in New Zealand makes it somewhat more difficult to identify remote learning policy offerings likely to be typical in the future. However, this is now significantly more typical than before Covid and is likely to form a large part of any student's learning experience. This also includes more informal cooperation by students as well, rather than necessarily meeting for group projects at the Unitec site.
 - (b) 2023 Census data – expected to be available before the plan change hearing – is likely to also assist with a better post-Covid data base regarding remote learning / working levels.

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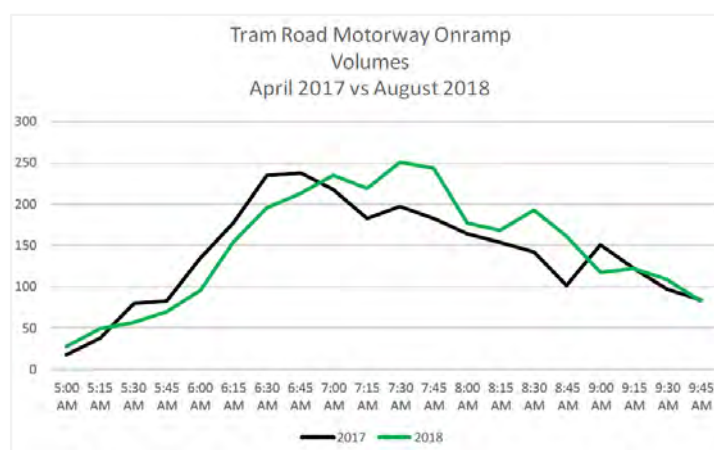
- (c) Unitec's Travel Demand Management – the Travel Plan for Mt Albert Campus (2020-2021)⁴ sees potential to reduce car traffic by a third (which is the same level as the TMR assumes) and focusses on the development of a carpooling system and encouragement of active commutes. It states:

"Over the next few years, as campus retracts back to the core, we will have less space for parking. This is our opportunity to develop a campus that supports healthy, sustainable travel choices."

- (d) Congestion impacts: For example, where students choose to travel earlier or (where feasible) later, or switching to other transport modes such as bus, train & walk, or cycling because increased congestion as identified in the TMR makes driving a less attractive mode in relative terms than it is now. This is especially relevant as projects such as the Carrington Road Upgrade at the same time aim to improve public transport and active modes.
- (e) Research into demand peak spreading is discussed in detail in New Zealand Research Report No 241⁵ and a number of other studies e.g. [emphasis added]:

*"As congestion increases in urban road networks, there is a tendency for the distribution of traffic during peak periods to become more uniform, as journeys are **delayed or deliberately re-timed** to avoid the worst parts of the peak periods".⁶*

- (f) An example from Christchurch⁷, refer below, shows Tram Road on-ramp traffic volumes pre-Western Belfast Bypass (WBB) completion in 2017 and post-completion in 2018. It shows traffic demand profile peaked at around 6:30am earlier in 2017 as people chose to travel earlier to avoid congestion compared to 7:30am peak after the completion of WBB. The difference in travel demand during any specific time peak hour was around 10%-25% upwards / downwards, showing that congestion can directly affect demand.



⁴ <https://oneplanet.unitec.ac.nz/wp-content/uploads/2022/02/Travel-Plan-2020-and-2021.pdf>.

⁵ <https://www.nzta.govt.nz/assets/resources/research/reports/241/241-Research-into-traffic-peak-spreading.pdf>.

⁶ <https://assets.highwaysengland.co.uk/roads/road-projects/a2-bean-ebbsfleet-junction-improvements/Orders/I.8+DMRB+Part+1+Traffic+Appraisal.pdf>.

⁷ Cited in "NZ Modelling User Group (MUGs) Micro Time-of-Day Choice Research Validation of Existing MTC Methods", report by Stantec, V4, August 2021.

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- (g) Public transport improvements: The assumptions made in the TMR are for vehicle traffic levels in 2031, some eight years from the time of production of the TMR. Despite recent difficulties for public transport patronage in Auckland caused by Covid effects and driver shortages, it is considered realistic to expect that access by public transport to the precinct will significantly improve in the coming eight years from its already very good accessibility levels.
- (h) The ITA discusses the expected changes in Section 4, while the TMR also discusses further public transport-related improvements (particularly an extended Carrington Road Upgrade scope) in Section 2.4.
- (i) Active mode improvements: Similar to the public transport improvements, safer and more convenient ways to walk, cycle or scooter to the precinct will also assist in reducing the trip generation rates. Making connections to and from the Western Line train stations more accessible also boosts multi-modal trips (walk-train, cycle-train).
- (j) The ITA discusses the expected changes in Section 4, while the TMR also discusses further public transport-related improvements (particularly an enlarged Carrington Road Upgrade scope) in Section 2.4.
- (k) Unitec charging for car parking – the site survey of existing trip generation at the Unitec site in 2014 was undertaken at a time when car parking in the precinct was both plentiful and fully free.⁸ Unitec's parking availability has since shrunk substantially, and Unitec have confirmed to HUD that car parking will in the future be charged. This will make driving to the Unitec campus significantly less attractive.
- 15 All these assumptions are expected to significantly reduce the historically "suburban" driving patterns among Unitec students as Auckland urbanises further.
- 16 In regard to "sanity checking" the projected total reduction, it is useful to assess the car mode share percentages of other New Zealand tertiary institutes. While the 45% driving (driver or passenger) mode share rate found for Unitec students in 2018 is unlikely in the foreseeable future to drop to the 4% to 13% driving mode shares achieved at City Centre and City Centre Fringe tertiary education institutes in Auckland⁹ an effective "one third reduction" as per the trip rate assumptions only requires this 45% to drop to 30%.

Residential trip rates

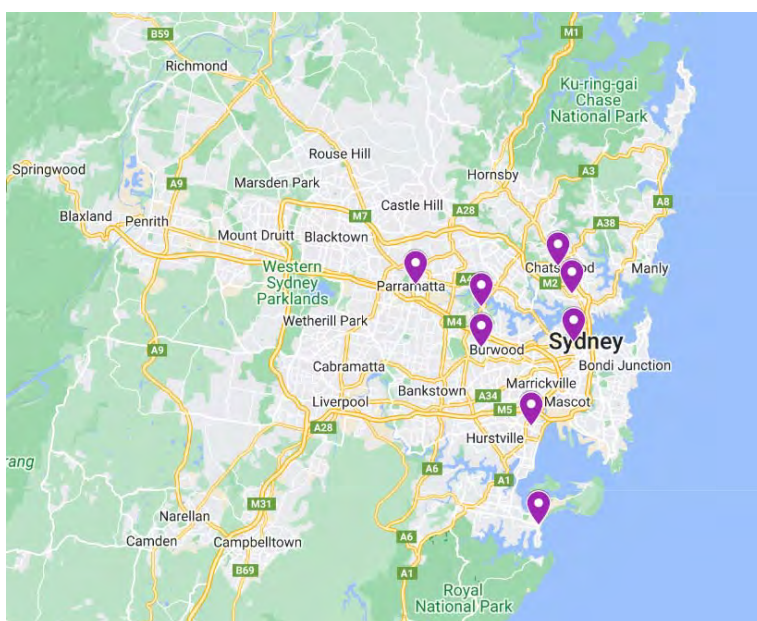
- 17 Regarding the question on further residential trip generation rate reductions in the North-west, northern and Carrington areas in the ITA, we refer to the discussion in Section 5.8.3.3 of the ITA. While the added increase from 20% to 25% was not explicitly agreed again with Auckland Transport, it is noted that the ITA has since been approved by Auckland Council – this included extensive Auckland Transport feedback to Council. As such, the ITA rates, including these reductions can be considered the agreed baseline, from which further changes in the TMR proceed.

⁸ In 2014, there were approximately 2,650 car parks available to students and staff, based on *Report on Car Parking at Unitec Campuses For Commercialisation of Car Parking for Unitec, Silvereye, 2014*.

⁹ Section 2.4.2 of the ITA and Table 4.3, Auckland Transport Tertiary Student Travel Survey 2018.

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- 18 In this regard, as set out in the TMR, significant further changes in assumptions have occurred since the ITA. This is in part because some of the rates in the ITA are considered by HUD as rates that were chosen in 2020 “to be safe”, rather than to represent rates resulting from more stringent “carrot and stick” measures to reduce private car travel to and from the development.
- 19 The inclusion of more stringent measures than in the ITA – most substantially, a significant reduction of car parking compared to the ITA assumptions – also results in a need to differentiate more between different trip generation rates for different types of dwellings. This includes differentiating rates by the average level of car parking (if any) the dwellings will provide.
- 20 This is discussed in detail in Section 3.6.3 of the TMR and broken down by areas before being summarised in Appendix A of the TMR.
- 21 The TMR in these sections also discusses surveys by Transport for New South Wales (formerly Roads and Maritime Services). Published as far back as 2013, this survey data supports reduced rates as being realistic. The relevant study assessed trip generation rates of urban apartments with good public transport access in Sydney. The areas where surveys took place are shown below:



- 22 The trip generation study in Sydney covered high density residential areas that comprised mostly 2+ bedrooms. The number of dwellings at the surveyed developments ranged between 28 and 234 dwellings with an average of 100 dwellings per development and the parking ratio per dwelling ranged between 0.64 to 1.60 with an average rate of 1.24 parking spaces per apartment.
- 23 For the proposed development at Wairaka, out of the 4,000 dwellings, at least 1,000 are intended to provide no car parking at all, while the remaining 2,000 will provide 0.7 or less car parking spaces per apartment on average. Such parking ratio per dwelling is therefore towards the lower rate of the surveyed data in Sydney.
- 24 In addition to that, as set out in the TMR's relevant section, the rates for the 2031 traffic model remain still higher than the Sydney rates:

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...represented a halfway average between the 2020 ITA trip generation rates for the 1.5-bedroom and the average surveyed Sydney trip rate per unit (the higher of trip rate per unit, per parking space and per bedroom).

- 25 The survey data identifies that while chosen rates are notably lower than applied in Auckland in the past, they are far from unrealistic in comprehensively planned, parking-constrained and well-located developments such as those proposed for the precinct.

Specific request T3 Please assess options for southern connections to the Precinct (via Laurel Street / Renton Road / Rhodes Avenue), but with access limited to walking and cycling and potential public transport use.

Reasons for request T3 While any vehicular access via Laurel Street, Renton Road and Rhodes Avenue would require a change to Wairaka Precinct Rule 1334.3(26), which currently precludes direct vehicle access to and from the south, an arrangement allowing for access limited to use by sustainable modes of travel could contribute toward strategic aims to achieve modal shift.

The ITA references a previously considered 'back route' bus service following the north-south spine and looping via Carrington Road at both ends of the Precinct, which AT previously did not support due to slow service speeds compared to Carrington Road.

However, a potential variation to this proposal could include a re-routing of such a bus service via a new bus-only link to the south of the Precinct, which would provide buses with the advantage of a shorter-distance route compared to general traffic.

The ITA acknowledges previous consideration towards additional access to the Precinct from the south, and while it confirms that the arterial road network to the southeast of the precinct is currently not forecast to experience significant congestion issues which would warrant new road connections, a bus service serving the main spine road through the Precinct could have wider-spread benefits for trips generated within the Precinct.

Applicant response

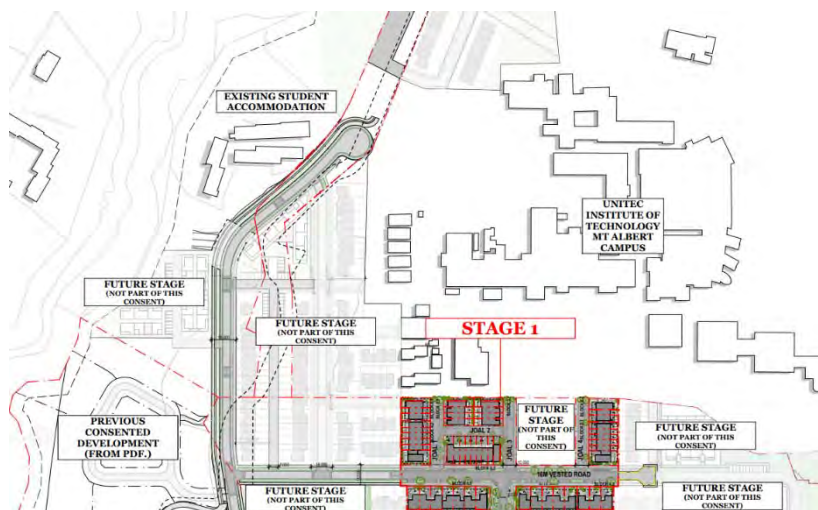
Precinct provisions

- 1 To clarify in response to the question, neither the existing precinct objectives and rules nor those proposed in the plan change specifically prohibit vehicular connectivity from the southern existing residential roads into the precinct as such; rather, the various objectives, standards and matters of control / matters of discretion that intended to:
- (a) discourage direct vehicular access from these southern roads into the tertiary education site and/or any tertiary education parking buildings (e.g. policy 26 referenced in the clause 23 request and non-complying activity A30);
 - (b) discourage "rat running" through the precinct to avoid Carrington Road congestion; and

- (c) retain a residential character for the southern streets.
- 2 Extensions of the existing roads into the precinct provided that a cul-de-sac is maintained will be a permitted activity (A27) and extensions into the precinct as a public road are a restricted discretionary activity (A29), including specifically to provide vehicular connections to the western road within the precinct as sought through the plan change.
- 3 For the avoidance of doubt, neither the ITA, the ITA traffic modelling, or the updated assumptions in the Te Auaunga Plan Change – Transport Assessment & Traffic Modelling Report (*TMR*) include any vehicular connectivity between the northern and central areas of the precinct (in this regard including the Unitec tertiary education area) and the southern residential zones within the precinct and the southern existing roads. There is a clear “cut” in the traffic model preventing cross-traffic.
- 4 For completeness, it is also noted that Policies I334.3 (25) and (26) currently do not identify (list) Mark Road, which in the plan change’s version of Precinct plan 1 is proposed to also be shown as connected into the precinct. However, for avoidance of doubt, the relevant policies (and the statements made below) are considered by HUD to also cover this fourth southern local street.

Existing consents

- 5 For context, it is noted that the Wairaka Precinct Stage 1 development recently consented under the COVID-19 Recovery (Fast-track Consenting) Act 2020 authorises extensions to Laurel Street and Rhodes Avenue, including separated cycle and pedestrian facilities. Together with the consented Spine Road through the ‘backbone’ consent (BUN60386270) the existing precinct provisions are therefore now increasingly being translated into actual physical roading details, i.e. development envisages turning heads at the “cut” preventing vehicular cross-connections, as shown below in an excerpt from the Stage 1 application’s masterplan.



- 6 While not directly affecting the plan change (which does not propose specific roading designs, nor proposes to modify the relevant parts of the precinct rules), these plans are a good representation of what the traffic models in the ITA/TMR assume – that the “cut” will include a form of (ideally physical) barrier to vehicle connectivity, while active mode connections across the “cut” remain uninterrupted. It is also understood that there is the possibility that not all internal roads necessary for such a link will be vested as public roads by the development partners.

Walking and cycling connections

- 7 The Wairaka Precinct Stage 1 consent also demonstrates how cycle and pedestrian connections are proposed to be provided in the precinct.

Bus-only route

- 8 Regarding the possibility of a “back route” bus service travelling through the southern residential roads and then connecting onwards along the Spine Road across such a “cut”, it is considered that there is nothing within the precinct rules as written that would prohibit this, nor would the changes now proposed as part of the plan change modify any relevant rules. However, there would arguably be a need for any such proposal to show how a “bus only” link would be implemented in such a way to discourage private car use. Signage alone would be considered highly unlikely to be sufficient.

- 9 Auckland Transport over the last ten years has implemented an ambitious overhaul of its public transport network (the “New Network”), which re-prioritised bus services onto main corridors – to achieve greater frequencies, better reliability, and the ability to implement bus priority more effectively.

- 10 A “back route” through the precinct would appear to be contrary to the service design objectives and relevant public transport planning policy by Auckland Transport. For example, Auckland Transport says the following on their own website regarding the removal of bus stops/routes from some streets as part of the New Network re-organisation of routes [emphasis added]:

25.1 *Some of the factors we consider when removing bus services from a street include low all-day patronage, road layout constraints, [alternative] access to frequent services, and shortening the routes to make them quicker and more direct.*

- 11 These factors weigh particularly in cases where a back route would run parallel to, and in-between, two nearby Frequent Transport Network corridors whose stops are well accessible from the vast majority of the Precinct (stops on Great North Road and Carrington Road). It would also arguably undermine planned bus priority improvement on Carrington Road as part of the Carrington Road Upgrade.

- 12 In summary, it is not considered necessary or appropriate to provide specific provision for such a service in the precinct provisions themselves. There is nothing in the plan change that prevents such a “back route” from being implemented in the future, should there be changes to public transport service planning guidance, or changed local conditions that would make such a route more desirable.

Specific request T4 Please provide an assessment based on the Woodward Road Level Crossing not being removed.

Reasons for request T4 The Table in Section 4.9 'Summary of Transport Assumptions' assumes completion of the Level Crossing Removal in all modelled scenarios. It is uncertain at this stage what the timing of those works would be (updates from KiwiRail / AT would be beneficial in that respect).

In the event that this work does not take place by the time of completion of Plan Change development and other transport proposals, an analysis should be provided of the level of operational effects on the adjoining road network.

Further detail on this proposal would be beneficial for background context and understanding the timing and nature of adverse effects on the adjoining road network. Possible considerations could include development staging to align with the Rail Crossing works being completed and construction works being timed to avoid the construction phase of Carrington Road corridor improvements.

Applicant response

- 1 The transport reviewer appears to have read Table 4.9's relevant row as "Level crossing removal at Woodward Road".
- 2 The table's relevant row however states "Level crossing at Woodward Road" (no mention of removal). That is, the ITA (and the TMR) retain the level crossing in their traffic models in all scenarios and apply modelled penalties (to replicate the effect of periods of crossing closure) to car traffic along this route.
- 3 In earlier discussions (prior to the 2020 ITA model being finalised), it had been considered whether the removal (grade separation) of the Woodward Road level crossing would have been a beneficial change. However, tests found that in terms of the traffic models, removal did not create significant benefits.
- 4 Therefore, while there may well be advantages from a potential future removal of the crossing, perhaps as part of a future Auckland Transport/KiwiRail level crossing removal programme, the level crossing was retained in all models, and the table row states this.

Specific request T5 Please provide a schedule of transport improvements and interventions with 'trigger points' in the form of development milestones (e.g. nos. dwellings, completion of other land use activities), at which particular improvements are deemed to be required. Please also include anticipated timescales based on latest information available.

Reasons for request T5 While Section 4.9 of the ITA lists Transport Assumptions and interventions included in the traffic modelling scenarios, many of these are notably dependent on other parties for funding and delivery, such as the Carrington Road upgrade works to be delivered by AT.

Following recent discussions with AT, it is understood that the timeline for delivery of the Carrington Road improvements is subject to ongoing uncertainty and may extend beyond the horizons assumed for the traffic modelling scenarios (of 2024 and 2028 for Scenarios A and B respectively).

Trigger points for individual transport improvements according to levels of development completed may ultimately be seen as more appropriate, to ensure that transport effects will be mitigated in a timely manner.

It is also appropriate to revisit the traffic modelling scenarios with regard to the assessment years and particular improvements assumed in each scenario, in the event that the full package of Carrington Road improvements cannot be delivered by the respective time horizons.

Applicant response

Carrington Road upgrade

- 1 In December 2022, the Government announced \$113 million in funding for the Carrington Road upgrade. That funding, which was provided through the Infrastructure Acceleration Fund, is explicitly tied to the development proposed within the precinct.
- 2 Auckland Council (and then Auckland Transport (AT)) were successful in their application to the government for this standalone, competitive, grant funding round – which was not part of regular ATAP or other funding streams – as they committed to meet criteria that required the Carrington Road upgrade works timeframe to enable the housing development, and included a 2025 physical works start date. These documents can be supplied by AT. While it is appreciated that a project of this scale will always have a measure of delivery uncertainty around it, in terms of design, consenting and construction timeframes, it is not considered accurate by HUD – as one of the parties to the relevant contracts mentioned above – to characterise the status of the upgrade as having “ongoing uncertainty”.

Assumptions and trigger points

- 3 The answer to this question can be found in the “assumptions” sections of the ITA (Section 3 for development and Section 4 for transport assumptions) and TMR (Section 2 for development and transport updates to the ITA). This is further summarised in tables in Section 4.9 of the ITA and Section 3.8.3 of the TMR respectively.
- 4 These sections of the ITA and TMR already provide an essentially “three stage” trigger point process which also identifies the key mitigations required:

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- (a) Scenario A in the ITA (i.e. to allow up to 1,023 dwellings, limited external road network changes are required beyond the first signalisation of an additional access “gate” – i.e. no Carrington Road Upgrade is required).¹⁰
 - (b) Scenario B in the ITA (i.e. to allow up to 2,049 dwellings, the Carrington Road Upgrade needs to be implemented (along the precinct frontage only) including added signalised intersections along the length including Woodward Rd).
 - (c) The TMR scenario (i.e. to allow up to 4,000 dwellings, the Carrington Road Upgrade needs to be implemented along the length of Carrington Road, not just the precinct frontage).
- 5 While these scenarios each have assumed horizon years (2024, 2028 and 2031 respectively), it is considered that the level of development and assumed mitigation represent the most relevant scenarios in response to the stated query.
- 6 As such, there is not considered to be any need for or benefit from modelling other time horizons “in case of non-delivery” (or only partial delivery) of the extended Carrington Road Upgrade.
- 7 If such non-delivery occurred, this would simply mean that development could only occur up to the assumptions of the “lower” scenario that does not yet include the missing upgrade, as new development in the precinct will be assessed for consistency with any existing ITA applying to the proposed development. Alternatively, an applicant for development could undertake new modelling and/or an update of the ITA at that time to assess alternate ways of ensuring appropriate mitigation. (Refer proposed matter of discretion I334.8.1(1A)(f)(i).)
- 8 However, the already-modelled scenarios represent a logically stepped increase in both development levels and mitigation, including assessing at what development levels the basic and extended Carrington Road Upgrades become necessary.
- 9 Therefore, the request is already considered fulfilled by the application documents.

¹⁰ It is noted for avoidance of doubt that approval of the ITA was contingent on further sensitivity modelling on AT request. This led to an agreement that the first access “gate” may need to be signalised after 600 dwellings (Gate 2 in the ITA assumptions, since proposed to instead be Gate 1 by the local development parties and modified accordingly in the TMR). This approved arrangement essentially creates an agreed **fourth scenario** (lowest-intensity in comparison), for which no signalisation or Precinct-external road upgrades (beyond tie-in adjustments at the “gates”) are deemed necessary at all.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	T6
Specific request	Please update the proposed Precinct Plan to show a shared path connection in the northern part of the precinct, to replace the linkage lost through proposed PC75.
Reasons for request	It is understood that consideration has been given to an alternative shared path route. This should be illustrated on the Precinct Plan for consideration. Note that the intention to replace this path was referred to in the 11 May 2021 MHUD letter (see also OS6).
Applicant response provided by	John Duthie, Tattico

Applicant response

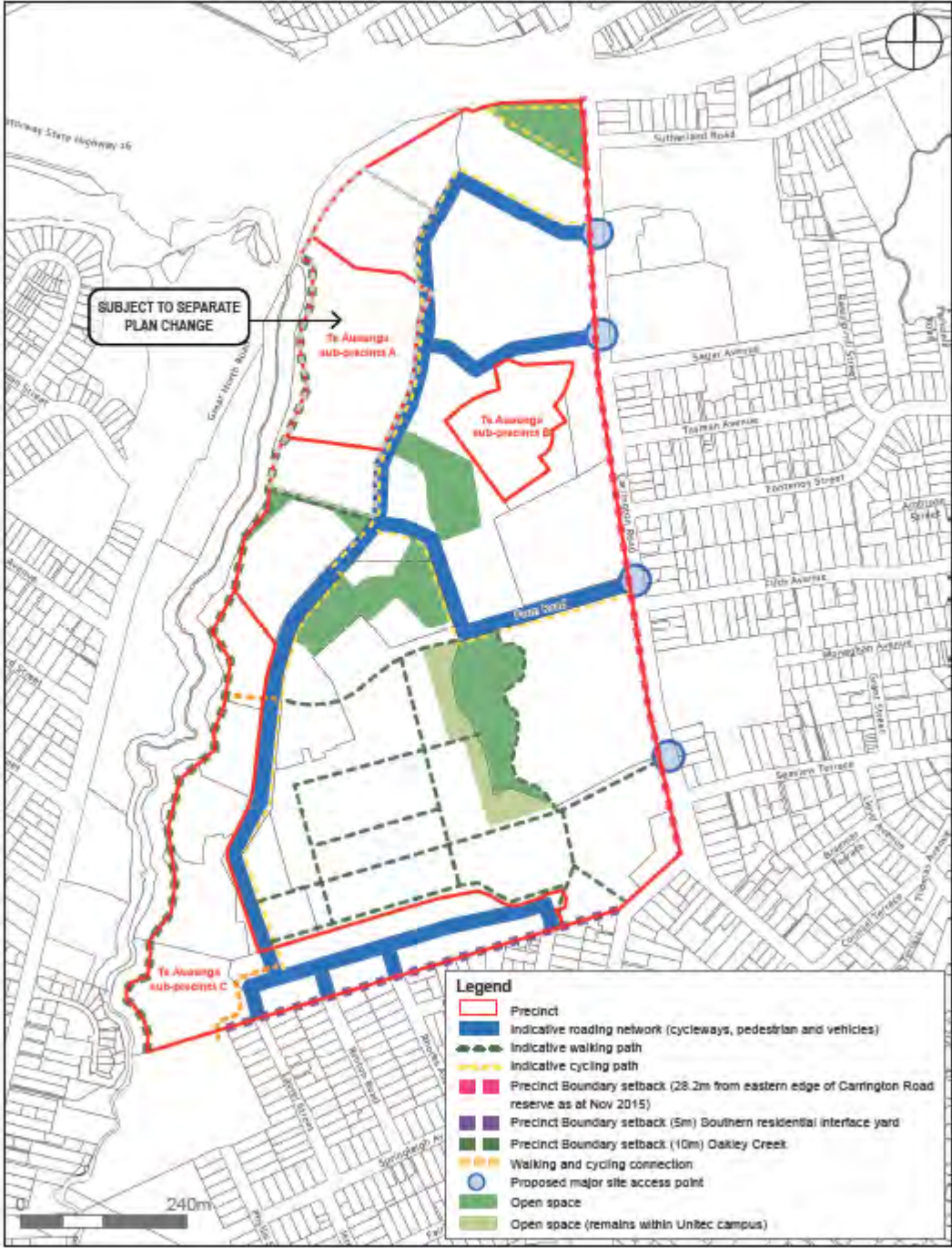
- 1 The Precinct plan map update provided with the clause 23 response package and reproduced for ease of reference below shows the proposed walking and cycling path connection in the northern part of the precinct. The new path section is proposed to run from approximately where the Northwestern Shared Path's boardwalk section finishes, travelling between Building 1 and the open space to connect to Carrington Road in the vicinity of the current path crossing south of Sutherland Road. The purpose of the new path section is to provide connectivity for future residents in the centre and north of the precinct.
- 2 Although we understand some alternatives have also been investigated by Council/ Auckland Transport (AT), the advantages of placing the path in this location are considered to be:
 - (a) there is sufficient space in this location to fully separate pedestrians and cyclists, avoiding the user conflicts that sometimes arise with shared paths;
 - (b) it separates cycling traffic heading further west (or east) from cyclists heading north/south, who are likely to continue along the separate cycleway within the precinct (also shown on the Precinct plan), which creates additional capacity for cycling;
 - (c) it assists with Crime Prevention Through Environmental Design and open space activation, through generating additional foot and cycling traffic adjacent to public open space; and
 - (d) it improves connectivity / directness from the west towards the expected location of the long-term signalised crossing of the path over a wider Carrington Road.

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- 3 HUD has had a number of discussions with AT over this alignment. The final alignment shown on the plan below, and included in the updated set of Precinct plan maps provided for the clause 23 UD8 response, has been agreed with AT as being appropriate to provide a local connection for future residents of the precinct.

I334.10. Precinct plans

I334.10.1 Te Auaunga: Precinct Plan 1



**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question H1 & H2

Specific request H1 Boffa Miskell Assessment of Landscape and Visual Effects: Graphic Supplement - Visualisations - Please provide further visual simulation viewpoints that show the (full extent) of the proposed and operative enabled new development within the context of the Oakley Hospital Main Building from:

- the Point Chevalier Town Centre (Figure 1); and
- Carrington Road (south of the motorway bridge) (Figure 2).



Figure 1: The Oakley Hospital Main Building viewed from the western edge of Point Chevalier Town Centre.



Figure 2: The Oakley Hospital Main Building and front garden viewed from Carrington Road.

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Reasons for request H1

These are additional key views of the Oakley Hospital Main Building as experienced in the local landscape. The request has also been guided by the following statements in the HIA (p.5):

"A distant view of the Former Oakley Hospital Building can still be had from the Point Chevalier shops and the building is also visible from Carrington Road. These views of the buildings and the landscaped area in front of the building will not be affected by the Plan Change."

From the western edge of Point Chevalier Town Centre, the symmetrical frontage of the scheduled building is captured (compared to existing viewpoints VS5 and VS6); and from Carrington Road (heading south), views of the building within its immediate garden setting (EOP) are experienced.

(It is noted that the L5 request notes that that response may be combined with the RFI in H1.)

Specific request H2

Boffa Miskell Assessment of Landscape and Visual Effects: Graphic Supplement - Visualisations - Please provide further (or annotated) visual simulations that show the height of new buildings as enabled in the operative precinct plan.

Reasons for request H2

To assist in determining the potential visual/dominance impacts generated by the proposed new development relative to that currently enabled in the operative precinct plan.

Applicant response provided by

Rachel de Lambert of Boffa Miskell

Applicant response

- 1 Eleven visual simulations have now been prepared to show the development enabled by the operative provisions as well as the proposed heights.
- 2 Four visual simulations are provided showing views to the Former Oakley Hospital Building from viewpoints in Point Chevalier. They are VS6, VS7, VS8 and VS9. These locations have been selected as they best show clear views to the northern frontage of the building with proposed development adjacent and behind. They include two additional visual simulations at the request of Council's landscape architect peer reviewer, refer to the updated set of visual simulations in the Landscape and Visual Effects Graphic Supplement dated June 2023 (issue date 16 June) and updated Assessment of Landscape and Visual Effects dated 3 July 2023.
- 3 No further additional visual simulations have been prepared in respect of this request as visual simulations have already been provided from those locations with the clearest available views.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question H3, H4 & H5

Applicant response provided by Adam Wild and Veronica Cassin, Archifact and John Duthie, Tattico

Overview of applicant response

- 1 This is a combined response for questions H3, H4 and H5 on the Former Oakley Hospital Building.
- 2 Mr Wild and Ms Cassin of Archifact have undertaken a full assessment of the Former Oakley Hospital Building in the context of this plan change. Their report is attached as part of this clause 23 response package. Questions H3, 4 and 5 are fully addressed in the Archifact report. This summary is to assist the Council in referencing that report.

Specific request H3 Please provide a detailed assessment of effects (including cumulative effects) of the entire PPC on the historic heritage values of the Oakley Hospital Main Building.

Heritage-related AUP RPS objectives and policies, including B2.3.2.(1)(a); B5.2.1.; and B5.2.2.(6-8), are relevant to this assessment. Please also consider within the context of the building's conservation plan¹ and heritage assessment².

Reasons for request H3 The HIA acknowledges that:

*"...the enabled development will **potentially impact** the heritage values of the former hospital." (p.4) and "...any new buildings, and particularly those of additional height, **will have an impact** on the heritage values of the Former Oakley Hospital." (p.6) (emphasis added).*

However, the level and extent of this impact on the historic heritage values (particularly aesthetic (incl. landmark) and context values) of the Oakley Hospital Main Building and on its overall significance as a Category A historic heritage place, is unclear.

¹ Former Carrington Psychiatric Hospital: A Conservation Plan, prepared by Salmond (now Salmond Reed) Architects, 1995.

² Unitec Institute of Technology Former Carrington Psychiatric Hospital: A Heritage Assessment, prepared by DPA Architects, May 2014.

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Furthermore, focus is currently placed on the impact generated by development in Height Area 1, with less mention of impacts (including cumulative impacts) of increased building heights across the precinct, particularly in Height Areas 2 and 4, which are in similarly close proximity to the scheduled place.

Applicant response

- 1 Mr Wild and Ms Cassin, in their analysis, address the effects of development at length. The report sets out:
 - (a) The methodology used (section 6 of the report).
 - (b) The identification of the place (section 4 of the report).
 - (c) Planning policy (section 5 of the report). This gives an analysis of the heritage aspects of the plan change in terms of the relevant Regional Policy Statement provisions. It compliments clause 23 response P3.
 - (d) Site and context and recent history (sections 7 and 8 of the report).
 - (e) Review of the extent of place and landscape setting (section 9 of the report).
 - (f) Statement of heritage significance (section 10 of the report).
 - (g) Assessment of the heritage effects of this plan change, including an assessment under section D17.8 of the Auckland Unitary Plan (Operative in Part) (*AUP*) (section 11 of the report).
 - (h) The conclusions as to the impact of this plan change and the development enabled under the plan change in terms of the heritage values of the building (section 12 of the report).
- 2 In terms of the heritage values of the building:
 - (a) The Former Oakley Hospital Building and extent of place is protected under the Auckland overlay rules relating to heritage protection and the accompanying schedules. There is no change to those provisions through this plan change.
 - (b) The northern formal landscape gardens of the Former Oakley Hospital Building have been significantly impacted by the historic development of the North-Western Motorway which has severed a large portion of this land with associated changes to access and layout. The remnant gardens are identified as an open space location within the plan change. If there is an effect, it will be to provide a higher level of protection to these areas than the current extent of place classification of the heritage provisions of the AUP.
 - (c) The plan change strengthens the policies on adaptive reuse of heritage and character buildings for retail and other activities. Adaptive reuse is identified as an important method to assist in heritage conservation. The retail provisions already provide for the opportunity for retail floor space within the Former Oakley Hospital Building. The introduction of new Policy 30A simply reinforces this opportunity for heritage restoration through adaptive reuse.

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- 3 The plan change introduces a particular height area adjacent to the Former Oakley Hospital Building. This was considered in the original reports provided by Mr Pearson. A second, independent, heritage opinion was sought as part of these clause 23 responses which is provided in the response by Mr Wild and Ms Cassin in their report.
- 4 The Archifact report addresses these matters in some detail.
- 5 The report's executive summary states:

Overall, the proposed change in height in Height Area 1 adjacent to the west of, but beyond the EOP associated with, the former Oakley Hospital is unlikely to have a significant adverse effect on its historic heritage values.

Specific request H4

The HIA states (p.5):

"...locating buildings of additional height in an area in the north west...will result in the least impact on the heritage values to the scheduled building."

Please explain why this is considered to be the case.

Reasons for request H4

The location of the buildings of additional height in the site's northwest corner (Height Area 1) means that they will be located adjacent to and viewed within the immediate context of the Oakley Hospital Main Building. Given the proximity of Height Area 1 and the considerable increase in building height sought, it would seem that this location has the potential to result in the greatest (rather than the least) visual impact on the scheduled building's historic heritage values.

It is therefore important to understand what has informed this critical statement.

Applicant response

- 1 Mr Wild / Ms Cassin address at length the proposal to create a high rise residential opportunity to the south-west of the Former Oakley Hospital Building. This is referenced throughout the report.
- 2 The report states:

Installing large landmark buildings in this location is an appropriate approach considering effects on historic heritage values that can be achieved without causing any change to how the historic heritage place is understood and appreciated.
- 3 The report further states:

Responses to Auckland Council RMA cl 23 Requests | H3, H4 & H5 | 4

The proposed change to Height Area 1 offers better clarity to the consideration of potential effects of built form (notably height) within the setting of the former Oakley Hospital. The proposed arrangement of the three building sites and their respective maximum heights provides a spatial layering which illustrates how the depth and scale of the development sites, combined with the advantage of the natural and substantial changes in ground level, might allow the historic building to remain appreciable as a prominent feature in the wider townscape context.

The architectural emphasis of the historic former Oakley Hospital Main Building is strongly horizontal and it relies on the open space around it recognised by the defined EOP, specifically to the front as illustrated in view VS6 in commanding its prominent position in the townscape and open space setting. The operative Auckland Unitary Plan (AUP) allows height in this area that surpasses the ridgeline of the historic building. The proposed additional height changes the backdrop to the former Oakley Hospital Main Building, but it would remain nonetheless appreciable as a prominent building within the wider area. The articulation of the open space in the foreground of the Oakley Hospital Main Building could be enhanced to support the development site as a permeable threshold to the local town centre of Point Chevalier.

Overall, the proposed change in height is unlikely to have a substantial effect on the interior shading of the historic building and, in some cases, the effects appear to lessen. The formerly long views from these wards and corridors will become shorter in some locations, but the proposed height increase will not worsen the effects from shading from those generated by the currently operative controls.

Specific request H5 Please clarify what aspects of the PC are considered mitigating factors from a built heritage perspective.

Reasons for request H5 The HIA incorporates a section titled 'Mitigating Factors' (p.5), however, it is not entirely clear what these factors are considered to be.

Given the significant changes envisioned by the PPC and the resultant potential for visual dominance effects, it is important to understand what measures are considered to mitigate effects on both the scheduled Oakley Hospital Main Building and the precinct's broader historic landscape.

Applicant response

- 1 Visual effects are also raised in H3 and H4.
- 2 The Archifact report directly addresses visual effects on the Former Oakley Hospital Building, in particular the report addresses:
 - (a) the location of the greater height zone relative to the heritage features and landscaping to the north of the Former Oakley Hospital Building; and
 - (b) its visibility from key public spaces including Great North Road, Carrington Road and the Point Chevalier town centre.
- 3 The conclusions provided in clause 23 response to H4 equally apply to H5.

Responses to Auckland Council RMA cl 23 Requests | H3, H4 & H5 | 5

- 4 The Archifact report addresses a series of views of the heritage building in the context of new height controls in the precinct with reference to the visual simulations prepared and assessed as part of the Landscape and Visual Effects Assessment, prepared by Boffa Miskell in 2022 and updated in 2023 as provided in this clause 23 response package. The report describes the effects as:

The operative AUP allows for a tall building mass to the rear of the former Oakley Hospital in both Height Area 1 (to the west of the former Oakley Hospital site) and Height Area 4 (to the north and east). The baseline massing breaks the ridgeline of the historic building and changes its backdrop, but maintains its formal relationship to the north and engaged with its Extent of Place.

- 5 The analysis identifies that the visual simulations that have been prepared demonstrate:

...how the Oakley Hospital Main Building and its space in front remains a primary focus within that viewing context framed behind by the development potential enabled by the operative and Plan Change height and massing provisions. The Plan Change enabled height and massing breaks up and articulates that foil against which the Main Building is read more than the single mass enabled by the operative provisions.

- 6 The executive summary of the Archifact report states:

The proposed change to Height Area 1 offers better clarity to the consideration of potential effects of built form (notably height) within the setting of the former Oakley Hospital. The proposed arrangement of the three building sites and their respective maximum heights provides a spatial layering which illustrates how the depth and scale of the development sites, combined with the advantage of the natural and substantial changes in ground level, might allow the historic building to remain appreciable as a prominent feature in the wider townscape context.

- 7 Visual effects are also assessed in the updated Boffa Miskell Landscape and Visual Effects Assessment and clause 23 response L7.

- 8 With respect to the reference to "mitigation" in the clause 23 request, the application of the matters of discretion, assessment criteria and policies will ensure a high quality of development. In particular, a new Policy 14AA is introduced (refer clause 23 response H7). With this addition, the precinct provisions and the zone / Overlay Heritage provisions of the AUP provide for appropriate development and management of the effects of such development, including around and adjacent to the Former Oakley Hospital Building.

**Proposed Plan Change xx (Private) – Te Auaunga’
Amending I334 Wairaka Precinct**

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	H6
Specific request	<p>The HIA states (p4):</p> <p><i>"Detailed assessment criteria are proposed to ensure the buildings attain a design standard of high quality. These are found in section 1334.8 Assessment – Restricted Discretionary Activities."</i> and</p> <p><i>"Any new buildings within Height Area 1 should be positioned and orientated having regard to their impact on the heritage values of the Former Oakley Hospital Building."</i></p> <p>Please clarify which assessment criteria have been relied on and if (or how) the provision sought in the HIA has been met.</p>
Reasons for request	<p>Section 1334.8.1.(1A)(b) Assessment – RDA, Matters of Discretion – ‘Building form and character’ provides several assessment criteria, none of which appear to have regard to the effects of the new development on the historic heritage values of the Oakley Hospital Main Building. It is therefore unclear what assessment criteria have been relied upon in the HIA and if they are considered to appropriately safeguard and manage the heritage values of the scheduled building.</p> <p>It is noted that the HIA seeks that new buildings be ‘positioned’ and ‘orientated’ to have regard to their impact on the heritage values of the Oakley Hospital Main building, but this does not appear to have been incorporated into the new precinct provisions. It would be beneficial to understand whether this has a bearing on the HIA findings.</p> <p>Note: See also issue raised below in relation to the sufficiency of the provisions proposed.</p>
Applicant response provided by	Matt Riley, Boffa Miskell; Dave Pearson, DPA Architects; John Duthie, Tattico; and Adam Wild, Archifact

Applicant response

1. A new policy I334.3(14AA) is proposed as follows:

Require proposals for new high rise buildings adjacent to the former Oakley Hospital scheduled historic heritage building to provide sympathetic contemporary and high quality design which enhances the precinct's built form.
2. It is also proposed to amend assessment criterion I334.8.2(1B), which relates to assessment of taller buildings in Height Area 1, to include reference to the new policy.
3. This change will enable the relationship (and therefore degree of compatibility) between taller new buildings adjacent to the Former Oakley Hospital Building and the scheduled building to be assessed.
4. This matter is also addressed in response to clause 23 requests H3, H4, H5, H7 and L8 and the report by Archifact attached to this clause 23 response package.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question H7

Specific request Please explain why reference to the scheduled building has been removed altogether from existing provision I334.3.(14).

Reasons for request It is not clear why this reference has been deleted.

Note: See also issue raised below in relation to the sufficiency of the provisions proposed.

Applicant response provided by John Duthie of Tattico

Applicant response

Proposed Changes to Policy 14 and the Introduction of Policies 14A and 14AA

- 1 Policy 14 was amended as per the set of proposed precinct provisions provided with the application materials to focus this policy on the relationship of development with the significant ecological area.
- 2 The requested private plan change has been further amended following the clause 23 requests from the Council.
- 3 This includes a change to Policy 14 and the introduction of a new Policy 14AA to respond to the refocussing of Policy 14 on the significant ecological area relationship and to provide a policy with a particular reference to heritage.
- 4 Policy 14 continues to refer to landscaping treatment adjacent to Te Auaunga.
- 5 A separate policy 14AA relating to heritage buildings is inserted as follows:

Require proposals for new high rise buildings adjacent to the former Oakley Hospital scheduled historic heritage building to provide sympathetic contemporary and high quality design which enhances the precinct's built form

Reasons

- 6 Policy 14:
 - (a) The changes to Policy 14 are essentially to promote native plants within landscaping adjacent to Te Auaunga / Oakley Creek.

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- (b) This is an important consideration for mana whenua. This plan change seeks to support that by promoting the use of native species in this key landscape and cultural corridor. Te Auaunga / Oakley Creek was an important portage route for Māori. Ensuring that the interface between the precinct and the Te Auaunga valley is appropriately landscaped with native species is reinforced through this policy.

7 Heritage:

- (a) The juxtaposition of the Former Oakley Hospital Building and the new development potential for high rise in the north-western corner of the precinct, is addressed in clause 23 responses H4 and H5.
- (b) Mr Wild has undertaken a detailed assessment of this proposal. His report is attached to this clause 23 response package and is referred to in several of the clause 23 responses.
- (c) Mr Wild's analysis carefully examines the appropriateness of locating tall high-rise buildings adjacent to the heritage structure. These responses are also set out in clause 23 response H3, H4 and H5.
- (d) Mr Wild states:

The proposed Height Area 1 is intended to become a marker of the wider northern portion of the site which can be observed from the longer reaches of the western area of the region. The western site edge has dense planting which currently obscures the historic building. The building was not designed to be appreciated from this range and consequently makes only a slight contribution to the area. Installing large landmark buildings in this location is an appropriate approach considering effects on historic heritage values that can be achieved without causing any change to how the historic heritage place is understood and appreciated.

- (e) Mr Wild's report identifies that all the objectives and policies relating to the scheduled heritage building and extent of place as set out in Chapter D17 of the Auckland Unitary Plan (Operative in Part) (*AUP*) apply to this precinct. These provisions manage the effects on heritage of any modifications, alterations or additions to the heritage building and any new buildings or structures within the extent of place.
- (f) Mr Wild concludes:

Policies that support the Objectives include requirements that new buildings be designed in a manner that respects existing buildings, provides for amenity, protects heritage values and, where appropriate, enhances the streetscape and gateway locations of the campuses. Similarly, new buildings or additions to existing buildings adjoining or adjacent to scheduled historic heritage places should be sympathetic and provide contemporary and high-quality design which enhances the historic built form. That is not a requirement however that relies on the form and scale of the historic heritage assets as a baseline for the establishment of height per se.

- (g) The new Policy 14AA recognises (in association with Policy 14A) that new high rise built form and scale is appropriate in this location, and can occur consistently with protecting historic heritage values. The provisions of Policy 14AA provide for the “sympathetic contemporary and high-quality design” of the new high-rise buildings to enhance the precinct’s built form, which includes the Former Oakley Hospital Building.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question

H8

Specific request

Proposed policy 30A states:

"Encourage the adaptive re-use of the existing buildings with historic value for retail activity."

Also relevant is existing Policy 11, which states:

"Encourage the retention and adaptation of the heritage and character buildings, and elements identified within the precinct."

Please provide further details about which existing buildings are being referred to here and (in relation to Policy 30A) how their historic value has been/will be determined.

Once identified, please advise what further provisions will be put in place to ensure appropriate outcomes for these buildings (including the Pump House) in the context of the PPC.

Reasons for request

There are several existing (late nineteenth and early twentieth century) buildings within the Te Auaunga Precinct that have a strong association with the historical development of the hospital site, contribute to its sense of place, and have potential (or known) historic heritage values. This includes the Pump House (which is understood will be protected via restrictive covenant). These buildings are both broadly and more specifically acknowledged in a number of the PPC supporting and background documentation.

DPA's HIA positively references how "policies are included [in the precinct provisions] to encourage the retention and adaptation of heritage buildings on the site including the Former Oakley Hospital." (p.6)

Boffa Miskell's Assessment of Landscape and Visual Effects goes further by identifying 'key buildings and features' on the site (Figure 4, p.7).

CFG Heritage's Archaeological Assessment (Carrington Backbone Works project) also identifies several historic buildings associated with the early hospital site.

Responses to Auckland Council RMA cl 23 Requests | H8 | 2

At this stage, the identity of the 'heritage and character buildings' and 'existing buildings with historic value' referred to in the policies are uncertain. To provide greater clarity and avoid confusion in the application of the policies, it would be helpful to have these buildings clearly set out in the precinct plan (in a similar way to trees). There is also the question of whether the objectives, policies and assessment criteria should go further in acknowledging these key features in the precinct's landscape – e.g. Objective (I334.2.(6)); Policy I334.3(4)(i).

Applicant response provided by John Duthie, Tattico

Applicant response

- 1 The question seeks to:
 - (a) identify existing heritage features protected within the precinct; and
 - (b) address "appropriate outcomes" for these buildings.

Heritage Buildings / Features

- 2 There is only one scheduled heritage building within the precinct and that is the Former Oakley Hospital Building at the northern end of the precinct.
- 3 This is a substantial Category 1 Historic Place listed on the New Zealand Heritage List Rārangī Kōrero.
- 4 The Oakley Hospital Main Building is also scheduled in the Auckland Unitary Plan (Operative in Part) (AUP) Schedule 14: Historic Heritage Schedule (ID1618) and the building and its extent of place are subject to the D17 Historic Heritage Overlay. There is no change to the existing protection of the building afforded through the operative AUP provisions proposed as part of this plan change.
- 5 In addition, in accordance with the resource consent BUN60386270 conditions, the Pumphouse (B33) will be protected by way of covenant. This protection includes the original Pumphouse but excludes the modern annex.
- 6 The Precinct plan could identify the Pumphouse as being subject to a separate covenant if the Council so requests. However, that is not the practice elsewhere in the AUP, and therefore is not proposed.
- 7 The third protected heritage element within the precinct is the stone wall along the southern boundary. This is an archaeological feature protected by covenant with Heritage New Zealand Pouhere Taonga, and also – as with the other archaeological features within the precinct – under the Heritage New Zealand Pouhere Taonga Act 2014. Neither of these features are currently specifically identified and scheduled within the AUP.
- 8 The Precinct plan could identify the stone wall as being subject to a separate covenant, if the Council so requests. However, that is not the practice elsewhere in the AUP, and therefore is not proposed.
- 9 Neither the Pumphouse nor the stone wall warrant protection beyond the standard controls within the Heritage New Zealand Pouhere Taonga Act 2014 or the AUP.

Responses to Auckland Council RMA cl 23 Requests | H8 | 3

- 10 For completeness, I record that there are no protected or identified heritage buildings within the Unitec campus area. This plan change makes no alteration to that situation, nor would it be appropriate to do so. While the precinct needs to be advanced as one integrated development, effectively the Unitec property is out of scope in terms of any changes promoted as part of this plan change request.
- 11 No changes are proposed to the Precinct plan.
- 12 No other buildings structures, or features are proposed to be protected as part of this plan change request.

Heritage provisions

- 13 With respect to the operative AUP provisions and proposed precinct provisions that address the protection of historic heritage:
- (a) The existing objectives and policies are robust and appropriate for the heritage protection of these features.
 - (a) The objectives and policies section of the precinct make it clear that these objectives and policies are in addition to the AUP overlay objectives and policies including part D17: Historic Heritage Overlay.
 - (b) Those objectives and policies have been tested during the original AUP process and found to be appropriate to protect heritage across Auckland.
 - (c) The specific precinct objectives and policies deal with the particular elements relating to this precinct.
 - (d) The adaptive reuse of heritage buildings is a long understood and supported technique. Demonstrably the Former Oakley Hospital Building is not fit for purpose for mental health treatment in New Zealand. In fact, it reflects an era where the knowledge and treatment methods used for mental health are now considered unacceptable. If this heritage building is to be retained, then it requires adaptive reuse.
 - (e) The objectives and policies of this precinct signal the support for adaptive reuse including the opportunity for some retail usage within this building.
 - (f) Equally, the Pumphouse is no longer required for its original purpose. It does not function as part of the Auckland potable water supply. Its protection relies on its adaptive reuse. The objectives and policies provide for this.
 - (g) HUD does not propose any changes to the precinct provisions relating to heritage, as it considers these are fit for purpose.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question

H9

Specific request

It is noted with concern that the proposed plan change provisions give little weight to historic heritage and do not enable greater consideration and assessment to be given to the effects of new development on the historic heritage values of the Oakley Hospital Main Building. – see, for instance I334.3.(14) Policies – Built Form and Character; I334.8.1.(1B) Assessment RDA - Matters of Discretion; I334.8.1.(5)(d)(iv) Assessment RDA - Matters of Discretion; I334.8.2.(1A)(b)(i) Assessment RDA – Assessment criteria and I334.8.2.(1B)(a) Assessment RDA – Assessment criteria.

The Oakley Hospital Main Building is a Category A historic heritage place of outstanding significance well beyond its immediate environs (AUP) and a Category 1 heritage place of special or outstanding historical or cultural significance (HNZPT). It has stood as a distinctive and recognisable landmark in the local landscape for over 150 years. Its landscape qualities are noted in its conservation plan as such:

“The former hospital building is a major local landmark and dominates its immediate setting. It is of regional importance that existing views and the landmark significance of the building remain unaffected by external changes and internal developments.”

Ensuring that the PPC is considered within the context of this significant heritage place and enabling its heritage values to be appropriately protected and managed (as directed in RPS B5. objectives and policies) is therefore considered to be imperative. This cannot be achieved if the precinct provisions neglect to require proposals to be sympathetic to adjacent historic heritage and fail to enable greater consideration and assessment to be given to the relationship between the new development and the Oakley Hospital Main Building.

It is noted that more targeted historic heritage policies and criteria, together with tailored design guidelines, are included in other precincts that enable/have enabled the large-scale (residential) development of sites with heritage values (e.g. Hobsonville Point, Kingseat).

The applicant is encouraged to propose more appropriate provisions to recognise this issue.

Applicant response provided by John Duthie of Tattico

Applicant response

- 1 This is a non-clause 23 comment.
- 2 The question suggests the plan change “gives little weight to historic heritage”, and does not give consideration to the effects of new development on the heritage building.
- 3 The plan change gives full consideration to the scheduled Former Oakley Hospital Building:
 - (a) The Former Oakley Hospital Building is the only historic heritage place within the precinct scheduled within the Auckland Unitary Plan (Operative in Part) (*AUP*). Its scheduling is unchanged through this process, i.e. there is no change to the heritage provisions or schedules; and there is no change to the ‘*extent of place*’ which applies to the site surrounds.
 - (b) This plan change is not seeking to remove any heritage features or amend any heritage identification including this building’s ‘extent of place’. The Council has set the schedules for protected features and buildings, and what is the appropriate extent of place.
 - (c) Separately two other features within the precinct are, or will be, protected by covenants, being the southern heritage stone wall and the Pumphouse.
 - (d) The same assessment criteria for heritage buildings in terms of objectives, policies, activity classification, and assessment criteria, apply to the Former Oakley Hospital Building as applies to any other Category 1 building within the region.

The plan change is very careful to adopt and incorporate all these provisions.
 - (e) The Auckland Unitary Plan (Operative in Part), through identifying the extent of place, has determined the area in which there should be control of buildings / structures adjacent to the heritage building. This locational extent remains. There is no additional or different development rights sought within the “extent of place”.
 - (f) If the reason for the non-clause 23 comment is related to new development in the area adjacent to the heritage building, that has been extensively addressed in the report by Mr Adam Wild of Archifact. This work was commissioned to give a second opinion to complement the original report done by Mr Pearson of DPA.

The work of Mr Wild is attached to this clause 23 response package.
 - (g) This response should be read in conjunction with response H3, H4, H5 and H7, including reference to a new Policy 14AA included in the updated precinct provisions provided as part of the clause 23 response package addressing the quality of high rise buildings adjacent to the Former Oakley Hospital Building.

'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	H10
Specific request	As the Oakley Hospital Main Building is included on Heritage New Zealand Pouhere Taonga's List as a Category I place (and the precinct likely determined a pre-1900 site), it is considered beneficial to engage with HNZPT (if not already done so) and seek their views at this early stage of the PPC process.
Applicant response provided by	John Duthie, Tattico
Applicant response	
1	There is ongoing engagement between HUD and Heritage New Zealand Pouhere Taonga (HNZPT) in respect of heritage and archaeological matters within the precinct, including the Former Oakley Hospital Building. As part of this engagement, HNZPT was also provided with a copy of the plan change to consider on 7 March 2023.

'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct

Question

H12 – Former Oakley Hospital Main Building

Specific request

It is noted that the scheduled Oakley Hospital Main Building is currently unoccupied and due to the lengthy timeframes anticipated for the staged redevelopment of the precinct, there is concern that the building is at risk of vandalism and/or falling into a state of disrepair. Whilst it is acknowledged that the PC has the potential to positively enable new opportunities to support adaptive reuse (including earthquake strengthening), there is no clear understanding of when this might occur. From a good practice conservation standpoint, understanding what commitment has been made to utilise this significant heritage place and safeguard its historic fabric in the short to medium term is important.

Applicant response provided by

John Duthie, Tattico

Applicant response

- 1 This is a non-clause 23 comment/question.
- 2 The plan change sets up and encourages a range of adaptive reuses of the Former Oakley Hospital Building. That could include residential offices, retail and/or community facilities within the building itself.
- 3 There are significant interdependencies between the timing of this plan change, and the timing of heritage restoration and adaptive reuse. These matters will be worked through between Heritage New Zealand Pouhere Taonga and the Rōpū.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	HH1
Specific request	Please provide a historic heritage assessment that addresses the full plan change area and the actual or potential effects of all forms of development, in particular activities involving land disturbance such as building platforms, roads and tracks, utility connections, retaining structures, fencing and planting.
Reasons for request	<p>The archaeological assessment provided has been prepared in support of previous applications for backbone infrastructure works. This assessment does not assess the full plan change area or proposal.</p> <p>The assessment should specifically refer to the criteria in the AUP's RPS, part B5 (historic heritage) and identify how any adverse effects on any significant historic heritage place/s identified within the proposed plan change area will be managed in accordance with the B5 objectives and policies.</p> <p>Recent reporting should also be drawn from in any updated assessment – i.e.:</p> <ul style="list-style-type: none"> • Shakles, R., Burnett, Z. and Farley, G. September 2022. Proposed Residential Subdivision, Wairaka Precinct, Carrington Road, Mt Alert, Auckland: Archaeological Assessment. Prepared for Ngāti Whātua Ōrākei – Whai Rawa by Clough and Associates Ltd. • Usher, E. August 2022. Carrington Stormwater Outfall 06: Final Report (HNZPTA Authority 2021/777). CFG Heritage report to Heritage New Zealand Pouhere Taonga, BECA Ltd, The Ministry of Housing and Urban Development and Marutūāhu and Waiohua-Tāmaki Rōpū. <p>Further, the 1879 field book supporting cadastral plan SO 1992 may also be of use to determine other heritage buildings, features and areas of archaeological potential associated to the Whau Lunatic Asylum (later Carrington Psychiatric Hospital) and Farm (LINZ Recollect – Field Book 0312 pages 0312-039 to 0312-046).</p>
Applicant response provided by	John Duthie, Tattico

Applicant response

- 1 This plan change is subject to the full Auckland Wide provisions of the Auckland Unitary Plan (Operative in Part) (*AUP*). This includes all heritage matters. It is obviously also subject to the Heritage New Zealand Pouhere Taonga Act 2014, and the protections for archaeological features. The plan change does not seek to modify any of these regulatory controls over development.
- 2 The archaeological assessments provided address the majority of the precinct. Additional assessments are able to be prepared in support of any further land disturbance activities, which will require resource consent and, likely, archaeological authorities.
- 3 The plan change does not increase the area that is available for development – the existing precinct is fully enabled for activities with the potential to disturb the land and subsurface environment, as the precinct is – in its entirety – zoned for either Special Purpose – Tertiary Education, Mixed Housing – Urban, Terraced Housing and Apartment Buildings, Special Purpose – Healthcare Facility and Hospital and Business – Mixed Use. All of these zones enable development that may involve land disturbance, building platforms, roads and tracks, utility connections, retaining structures, fencing and planting, including within the open space areas.
- 4 Any material development (excluding minor additions) triggers a resource consent enabling the Council to determine whether to require a further archaeological assessment.
- 5 The GFC archaeological assessment provides a precinct wide assessment of the Heritage NZ and AC databases and the known history of the precinct. The more detailed inspection relates to the backbone consent. It is not practical, necessary or appropriate to do a full precinct survey over approximately 64ha; particularly given the area is already development-enabled and given the ability to require an assessment as part of future development applications.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	HH2
Specific request	Please provide details of how it is proposed to identify / protect the pre-1900 stone wall (NZAA R11/2979) located along the southern boundary of the plan change area.
Reasons for request	The protection of this feature should be provided for in the plan change.
Applicant response provided by	John Duthie, Tattico
Applicant response	
1	The stone wall along the southern boundary (NZAA R11/2979) is protected by a heritage covenant between Heritage New Zealand – Pouhere Taonga and Ngāti Whātua Ōrākei Whai Rawa. No change to that covenant is proposed through this plan change.

**'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct**

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct

Question	HH3
Specific request	Please provide a copy of the Memorandum of Understanding between Heritage New Zealand and Wairaka Land Company Limited (as agent for Unitec Institute of Technology) regarding the identification, protection and management of cultural and heritage resources within the Wairaka Precinct
Reasons for request	A copy of this document should be provided to council and where relevant evidence also provided outlining any effects arising from the plan change.
Applicant response provided by	John Duthie, Tattico
Applicant response	<p>1 HUD is not a party to the agreement between Heritage New Zealand Pouhere Taonga (<i>HNZPT</i>) and the Wairaka Land Company, had never received a copy of this agreement, and is not bound in any way by this agreement.</p> <p>2 On request from HUD, the Council provided a copy of the agreement to HUD on 1 March 2023 for review. Our review of the agreement shows:</p> <p>(a) Neither HUD, nor the Crown are a party to this agreement.</p> <p>(b) The agreement is irrelevant to this private plan change request and proceedings.</p> <p>3 Notwithstanding that the Crown is not a party to the agreement, the Crown understands that the stone wall referenced in the agreement is an archaeological feature under the Heritage New Zealand Pouhere Taonga Act 2014, that there is a protective covenant between Ngāti Whātua Ōrākei and HNZPT in respect of it, and as such it is protected. That protection is afforded through the legislation and the covenant, and does not rely on any private agreement such as the agreement referenced in this clause 23 request.</p>

'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct

Applicant: Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question Historic heritage (Archaeology): Non CI23(1) request matter/other comments

Specific request Early engagement with Heritage New Zealand Pouhere Taonga is encouraged

Applicant response provided by John Duthie, Tattico

Applicant response

- 1 This is a non-clause 23 statement by the Council.
- 2 It advises HUD that early engagement with Heritage New Zealand Pouhere Taonga is encouraged.
- 3 HUD is fully aware of the benefits of consultation.
- 4 HUD has been in discussions with Heritage New Zealand Pouhere Taonga, and will continue to do so through this process.

'Proposed Plan Change xx (Private) – Te Auaunga'
Amending 1334 Wairaka Precinct

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question

P1

Specific request

Please clarify the calculation made for potential yield.

Reasons for request

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

Please include details of:

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

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

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

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

(1) This is the area which has undevelopable areas removed such as larger areas of open space (i.e. those areas that would often have an Open Space zoning in other situations), wetlands, etc.
 (2) This is a separate ratio, applied subsequently to (1). It is the ratio applied to estimate the share of the developable area that would result in actual privately-owned parcelled area once public roads, reserves, etc have been removed. It is the usual 68%-70% ratio applied to greenfield areas, but realise this will be lower in this case due to the existence of main roads, etc.
 (3) This is the % of the final parcelled area that is covered by floorspace.

Applicant response provided by John Duthie of Tattico

Applicant response

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

does not represent any proposed subdivision plan, including as the zoning changes proposed through this plan change will influence the future layout, if confirmed. As land is developed subdivision will occur.

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

- (i) Terrace Housing is based on an average site of 250m² gross land area. Assuming a double loaded road / access provision, which delivers about an average 180m² net for end and mid-block sites. These assumptions reflect the yield in the granted fast-track consent for terrace housing within the south of the precinct.
 - (j) Land efficiency takes account of the local roading network, infrastructure and potential open space that will be part of the overall subdivision and land development of the land. This is land that will not be part of a private development title.
 - (k) Site efficiency is the percentage of a site that will be developed for building footprint. The remainder of the land is in access, at grade parking, private open space, outlook areas and general landscaping.
 - (l) Building efficiency in apartment buildings is set at 80%. The other 20% is in corridors, vertical circulation space (lifts and stairwells) and services.
- 8 The model assumes 4059 apartments (including walkups) and 559 terrace houses. As discussed above, this does not represent the exact number of dwellings, or proportion of these typologies, that will be developed within the precinct. It provides an approximate measure which has informed the development of the precinct provisions that we propose be created through the plan change.
- 9 The tabulated form of the model is set out below.

Block No.	Land Area (ha)	Land Efficiency		Typology	Average Site Size Terrace (m ²)	No. Terrace	Site Efficiency		No. Storeys	Building Footprint GFA	Bldg Efficiency		Average Apartment Size (m ²)	No. Apartments
		%	Land (ha)				%	Area (m ²)			%	Net GFA (m ²)		
1*	1.83	-	-	Adaptive Use	-	-	-	7979	2	15958	50%	7979	100	80
2* BLDG 1	0.88	-	-	Apartment	-	-	-	764	19	14516	80%	11613	100	116
2* BLDG 2	-	-	-	Apartment	-	-	-	953	14	13341	80%	10672	100	107
2* BLDG 3	-	-	-	Apartment	-	-	-	953	11	10482	80%	8386	100	84
3A*	0.65	-	-	Apartment	-	-	-	-	-	-	-	-	-	266
3B - 1	1.00	75%	0.75	Apartment	-	-	50%	3750	9	33750	85%	28688	100	287
3B - 2	1.00	75%	0.75	Walkup	-	-	55%	4125	4	16500	85%	14025	100	140
3C	1.27	-	-	Terrace	250	51	-	-	-	-	-	-	-	-
4 - 1	0.40	80%	0.32	Apartment	-	-	50%	1600	7	11200	85%	9520	90	106
4 - 2	0.50	80%	0.40	Walkup	-	-	55%	2200	4	8800	85%	7480	90	83
5* - 1	0.80	75%	0.60	Apartment	-	-	50%	3000	7	21000	85%	17850	100	179
5* - 2	0.82	80%	0.66	Walkup	-	-	55%	3608	4	14432	85%	12267	90	136
6A*	1.13	-	-	Apartment	-	-	-	-	-	-	-	-	-	381
6B - 1	0.55	75%	0.41	Apartment	-	-	50%	2063	6	12375	85%	10519	90	117
6B - 2	0.55	75%	0.41	Apartment	-	-	50%	2063	5	10313	85%	8766	90	97
7*	0.33	100%	0.33	Walkup	-	-	50%	1650	4	6600	85%	5610	90	62
8*	0.39	85%	0.33	Apartment	-	-	50%	1661	7.5	12460	85%	10591	90	118
9A	1.38	-	-	Terrace	250	55	-	-	-	-	-	-	-	-
9C	0.60	85%	0.51	Walkup	-	-	50%	2550	4	10200	85%	8670	90	96
9B	0.60	85%	0.51	Apartment	-	-	55%	2805	7	19635	85%	16690	80	209
10A - 1	0.25	85%	0.21	Apartment	-	-	50%	1063	9.5	10094	85%	8580	90	95
10A - 2	0.28	85%	0.24	Apartment	-	-	50%	1190	7.5	8925	85%	7586	90	84
10B	0.63	85%	0.54	Walkup	-	-	55%	2945	4	11781	85%	10014	80	125
10C	0.62	-	-	Terrace	250	25	-	-	2	-	-	-	-	-
11*	0.48	-	-	Terrace	250	19	-	-	-	-	-	-	-	-
12	0.86	-	-	Terrace	250	34	-	-	-	-	-	-	-	-
13	0.77	-	-	Terrace	250	31	-	-	-	-	-	-	-	-
14	0.95	-	-	Terrace	250	38	-	-	-	-	-	-	-	-
15A	0.60	80%	0.48	Walkup	-	-	55%	2640	4	10560	85%	8976	80	112
15B	0.61	-	-	Terrace	250	24	-	-	-	-	-	-	-	-
16	0.35	100%	0.35	Walkup	-	-	55%	1934	4	7735	85%	6575	100	66
17A - 1	0.75	75%	0.56	Apartment	-	-	50%	2813	7.5	21094	85%	17930	90	199
17A - 2	0.75	75%	0.56	Apartment	-	-	50%	2813	5.5	15469	85%	13148	90	146
17B	1.60	-	-	Terrace	250	64	-	-	-	-	-	-	-	-
17C*	1.40	-	-	Office	-	-	-	-	-	-	-	-	-	-
18	1.42	85%	1.21	Walkup	-	-	55%	6646	4	26582	85%	22595	80	282
19	1.04	75%	0.78	Walkup	-	-	55%	4306	4	17223	85%	14639	80	183
20	1.78	-	-	Terrace	250	71	-	-	-	-	-	-	-	-
21*	3.67	-	-	Terrace	250	147	-	-	-	-	-	-	-	-
22	0.34	85%	0.29	Walkup	-	-	55%	1600	6	9599	85%	8159	80	102
Subtotal	33.83	-	-	-	-	559	-	-	-	-	-	307526	-	4059
23	0.69	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
24	0.98	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
25	0.32	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
26	1.47	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
27	1.64	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
Subtotal	5.10	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	38.93	-	-	-	-	-	-	-	-	-	-	-	-	-

KEY

ADAPTIVE USE
APARTMENT
WALKUP
TERRACE
OFFICE
OPEN SPACE

NOTE:

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

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

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

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

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

Notes

1. AREAS AND DIMENSIONS SUBJECT TO FINAL SURVEY
2. EASEMENTS TO BE CREATED OVER SERVICES AS NECESSARY

LEGEND

- OPEN SPACE/ RESERVE
- NGĀTI WHĀTUĀ RŌPŪ LOTS
- WHAI RAWA LOTS
- WAIOHUA - TĀMAKI RŌPŪ LOTS
- MARUTŪĀHU RŌPŪ LOTS
- ROAD WIDENING PARCELS
- PROPOSED FUTURE ROAD PARCEL
- NEW BOUNDARIES
- EXISTING LINZ XML BOUNDARIES



**FOR INFORMATION
NOT FOR CONSTRUCTION**

No.	Revision	By	Chk	Appd	Date
J	POND BOUNDARY UPDATE SECTION 3 AND 4	AH	AH	NG	14/02/23
I	STRAIGHTENED BOUNDARIES SECTION 3 AND 4 AND UPDATED AREAS	CG	AH	NG	31/01/23
H	UPDATED BOUNDARIES SECTION 3 AND 4	AH	AH	NG	21/12/22
G	UPDATED BOUNDARIES SECTION 8	AH	AH	NG	20/12/22

Drawing Originator:



Original Scale (A1)	1:1500	Surveyed	KM	06/2022	Approved For Issue*
Reduced Scale (A3)	1:3000	Drawn	AH	06/2022	Date
		Verify	NG	06/2022	
		Day Check	NG	06/2022	

*Refer to Revision 1 for Original Signature

Client: **MINISTRY OF HOUSING AND URBAN DEVELOPMENT (HUD)**

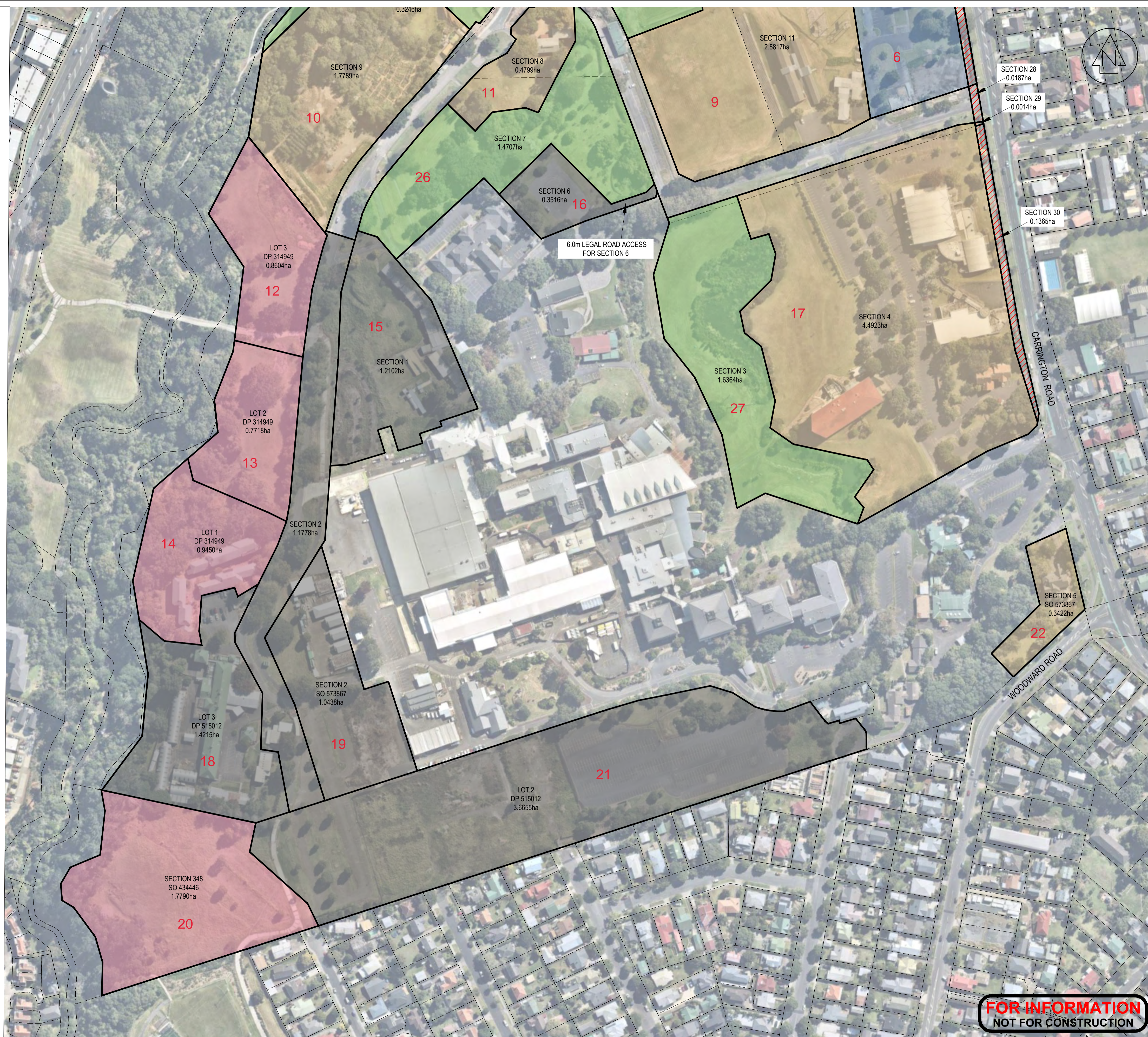
Project: **CARRINGTON SUBDIVISION**

Title: **SCHEME PLAN 2 INCLUDING ROAD WIDENING**

Discipline	SURVEY	
Drawing No.	3126781-WS-003	Rev.
		J

Notes

1. AREAS AND DIMENSIONS SUBJECT TO FINAL SURVEY
2. EASEMENTS TO BE CREATED OVER SERVICES AS NECESSARY



LEGEND

- OPEN SPACE/ RESERVE
- NGĀTI WHĀTUĀ RŌPŪ LOTS
- WHAI RAWA LOTS
- WAIOHUA - TĀMAKI RŌPŪ LOTS
- MARUTŪĀHU RŌPŪ LOTS
- ROAD WIDENING PARCELS
- PROPOSED FUTURE ROAD PARCEL
- NEW BOUNDARIES
- EXISTING LINZ XML BOUNDARIES

FOR INFORMATION
NOT FOR CONSTRUCTION

No.	Revision	By	Chk	Appd	Date
J	POND BOUNDARY UPDATE SECTION 3 AND 4	AH	AH	NG	14/02/23
I	STRAIGHTENED BOUNDARIES SECTION 3 AND 4 AND UPDATED AREAS	CG	AH	NG	31/01/23
H	UPDATED BOUNDARIES SECTION 3 AND 4	AH	AH	NG	21/12/22
G	UPDATED BOUNDARIES SECTION 8	AH	AH	NG	20/12/22



Original Scale (A1)	Surveyed	Drawn	Verified	Checked	Approved For Issue*
1:1500	KM	06/2022	AH	06/2022	Date
Reduced Scale (A3)	Diag Check		NG	06/2022	Date
1:3000					*Refer to Revision 1 for Original Signature

Client: **MINISTRY OF HOUSING AND URBAN DEVELOPMENT (HUD)**

Project: **CARRINGTON SUBDIVISION**

Title: **SCHEME PLAN 2 INCLUDING ROAD WIDENING**

Discipline	Drawing No.	Rev.
SURVEY	3126781-WS-002	J

'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I 334 Wairaka Precinct

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	P2
Specific request	Summary of community consultation outcomes
Reasons for request	It is understood the Applicant is undertaking local community consultation. It will be helpful to have information on the outcomes of that consultation.
Applicant response provided by	John Duthie of Tattico
Applicant response	

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

Public Drop in Sessions

- 1 Drop-in sessions were held in February 2023. Two sessions were held two weeks apart with a 3pm to 7pm timeframe. The time spread was intended to provide an afternoon and / or evening opportunity for people to visit the precinct, to question the HUD's **consultant team**, and to view a summary of the plan change material, including the Precinct plans. This also included information in respect of the existing precinct provisions and plans for comparison.
- 2 Approximately 25-30 members of the community attended on the first drop-in session, with around 50-60 attending the second session.
- 3 A broad range of the community attended including:
 - (a) residents;
 - (b) people who worked in the area;
 - (c) people studying in the area;
 - (d) people with children at primary schools in the area;
 - (e) local business owners;
 - (f) people coming on behalf of public interest groups; and
 - (g) Local Board members.
- 4 The key themes raised are set out below.

5 *Transport:*

- (a) Traffic to and from the south and how this would be controlled to prevent through traffic in residential streets / the maintenance of the existing cul-de-sacs in the southern section of the development.
- (b) Volumes of cars and the effects of increased traffic in surrounding streets.
- (c) **Integration with Auckland Transport's (AT) Carrington Road upgrade.**
- (d) Related upgrades and whether these were planned, including the Woodward Road Railway Crossing.
- (e) Rooding connectivity to and from the east, i.e. integration between the precinct and Mount Albert streets on the other side of Carrington Road.
- (f) The feasibility of extending the Carrington Road upgrade east of Woodward Road (narrower corridor, steeper land adjacent) and how the rail and motorway overbridge pinch points would be dealt with.
- (g) **Concern about parking in surrounding suburbs by residents of the new "low car" development and whether a residents' parking scheme would be supported by AT.**
- (h) Support for the alternative expanded cycleway network and connections to the Northwestern and Southern Cycleway to Mount Albert. Higher density considered to be supported by this network.
- (i) Support for the cycling initiatives in the plan change.
- (j) Questions about the new connection to the Northwestern Cycleway in light of the proposed connection, as shown on the operative Wairaka Precinct plans, being removed through the Mason Clinic plan change.
- (k) Support for provision of public walking through the precinct and connectivity to the surrounding neighbourhoods.

6 *Business – Mixed Use zone:*

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

(e) **Questions about the future of Taylor's Laundry.**

7 *Stormwater:*

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

8 *Open Space and Community Facilities:*

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

9 *Trees:*

- (a) Protection for trees in the plan.

10 *Height:*

- (a) Permitted heights across the precinct, particularly along the Carrington Road frontage.
- (b) Impact of Plan Change 78 and nature of change / further development opportunity in the surrounding residential area.

11 *Timing of the development:*

- (a) Timing of development, including interest in seeing development progress to help bring a future community to support the Point Chevalier town centre and its retailers.
- (b) Timing of Carrington Road upgrades.
- (c) Interest in opportunities to buy dwellings for themselves or family members.

12 *Former Oakley Hospital Building and Heritage:*

- (a) Interest in Building 1 (the Former Oakley Hospital Building) and its future.
- (b) Request for the Pumphouse to be returned to a publicly accessible operating café / bar / restaurant.

- 13 *School:*
- (a) Whether a primary school is planned within the precinct and whether it could be added later if not included now.
- 14 *Housing tenures:*
- (a) Future home ownership tenures i.e. who will own the land, will it be leasehold, will there be public housing, will there be many rentals.
- (b) **Support for “rent to buy” possibilities.**
- 15 HUD considers that the relevant matters raised at these sessions have been comprehensively addressed in the plan change application materials and clause 23 responses.

The Tree Council

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

Unitec’s Ngā Kaitiaki Committee

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

'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I 334 Wairaka Precinct

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	P3
Specific request	Please provide an analysis of the proposed plan change in relation to AUP RPS chapters B3 – Infrastructure, Transport and Energy; B4 - Natural heritage; B5 – Built heritage and character; B6 Mana Whenua; B7 Natural Resources; B8 Coastal Environment and B10 Environmental Risk.
Reasons for request	Required for a full understanding of the proposed plan change under the RPS.
Applicant response provided by	John Duthie of Tattico
Applicant response	
1	As stated in the plan change application, the plan change will give effect to the Regional Policy Statement, as required by s 75(3).
2	The attached table sets out the requested assessment of the plan change against chapters B3-B8 and B10 of the Regional Policy Statement.

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

RPS Chapter and provisions	Assessment in respect of plan change
<p>(5) Infrastructure planning and land use planning are integrated to service growth efficiently.</p> <p>(6) Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development.</p> <p>(7) The national significance of the National Grid is recognised and provided for and its effective development, operation, maintenance and upgrading are enabled.</p> <p>(8) The adverse effects of infrastructure are avoided, remedied or mitigated.</p>	<p>5. The key natural resource is the Te Auaunga stream (Oakley Creek) and the protected trees within the precinct. This plan change retains the additional yard setback of 10m to Oakley Creek as required under the current Precinct provisions. This is designed to enhance protection of the Te Auaunga stream environs. The plan change also retains the same list of protected trees.</p>
<p>B3.3 Transport</p> <p>B3.3.1 Objectives</p> <p>(1) Effective, efficient and safe transport that:</p> <p>(a) supports the movement of people, goods and services;</p> <p>(b) integrates with and supports a quality compact urban form;</p> <p>(c) enables growth;</p> <p>(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</p> <p>(e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.</p>	<p>1. Consistent with the above response in relation to infrastructure, effective, efficient and safe transport will be provided in an integrated manner, in accordance with the precinct provisions proposed in the plan change.</p> <p>2. The precinct is uniquely located in terms of the walkway and cycleway network, bus network, and, particularly for the southern portion of the precinct, access to trains.</p> <p>3. The transport links, across several modes and improving with the planned upgrades, between the Mount Albert and Point Chevalier town centres assists in the integration between these two growth nodes.</p> <p>4. As a result, the plan change, and development enabled by it, will provide significant transport choices.</p>
<p>B4 Te tiaki taonga tuku iho - Natural heritage</p>	
<p>B4.2 Outstanding natural features and landscapes</p>	<p>1. There are no outstanding natural features or landscapes within the precinct.</p>
<p>B4.3 Viewshafts</p> <p>B4.3.1 Objectives</p>	<p>1. Existing viewshafts over the precinct are protected by the Auckland Unitary Plan (Operative in Part) (<i>AUP</i>) overlay provisions.</p> <p>2. There is no change to these provisions through this plan change.</p>

RPS Chapter and provisions	Assessment in respect of plan change
<p>(1) Significant public views to and between Auckland’s maunga are protected from inappropriate subdivision, use and development.</p> <p>(2) Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use and development.</p>	<p>3. No height standard proposed through the plan change will impinge on any existing viewshaft.</p> <p>4. This plan change fully protects the volcanic viewshaft that crosses the southern part of the precinct.</p>
<p>B4.5 Notable trees</p> <p>B4.5.1 Objectives</p> <p>(1) Notable trees and groups of trees with significant historical, botanical or amenity values are protected and retained.</p>	<p>1. There are no changes to notable trees as part of this plan change.</p> <p>2. The Council has recently reviewed the tree schedule within the region. This culminated in Proposed Plan Change 83 (<i>PC83</i>) looking at notable trees.</p> <p>3. PC83 proposed to amend the description of the only notable group of trees in the precinct (ID 173) from 6 to 5 trees. HUD has made no comment on this plan change as it accepted the Councils changes.</p> <p>4. However, due to a notification error, this amendment has been withdrawn from PC83 and we understand will be included in a subsequent Council plan change.</p> <p>5. The withdrawal of the proposed amendment has no effect on the plan change.</p> <p>6. In addition to the notable trees, the precinct provides a schedule of specifically protected trees. Again there is no change to those provisions as part of this plan change.</p> <p>7. This plan change is consistent with the regional policies on notable trees.</p>
<p>B5 Ngā rawa tuku iho me te āhua – Historic heritage and special character</p>	
<p>B5.2 Historic heritage</p> <p>B5.2.1 Objectives</p>	<p>1. Heritage protection is provided through the overlay provisions within the AUP. In particular, these provisions identify the Former Oakley Hospital Building as a protected heritage building.</p>

RPS Chapter and provisions	Assessment in respect of plan change
<p>(1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.</p> <p>(2) Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.</p>	<p>2. There is no change to the protection of this building or its extent of place as part of this plan change.</p> <p>3. There are no changes to any of the heritage or character provisions or operative precinct provisions that encourage the retention and adaptation of the Former Oakley Hospital Building.</p> <p>4. In addition, a new policy is proposed in the precinct provisions through the plan change to encourage adaptive re-use of existing buildings with historic value for retail activities.</p>
<p>B6 Mana Whenua</p>	
<p>B6.2 Recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation</p>	<p>1. This chapter of the Regional Policy Statement sets out a series of objectives and policies relating to partnership with mana whenua.</p> <p>2. Fundamentally, this plan change is supporting the provision of Treaty redress in part settlement of historical Treaty of Waitangi grievances by the Crown, as set out in the provisions of the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed and Act which contain the terms which underpin this plan change proposal. It, therefore recognises Treaty of Waitangi/ te Tiriti o Waitangi partnerships and participation.</p> <p>3. As the development will be undertaken by the iwi collectives (Rōpū), its outcomes will reflect their participation in urban development, in partnership with the Crown.</p>
<p>B6.3 Recognising Mana Whenua values</p> <p>B6.4 Māori economic, social and cultural development</p> <p>B6.5 Protection of Mana Whenua cultural heritage</p>	<p>1. These objectives are all directly related and relevant to this plan change.</p> <p>2. Particular objectives and policies are introduced into the plan change which promote Māori economic development and the cultural values of this land.</p>

RPS Chapter and provisions	Assessment in respect of plan change
	<p>3. This plan change enables the three Rōpū comprising 13 iwi to advance their own economic development aspirations and to do this in a manner which protects and enhances their cultural values for this place.</p> <p>4. This plan change is fully consistent with, and gives effect to, these regional objectives. In particular, it has been drafted to support Rōpū aspirations for the precinct, and the proposed provisions have been agreed with them.</p>
B7 Toitū te whenua, toitū te taiao – Natural resources	
<p>B7.2 Indigenous biodiversity B7.3 Freshwater systems</p>	<p>1. The natural resource provisions are reflected in the Auckland-wide provisions of the AUP. This plan change does not seek any changes to these Auckland-wide provisions.</p> <p>2. The operative precinct adopts in full all the objectives, policies, rules and assessment criteria of the Auckland-wide provisions, and this is not proposed to be changed through this plan change.</p> <p>3. In that regard, this plan change is fully consistent with the Regional Policy Statement by virtue of adopting the Auckland-wide provisions of the AUP.</p>
B8 Toitū te taiwhenua – Coastal environment	
	<p>1. The precinct is not on the coast and therefore does not directly relate to these policies. The regional and Auckland wide policies on Water quality and land disturbance provide appropriate methods to manage the effects of development and the impact on the coastal environment. These policies and related provisions are all applicable with in the precinct. This plan change does not seek to alter any of those provisions.</p>

RPS Chapter and provisions	Assessment in respect of plan change
B10 Ngā tūpono ki te taiao - Environmental risk	
<p>B10.2 Natural hazards and climate change B10.3 Land – hazardous substances B10.4 Land – contaminated</p>	<ol style="list-style-type: none"> 1. The Regional Policy Statement addresses natural hazards and climate change, land hazardous substances, land contaminated, and genetically modified organisms. 2. The provisions which flow from these objectives are set out in the Auckland-wide objectives, policies and rules of the AUP. 3. The precinct fully adopts those Auckland-wide provisions. It does not seek to delete or change any objective, policy, method or assessment criteria relating to environmental risk. 4. There are no known natural hazards that apply to the precinct. 5. There are overland flow paths that traverse through the precinct. These are fully addressed in the Stormwater Management Plan for the precinct which has been adopted by Council. This demonstrates how stormwater management and localised flooding and overland flow is to be managed on site. 6. Significant portions of this work are well advanced. This includes works consented and delivered including the daylighting of the Wairaka Stream, and Outfall 6. 7. In addition, the Mason Clinic development is advancing the management of certain overland flows and stormwater in the northern portion of the precinct. 8. The land does have isolated pockets of historical land contamination.

RPS Chapter and provisions	Assessment in respect of plan change
	<p>9. For the central and northern portion of the precinct, a global land contamination consent has already been obtained. This sets up the process to monitor and manage these effects. The process for investigation and management of any contaminants is set out within that consent.</p> <p>10. Areas of land not covered by this global land contamination consent, are subject to separate applications under the Auckland-wide provisions as addressed in clause 23 response P7.</p> <p>11. Any hazardous substances stored on site within the precinct would be subject to the objectives, policies, rules and standards of the relevant Auckland-wide provisions.</p> <p>12. In terms of environmental risk, the regional objectives and policies are embodied in the Auckland wide provisions. These provisions are adopted in full within this precinct. There are no environmental risk features inherent to this precinct that warrant provisions beyond the Auckland wide controls.</p>

'Proposed Plan Change xx (Private) – Te Auaunga'

Amending I 334 Wairaka Precinct

Applicant: **Te Tūāpapa Kura Kāinga** – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	P4
Specific request	Please provide an analysis of the proposed plan change in relation to any applicable iwi management plan.
Reasons for request	Required for a full understanding of the proposed plan change in relation to any relevant iwi management plan.
Applicant response provided by	John Duthie, Tattico
Applicant response	<p>1 While iwi management plans have been produced, at various times, for the Wairaka Precinct there are no iwi management plans that apply specifically to this plan change.</p> <p>2 While this plan change has been put forward by HUD, it is in the context of Treaty settlement obligations that apply to the Crown over the site, which were agreed as part of the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed arrangements. As part of those arrangements, the Crown is working closely with the three Rōpū parties to the Collective Redress Deed: Marutūāhu, Ngāti Whatua and Waiohua-Tāmaki who will take ownership of the land and undertake development, in partnership with HUD. The thirteen iwi constituting those three Rōpū are:</p> <p><i>Marutūāhu Rōpū:</i></p> <ul style="list-style-type: none"> (a) Ngāti Maru. (b) Ngāti Pāoa. (c) Ngāti Tamaterā. (d) Ngaati Whanaunga. (e) Te Patukirikiri. <p><i>Ngāti Whātua Rōpū:</i></p> <ul style="list-style-type: none"> (f) Ngāti Whātua Ōrākei. (g) Te Rūnanga o Ngāti Whātua. (h) Ngāti Whātua ki Kaipara.

Waiohua-Tāmaki Rōpū:

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

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

'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I 334 Wairaka Precinct

Applicant: Minister of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	P5
Specific request	Please provide an analysis of the proposed plan change in relation to the Auckland Council Ten Year Budget / Long Term Plan 2018-2028
Reason for request	Required for a full understanding of the proposed plan change in relation to the demands of development enabled by the plan change and what is / what is not provided for in Council's LTP.
Applicant response provided by	John Duthie, Tattico
Applicant response	
1	The question relates to funding of infrastructure and how this plan change relates to Council's planned expenditure.
2	While the question is confined to the Council's Long Term Plan (LTP) (noting that the current LTP is for 2021-2031), Auckland Transport's (AT) funding plan (Regional Land Transport Plan 2021-2031) and Watercare's funding plan 2021-2031 are also relevant to funding of infrastructure required to service the precinct.
3	The LTP's most significant budget centre is for the funding of transport functions into AT.
4	Watercare are self-funding necessary infrastructure through its user-pays regime.
5	The Crown's funding of the Carrington Road upgrades and the funding of the cycle lane extensions within the precinct means that this development will have some, but a proportionally low, regional impact on transport funding through the existing LTP. Rather, the proposed development has facilitated a funding stream to pay for a major regional project that will help enable intensification within this part of the city - being the Carrington Road upgrade.
6	An assessment of the different types of network infrastructure required to service the precinct and relevant funding streams is set out in the table below.

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

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

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

'Proposed Plan Change xx (Private) – Te Auaunga'
Amending I334 Wairaka Precinct

Applicant: **Te Tūāpapa Kura Kāinga** - Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	P6
Specific request	Please provide an analysis of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020.
Reasons for request	Required for a full understanding of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020.
Applicant response provided by	John Duthie, Tattico
Applicant response	<p>1 The Local Board Plan 2020 (<i>Local Board Plan</i>) has six key outcomes. The response below explains how the plan change makes a contribution to each of these outcomes.</p> <p>Outcome 1: resilient connected and empowered communities who value diversity</p> <p>2 Spatially, and in its objectives, the plan change is intended to ensure that the future community is connected into the adjacent neighbourhoods of Mount Albert, Point Chevalier and Waterview. This is realised both practically through the roads, walking and cycling paths that are updated through the plan change to reflect the extended network being built, and in provisions that recognise the need for a variety of community facilities and opportunities for the community to socialise, work, undertake learning, and recreate within the precinct, as well as acknowledging the hierarchy of the Mount Albert and Point Chevalier town centres as hubs for the wider suburban area.</p> <p>3 The range of housing typologies, and mix of social, affordable, and market housing that will be delivered through the development that will be enabled by the plan change will contribute to creating a diverse community.</p> <p>Outcome 2: neighbourhoods that reflect and value our heritage and unique identity now and into the future</p> <p>4 The plan change increases the emphasis given to the priorities of the Rōpū, who together represent 13 iwi/hapu of Tāmaki Makaurau, including through amendments to the objectives and policies to provide for contributing to Māori cultural promotion (I334.2(10)(f) and I334.3(4)(e)).</p> <p>5 The plan change also includes a specific policy seeking to encourage the adaptive reuse of the existing buildings with heritage values for retail activities (I334.3(30A)), which is intended to assist in their preservation. The plan change is intended to enable a future community with a higher density urban form but also seeks to minimise the impact of additional development height on the existing neighbouring suburbs by focusing provision</p>

for this height away from these areas. (Refer also the planning report and clause 23 responses on heritage.)

Outcome 3: high-quality natural environments and sustainable lifestyles

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

Outcome 4: a strong local economy with thriving town centres

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

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

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

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

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

'Proposed Plan Change xx (Private) – Te Auaunga'

Amending I 334 Wairaka Precinct

Applicant: **Te Tūāpapa Kura Kāinga** – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	P7
Specific request	Please provide an analysis of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
Reasons for request	Required for a full understanding of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
Applicant response provided by	John Duthie, Tattico

Applicant response

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

Global land contamination consent

- 5 **The Marutūāhu and Waiohua-Tāmaki Rōpū have obtained a global land contamination consent** for the entire HUD properties. This does not include the Whai Rawa, Unitec or Mason Clinic land, but those land owners may have previously undertaken a Preliminary Site Investigation (*PSI*). (It is understood at least Unitec has.) This plan change does not seek any rezoning of those sites (Unitec, Whai Rawa, Mason Clinic).
- 6 The global land contamination consent application was supported by a Detailed Site Investigation (*DSI*) by Beca, including a Contaminated Site Management Plan (*CSMP*) and Remediation Action Plan (*RAP*).

- 7 That consent included a detailed assessment under both the NESCS and the Auckland Unitary Plan (Operative in Part) (*AUP*).
- 8 The DSI identified there were substantial portions of the HUD properties that had no discernible contaminants above trigger levels. There were a number of buildings which had asbestos. There were some locations of potential future contaminants, e.g. coal bunkers on the Taylors Laundry site.
- 9 The existing consent sets out an approved process for the management of land contamination in various parts of the precinct. In certain identified areas it also requires additional investigative work.
- 10 That consent is relied on as part of this plan change request. It provides a comprehensive management regime for all land contamination issues on-site.
- 11 **That consent forms part of Council's records, including the consent itself, assessment under the NESCS, CSMP, and RAP.**
- 12 To assist reporting officers in their consideration, I reference the consent number, which is BUN 60388418.
- 13 In summary, the Council, in determining the global consent, found that the land contamination matters on the property were appropriately managed through the conditions of consent and the process outlined within the consent such that the effects would all be less than minor.

Balance of precinct land

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

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

'Proposed Plan Change xx (Private) – Te Auaunga'

Amending I 334 Wairaka Precinct

Applicant: **Te Tūāpapa Kura Kāinga** – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	P8
Specific request	Please explain why the applicant has elected not to use the height variation control in the B-MU zone in conjunction with the precinct provisions.
Reasons for request	Council's preference is not to introduce bespoke provisions in precincts when other tools are already available.
Applicant response provided by	John Duthie, Tattico

Applicant response

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

AUP tools

- (a) The Height Variation Control in the AUP is designed to work alongside zonings:¹

Zones are identified on the planning maps. In addition, zone rules which have a spatial component such as the Height Variation Control are identified on the planning maps.
- (b) The Height Variation Control is therefore used to identify where a variation to the standard zone provisions, i.e. regarding height, applies.
- (c) In contrast, where a precinct is applied, that already acts as an indicator that bespoke provisions apply to that area of land:²

¹ AUP, Chapter A Introduction: A1.6.4. Zones.

² AUP, Chapter A Introduction: A1.6.5. Precincts.

Precincts enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling.

- (d) Different methods are used within precincts to set alternative height standards. Some achieve this by reference to sub-precincts,³ whereas others include a separate precinct plan identifying the different height standards that apply in different areas within the precinct.⁴ While there are some limited instances where the Height Variation Control has been applied within a precinct, the applicant understands the above approaches to be the more common method of providing for alternate height within a precinct under the AUP; as additional height provided for within a precinct is necessarily linked to the outcomes sought to be achieved, and activities that are provided for, in that particular precinct; together with the particular assessment criteria contained in the relevant precinct to assist in achieving the stated outcomes.

Plan change approach adopted

- (e) When considering what approach to apply within the existing Wairaka Precinct, it was relevant to consider the existing precinct provisions alongside the outcomes sought to be achieved to provide for the future community within the precinct.
- (f) In the operative Wairaka Precinct, sub-precincts are used for a specific purpose – to identify areas within the precinct where particular objectives apply to enable activities specific to that area within the precinct. Height is addressed separately in the operative precinct provisions.⁵
- (g) It would therefore not be suitable to use the sub-precinct mechanism to set the different height standards sought to be provided for within this plan change.
- (h) Accordingly, the applicant has elected to adopt the approach of providing a separate precinct plan to identify the height sought to be enabled within the precinct in different areas to provide for its future community, recognising that this is a tool that has been used elsewhere within the AUP precinct framework, as set out above.
- (i) Precinct provisions enabling the assessment of development in these areas are proposed with reference to proposed Precinct plan 3.
- (j) That approach is of particular relevance in Height Area 1, where a flexible height arrangement is allowed with three towers enabled up to varying heights. This is not a case of a single set height across this entire part of the precinct. Rather, heights can vary by building in different locations.
- (k) Critical to the workability of the maximum height control in Height Area 1, is the combination of maximum height and maximum diagonal dimension controls. The two standards work together to achieve the desired planning outcome. It is more logical and operationally significantly easier to collocate these provisions within the precinct standards.

How Height Variation Control could be used

- (l) While it could be possible to manage height in other areas of the precinct through the application of the Height Variation Control, that would result in two separate

³ For example, the sub-precincts within the Albany 10 and Hobsonville Point Precincts.

⁴ For example, Precinct Plan 2 in the Three Kings Precinct.

⁵ AUP, 1334 Wairaka Precinct: 1334.6.4. Height.

frameworks applying within the precinct, which the applicant considers would be an unnecessarily confusing outcome, given than other established tools exist within the AUP. The applicant considers the approach taken in this plan change to be a more straightforward method of identifying the height standards that apply to different areas within the precinct, and the particular provisions that apply to the assessment of building of this height in the different areas.

- (m) The alternative would be applying the Height Variation Control, including with a cross reference to the Wairaka Precinct provisions with respect to Height Area 1, given the particular provisions that apply in this area. However, that would be the first time that approach is used in the AUP. **Hence the applicant's preference to manage all height controls through the precinct provisions as proposed in the plan change.**

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

'Proposed Plan Change xx (Private) – Te Auaunga'

Amending I 334 Wairaka Precinct

Applicant: **Te Tūāpapa Kura Kāinga** – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question

P8B

Specific request

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

Applicant response provided by

John Duthie, Tattico

Applicant response

1 This is a non-clause 23 response.

2 The Council has requested a comparison of yield between the existing operative Wairaka Precinct and new requested precinct provisions. The request particularly asks for an assessment of whether the proposed open space area and retail provision are adequate in light of the proposed increase in density that will be enabled by the plan change.

3 The author was directly involved in the development of the Wairaka Precinct and advancing those provisions through the Auckland Unitary Plan (Operative in Part) (AUP) process, working initially for Unitec and subsequently for the Wairaka Land Company. This included securing all resource consents for the core campus development, developing the draft Wairaka Precinct provisions and appearances through the Proposed AUP submission process.

4 The information set out in this response relating to the historical development of the precinct is drawn only from reports, evidence and summary material tabled through the Proposed AUP hearing process or related publicly available information.

Original yield: Wairaka Precinct

5 The original Wairaka Precinct comprised the following components:

(a) The Mason Clinic and Taylors Laundry site were included within sub-precincts with yield **treated on a "status quo" basis.**

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

Yield comparison

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

Context

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

Land area comparison

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

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

11 The table below sets out a direct comparison:

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

Whai Rawa	4.4 ha	4.36 ha
Total	32.2	33.8

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

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

Open space

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

14 The open space responses are fully addressed at clause 23 responses OS1-OS8. That is not repeated here. In summary:

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

(d) The open space provides a wide variety of functionality as set out in the response to clause 23 request OS3 and OS4.

15 Whether the yield uplift is considered at 500 or 1,000, the increase in public open space as part of this plan change is considerable.

Retail

16 The question has been raised as to whether there is sufficient retail in the precinct. Mr Heath has addressed this issue from an economic perspective at clause 23 response EA1.

17 This plan change does not seek to amend the overall cap on retail floor space. This follows **the Council's key focus at the** Proposed AUP hearings that it wanted to support the Point Chevalier and Mount Albert town centres by limiting the gross floor area of permitted retail development within the precinct to 6,500m². Furthermore, retail was distributed between:

(a) that associated with the campus;

(b) a core retail node around Gate 3; and

(c) the provision for retail within the Former Oakley Hospital Building to assist in the adaptive reuse of this building and to assist with the connection to Point Chevalier.

18 From a planning perspective, I make the following observations:

(a) The northern portion of the precinct is within the walkable catchment of the Point Chevalier town centre. For the first time, Point Chevalier town centre will have a residential population in its southwestern quadrant. This will increase its catchment. A walkable catchment to a town centre helps reinforce the economic sustainability of the centre.

(b) The new retail hub adjacent to Gate 3 provides a good service area to the central part of the precinct and to the properties on the eastern side of Carrington Road. It creates retail services within a good walkable catchment of this part of the precinct. It is also the prime access to the central part of the precinct for vehicles. It sits on the major public transport corridor of Carrington Road. There will also be a dedicated cycleway that connects through the precinct to this retail area.

(c) While further away, the southern end of the precinct is within a reasonable walking distance of the Mount Albert shopping centre.

(d) The BMU zone does provide for small dairy and food and beverage type operations within the zoning. Immediate top-up shopping provision can be made elsewhere in the precinct if there is a demand.

‘Proposed Plan Change xx (Private) – Te Auaunga’

Amending I 334 Wairaka Precinct

Applicant: **Te Tūāpapa Kura Kāinga** – Ministry of Housing and Urban Development

Address: 1-139 Carrington Road, Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

Question	P9 & P10
Specific request P9	<p>Spatial Distribution of future land use activities. It will be noted that a number of the Council’s specialists (including under UD9 and EA1) have raised concern that the plan change, while identifying the location of some activities (e.g. open space on the precinct plan and retail in the provisions) and limitations on where industrial activities may be located) does not provide clarity on whether the location of non-residential activities in particular may be located in respect of the needs of the future community, and effects on the residential community. It is also difficult to appreciate how various land use activities may be connected to each other and to places beyond the precinct. Further, the retail activity locations are similar to those in the current precinct and may not be best located for the nodes of new development enabled by the proposed provisions. The Applicant is invited to reconsider whether what is proposed provides sufficient clarity in relation to these concerns. In that respect, while a master plan may not be a requirement of the plan change itself, it can nevertheless illustrate the vision sought for the site. There has clearly been much consideration of this already, and perhaps further planning that is underway. The Applicant is invited to share as much of that planning as possible, as it may alleviate some of the concerns that are and could still be expressed about how the Precinct could develop, particularly in a way that does not address context and the needs of the community as a whole.</p>
Specific request P10	<p>The approach that has been taken in the plan change is to amend the current precinct provisions, rather than take a fresh look at how it is intended this future community will look (the vision) and what better way there may be to plan, through the AUP, for that future community. As an example, Objective 1 still refers to provision of a tertiary institution. While that will still be a major presence in the future community, what is intended to be enabled is more a higher density residential community – of 10,000 or more residents. Whether that ultimate urban outcome is adequately portrayed in the objectives and policy framework proposed is questionable. The Applicant is invited to reconsider whether the proposed provisions provide sufficient clarity in relation to these concerns.</p>
Applicant response provided by	John Duthie, Tattico

Applicant response

- 1 These are non-clause 23 matters.

Modification to an existing precinct

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

Spatial distribution

- 7 The clause 23 request raises issues of spatial distribution on the precinct. In that regard:
 - (a) The tertiary institution at the Unitec core campus is retained, remains on its existing site and will be progressively developed in accordance with the long-term plan for that **institute (now part of Te Pūkēna)**. **The only effect of this plan change is to change the zoning of land purchased by the Crown from Unitec.**
 - (b) The Mason Clinic remains on its existing site but is expanded. That is subject to a separate Plan Change 75 process.
 - (c) The retail hub remains in its current location. That location was identified and supported by assessments during the AUP process. That process:
 - (i) identified the gross floor area cap for retail;
 - (ii) allocated a core retail area as part of the campus (food and beverage, bookshop opportunities etc);
 - (iii) allocated the core location for the hub to service the precinct and local community;

- (iv) identified the importance of locating this retail hub between the Mount Albert town centre and Point Chevalier town centre so as to reduce the impact on those two centres and maximise convenience for the precinct (as it is approximately at the **precinct's midpoint**);
 - (v) identified the importance of locating the retail hub on the public transport route giving it the ability to service both the new Te Auaunga neighbourhoods, the tertiary staff and students, and the neighbourhoods east of Carrington Road; and
 - (vi) located the retail hub adjacent to the Farm Road intersection, at the top of the future public shared exit / entrance for both the residential neighbourhood and Unitec, because this provides good connections to both the Unitec campus and the residential neighbourhood.
- (d) Notwithstanding the changes proposed to distribution of land uses through the plan change and increase in overall dwelling scale that will be enabled, Mr Tim Heath has confirmed his response to the economic clause 23 requests that the above factors continue to apply to, and support, the proposed retail distribution within the precinct.
- (e) Unitec is an applied learnings tertiary institution. A significant component of the facility is practical training. During the AUP process Unitec sought a range of semi-industry or service type activities within its zone to assist in that learning process. Major IT service centres, veterinary clinics, electronics and construction activities are examples of what has been used currently or in the past to complement the Unitec courses.
- This plan change preserves that opportunity. However, while that opportunity currently exists through the majority of the precinct (excluding the southern interface), this plan change ensures these uses are located away from the Carrington Road frontage. The combination of the new control, and the existing control, ensures that these types of activities are removed from existing established residential areas. New residents moving into the precinct understand that they are living within a mixed-use area.
- (f) Community facilities are enabled within the residential neighbourhoods. The level of community facilities is expected to be relatively modest but it is not practical to predetermine the extent or location. The intention is to embed these within the precinct. The Pumphouse is an example of what could either be a retail food and beverage facility or a community facility, or both.
- (g) The vast majority of the HUD land is intended for residential development. To the extent practical, the spatial distribution on the precinct is known and established. The precinct plan, through the sub-precincts, identifies the location of:
- (i) the Unitec campus;
 - (ii) the Mason Clinic;
 - (iii) Taylors Laundry and the industrial activity associated with that leasehold land, while this activity remains;
 - (iv) the low rise development along the southern boundary;

- (v) the heritage precinct in the north (identified through the overlays within the AUP);
 - (vi) the area of protected trees;
 - (vii) the open space; and
 - (viii) the areas of increased height.
- (h) In a land use spatial distribution sense these key elements are defined to the extent appropriate through Precinct plan 1.

Masterplan

8 This question again raises the issue of the masterplan. That is addressed in clause 23 response UD9. In summary:

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