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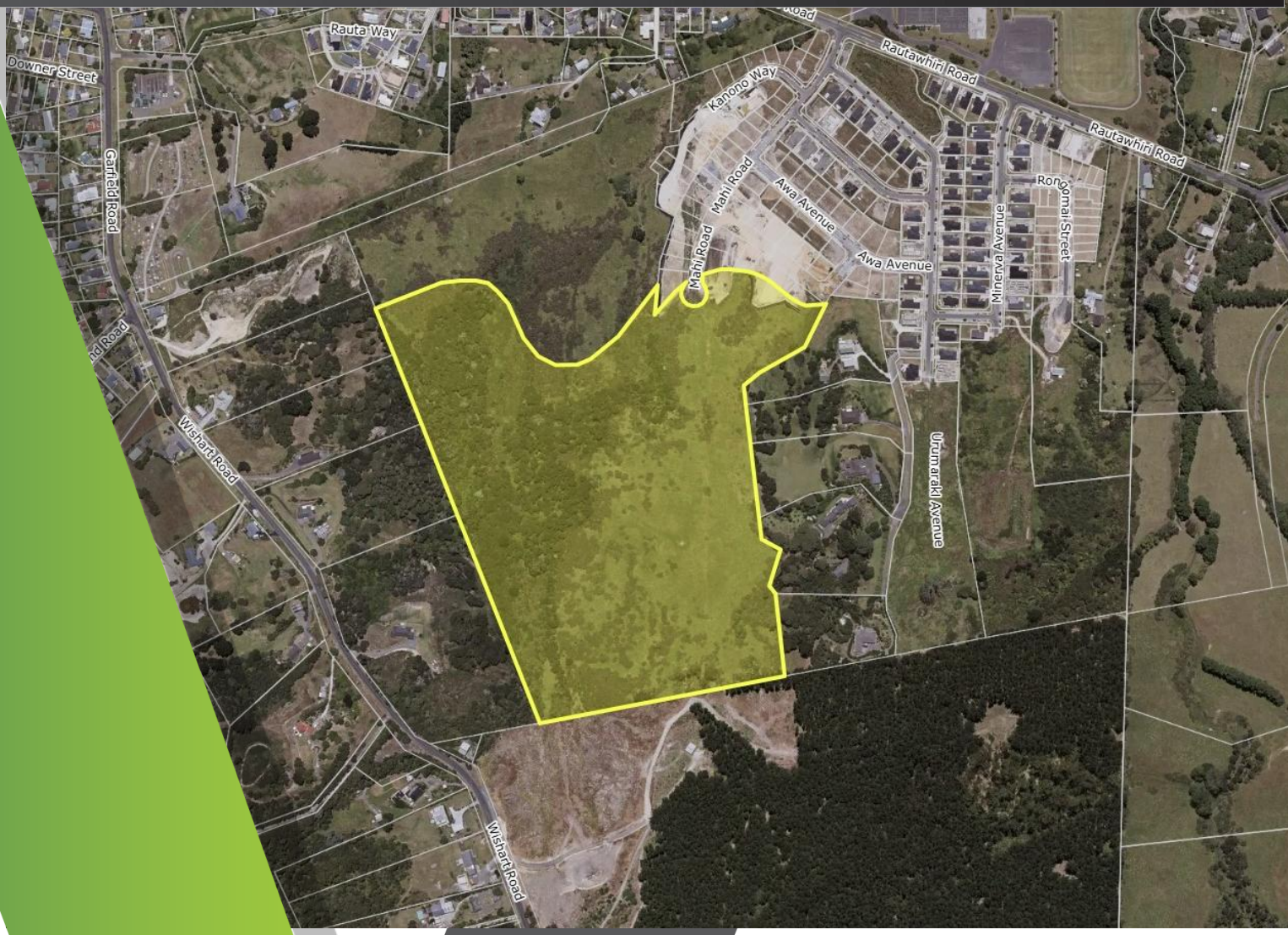

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21/08/2025

40 Mahi Road, Helensville

Request for Private Plan Change
AEE & Section 32 Evaluation Report
Prepared for: Hounslow Holdings Ltd

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DOCUMENT CONTROL RECORD

Document Issue No	Author	Reviewed by	Date
01	Lance Hessell – Senior Planner	Angela Stewart – Planning Manager	21/08/2025

1. APPLICATION DETAILS

Applicant	Hounslow Holdings Ltd
Site Address	40 Mahi Road, Helensville
Legal Description	Lot 2 DP 586879 RT 1164429 (**Appendix 1**)
Site Area	17.3660 Hectares
Statutory Plan	Auckland Unitary Plan (Operative in Part) ('**AUP**')
AUP Zoning	Future Urban Zone ('**FUZ**') Countryside Living Zone ('**CLZ**')
AUP PC78	Outside Urban Environment – excluded from PC78
AUP Overlays and Controls	**Overlays:** • No overlays apply to this site. **Controls:** • Controls: Macroinvertebrate Community Index - Exotic • Controls: Macroinvertebrate Community Index - Native • Controls: Macroinvertebrate Community Index - Rural • Controls: Subdivision Variation Control - Rural, Helensville Countryside Living
Non-Statutory Features	Overland flow paths/ streams and associated floodplain

2. EXECUTIVE SUMMARY

Hounslow Holdings Limited ("the Applicant") requests a private plan change ("the PPC") under the Auckland Unitary Plan (Operative in Part) ("the AUP") to rezone 17.37 hectares of land at 40 Mahi Road, Helensville ("the site").

The PPC site is partly zoned as Future Urban Zone (FUZ) and partly as Countryside Living Zone (CLZ) under the AUP. The Applicant seeks to rezone part of this land to Residential – Single House Zone (SHZ) and part Mixed Housing Suburban Zone (MHSZ).

The site is currently vacant, featuring large grassed areas, exotic and native bush, and various watercourses. The topography varies, with steeper land in the gullies and more gently sloping grassed areas to the northeast, which is more suitable for future urban development.

While there are no specific overlays under the AUP for this site, there are native bush areas and associated watercourses, as well as geotechnical constraints. These ecological and geotechnical factors have influenced the proposed zoning boundaries, with most sensitive areas remaining as CLZ or re-zoned to CLZ, and the balance proposed for SHZ and MHSZ.

The Council's Future Development Strategy 2023–2053 (FDS) categorizes FUZ land in Helensville into "Helensville Stage 1" and "Helensville Stage 2," with live zoning not recommended until 2035+ due to prerequisites including:

- The Helensville Wastewater Treatment Plant Upgrade; and
- The Helensville Water Treatment Plant Upgrade.

Watercare has confirmed that the Helensville Wastewater Treatment Plant (WWTP) upgrade was completed and operational as of June 2023, with sufficient capacity to support projected population growth over the next 30 years, including the proposed re-zoned FUZ land. Additionally, Watercare has confirmed that the local wastewater network, including the Rautawhiri wastewater pump station, has sufficient capacity to service this catchment. A confirmation letter dated 9 August 2024, is included in Appendix 2.

Regarding water supply, Watercare noted that while the current Helensville Water Treatment Plant (WTP) has limited capacity, an upgrade anticipated by late 2026 may resolve this constraint, subject to securing an additional water source. Although the FDS schedules servicing for Helensville after 2035, a new 250PE (200mm ID) pipeline extends from the WTP along Rautawhiri Road to Mahi Road. If feasible at the time of development, the site could connect to this supply, though an on-site booster pump station would be required.

Due to uncertainties around water supply timing, the initial water source for the development will be on-site rainwater tanks. Details on this approach and service connections are discussed in Appendix 3 – Infrastructure Report and in Section 3.6 of this AEE.

The FDS states that live zoning prior to 2035+ may be granted if prerequisites are demonstrated to be deliverable. Although Watercare's consultation letter notes that the proposal is "out of sequence" with the FDS, the PPC is considered appropriate given available infrastructure capacity and recent investments in wastewater and water supply upgrades.

The proposal includes a mix of SHZ zoning on the periphery of the proposed urban area and MHSZ to accommodate smaller lots and higher residential yield internally, maximizing land efficiency and meeting demand for varied housing typologies and price points. This is particularly relevant given the limited land available for rezoning in Helensville and aligns with the lot sizes in nearby subdivisions, such as the Parkview development, where lots are as small as 198m². The proposal also amends and adds some small areas of CLZ to better manage ecological features such as the stream near the south-western boundary and the associated riparian margin, and

areas of ecological vegetation. The proposed zoning mix reflects the character of recent developments in the area.

The proposed lot sizes are based on the residential market analysis by Insight Economics in Appendix 4, which supports the mix as beneficial for affordability and responsive to market demand.

The Concept Master Plan developed by Mr. Ian Munro (Appendix 5) sets out a minimum 20m wide margin from Stream 1 at the western periphery of the MHSZ. It is proposed that his margin will be within the CLZ to ensure this riparian margin is protected and considered in any subsequent subdivision proposals for the CLZ.In summary, the PPC aligns with relevant planning documents and legislation to enable urban development on this site, and is appropriate because:

a) The proposal provides additional residential capacity, making efficient use of the land as sought by the National Policy Statement on Urban Development 2020 (NPS-UD).

b) The rezoning of part of the site to SHZ and MHSZ complements the existing neighbourhood character, noting that further development is underway on adjacent land to the north, while CLZ areas preserve ecologically sensitive bush and watercourses, supporting positive ecological and amenity outcomes.

c) Environmental effects have been assessed, with no significant adverse impacts anticipated; rather, the effects are positive overall, with the provision of additional housing and preservation of native bush and watercourses.

d) The Section 32 RMA evaluation report confirms that the proposed zoning is the most efficient and effective way to achieve the PPC objectives and the RMA's purpose.

e) The PPC is in accordance with, and gives effect to, relevant planning documents.

3. SITE AND LOCALITY DESCRIPTION

3.1. Site Description

The site comprises 17.37 hectares of land at 40 Mahi Road, Helensville. The site is zoned CLZ and FUZ.

The site is currently vacant, consisting of large areas of grass, native and exotic scrub and bush, with watercourses and overland flow paths leading to a north-eastern catchment across Rautawhiri Road before discharging to the Kaipara River.

The land generally slopes to the north-east but with steeper gradients in the locations of the gullies, and also from the cul-de-sac head at the end of Mahi Road leading to the site boundary.

Overhead power lines run up the site to properties to the south.

Newly developed and subdivided land adjoins to the north-east, with Mahi Road and connecting roads all fairly recently completed, and with some lots as small as 198m^2 shown in the SHZ (off Rongomai Street). The adjoining SHZ site to the north is currently being worked for development.

There are native bush areas remaining in the steeper gullies and associated watercourses described in more detail below within *Section 3.3 – Vegetation*, *Section 3.4 – Flood Catchments and Watercourses* of Appendix 6 – *Ecological Assessment*. The overland flow paths and watercourses fall toward the north-east, leading to a contributor to the Kaipara River to the north. Due to the site's elevation and sloping topography, the only areas of flooding relate to the watercourse alignments, and there are no substantial flood prone areas in the location of the proposed SHZ.

There are substantial views from the proposed SHZ to the north overlooking the residential areas toward the rural and coastal landscapes to the north and east, including toward the Kaipara Harbour.

Access is obtained from Mahi Road, being a relatively new road to the site, and which currently culminates at a cul-de-sac head at the northern boundary of the site. The land slopes upwards from this cul-de-sac head into the site.

The site is subject to the following controls under the AUP:

- Controls: Macroinvertebrate Community Index - Exotic
- Controls: Macroinvertebrate Community Index - Native
- Controls: Macroinvertebrate Community Index - Rural
- Controls: Subdivision Variation Control - Rural, Helensville Countryside Living

There are no overlays or precincts applicable to the site. The site location and existing surrounding zones are shown below in *Figure 1*.

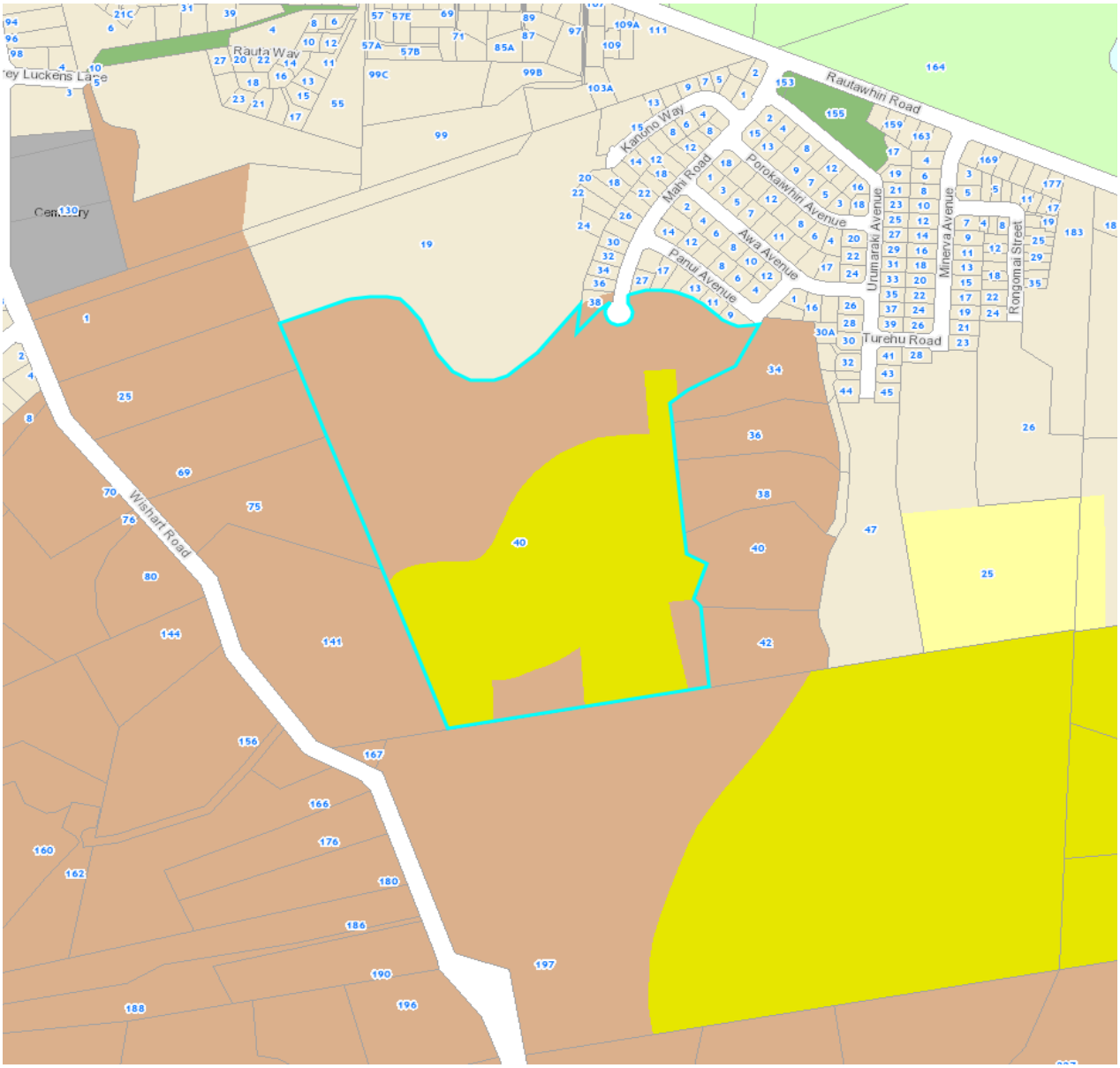

Figure 1 – Plan Change Area with Current Underlying surrounding SHZ and FUZ.

The details of the site are illustrated below in *Figure 2*, showing contours, watercourses, bush areas, and adjacent residentially zoned and developed areas. Further development of the adjacent residential areas has since occurred.

Figure 2 – Aerial of Plan Change Area including contours and hydrological features.

3.2. Surrounding Areas Description

The surrounding neighbourhood to the north-east and north consists of new subdivision developed under the SHZ, with some lots in the order of ~200m^2 to 300m^2. The adjoining site to the north at Number 19 Kanono Way in the SHZ is currently being cleared for further development and subdivision by Cabra Developments Limited.

The land immediately to the west, south, and east is zoned CLZ, with the character reflecting this zoning, although further to the east of the adjoining CLZ the land becomes SHZ. The existing and emerging residential character in this location is therefore a mix of larger to medium sized residential lots and dwellings, and countryside living character.

This site is one of two areas of FUZ within the entire Helensville and Parakai areas as shown below in Figure 3, but the only site that currently has direct access to adjoining wastewater connections.

The site is located approximately 1.7km to the *east of the* Helensville commercial centre, and approximately 2.3km to the industrial area to the west.

The commercial centre includes arrange of retail shops (including Woolworths supermarket) and food and beverage providers. Approximately 800m to the west is Kaipara College, and Helensville Primary School is located approximately 1.3km to the west. There are several reserves in proximity to the site, including Rautawhiri Park approximately 500m to the north, which includes rugby, league, tennis, cricket, netball, a skate park, playground, open grassed recreational areas, pathways, and public toilets.

The industrial area along Mill Road includes a gym, massage facility, Helensville Museum, and several industrial activities including vehicle services, building supplies (including Mitre 10), and a rural supply depot.

The nearest bus stop is located 450m to the west (Bus Stop ID 4904) outside Kaipara College, with busses 125 and 128 going to Westgate (125) and Kaukapakapa (128), with connections at Westgate possible to Auckland CBD.

The characteristics of the location are reflective of the zoning of the site and surrounds as illustrated below in *Figure 3*.

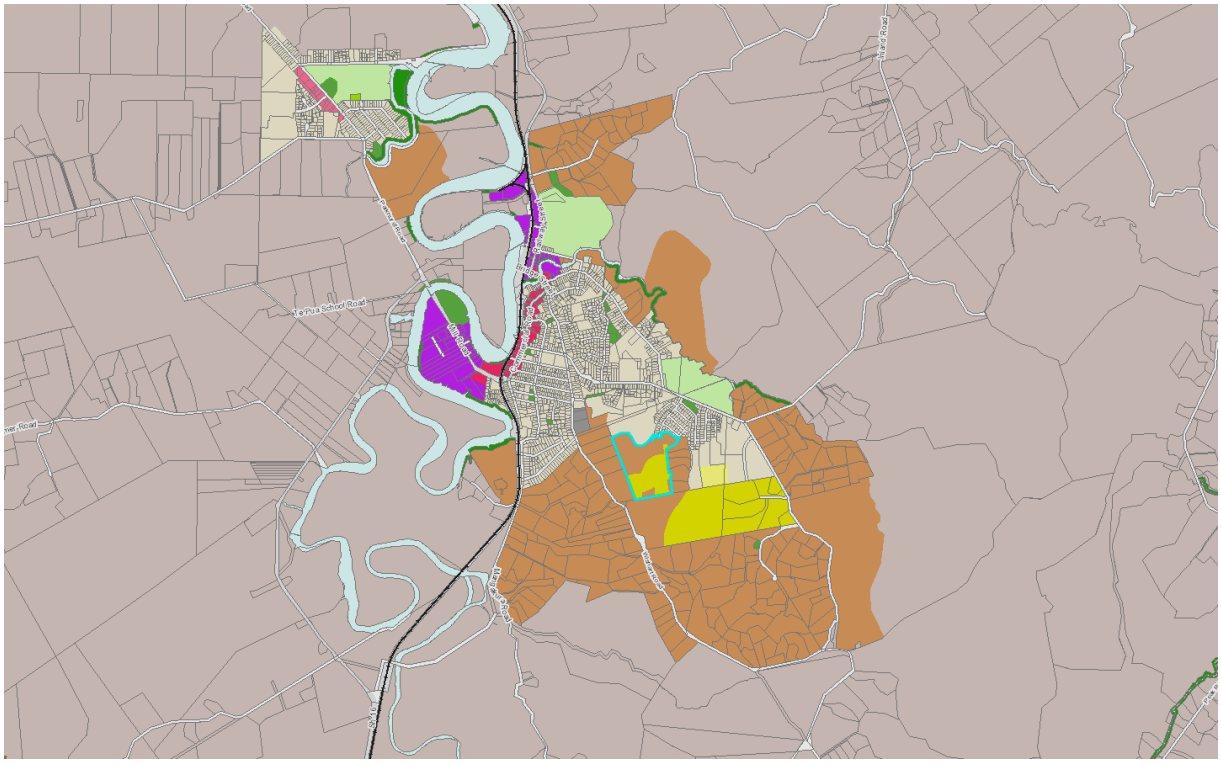

Figure 3 – Zoning of the site and surrounds.

3.3. Vegetation

Thomas Consultants Ltd has undertaken a detailed ecological assessment of the site and has provided information on the locations and species of plants and trees over the site, as shown in the ecological map below in *Figure 4*. This shows some areas (approximately 5.7ha) of manuka/kanuka Scrub/Forest (shown as "*VS3 – manuka/kanuka scrub*"), with areas of Exotic Scrub - mostly gorse ("*ES*") and the remaining being mainly kikuyu and some gorse cover. The native kanuka scrub forest areas (VS3) are to be retained under this proposal.

The VS3 bush area includes tall kanuka trees (the most dominant canopy species) within the central forested area, and smaller younger trees towards the outside. Shrubs are dominant on the outer edges but are also present within the forest. Details of these shrub species are set out in Section 5.2 of the ecological assessment in **Appendix 6**. Weed species are present in the outer edges of bush and along streams, including woolly nightshade, wild ginger, and Chinese privet. A few tall one trees are also present on the site.

Figure 4 – Ecosystem and Watercourse Delineated map (Source: Thomas Consultants Ltd)

3.4. Flood Catchments and Watercourses

The site is identified in the Council's GIS as accommodating various watercourses and overland flow paths, with associated flood plain areas shown below in *Figure 5 – Hydrological Characteristics of the Site*. The watercourses and flood plains are also illustrated above on *Figure 4*, and described in the **Appendix 6** – *Ecological Assessment*, and within **Appendix 3** – *Infrastructure Report* including the *Stormwater Management Plan* (SMP).

Section 2.1.1 of the SMP describes the primary stream within the site, stating that it is shallow with the depth of the stream channel increasing towards the east. As the stream enters the site from the south, the water depth is less than 10cm and increases to approximately 30cm in the neighbouring property to the north. Total stream width is between 30cm and 2m with the widest section at lowest point of the site, and smaller intermittent streams join this tributary.

The sub-catchment for this stream extends southwest of the development. This permanent stream discharges into the Awaroa Stream to the north of Rautawhiri reserve.

Appendix 6 – *Ecological Assessment* confirms there are no natural wetlands on site. The primary stream provides habitats for many fauna species, especially where this flows through the kanuka and broadleaved forest areas. This stream is small in terms of depth and width and has does not appear to have been recently modified as it retains an established condition. The stream is considered to have moderate ecological value.

The Precinct Plan has been drafted to keep away from watercourses, except for minor overland flow paths that do not require avoidance due to the minor contributing catchments and the ability to maintain entry and exit points and the hydrology of these. It is also noted that some of these have a contributing catchment of up to 4,000m^2 and fall outside of the AUP definition of overland flow path.

Figure 5 – Hydrological Characteristics of the Site. (Source: Auckland Council GIS)

3.5. Transport Networks and Access

3.5.1 Road Network

The site accessed off Mahi Road, feeding into Rautawhiri Road which leads (via other roads) to Commercial Road, the main street within the township of Helensville. There are several intersections along Mahi Road, serving the relatively new "Parkview" residential development. All of these roads are local roads.

Commercial Road in Helensville forms part of State Highway 16 (SH16) providing access to the south towards Kumeu and the Auckland CBD, and to the north towards Wellsford along a section of SH16 known as the Kaipara Coast Highway (which subsequently connects with State Highway 1).

3.5.2 Existing Traffic Network

Section 5.0 within **Appendix 7** –*Traffic Assessment Report* (TAR) sets out the details of the existing traffic network, and Figure 4 within the TAR shows the key attractions and destinations likely to be visited by road users. Figure 5 within the TAR shows traffic trends across Helensville, with the highest traffic volumes seen on SH16. Significant volumes enter and exit Helensville from Kumeu and Parakai (from the west). A lower volume enters and exits from the Silverdale/Dairy Flat areas to the north. Some traffic from Auckland enters Helensville via Garfield Road/Wishart Road. Key intersections for consideration based on these movements are identified as being:

- Rautawhiri Road / Garfield Road / Rata Street
- Rata Street / SH16
- Garfield Road / SH16
- SH16 / Parkhurst Road

3.5.3 Public Transport

Section 10 of the TAR addresses public transport accessibility, including maps of the surrounding PPC area, and the location of existing bus routes in the area – being Route 125 and Route 128. These are shown below in *Figure 6*.

Route 125 is a service that runs every 30-minutes between the hours of 5am and 9pm, Monday to Friday. On weekends and public holidays, the service runs every hour, between the hours of 7am to 9pm.

Route 128 is a service that runs every hour between the hours of 8am and 9pm, Monday to Friday. On weekends and public holidays, the service runs every two hours, between the hours of 8am to 9pm.

Bus Route 125 travels between Helensville and Westgate. Users of the 125 route will need to transfer to other Bus services at Westgate to access other locations. Bus Route 128 is a service between Helensville and the Hibiscus Coast Station. From the Hibiscus Coast Station, public transport users can transfer to a number of services including the northern bus-way.

The closest bus stop to these services is located approximately 740m from the proposed development area, being about a 10-minute walk, considered suitably accessible.

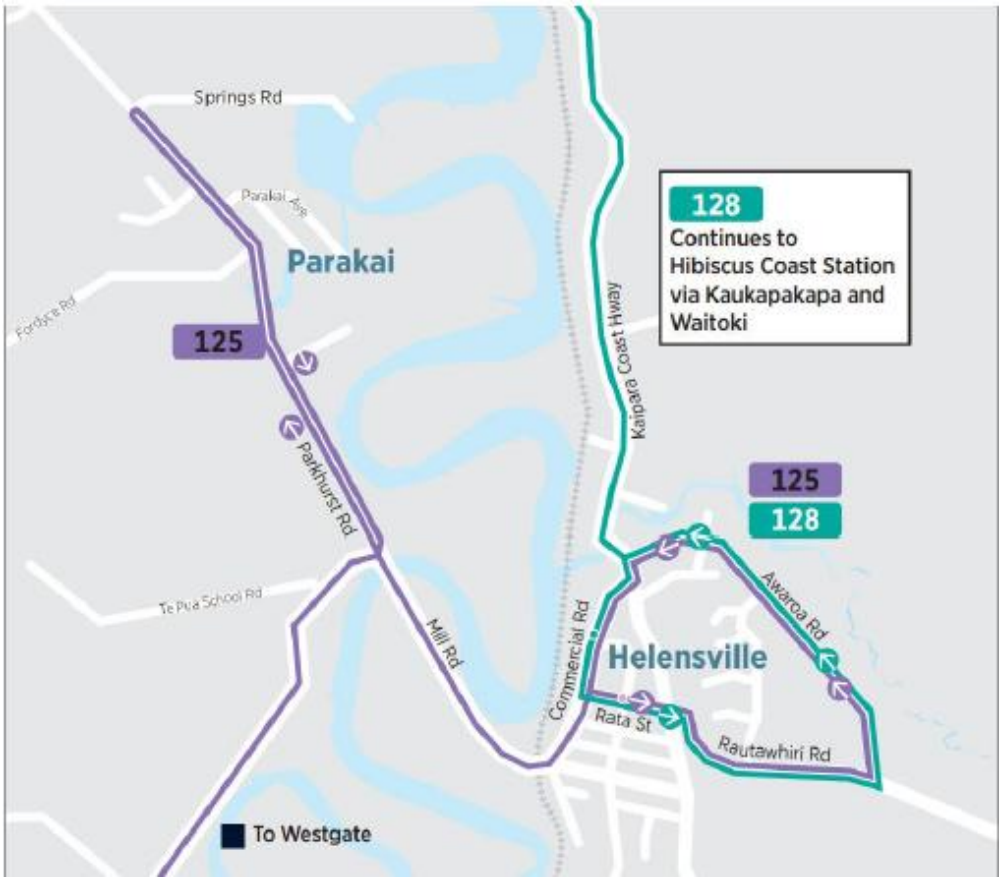

Figure 6 – Existing bus routes near the proposed development.

3.6. Infrastructure Servicing

3.6.1 Stormwater

Stormwater servicing is set out in the SMP within **Appendix 3 –** *Infrastructure Report*. The SMP has been developed to achieve consistency with the objectives and policies of the AUP and meet Healthy Waters Network Discharge Consent requirements and Auckland Council's guideline documents and industry best practice. This provides a cohesive approach to the management of stormwater runoff by specifying controls on the quality and quantity of runoff and requiring ecological enhancements where practicable.

Should the land be rezoned as intended by this PPC, further detailed design and documentation will be provided during the resource consent stage of the development.

Section 2 of the SMP includes a description the existing site, and Section 2.3 sets out the existing drainage features and stormwater infrastructure. In summary, the existing features and infrastructure consist of:

- Two existing stormwater connections laid into the subject site as part of the downstream Parkview development to the north-east, installed in 2023 intended to connect to the upstream catchment to align with the Auckland Council stormwater code of Practice.
- Stormwater will be discharged to a tributary of the Awaroa Stream, which in turn discharges to the Kaipara River.
- Existing hydrological features on the site include overland flow paths and the permanent stream and minor tributaries to that. The stream is small in terms of depth and width, and overall has not been modified from its original condition. There is no sign of erosion or channelisation and bank vegetation is relatively intact.
- There are several overland flow paths (refer above to Figure 5) and the stream on the site, and flood plains are limited to minor extents in relation to these features.

3.6.2 Wastewater

Section 7 of **Appendix 3 –** *Infrastructure Report* addresses wastewater. There is an existing manhole within 40 Mahi Road to be used as a connection between the recently built wastewater network formed under the adjacent Parkview development to the north-east. This discharges to the Rautawhiri Road pump station, which in turn discharges to the Helensville wastewater network leading to the Helensville WWTP.

The consultation letter from Watercare included in **Appendix 2** confirms that these is sufficient capacity in the local network (including the Rautawhiri Road pump station) and the Helensville WWTP to accommodate the additional demand from the proposed future development within the PPC area. More details on the proposed wastewater infrastructure and management requirements are set out in other parts of Section 7 included within **Appendix 3**.

3.6.3 Water supply

Section 8 of **Appendix 3 –** *Infrastructure Report* sets out the existing water supply network for Helensville, noting that there is currently limited capacity in the Helensville WTP and the existing reservoir in Audrey Lane.

The consultation letter from Watercare included in **Appendix 2** notes that this capacity constraint could possibly be resolved by late 2026, however, this also further states that there is uncertainty given that an additional water source needs to be found. It also comments that noting that the FDS sets out timing for 2035+ it is possible that water supply upgrades may not occur until later.

Using the Parkview development as an example, a water supply reticulation system can be designed and constructed in accordance with the relevant Water Code of Practice. As an interim solution, water tanks can be

installed to provide potable supply until the upgrade works are completed. More detail is set out in **Appendix A** – Technical Memorandum within **Appendix 3 –** *Infrastructure Report.*

3.7 Contamination

A *Preliminary Site Investigation* (**PSI**) *Addendum* was prepared for the southern portion of the site by Thomas Consultants in May 2023, to be read in addition to the original PSI completed by Soil and Rock Consultants for 151 and 177 Rautawhiri Road (as they were known at the time in September 2013). The site for this PPC was previously assessed as 151 Rautawhiri Road.

The original Soil and Rock PSI identified no areas of contamination under the *National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health* (**NESCS**) for Hazardous Activities and Industries List (**HAIL**) likely to have occurred over the site, and that accordingly the site is not covered under the NESCS.

The May 2023 *PSI Addendum* maintains the land is not covered by the NESCS, and notes that the *Chapter 30 – Contaminated Land* provisions of the AUP do not apply.

In response to the latest PPC proposal and noting areas identified under the Precinct Plan, the September 2024 Technical Memo is provided to ensure the two previous assessments remain valid, and the conclusions are reached that these previous assessments are still valid and that the site is not subject to the provisions of Chapter 30 of the AUP, or to the regulations under the NES-CS, with no HAIL activities identified over the site.

These contamination assessments are included in **Appendix *8***.

3.8 Geology

3.8.1 Subsurface Geology

A *Geotechnical Investigation Report* (GIR) for the Site was undertaken by Soil and Rock Consultants Ltd, dated 24th September 2013, with the Job Reference 13567 for a PPC at 151 & 177 Rautawhiri Road, Helensville being a broad area that has since been subdivided.

Soil and Rock Consultants have undertaken a recent *Geotechnical Review* with respect to the current proposed re-zoning of the site.

In terms of the geology of the site, this remains as set out Section 3 in the original Soil and Rock Consultants GIR Job Reference 13567 (**Appendix 9**), stating that the site is underlain by three separate geologic units identified as Q1a (Alluvial Deposits), Mwc (Cornwallis Formation), and Mwl (Helensville Conglomerate). The current site area is consistent mainly the Cornwallis Formation, with a small south-western corner being Helensville Conglomerate (although this is location outside of any proposed re-zoning or development areas.

Figure 2 of Section 3 of the original GIR is shown below in *Figure 7*. The corresponding geologic unit descriptions are included within Section 3.0 of the original GIR and is not repeated here for succinctness. Key points to note however are as follows.

- The Cornwallis Formation is defined as Volcanogenic Flysch comprising alternating muddy sandstone and mudstone with occasional interbedded lenses of grit.
- The Cornwallis Formation rocks weather naturally to depths of up to 20m producing firm to very stiff, light yellow-grey to reddish-grey souls and clays of variable plasticity.
- Gravel or cobble sized lithorelics of less weathered material may also be present within the residual soil horizons.
- The residually weathered subsoil is prone to instability where the slope inclination, groundwater or soil strength conditions are unfavourable.

- Joint / defect-controlled failures around gully heads may be prevalent. More clayey or clayey silt horizons may be prone to shrink and swell when subject to seasonal soil moisture changes.

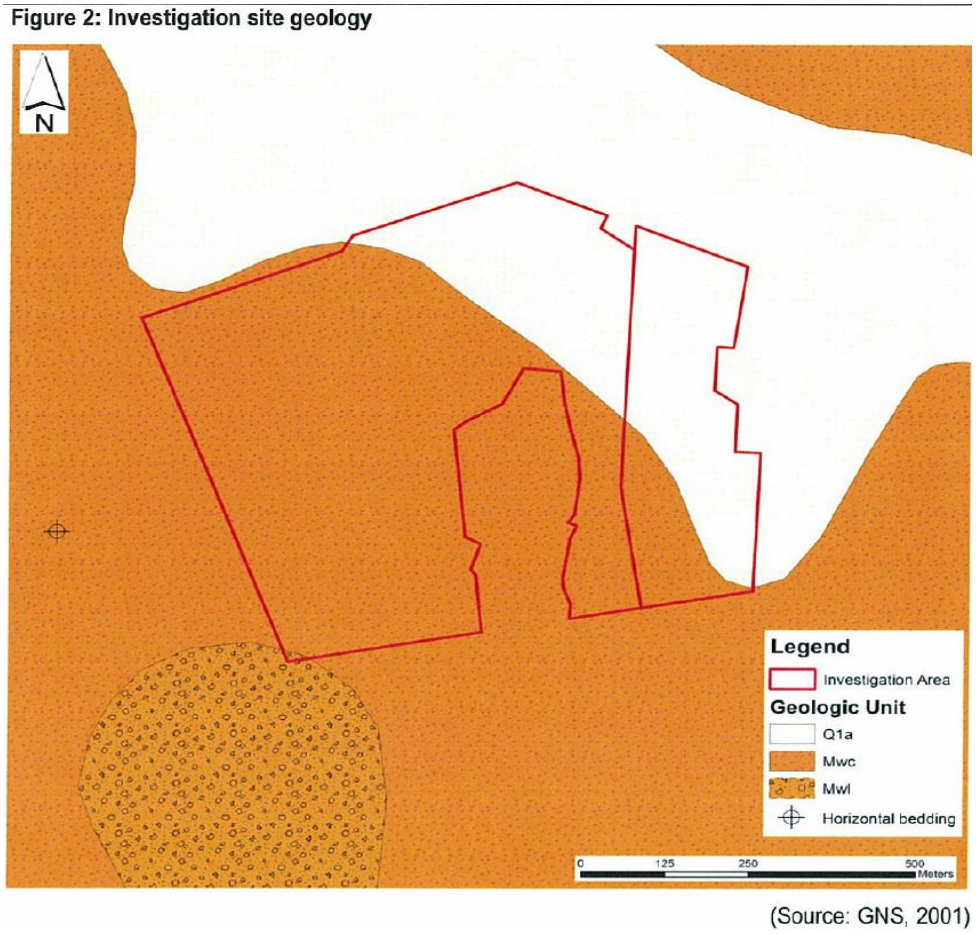

Figure 7 – Geologic Units for the earlier site area . (Source: Spoil & Rock Consultants Ltd Job # 13567 24/09/2013).

3.8.2 Geotechnical Assessment

Appendix 9 – *Geotechnical Review* dated 24 September 2024 has been prepared to support this PPC. The original *Geotechnical Investigation Report* completed for an earlier similar proposal is also included in Appendix 9. The supplementary review addresses the amended proposal applied for under the PPC, and was completed after a more recent walkover in September 2024 to ensure there were no significant changes to the land area assessed since the time of the original report completed in September 2013.

The supplementary memo concludes that the findings of the original assessment remain valid for this proposal, and the areas of geotechnical stability zonings as described remain the same. The three zones of suitability for development identified are:

- Zone A: Land with little geotechnical constraints, including the land that is potentially suitable for residential development.
- Zone B: Generally suitable for residential development, however, will require specific geotechnical investigation, specific design for building foundations, and potential design for remedial slope stability works (e.g. cut/fill earthworks and installation of buttress drainage).
- Zone C: Land where due to the present conditions of the hill slope or other geotechnical hazards development is not recommended.

The supplementary geotechnical review concludes that the PPC area is considered geotechnically suitable, subject to the recommendations of the geotechnical reporting from both the 2024 and 2013 assessments. No additional geotechnical investigation is considered necessary at this stage, however, more detailed investigations must be completed as outlined prior to application for any resource consent application.

3.8.3 Groundwater

Subsoil conditions are summarised in Table 1 of the Soil and Rock 2013 GIR reference 13567. The boreholes of relevance to the PPC site are Boreholes AH07, AH08, and AH09. For Borehole AH07 groundwater was encountered at 1.9m depth, and there was no groundwater encountered for Boreholes AH08 and AH09. The locations of these Boreholes are shown below in *Figure 8*.

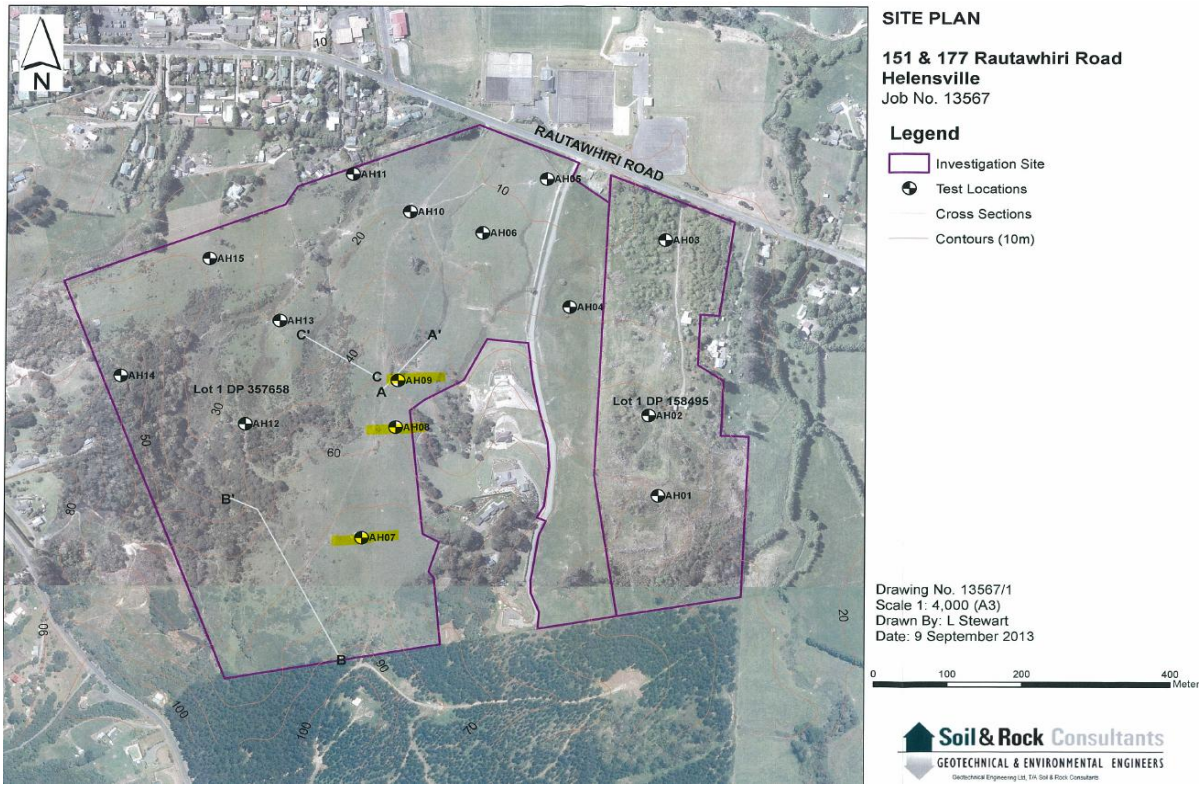

Figure 8 – Geologic Units for the earlier site area. (Source: Spoil & Rock Consultants Ltd Job # 13567 24/09/2013).

3.9 Archaeology and Built Heritage

An *Archaeological Assessment* for the site was prepared by CFG Heritage Ltd on the 27th June 2024 and this is included in Appendix 10. This involved a historical survey, archaeological background review, consideration of the physical environment, and field assessment.

No previously recorded archaeological sites are located in the site area and no unrecorded archaeological sites were identified during the survey for this assessment. Most recorded archaeological sites are located nearer the shores of the Kaipara Harbour and the low consolidated dunes further afield to the west, but there are very few in and around the Helensville township itself.

The field assessment identifies that the soils are of very poor quality and the property is not in a suitable location for pre-European Māori kumara cultivation or storage, and there is no reasonable cause to suspect that any archaeology will be found at the site.

4 DESCRIPTION OF THE PLAN CHANGE REQUEST

4.1 Purpose and Description

The purpose of the PPC is principally to rezone approximately 10 hectares of FUZ land and a small area of Countryside Living Zone land to SHZ and MHSZ, and to add a new area of CLZ to the south west (to create more logical zoning boundaries and enable appropriate ecological management) to allow for development and use to occur within the Site.

FUZ land is intended to be used and developed to achieve the objectives of the Rural – Rural Production Zone up until it has been rezoned for urban purposes when infrastructure is available to accommodate this. The site is located adjacent to existing urbanised areas, and Watercare has confirmed the Helensville Wastewater Treatment Plant has capacity to provide for this live zoning now. Water supply can be accommodated by way of roof tank supply, as has been provided for the adjacent subdivision of sites to the north-east. It is also noted that the Watercare consultation letter advises that public water supply may be possible as early as 2026.

Noting the above, the AUP also requires that before any FUZ land is rezoned, a Structure Plan is required. The *Helensville South Structure Plan* was previously included in the *Rodney District Plan 2000* in Appendix 6, showing the site within an area identified as "*M7 – Medium Intensity Urban*" as shown below in *Figure 9*.

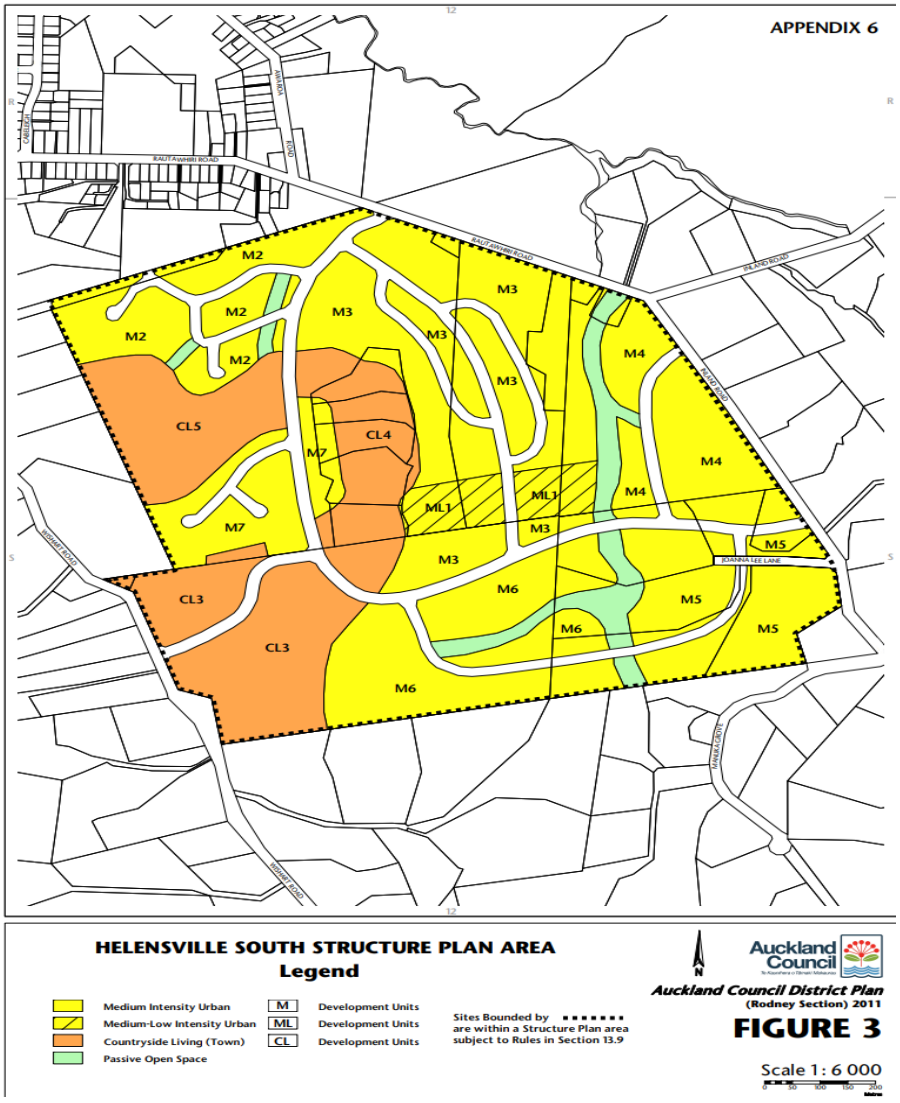

Figure 9 – Helensville South Structure Plan Area (Refer: Appendix 6 of the Rodney District Plan 2000).

The previous *2017 Future Urban Land Supply Strategy* (FULSS) had identified the site as "*Helensville Stage 1 – Development Ready in the second half of Decade 1 2023 – 2027*" as shown below in *Figure 10*.

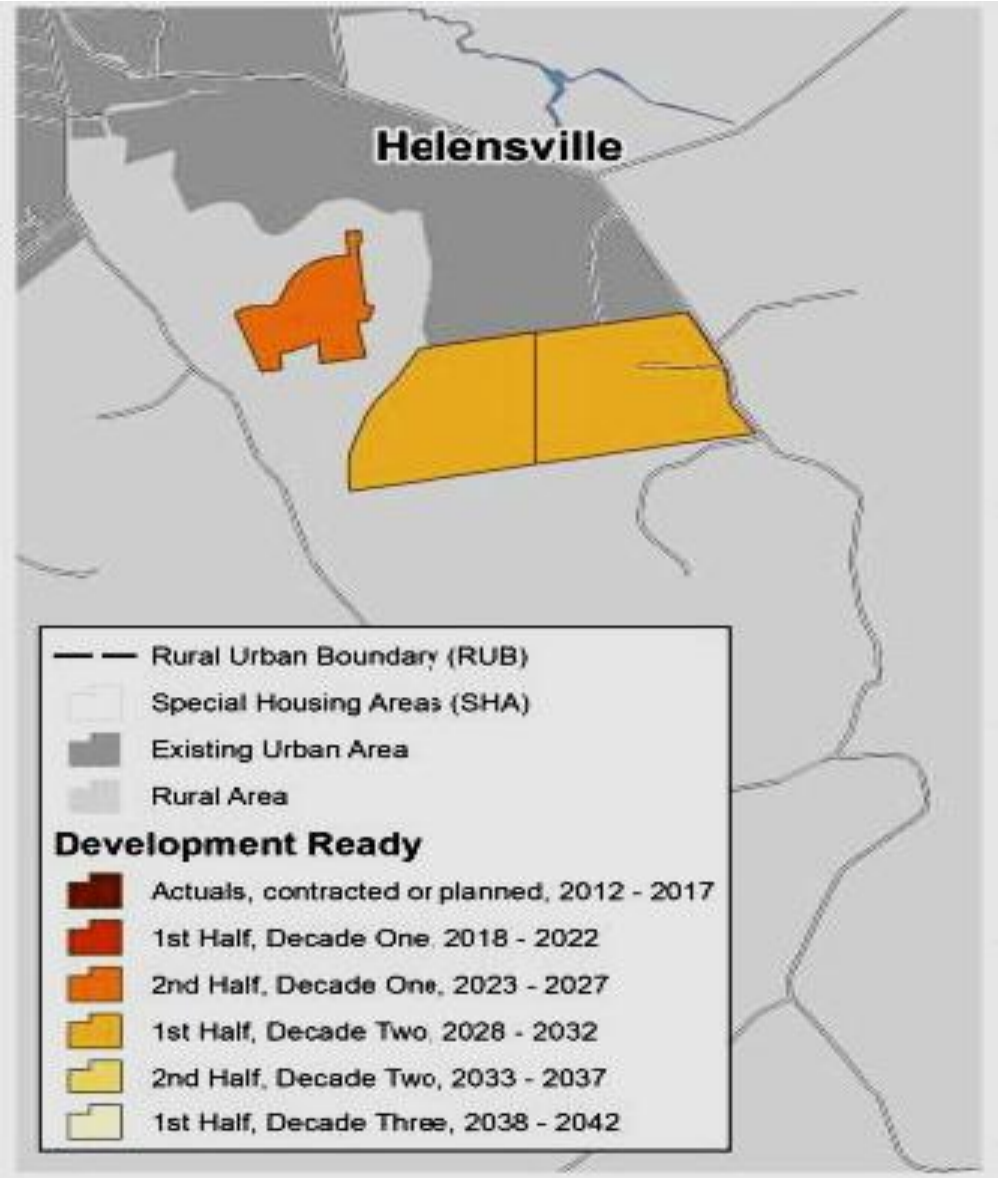

Figure 10 – Rodney FULLS 2017: Helensville Development Ready Areas

Based on detailed site assessment and noting the above, it is proposed to apply a mix of SHZ and MHSZ provisions to the Site – to enable a higher yield of dwellings in specific areas (MHSZ areas are located internally and SHZ at the periphery), and to provide options for housing choices suitable to the local housing market, including a mix of smaller more affordable sites and dwellings with larger sites. The site is suitable for more intensive MHSZ development noting services and facilities in the Helensville town centre are located within close proximity of the Site, and additional services and employment options in the wider district.

The boundaries of the proposed SHZ and MHUZ are designed to provide the most rational zoning pattern for the CLZ and to manage edge effects of the more intensive MHSZ by locating the MHSZ internally. The PPC zone boundaries are also designed to avoid areas of ecological significance, including watercourses and areas of manuka/kanuka in the CLZ as proposed to keep these features outside of intensive residential development, and to apply the more protective objectives and policies of the CLZ to these natural features.

4.2 Concept Masterplan

A *Concept Masterplan* has been prepared to demonstrate a possible design stage. This plan is purely for the purpose of demonstrating how future development could occur under future resource consent applications. To be clear, this is not a proposed development plan as applicable for a resource consent application and does not warrant in-depth assessments of effects and associated requests for information in that regard.

The *Concept Masterplan* (including lot and dwelling sizes) has been prepared based on the *Market Assessment* included in **Appendix 4**. It has also been informed by the matters addressed in the **Appendix 11 –** *Urban Design Assessment* of Mr. Ian Munro. The Concept Masterplan identifies circa 105 residential lots, with lots ranging in size from 200m^2 to 600m^2 as shown below in *Figure 11* and as included in **Appendix 5.** This also shows the ecological area proposed to be largely avoided as identified in the ecological assessment included within **Appendix 6**. The Market Assessment and Concept Masterplan have informed the proposed spatial extents of the MHSZ, SHZ, and CLZ.

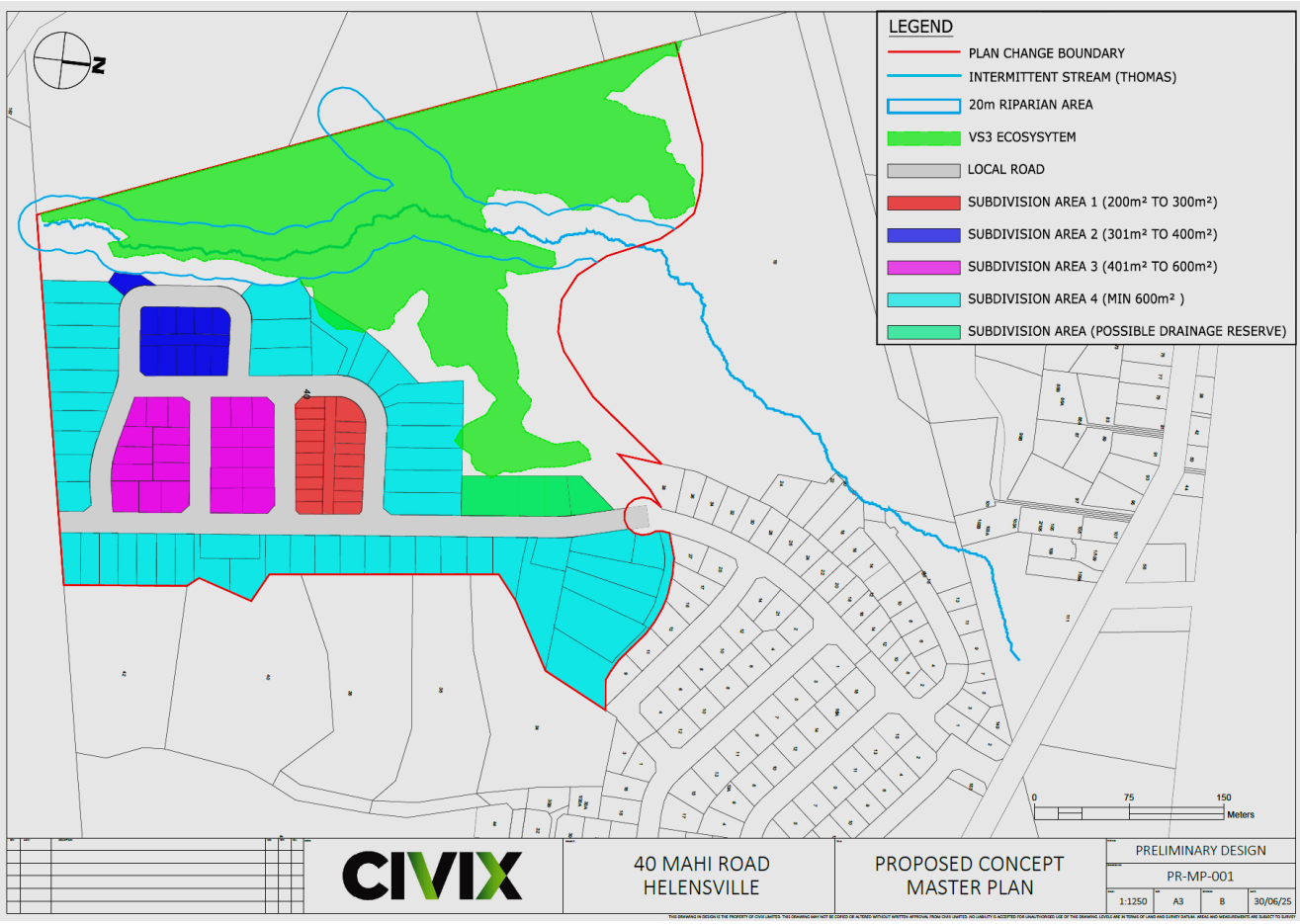

Figure 11 – Concept Masterplan including the proposed development areas and site sizes

4.3 Amendments to the Unitary Plan Zoning Maps

The proposed rezoning includes replacing areas of FUZ and CLZ with SHZ and MHSZ . There is also an area of FUZ to the south-west proposed for re-zoning to CLZ, being more appropriate than retention as FUZ as discussed previously. The proposed rezoning plan is shown below in *Figure 13* and included in **Appendix 12**. The existing zoning plan is also shown in **Appendix 12**.

The proposed amendments to the CLZ provide an improved rationalisation of the zone in relation to Stream 1 and a minimum 20m margin from that. This also removes the pocket of previous CLZ surrounded by the FUZ that did not sit well within that in terms of enabling rational and cohesive future residential development design in that southern location.

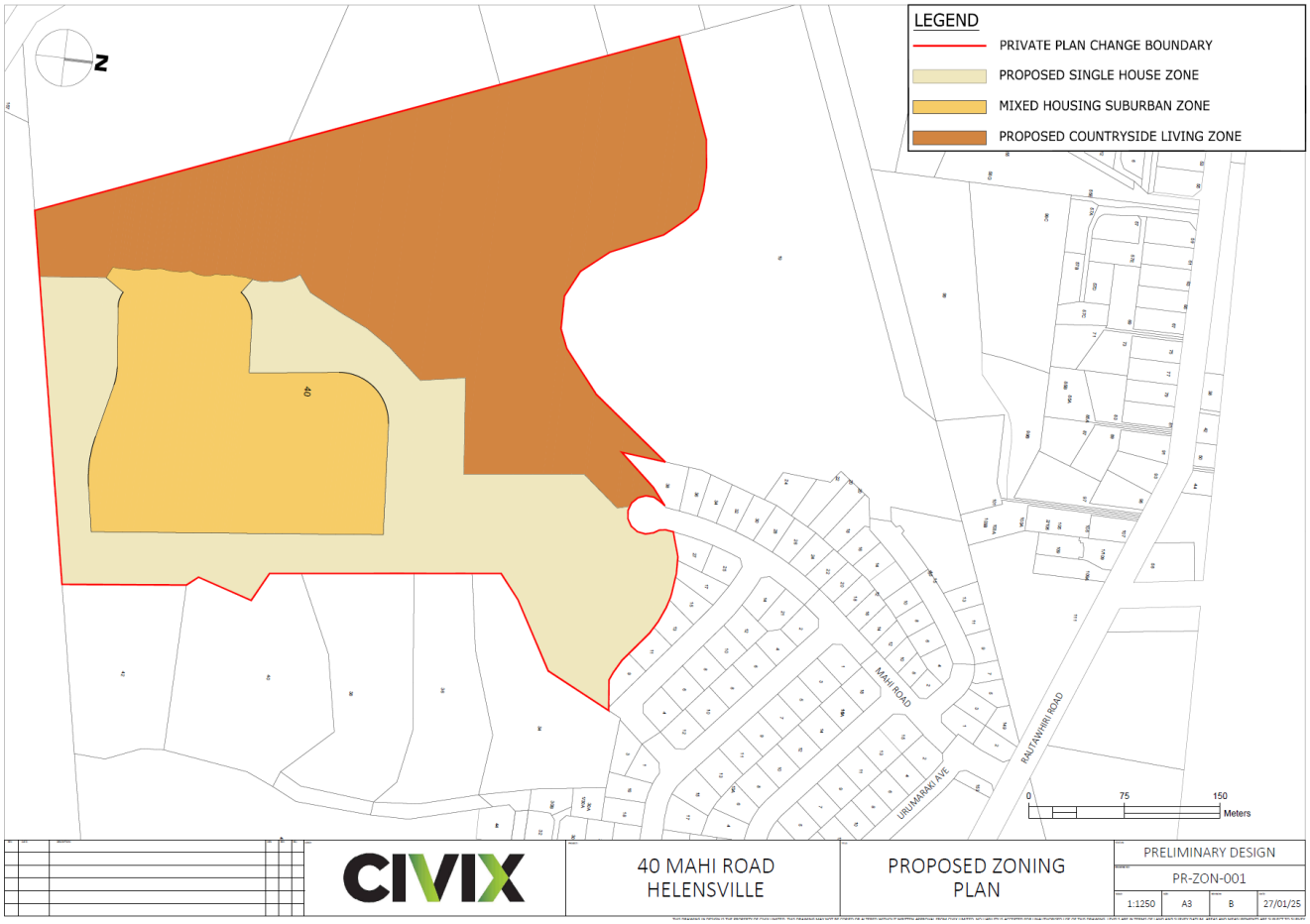

Figure 13 – Proposed Zoning Plan

4.4 Amendments to the Unitary Plan Overlays and Controls

The existing controls, including the *Subdivision Variation Control – Rural, Helensville Countryside Living* will remain over the site, and all relevant Auckland-wide and zone rules would apply to future development within the Plan Change area. There are no existing overlays or designations associated with the site.

5 STATUTORY PLANNING FRAMEWORK

5.1 National Policy & Planning Documents

Section 74(1)(ea) states that, "*A territorial authority must prepare and change its district plan in accordance with – a national policy statement, a New Zealand coastal policy statement, and a national planning standard and any regulations*".

Section 75(3)(a)-(ba) states that, "*A district plan must give effect to any national policy statement, and any New Zealand coastal policy statement, and a national planning standard*."

5.1.1 National Policy Statement on Urban Development 2020

The *National Policy Statement on Urban Development 2020* (NPS-UD) took effect on 20 July 2020 and replaces the *National Policy Statement on Urban Capacity 2016*. The NPS-UD sets out the objectives and policies for matters of national significance pertaining to well-functioning urban environments, that are relevant to achieving the purpose of the RMA.

A regional policy statement, regional plan and district plan must give effect to a national policy statement. Auckland Council as a Tier 1 local authority must comply with Policies 3 and 4 not later than 2 years after the commencement date.

The overall intent of the NPSUD is clear in that where intensification is practical, Councils are required to be responsive to such proposals that would 'add significantly to the development capacity and contribute to well-functioning urban environments, even if the capacity is out of sequence with planned land release.

The following Objectives and Policies are of relevance to the PPC:

Objective 2 states:

> *"Planning decisions improve housing affordability by supporting competitive land and development markets".*

The PPC would enable the Helensville residential market to better meet this Objective by increasing market competitiveness. The *Housing Market Assessment* of Insight Economics included in Appendix 4 sets out how the proposed lot sizes possible from the mix of SHZ and MHSZ and likely housing typologies complement the market in this location, with the smaller lots being especially attractive in that affordability range. The other range of lot sizes caters for a variety of housing demand, appropriately responding the demand profile for Helensville.

Objective 3 states:

> *"Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*
>
> *a. the area is in or near a centre zone or other area with many employment opportunities*
> *b. the area is well-serviced by existing or planned public transport*
> *c. there is high demand for housing or for business land in the area, relative to other areas within the urban environment".*

The Site is intended to be rezoned for urban purposes and is intended to contribute towards the Helensville housing market.

While the current population of Helensville is only in the order of over 5,000 people, there is an anticipated population growth of around 1,500 people in the area by 2050[1] bring this to a total of around 6,500 people. This may actually grow higher than this predicted level over time. The site is located in reasonable proximity to the Helensville town centre and there are other services and facilities in proximity such as Kaipara College and Helensville Primary School. There are several reserves in proximity to the site, including Rautawhiri Park within easy walking distance to the Site.

The nearest bus stop is located 450m to the west (Bus Stop ID 4904) outside Kaipara College, with buses 125 and 128 going to Westgate (125) and Kaukapakapa (128), with connections at Westgate possible to Auckland CBD.

[1] Helensville Parakai Servicing Strategy May 2024

Objective 6 (links to Policy 8) states:

> *"Local authority decisions on urban development that affect urban environments are:*
>
> *a. integrated with infrastructure planning and funding decisions; and*
> *b. strategic over the medium term and long term; and*
> *c. responsive, particularly in relation to proposals that would supply significant development capacity".*

The PPC can integrate with the known planned infrastructure upgrades for the area.

As required under the NPS-UD, Council prepared a *Housing Assessment* for the Auckland Region, dated July 2021. The assessment shows that while providing an enabling planning policy environment is fundamental to create greater development potential, there are many other dimensions of complexity out of the scope or control of territorial authorities that may have a greater impact on affordability and competitiveness. The NPS-UD could however have an impact on prices over time as more supply enters the markets and enables capacity in accessible locations.

> *"Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*
> *a. unanticipated by RMA planning documents; or*
> *b. out-of-sequence with planned land release".*

The PPC could enable the development of in the order of 105 to 110 new homes which is considered to be a reasonably significant development in Helensville. This complements the adjacent development to the north in the existing SHZ with a mix of lot sizes and some as small as 200m^2.

The PPC will also contribute to a well-functioning urban environment (see Policy 1 of the NPS-UD) as detailed above and indicated on the plans provided for this plan change. The PPC is not considered to be "*unanticipated by RMA planning documents*" given its current FUZ and by virtue of being located within the current Rural Urban Boundary, and its long-standing identification for medium density residential development as identified in the *Helensville South Structure Plan* and the *2017 FULSS*.

The PPC area is considered to be development ready in the period 2023 to 2027 as shown in the original FULSS and although the PPC is out-of-sequence with planned land release under the later FDS (being 2035+) it is demonstrably incorrect to preclude development now on the basis that servicing to the site is more than adequate as set out in previous sections, and as confirmed in the Watercare consultation letter in Appendix *2*. Better alignment with the NPS-UD is achieved through bringing development forward in order to deliver additional housing capacity in Auckland that is of relative affordability.

As noted above, the potential 2035+ timeframe for land release under the FDS is predicated on wastewater and water supply "*prerequisites*" and these can be readily addressed as of today. Notwithstanding this, the above policy supports the PPC should it be considered 'out-of-sequence' with planned land release by being ahead of the development ready timeframe.

The PPC responds in terms of anticipated residential capacity that is enabled by the rezoning through the AUP provisions, subject to specific design which would require separate detailed Resource Consent applications in the future. Overall, the proposal aligns strongly with the outcomes anticipated under the NPS-UD by enabling future residential capacity at a suitable location on the existing urban fringe, in an area which is suitably serviced.

5.1.2 National Policy Statement for Freshwater Management 2020

The *National Policy Statement for Freshwater Management 2020* (NPS-FM) provides local authorities with updated direction on how they should manage freshwater under the RMA. It sets a national policy framework for managing freshwater quality and quantity and introduces a number of policies that must be given effect to by regional councils. These policies include changes to definition and management of wetlands and streams, in order to:

a) *Protect wetlands and streams from loss and degradation;*
b) *Encourage restoration; and*
c) *Identify and work towards target outcomes for fish abundance, diversity and passage and address in-stream barriers to fish passage over time.*

The site contains some watercourses as identified in Appendix 6 – *Ecological Assessment*. These watercourses and their margins, as well as the kanuka forest areas, have informed the design of the Precinct Plan such that development areas avoid impacting these. Where development adjoins any watercourses, the Precinct Plan and associated provisions require the planting of a 10m riparian margin around these to any development boundary.

Earthworks required for the development of the site can be suitably managed, through the application of sediment control measures, to avoid the discharge of sediment beyond the site, and in turn can maintain the condition and values of freshwater and associated ecosystems in the receiving environment.

The Auckland Regional Policy Statement (ARPS) and AUP provisions regarding lakes, rivers and streams (E1 and E3 of the AUP) also give effect to this NPS and any future development within the Site would need to accord with those provisions. The stormwater management approach, along with the existing AUP provisions, will ensure that development enabled by the PPC appropriately gives effect to the NPS-FM.

5.1.3 New Zealand Coastal Policy Statement 2010 (NZCPS)

The *New Zealand Coastal Policy Statement* (NZCPS) includes policies in order to achieve the purpose of the RMA in relation to the coastal environment of New Zealand.

While the PPC land does not have direct frontage to the coastal environment, potential discharges from the site feed via tributaries to the Kaipara River, which in turn leads into the Kaipara Harbour. Therefore, the provisions of the NZCPS have some relevance to the PPC.

In order to address these matters the plan change seeks to ensure suitable stormwater management is incorporated into the PPC to ensure consistency with the NZCPS. This includes stormwater management controls and assessments across the plan change areas to manage sediment and contaminant runoff which could make its way into the coastal receiving environment. Further, as part of any resource consent application, earthworks erosion and sediment controls, and stormwater discharges will be specially designed to manage the potential effects on the downstream environments, and conditions of consent will ensure suitable outcomes in his regard.

The protection of the existing watercourses and adjacent ecological vegetation areas will also protect against potential future adverse discharge effects, noting that the development areas are separated from these.

Overall, the PPC gives effect to the relevant objectives and policies of the NZCPS by ensuring that development does not adversely affect the inherent natural qualities of the coastal environment and by maintaining the quality of the water discharging into the CMA.

5.1.4 National Policy Statement for Highly Productive Land (NPS-HPL)

The *National Policy Statement on Highly Productive Land* (NPS-HPL) has been enacted to change the way highly productive land is managed under the RMA.

The proposed NPS-HPL requires local authorities to identify highly productive land and protect highly productive land from "inappropriate" use and development. The NPS-HPL includes policies to guide decision-making on plan changes to rezone highly productive land to an urban use or more densely populated rural residential or rural-lifestyle use.

The Site is located outside any areas of Highly Productive Land as shown in the AUP planning maps, with the closest areas of productive soils located to the east of Rautawhiri Road in the vicinity of Inland Road, and larger areas to the west of Mangakura Road. This is shown below in *Figure 14.*

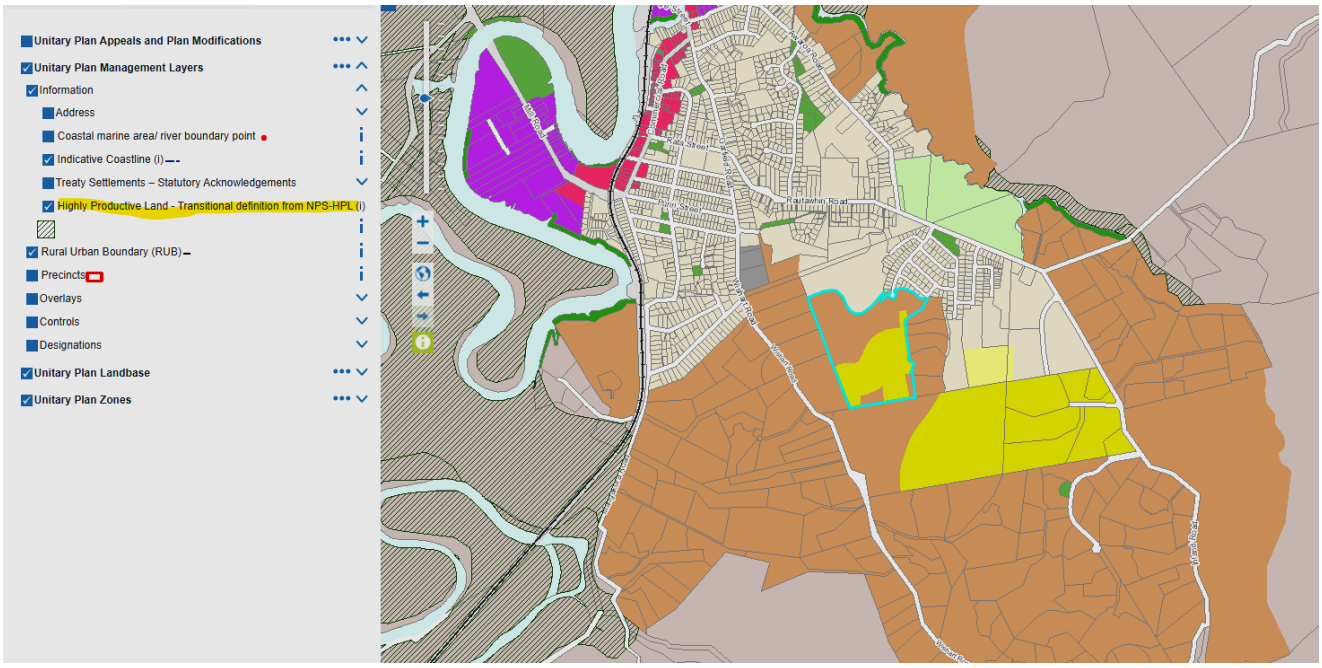

Figure 14 – Areas of highly productive soils in Helensville: Source – AUP Planning Maps

The site currently comprises rural land but is not useful for horticulture, and is likely not of sufficient size for any other viable rural farming activity.

The Site is directly adjacent to established residential subdivisions to the east – being relatively new, and the neighbouring land immediately to the north in the SHZ at Number 19 Kanono Way is currently being developed for residential development by Cabra Developments.

Given the site's close proximity to urban development and the ability to service the anticipated development resulting from this PPC, the proposed rezoning of the Site for urban residential purposes is practical and logical and is not considered to result in the sterilisation of Highly Productive Land or create reserve sensitivity issues with wider rural land use activities.

5.1.5 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

The *National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health* (NES-CS) is a nationally consistent set of planning controls and soil contaminant values. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed - and if necessary, the land is remediated, or the contaminants contained to make the land safe for human use.

The *Preliminary Site Investigation* (DSI) prepared by Thomas Consultants Ltd in Appendix 8 confirms that HAIL activities have not occurred on the Site and there is no evidence to indicate that potentially contaminating activities have occurred.

In accordance with Regulation 5(7) of the NES-CS the land is not considered to be affected by contamination and the regulations do not apply.

It is also noted that the contamination provisions of the AUP in Chapter 30 do not apply either.

In the context of the proposed plan change, there are no restrictions or additional requirements relating to contamination at the site.

5.1.6 National Environmental Standard for Freshwater 2020

The *National Environmental Standards for Freshwater* (NES-FW) regulates and restricts activities affecting the health of freshwater and freshwater ecosystems.

The following Regulations in the NES-FW are of potential relevance to the PPC:

1. Part 3 Subpart 1 – Natural Wetlands: Classifying the following activities as non-complying activities if they do not have another status under the subpart:
   (a) vegetation clearance within, or within a 10 m setback from, a natural wetland:
   (b) earthworks within, or within a 10 m setback from, a natural wetland:
   (c) the taking, use, damming, diversion, or discharge of water within, or within a 100 m setback from, a natural wetland

Appendix 6 – Ecological Assessment, prepared by Thomas Consultants Ltd identifies that there are no natural inland wetlands observed. It is noted that the proposed location of the SHZ is removed from the areas of watercourses on the site, such that any potential for impacts on wetlands or streams is to be avoided.

Based on the assessments within the Appendix 6, the NES-FW therefore considers to the outcomes anticipated under the NES-FW, and it is noted any future resource consent application will require, at the appropriate time, assessment of any relevant consenting requirements under the NES-FW.

5.2 Management Plans and Strategies

Section 74(2)(b)(i) states that, "*In addition to the requirements of section 75(3) and (4), when preparing or changing a district plan, a territorial authority shall have regard to — any management plans and strategies prepared under other Acts*."

5.2.1 Auckland Plan 2050

The Auckland Plan is a long term (20 to 30 year) strategy for Auckland's growth and development, which serves as the key strategic document to set the Council's social, economic, environmental and cultural objectives. The Development Strategy shows how Auckland will physically grow and change over the next 30 years. It provides:

- a pathway for Auckland's future physical development
- a framework to prioritise and coordinate the required supporting infrastructure

Section 4.1 – Purpose and Description of this report discusses how the location has been assessed and identified as suitable for residential zoning and intensification for many years now, noting this was previously identified in the *Helensville South Structure Plan* included in the legacy *Rodney District Plan 2000*, and was also included in the FULSS as considered development ready by 2023 – 2027. While the current FDS has pushed this development ready status out to 2035+, this is considered to be incorrectly applied to this location as previously discussed due to the ability to service the site now.

It is therefore considered that the PPC aligns with the intended outcomes of the *Auckland Plan 2050*.

5.2.2 Future Urban Land Supply Strategy 2017

The Future Urban Land Supply Strategy (FULSS) identified a programme to sequence future urban land over 30 years to assist with the ongoing supply of greenfield land for development. It was updated in July 2017 to reflect recent changes to the AUP, new demand for development and further technical work undertaken by Council to gain a greater understanding of the requirements for development.

Other council documents such as the Auckland Plan, the AUP, and the 30-year Infrastructure Strategy have close links with this strategy. There are also links with relevant transport documents such as the National Land Transport Programme, Integrated Transport Programme, Regional Land Transport Plan, Auckland Transport Alignment Project and Supporting Growth. This strategy also addresses the council's obligations under the NPS-UD.

As set out in "*Section 4.1 – Purpose and Description"* above, the Site is identified as "*Helensville Stage 1 – Development Ready in the second half of Decade 1 2023 – 2027*". This reflects the earlier identification of the site for live zoning and development in the *Rodney District Plan 2000*, within the *Helensville South Structure Plan* area.

It is noted that the replacement development strategy for Auckland (The *Future Development Strategy*) sets different timeframes for live zoning and development (2035+), and as previously stated, this is considered to be incorrectly applied to the Site as discussed further below. So, while the FDS technically replaces the FULSS, it is considered that in practical terms, the FULSS more correctly identifies this site as suitable for live zoning within the more immediate time frames specified.

5.2.3 Future Development Strategy 2023-2053

The *Future Development Strategy* (FDS) supersedes the FULSS detailed above and outlines updated timelines for the release of FUZ land for residential development over the next 30 years based on short to medium term priorities for investment (years 1-10) and long-term priorities for investment (years 11-30). The intention of this strategy is to better align with council's obligations under the NPS-UD and Plan Change 78.

The FDS shows the FUZ land subject to the PPC as "*Helensville Stage 1*" and is intended for development from 2035+ (see *Figure 15* below). The 2035+ timeframe is predicated on the completion of the "*prerequisites*" for live zoning of completion of:

- The Helensville Wastewater Treatment Plant Upgrade; and
- The Helensville Water Treatment plant upgrade.

Rural and Coastal Settlements	**Timing indication**	**Infrastructure prerequisite** Key bulk infrastructure projects to support development readiness (not an exhaustive list)
Helensville Stage 1	**Not before 2035+**	Helensville Wastewater Treatment Plant upgrade Helensville Water Treatment Plant upgrade

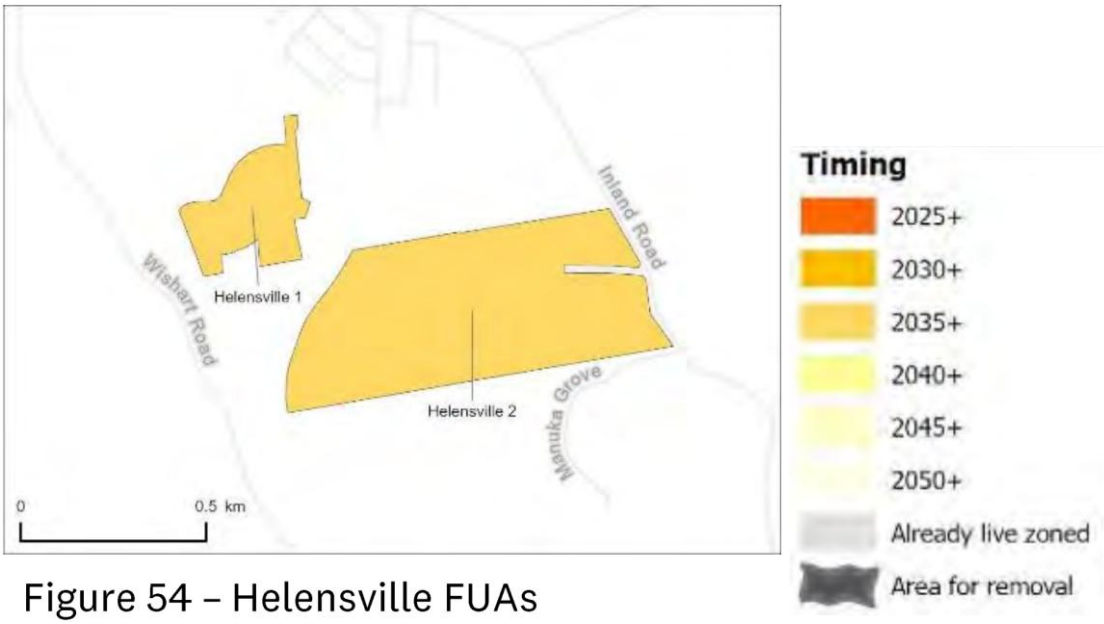

Figure 54 – Helensville FUAs

Figure 15 – FDS timing for development ready zoning and prerequisites

Consultation with Watercare has been held, and details of this are as set out above under *Section 1 – Executive Summary*, noting that the WWTP has already been upgraded and can accommodate the development and also that the local wastewater network is sufficient for the anticipated development of the site. The consultation letter also states the Water Treatment Plant and associated infrastructure may enable connection some time in 2026, although that is dependent on the sourcing of water supply. Water connection is not required to enable development however, as the provision for roof and tank supply can be made, as has occurred in the recent subdivisions to the east.

The FDS states that the live zoning of 2035+ can be revised to earlier timeframes upon demonstration that the specified prerequisites are deliverable when required by a development. There is clearly capacity to service this development currently, noting the extensive investment and upgrades of wastewater and water supply infrastructure already completed.

The FDS principles for growth and change are as follows:

1. Reduce greenhouse gas emissions
2. Adapt to the impacts of climate change
3. Make efficient and equitable infrastructure investments
4. Protect and restore the natural environment
5. Enable sufficient capacity for growth in the right place and at the right time

It is considered that this PPC readily aligns with these principles.

5.2.4 Regional Land Transport Plan 2021-2031

The *Regional Land Transport Plan* sets out the funding programme for Auckland's transport services and activities over a 10-year period. Planned transport activities for the next three years are provided in detail while proposed activities for the following seven years are outlined.

One of the key priority areas for the *Regional Land Transport Plan*, as relevant to Helensville is the design of bus improvements along SH16, with faster and more reliable bus services along SH16.[2] While this does not specifically refer to Helensville, there are beneficial outcomes for those commuting or otherwise utilising the bus services near the site to the metropolitan centres along the northwest corridor along SH16.

5.2.5 Rodney Local Board Plan 2023

The Site is located within the Rodney Local Board area. The *Rodney Local Board Plan 2023* (RLB Plan) is a three-year strategic document that guides local board activity, funding and investment decisions for the 2023 to 2026 period. Key initiatives of the RLB Plan of relevance[3] to this PPC include:

Our people

- *People have access to local spaces that are inclusive, accessible and culturally welcoming.*

Our environment

- *Improve water quality in our waterways by restoring freshwater ecosystems through appropriate riparian planting and sediment reduction, support initiatives that restore flood plains and significant wetlands, and environmentally sound forest harvesting. We also encourage the use of water-sensitive design practice.*
- *Protect and develop areas of particular importance to mana whenua in ways that are in accordance with mana whenua tikanga and aspirations.*

Our Community

- *Make changes to our current facilities network so that our parks, libraries, community halls and recreational facilities are fit for purpose, and deliver to future need and budget constraints.*
- *Work with mana whenua and mataawaka to integrate Māori design into local parks and facilities and include Māra Hūpara elements (traditional Māori play) in play areas and outdoor spaces*

Our Places

- *When community groups and organisations are delivering initiatives contributing to improved social and environmental outcomes, explore ways to reduce their costs and assist them with council processes.*
- *Reflect Māori cultural values and history in placemaking and town improvement projects and include mana whenua as a critical part of planning and design processes.*

Our Transport

- *Deliver safety projects for pedestrians, cyclists and mobility devices appropriate to the rural and semi-rural context.*

The Chairperson recognises the effect of climate change and the significant effects of recent extreme weather events, noting there is a need to build resilience into planning for the area, stating that:

> *"It is now projected the population will more than double over the next 30 years. We therefore need to ensure that we are ready for this growth by advocating for good planning away from flood prone areas, with sufficient infrastructure, transport options and essential public services delivered alongside housing".*

[2] Auckland Regional Land Transport Plan 2021 – 2031, Part 05 – Transport Funding, page 30, and Responding to Auckland's transport challenges, SH16 Northwest Bus Improvements, page 53.

[3] Not all key initiatives are listed here, but there may be broader connections through additional housing supply and a larger community base.

The PPC area is elevated well above flood plains and provides stable house platforms in a location that provides security from future weather events and the effects of climate change. The PPC is proposed to align with the other relevant key initiatives, through:

- Being located in close proximity to recreation reserves and schools and in reasonable proximity to the Town Centre.
- Protecting and enhancing natural features by keeping development away from key ecological features thereby protecting these in perpetuity.
- Consultation with mana whenua to recognise and provide for any identified cultural values.
- Enabling future subdivision and development proposals to ensure good road and pedestrian accessibility and safety outcomes are achieved, and that services can be readily available without adversely affecting the existing infrastructure for existing developed areas in Helensville.
- Enabling additional housing supply with a variation of densities, lot sizes, and housing typologies to assist affordable housing options and to cater for a variety of preferences, while completing the character of the existing residential development in the location.

Overall, it is considered that the PPC outcomes align with the key initiatives and desired outcomes of the *RLB Plan*.

5.3 Regional Policy Statement and Plans

Section 75(3)(c) of the RMA states that, "*A district plan must give effect to any regional policy statement*" and Section 75(4) of the RMA states that, "*A district plan must not be inconsistent with – a water conservation order or a regional plan for any matter specified in section 30(1)*."

5.3.1 Auckland Regional Policy Statement

The *Auckland Regional Policy Statement* (RPS) contained within the AUP outlines the resource management issues that are of significance in the Auckland Region and provides policies and methods to achieve integrated management of natural and physical resources across the region.

The RPS is prepared in accordance with Part 2 of the RMA and the completion of an evaluation report under section 32 of the RMA. The AUP overlay, Auckland-wide, zone, precincts, planning maps, schedules and appendices are part of the regulatory methods to implement the objectives and policies in the RPS.

The PPC has been assessed against the relevant objectives and policies of the RPS, which demonstrates that the PPS is consistent with, and will give effect to, the following RPS chapters in particular:

- B2 Urban growth and form;
- B3 Infrastructure, transport and energy;
- B4 Outstanding natural features and landscapes;
- B6 Mana Whenua;
- B7 Natural resources; and
- B10 Environmental risk.

B2 – URBAN GROWTH AND FORM

B2.2. Urban growth and form
With regard to achieving a quality compact urban form, the PPC has been considered against:

- Potential for economic growth;
- Availability and capacity of existing and new infrastructure;
- Proximity to public transport;
- Contribution towards social and cultural vitality;
- Potential impact on rural character and productivity.

While the Site is not within the urban area 2016 as identified in Appendix 1A of the AUP, it is within the FUZ and the proposed rezoning is in accordance with the *Helensville South Structure Plan* and the FULSS as discussed above. The rezoning of the land within the FUZ will help to accommodate growth in the Helensville and Parakai areas in a flood hazard free location.

The Site is in reasonable proximity to the Helensville Town Centre, bus stations, social facilities and employment opportunities that could be available in the Town Centre. Noting the intended upgrades to the public transportation network for the north-west along SH16[4] with faster and more reliable bus services, accessibility to other employment nodes along SH16 will improve.

The PPC will contribute towards residential development capacity to accommodate and support growth in Helensville and Parakai. The proposed SHZ and Precinct will be able to accommodate a range of housing typologies. The PPC can integrate with the provision of infrastructure to the area. The FULSS states that the Site will be development ready in 2023-2027 and infrastructure assessments indicate that the area can be adequately serviced in terms of water, wastewater, stormwater and transport infrastructure.

It is also highly relevant that the character of this neighbourhood is already undergoing significant further urbanisation, with the development of the adjacent site to the north at 19 Kanono Way in the SHZ and the relatively recent development of the sites to the east accessing off Rautawhiri Road, as set out in more detail above in *Section 3.2 – Surrounding Areas Description.*

B2.3. A quality built environment
With regard to achieving a quality built environment, the proposed rezoning and Precinct provisions respond to the intrinsic qualities and physical characteristics of the site and area by ensuring that:

- It provides opportunity for a mix of housing typologies.
- It provides the opportunity for development that meets the health and safety needs of people.
- It recognises and protects ecological features of value.
- It locates proposed development within a flood free environment, noting this is one of the last remaining areas in Parakai and Helensville where this is possible.

These outcomes are considered possible due to the elevated location, the stable areas for development, access to suitable wastewater infrastructure and capacity and the ability to otherwise service the development, and accessibility to the road network.

B2.4 Residential growth
The proposed residential zoning and the housing intensity it can accommodate, is appropriate to support a quality compact urban form. This is achieved by also meeting the objectives and policies under B2.2 and B2.3. The Site is generally within moderate walking distance to public transport, social facilities and open space, and can suitably accommodate medium residential intensity.

[4] Auckland Regional Land Transport Plan 2021 – 2031, Part 05 – Transport Funding, page 30, and Responding to Auckland's transport challenges, SH16 Northwest Bus Improvements, page 53.

There are no scheduled natural and physical resources within the Site. Areas of potential flooding are avoided, and while geotechnical risks are present, these can be avoided by locating development areas away from unstable land.

It is not considered that there will be reverse sensitivity effects arising from the PPC, where adjacent sites are zoned Residential, Rural, or Future Urban. The existing SHZ sites to the north and west are largely already under development or are developed, and the rural land to the south and west consists of large rural-lifestyle lots with associated dwellings located away from the proposed development areas.

CLZ is not the best use of the subject land where the small areas of existing CLZ to the south are surrounded by FUZ land, or where the CLZ land adjoining Mahi Road to the north-east adjoins SHZ to the north. The small areas to the south are too small to be subdivided, and subdividing the northern CLZ area near Mahi Road would add potential for reverse sensitivity effects to be increased in this predominantly urban location. Further, developing and subdividing residential land around the small CLZ pockets of land to the south would create potential reverse sensitivity effects, and it is considered the proposed amendments to the CLZ land address this concern.

Any perceived potential for reverse sensitivity effects at the southern and western boundaries can be addressed at the resource consent stage through mitigation fencing and landscaping, and/or a reverse sensitivity covenant to go on the titles of the lots – although that seems unlikely to be needed in this location.

B2.7 Open Space and Recreational Facilities

The size of the site, the topography, the areas of ecological features, and the location do not lend it to the provision of additional open space reserves or other recreational facilities, with the most efficient use to be solely for residential accommodation in the identified area of the site. It is noted that there are several reserves and parks in reasonable proximity to the site, as set out above in *Section 3.2 – Surrounding Areas Description.* These areas will provide sufficient recreational amenity for the future occupants of the site.

B3 INFRASTRUCTURE, TRANSPORT AND ENERGY

The objectives under B3.2.1 seek for infrastructure to be resilient and efficient, and for infrastructure planning and land use to be integrated to service growth efficiently. The existing and necessary infrastructure upgrades have been investigated by Civix Ltd as set out in the *Infrastructure Report* in Appendix 3, noting in particular that there is more than adequate wastewater capacity to accommodate the additional housing. The site can be readily accessed by vehicles as set out in the *Traffic Assessment* in Appendix 7. It is considered that overall, the PPC is able to be supported by infrastructure, and that infrastructure planning will generally align with the servicing and transportation requirements of the Site.

There are currently public transportation options with the area serviced by bus stops with the closest approximately 450m from the site that has have regular connections to metropolitan centres for work, recreation, or shopping needs.

There are low levels of crashes recorded in the area, and the *Traffic Assessment Report* considers there are no inherent safety concerns with the current road design in support of the plan change application.

Regarding trip generation, it is anticipated there to be in the order of 105 residential units[5] over the site and this could generate in the order of 990 vpd and 99 vph during the peak commuter periods. The *Traffic Assessment Report* assesses this traffic generation against the intersections and other road performance considerations, concluding that there will be an acceptable impact on the surrounding road network.

Overall, the Traffic Assessment concludes that the resulting traffic effects are likely to be minor in nature and there are no traffic-related reasons why the PPC should not be granted.

[5] Based on the Concept Masterplan – noting there could be variation of this under a detailed resource consent application.

B4 OUTSTANDING NATURAL FEATURES AND LANDSCAPES

There are no existing scheduled trees, outstanding natural features or landscapes, areas of high coastal natural character or high natural character located within the Site.

B5 BUILT HERITAGE AND CHARACTER

CFG Heritage has completed the archaeological assessment of the site, as detailed in Appendix 10. The assessment concludes that there are no previously recorded archaeological sites within the area, and the likelihood of future development affecting unrecorded archaeological sites is considered low.

B6 MANA WHENUA

The principles of the Treaty of Waitangi/Te Tiriti o Waitangi have been recognized in the preparation of the PPC, with consultation undertaken with iwi groups potentially interested in the PPC to ensure that Mana Whenua values are identified, protected, and enhanced.

No significant concerns were raised by iwi groups during consultation.

Consultation letters were sent to identified iwi, with responses received from Ngāti Manuhiri (email dated 2/09/2024) and Te Kawerau ā Maki (email dated 3/09/2024), who advised that they defer to Ngāti Whātua o Kaipara for comments on the PPC. A follow-up email and phone communications were sent to Ngāti Whātua o Kaipara on 18/09/2024 to seek their feedback. On 14 October 2024, an attempt was made to deliver the consultation documents by hand to the Ngāti Whātua o Kaipara office in Parakai, but the office was found boarded up and closed. The documents were subsequently posted to the address listed on the Ngāti Whātua o Kaipara website on 18 October 2024. No response has been received to date.

For any future resource consent applications, it is recommended that suitable consent conditions include provisions for cultural induction of contractors at pre-start meetings, as well as a karakia prior to any ground-breaking for proposed earthworks.

It is acknowledged that additional consultation with all identified iwi will be required for any subsequent resource consent application, providing further opportunities for iwi issues to be discussed and addressed. Iwi may also provide comments on any submissions made in response to the PPC notification, allowing any issues related to Te Tiriti o Waitangi principles to be addressed before a final decision on the PPC.

B7 NATURAL RESOURCES

The site includes areas of native bush and watercourses, as detailed in the *Ecological Assessment* in Appendix 6. The PPC highlights the site's most significant ecological features and ensures that proposed development areas avoid impacting these features. Additionally, any watercourses adjacent to the proposed development areas require a 10-metre planted riparian margin. It is also accepted that there can be a 20m riparian margin adjacent to Stream 1 and the proposed SHZ area, in response to previous comments by Council ecologists under Cl23 RMA assessments.

The site is not identified as having high-quality soils, as discussed in Section 7.1.5 of the NPS – HPL, so there is no potential for loss of productive land.

Existing Regional Rules under Chapter E7 – Natural Resources, which will continue to apply to the PPC area, already give effect to some of the Objectives and Policies in Section B7

B10 ENVIRONMENTAL RISK

Preliminary geotechnical and contamination investigations have been conducted as part of the PPC application.

Overall, the PPC site is suitable for future residential development, with no significant contamination areas anticipated, as detailed in the PSI by Thomas Consultants Ltd (Appendix 8).

The Geotechnical Assessment by Soil and Rock (Appendix 9) highlights some areas of instability where development is recommended to be avoided; however, further detailed investigation will be needed for any future specific development proposals. Most proposed development areas outlined in the Precinct Plan are located outside these identified unstable zones. In cases where sites may include unstable areas, there is sufficient space for building within the stable portions of the site.

Environmental risks are managed through Chapter E38 (Subdivision) and Chapter E36 (Environmental Risk) of the AUP. Any land contamination will be addressed during the resource consent process, with conditions aligned with the NES-CS and Chapter E30 of the AUP.

Potential hazard impacts from geotechnical instability are covered in the AUP's subdivision and development criteria, and specific geotechnical assessments will be required and reviewed for any future resource consent applications.

The environmental risks associated with the site and any future development are neither significant nor unique, and they can be effectively managed with existing tools and methods. Consequently, there is no reason to prevent the proposed residential zoning on this basis.

Summary

An assessment of the PPC against relevant sections of the Regional Policy Statement (RPS) has been completed. Based on this assessment, the PPC is expected to give effect to the RPS, particularly in achieving the outcomes outlined in Chapter B2 regarding urban growth and form. The PPC supports a high-quality, compact urban structure that will effectively accommodate residential growth.

5.3.2 Auckland Regional Plan

The *Auckland Regional Plan* (ARP) provisions control the use of land for the purpose of soil conservation, water quality and managing natural hazards. Development within the Site will be regulated by the Auckland-wide provisions within the AUP, which will ensure the effects of development on the natural environment will be appropriately managed and will achieve the objectives and policies of the ARP.

5.3.3 Auckland Unitary Plan (Operative in Part)

The *Auckland Unitary Plan (Operative in Part)* (AUP) is the primary statutory planning document for Auckland. It is a combined unitary plan comprising of the Auckland Regional Policy Statement, Regional Coastal Plan, Regional Plan and District Plan. The AUP provides the regulatory framework for managing Auckland's natural and physical resources while enabling growth and development and protecting matters of national importance. The AUP policy framework in order of hierarchy is for the regional and district plan provisions to give effect to the RPS.

The provisions of the AUP relevant to the PPC have undergone a full and thorough section 32 evaluation associated with the notification of the PAUP, and the AUPIHP hearings. As such, a full assessment of the existing operative objectives, policies and rules of the AUP that are proposed to be applied to the subject land through this PPC request is not necessary, particularly as the PPC does not seek to change or negate any of the existing regional plan provisions. However, the following assessment considers:

1) Whether the PPC is compatible with the existing AUP provisions; and

2) Whether the existing AUP provisions relevant to the PPC are appropriate to manage certain issues that may arise.

E1 WATER QUALITY AND INTEGRATED MANAGEMENT

The E1 objectives and policies are relevant to the following chapters:

- E4 Other discharges of contaminants
- E5 On-site and small scale wastewater treatment and disposal
- E6 Wastewater network management
- E7 Taking, using, damming and diversion of water and drilling
- E8 Stormwater – Discharge and diversion
- E9 Stormwater quality – High contaminant generating car parks and high use roads

The PPC will not present significant difficulties or inconsistencies with achieving these objectives and policies, and in turn the above chapters, will assist to give effect to the purpose and objectives of the proposed SHZ, MHSZ, and CLZ provisions.

The PPC does not anticipate any loss or degradation of existing waterways through discharges of stormwater, contaminants, or sediment.

Stormwater and wastewater can be managed without adversely affecting freshwater systems. The layout, location and type of zoning proposed seek to achieve integration of future development whilst minimising effects on hydrology and receiving environments.

E3 LAKES, RIVERS, STREAMS AND WETLANDS

While there are permanent or intermittent streams located over the site, these are purposefully avoided by the proposed development areas. These watercourses are located within the areas of vegetation identified within the proposed CLZ areas. The CLZ extent has been located so as to provide for a minimum 20m riparian margin to the adjacent proposed MHSZ and SHZ sites. Accordingly, there are to be no adverse effects on any streams or wetlands, noting that the avoidance of ecological VS3 areas identified will assist to protect these from development effects into the future.

E11 LAND DISTURBANCE – REGIONAL

Land disturbance is required to prepare the land for urban development. Development of the Site in accordance with its proposed SHA, MHSZ, and CLZ zoning will not present significant difficulties in meeting the standards set out in Chapter E11, which ensures that land disturbance is undertaken in a way that meets the objectives of the Chapter. Of particular relevance will be the implementation of best practice erosion and sediment control measures to ensure there is no discharge of untreated sediment laden water into any downstream water body.

E15 VEGETATION MANAGEMENT AND BIODIVERSITY

The areas of significant vegetation and watercourses over the site have been assessed in the ecological assessment in Appendix 6, and e any future development within the proposed MHSZ and SHZ areas proposed are located outside of these. Accordingly, the outcomes sought under Chapter E15 will not be compromised by the PPC. The amended CLZ areas incorporate the areas adjacent to Stream 1 and the ecologically significant areas of bush (VS3), noting there are objectives and policies and assessment criteria under the Rural and CLZ provisions requiring consideration of ecological values and the protection and enhancement of this. One such

example is Objective H19.7.2 (2) *The rural character, amenity values, water quality, ecological quality, historic heritage values and the efficient provision of infrastructure is maintained and enhanced in subdivision design and development.*

E30 CONTAMINATED LAND

A *Preliminary Site Investigation* (PSI) has been undertaken as part of the PPC. The DSI of Thomas Consultants in **Appendix 8** sets out that the site is not likely to have been subject to significant HAIL activities and it is unlikely that contamination in soils exist at levels that would preclude the reasonable development and subdivision of the land as proposed under the PPC.

The SHZ and proposed development under the Precinct provisions for this area is therefore considered to be appropriate, as no potentially contaminating activities have been identified with the site, and any low-level contamination can be adequately managed by any Site Management Plan required at the resource consent application stage.

Summary

The PPC aligns with the regional plan provisions of the AUP and is generally compatible with existing AUP provisions.

5.4 Iwi Planning Documents

Section 74(2A) states that, "*A territorial authority, when preparing or changing a district plan, must take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district*."

The site is not located within any Iwi Statutory Acknowledgement Area. There has been no identification of any relevant iwi planning documents from iwi in relation to consultation for this PPC to date.

6. ASSESSMENT OF ENVIRONMENTAL EFFECTS

Clause 22(2), Schedule 1 of the RMA states:

> *"Where environmental effects are anticipated, the request shall describe those effects, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement, or plan".*

The following assessment of the actual or potential positive and adverse effects includes consideration of the following matters that are relevant to the plan change request:

- Built Environment and Layout
- Public Amenities and Facilities
- Landscape Visual
- Ecological
- Infrastructure
- Flooding & Stormwater Management
- Transport
- Geotechnical
- Contamination
- Mana Whenua values
- Archaeological and Built Heritage

6.1 Built Environment and Layout (Urban Design)

To demonstrate the suitability of the site for the proposed residential density, the Concept Masterplan, shown in Appendix 5 and in Figure 11 of Section 4.2, illustrates how the site could be divided into appropriately sized lots. These lots are designed to provide high accessibility, avoiding sensitive ecological areas, watercourses, and areas identified as geotechnically unstable as noted in the *Geotechnical Assessment* (Appendix 9).

This design enables a range of dwelling types, including single-level and multi-story options, with an estimated total of approximately 105 - 110 dwellings. The I*nfrastructure Report* in Appendix 3 outlines the site's serviceability, while the *Traffic Assessment* in Appendix 7 addresses its accessibility.

The *Urban Design Assessment* by Ian Munro (Appendix 11) evaluates the proposed provisions, concluding that they are appropriate for the desired increase in residential density. Key points include:

- The site is recognized as suitable for urban zoning in the *Future Development Strategy* (FDS).
- The proposed residential use aligns with the land's characteristics, adjacent land uses, and is seen as the most suitable use given the site's constraints and opportunities.
- .
- The Concept Masterplan demonstrates how the land can provide a connected, coherent urban form in line with the AUP's objectives, accommodating various densities and living options while considering the site's slope and geotechnical factors.
- It is highly unlikely that the proposal will produce unusual or unmanageable urban design effects compared to typical urban expansion.
- The site's location supports the proposed residential density, creating a logical southward extension of Mahi Road, with proximity to the town centre (1.7 km) and Rautawhiri Reserve (400 m).
- The proposaalaligns with nearby residential and CLZ character , reflecting both the area's characteristics and market research showing viable housing types for Helensville. The SHZ, and MHSZ are seen as more suitable than the higher-density THABZ, which may be more appropriate nearer commercial centres.
- While some minor urban design effects may arise, none are expected to be unusual or severe within the context of urban land zoning.
- Positive urban design outcomes are anticipated, particularly through future subdivision.
- The private plan change application could be accepted and approved on urban design grounds.

The proposed SHZ and MHSZ and associated development will complement existing and planned development in this area. Any single-house or medium-density residential development will rationalize the development of remaining undeveloped Future Urban Zone (FUZ) land in this neighbourhood, contributing to housing supply in Helensville and Parakai and offering economic benefits to local retail and commercial sectors. Additionally, there is a recognized need for housing on stable land outside floodplains in Helensville and Parakai, and this area represents one of the last available zones for residential development in the region.

In summary, the PPC will introduce a change to the current site's urban form and character while complementing recent residential growth in the area. This aligns with the expectations outlined in the *Future Urban Land Supply Strategy* (FULSS) and the *Helensville South Structure Plan*. The PPC supports a high-quality, well-connected residential environment with a variety of housing options, proximity to public amenities, and good visual appeal, fostering a quality compact urban form without adverse effects on character or amenity.

6.2 Public Amenities and Facilities

The Site is within approximately 1.7km to the Helensville Town Centre which includes shops (including Woolworths supermarket), restaurants and café's, Churches, pre-school, and Caltex Petrol Station.

Approximately 800m to the west is Kaipara College, and Helensville Primary School is located approximately 1.3km to the west. There are several reserves in proximity to the site, including Rautawhiri Park approximately 545m to the east, which includes rugby, league, tennis, cricket, netball, a skate park, playground, open grassed recreational areas, pathways, and public toilets.

The nearest bus stop is located 450m to the west (Bus Stop ID 4904) outside Kaipara College, with busses 125 and 128 going to Westgate (125) and Kaukapakapa (128), with connections at Westgate possible to Auckland CBD.

The industrial area along Mill Road includes a gym, massage facility, Helensville Museum, and several industrial activities including vehicle services, building supplies (including Mitre 10, and a rural supply depot.

Overall, there are existing open spaces, public amenities and commercial and retail facilities that will be accessible to the Site, and will have the capacity to cater for the needs of future residents.

6.3 Landscape and Visual

The site is unremarkable in terms of landscape and visual impact and it is not located within an Outstanding or High Natural Landscape overlay and is bordered by residential developments to the north and east.

Accordingly, the PPC will produce landscape and visual effects that align with expectations based on the site's *Future Urban Zone* (FUZ), the *Helensville South Structure Plan*, the *Future Urban Land Supply Strategy* (FULSS), and the *Future Development Strategy* (FDS).

The *Landscape Visual Assessment* (LVA) for the site, included in Appendix 13, evaluates the landscape and visual effects of the proposed development against:

- Background review of site aerials and the PPC plans, and identification of key landscape and environmental factors that could potentially be affected by the proposed development.
- Review of relevant statutory provisions to identify key landscape and visual related objectives, policies, and assessment criteria for assessment of the PPC against these.
- Detailed site investigation and analysis of the site and surrounds to identify landscape character, natural character, visual and amenity values, with an analysis of the landscape values identified and the landscape's ability to accommodate future development enabled by the PPC.
- Identification of the visual catchment of the site and PPC development and the associated viewing audience.
- A series of viewpoints is identified to assess the impact of the PPC from these viewpoint locations.
- Specific analysis and assessment regarding the anticipated effects on landscape character and visual amenity on the site and surrounding areas. This assesses the effects of the PPC and identifies any aspects likely to have high or adverse landscape or visual amenity effects.

The above methodology is used to arrive at conclusions, including recommendations for avoiding, remedying, or mitigating any identified effects where necessary.

Regarding the statutory assessment in Section 5, it is considered that the PPC would generally be consistent with the intent of the landscape character, natural character, and visual objectives and policies of the AUP, and when considered in totality would be entirely acceptable in terms of landscape character and visual amenity terms.

Section 6 of the LVA sets out the detailed Evaluation of the Proposal, and Section 7 sets out the Conclusions arrived at from these evaluations. The conclusions reached are:

- *The proposed urbanisation of the Site resulting from development enabled by the PPC would change its current open and undeveloped landscape character. The development would however be consistent with the Site and parts of the surrounding area being zoned FUZ with urban expansion envisaged in the AUP. The proposed urbanisation of the land would inevitably result in the transformation of the Site from an undeveloped area to one with urban residential characteristics. Nevertheless, this is a landscape in transition and is an area identified as suitable for urban expansion under the AUP.*
- *Because of the nature of development enabled by the PPC and the anticipated eventual urbanisation of the Site and surrounding area, rather than trying to screen the development or create significant buffers, the approach has been to accept the change and develop the Site in accordance with accepted urban design principles to create a quality residential development with a high level of amenity, albeit an urban amenity as anticipated by the AUP.*
- *While development enabled by the PPC would result in a significant visual change from the Site's current open state to one with urban characteristics, particularly for some of the immediate neighbours, such visual change is anticipated and is in accordance with the key planning initiatives for the area.*
- *Development enabled by the PPC would initially generate landscape and visual effects of some significance. These however are inevitable with urban development at the start of a process of urbanisation. In addition, the visual effects of the development of the Site apparent from the early stages would decrease over time as street tree plantings and landscape plantings typically associated with the urbanisation of an area become established. The avoidance of the VS3 kānuka scrub and forest ecosystem will provide a significant vegetated setting for the Site.*
- *In conclusion, development enabled by the PPC would fulfil the need for residential and urban intensification and provide an opportunity for an innovative and environmentally sustainable urban development. The PPC would be largely consistent with the regional growth strategies for the area and would result in a high-quality urban development.*
- *I therefore consider that the proposed Private Plan Change is entirely appropriate in this urban setting from a landscape character and visual amenity perspective.*

The assessment has identified no significant adverse landscape or visual effects arising from the future development proposed in the PPC, therefore, no recommendations are required to mitigate potential significant visual impacts. Consideration of landscape and visual effects can be provided in relation to any detailed resource consent proposal at that stage.

The anticipated landscape and visual effects are consistent with the expected outcomes for residential zoning and development as indicated for this site under the FUZ, the FULSS, the FDS, and the longstanding *Helensville South Structure Plan*. The PPC has been developed with consideration for the existing and developing character of the immediate neighbourhood and the need to provide a range of housing options suited to market demand, as outlined in the *Residential Housing Market Analysis* (Appendix 4). It also responds to the requirement for adequate housing yield on stable land above the floodplains—an important constraint in the Helensville and Parakai areas.

Overall, the PPC is expected to result in less than minor adverse landscape and visual effects for this location.

6.4 Ecological

The proposed development areas within the site have limited ecological value, containing little to no indigenous vegetation and lacking significant waterbodies.

In contrast, the remaining areas of the site designated to remain as CLZ, along with an additional CLZ area in the southwest corner, hold ecological significance due to the presence of mānuka/kānuka scrub forest, watercourses, and their surrounding margins.

The *Ecological Assessment* by Thomas Consultants Ltd, included in Appendix 6, evaluates the entire site in terms of its terrestrial and freshwater ecological characteristics. It assesses the potential impacts of the PPC on these ecological values and provides recommendations to avoid, remedy, or mitigate these effects as appropriate. The assessment also considers the regulatory frameworks of the AUP and the *National Environmental Standards for Freshwater 2020* (NES-FW). The methodology of the assessments includes:

- Desk top studies of Auckland Council GIS layers, including;
  - Auckland Council Significant Ecological Area information,
  - Herpetofuana records,
  - Aerial photography and satellite imagery,
  - The New Zealand Freshwater Fish Database, and
  - Department of Conservation bat records.
- Field Assessment consisting of:
  - Assessment of vegetation ecosystems present on the site,
  - Classification and assessment of watercourses,
  - Assessment of habitats and the potential to support lizards, bats, birds, and aquatic species, and
  - Assessment of the ecological values of the site.
- Wetland and Watercourse Assessments, including:
  - Rapid hydrophytic vegetation test, in accordance with the New Zealand Wetland Delineation Protocols, and
  - Classification of identified overland flow paths in accordance with AUP definitions (AUP: Chapter J Definitions) for rivers, streams, overland flow paths, and artificial watercourses.
- Assessment of Ecological Effects, including:
  - Assignment of ecological value,
  - Calculating a magnitude of ecological effect, and
  - Assessment of the level of ecological effect using the decision matrix in Table 10 of the EIANZ Guidelines.

The *Ecological Assessment* sets out ecological context and describes the terrestrial and freshwater systems over the site.

6.4.1 Terrestrial Values

There are two main vegetation types identified on the site, namely, being manuka/kanuka scrub/forest (VS3), and exotic scrub (ES). These are shown on the Map in Appendix A to the ecological assessment in Appendix 6 and also shown above in *Figure 4*.

The remaining areas of the site consist mainly of dense overgrown kikuyu grass and areas of gorse.

The most valuable vegetation type (VS3) consists of approximately 5.73ha of diverse vegetation, including tall kanuka trees (the most dominant canopy species) within the central forested area, and smaller younger trees forming the next layer towards the outside. Shrubs are dominant on the outer edges but are also present within the forest. Details of these shrub species are set out in Section 5.2 of the ecological assessment in Appendix 6. Weed species are present in the outer edges of bush and along streams, including woolly nightshade, wild ginger, and Chinese privet. A few tall one trees are also present on the site.

6.4.2 Watercourses

There is an intermittent/ permanent stream (Stream 1) that flows through the site from south to north-east, starting shallow in the south and increasing in depth to the north-east. Detailed descriptions of this are included in Section 5.1.3 of the assessment.

Smaller ephemeral streams exist within the site that join the mainstream.

6.4.3 Wetlands

No wetlands were identified from the desktop study. An area of approximately 300m^2 was noted during the site visit with rushes (Juncus effusus) growing between the kikuyu covering 30% of the total area. This was located in an area of hillside that forms a shallow depression, and it was thought possible that seep wetland conditions are present. To be sure about the status of this, Dominance and Prevalence tests were undertaken, with the results proving that there is no wetland in this location.

An artificial dammed area is present approximately 70m south of Mahi Road, and this is considered a constructed wetland and therefore not a natural inland wetland under the NES-F.

6.4.4 Freshwater fauna

No fish survey was completed; however, the presence of stream provides habitat for freshwater species. According to the New Zealand Freshwater Fish Database (NZFFD) 11, no native fish records exist for the site itself, and the closest record is more than 3km to the southwest. The streams may support some common native fish and aquatic macroinvertebrates; however, no stream works are proposed during this stage of the development planning.

Further, the proposed development areas within the SHZ and MHSZspecifically avoid all watercourses, and these residential areas avoid the area of VS3 vegetation that surrounds large areas of the watercourses in the site. The VS3 area and watercourses within are located within the CLZ and any subdivision or development within the CLZ is required to consider ecological effects, so the CLZ is considered to provide sufficient protection of these features under the AUP.

6.4.5 Terrestrial fauna

A fauna survey has not been specifically conducted as part of this assessment and therefore habitat types and quality was identified to determine the species that could potentially be present.

Birds

Section 5.4.4 of the assessment identifies the species of birds observed on the site, as well as other likely to be present to roost within the vegetation habitats of the site. No threatened species were identified.

As the proposed development area is located outside these terrestrial habitats (except for the areas of kikuyu and gorse) it is not considered there to be any adverse impacts on the habitats of these bird species.

Further, the retirement of unused kikuyu covered land to landscaped lots and streetscapes will introduce indigenous landscaping to the site through landscape planning associated with future development resource consents, likely enhancing the habitat values for birds in those areas upon completion and establishment.

Bats

The l ecological assessment states that records show that native long-tailed bat (Chalinolobus tuberculatus) has been recorded in forested areas within 5km of the site (DOC, 2020). While the terrestrial habitats over the site provide potential suitable roosting areas for the bats, it is proposed that the VS3 areas be protected from removal preserving the potential habitat in perpetuity.

Reptiles
The ecological assessment states that the Auckland Council lizard database shows no lizard records within proximity of the study site. Forest geckos (*Mokopuririakau granulatus*) have been recorded within 5km of the site and no other survey results were found.

Noting again that the proposed provisions seek to include the areas of significant vegetation habitat on the site in the VS3 terrestrial area within the CLZ, it is likely that the habitats of skinks and geckos can be protected into the future under the AUP provisions. Further, at resource consent stage there is opportunity to include conditions of consent requiring herpetofauna surveys if and relocation if considered necessary.

6.4.6 Summary of Ecological values

Section 5.5 (specifically Table 6) of the *Ecological Assessment* sets out a summary of the ecological values. Overall, it has been assessed that:

- The areas of the forest and permanent stream within the site (VS3) have **moderate** ecological values.
- The areas of kikuyu/gorse exotic vegetation (ES) have **low** ecological values.
- The watercourses have **moderate** ecological values.
- The values for fauna have **high** ecological values – mainly in relation to the areas of VS3 bush.
- There are no wetlands under the NES-FW.
- It is recommended that the area of VS3 forest be protected by inclusion within the CLZ as proposed under this PPC.

It is concluded in the **Appendix 6** – *Ecological Assessment* that the site has potential for development in the areas of low ecological value, as well as for protection of specific areas by way of zoning these within the CLZ The inclusion of the VS3 forest areas within the CLZ will likely result in maintenance of, or a net gain of biodiversity and follows the hierarchy of impacts management by avoiding impacts before they occur.

The *Ecological Assessment* concludes that the PPC can effectively mitigate and manage potential effects to acceptable levels, provided the location of the VS3 forest area of moderate ecological value is included in the CLZ, that a 20m riparian margin setback from the MHSZ and SHZ is provided around intermittent or permanent watercourses, and that the recommendations regarding aquatic species, bats, avifauna, and lizards are adhered to. It is noted that these recommendations are able to be required at resource consent stage, enabling appropriate conditions of consent to be applied at that time.

6.5 Infrastructure

An *Infrastructure Report* by Civix Ltd, included in **Appendix 3**, evaluates the site's capability to be serviced practically without causing unacceptable adverse effects.

Section 4.6, "Infrastructure Servicing," explains how the site can be adequately serviced for water supply, wastewater, and stormwater.

For telecommunications, Chorus has confirmed that network extension to the site is feasible, pending detailed provisions at the resource consent and Engineering Plan Approval stages.

Vector has been contacted to confirm the presence of an existing electrical connection and sufficient capacity to support the proposed development. While a response is pending, it is expected these requirements will be met, based on recent subdivisions and development in the adjacent area at 19 Kanono Way. Future lots' connections to the electricity network will adhere to the Electricity Network Provider's conditions, including a capital contribution, ensuring the provider can invest appropriately to maintain service quality and supply security.

Road access will be established through new local roads leading to Commonly Owned Access Lots (COALs) within the site. These roads have been designed in line with the Austroads Manual and Auckland Transport TDM, with expected speed limits of 30 km/h, supplemented by speed management features such as speed tables, raised intersections, and kerb narrowing at 60-meter intervals. Detailed specifications will be reviewed at the resource consent application stage.

6.6 Flooding & Stormwater Management

Section 6 of the *Infrastructure Report* in **Appendix 3** references the Tuflow Flooding Results, provided in **Appendix D** of that report, and the *Stormwater Management Plan* (**SMP**), also included in **Appendix 3**.

The SMP has been prepared with the understanding that this is a plan change application, not a resource consent application; therefore, the level of detail provided aligns with the requirements of the PPC, and requests for information should be appropriately scoped on this basis.

The SMP outlines guidance for managing stormwater and existing freshwater systems throughout the future development areas within the proposed MHSZ and SHZ to ensure alignment with the objectives and policies of the AUP, the Healthy Waters Network Discharge Consent, Auckland Council guidelines, and industry best practices.

The report confirms that the proposal achieves the following outcomes:

- *No affects from flooding in 1% AEP event on new/additional buildings floor will be created and no increase in frequency of flooding existing buildings will be created.*
- *No significant increase in risk to the operation and structural integrity of other infrastructure from a 1% AEP event will occur.*
- *No increase in inundation that affects a building in the 10% AEP event.*
- *No loss in overland flow path capacity will occur, though overland flow paths will now primarily be directed through the roading network.*
- *Appropriate erosion protection/mitigation will be provided for any new outfall in accordance with the Stormwater Code of Practice.*
- *No stormwater is directed to a different receiving environment.*

The SMP also outlines the management approach/key elements of the catchment and provides an assessment including how an Integrated Stormwater Management approach has been adopted in the design and associated stormwater management in accordance with the policies in the AUP Sections E1.3, B7 and B8. This assessment shows how the SMP seeks to:

- Minimise the stormwater related effects of development.
- Retain/restore natural hydrology as far as practicable.
- Minimise the generation and discharge of contaminants (including gross Stormwater pollutants) and stormwater flows at source.
- Minimise temperature related effects.
- Enhance freshwater systems including streams and riparian margins.
- Minimise the location of engineered structures in streams.

A summary of the Stormwater Management approach is included in Table 1 of the SMP and shown below:

Requirement	Design response
Water Quality	Treatment for all areas via a communal scale wetland located in the lower portion of the catchment.

SMAF1 – Retention (5 mm) and detention (95th percentile)	Roof areas for all dwellings via tanks with non-potable reuse. Retention is not feasible for public roads, COALs and driveways. This solution has been chosen as it is the SMAF 1 specified outcome, which is the most restrictive outcome and will achieve equivalent hydrology (infiltration, runoff volume, peak flow) to predevelopment (grassed state) levels for the dwellings. Extended detention for the site to be provided via a communal scale wetland, this meets the NDC objectives and is the BPO (see green infrastructure assessment in section 6.3).
Primary Drainage	The design will ensure that there is sufficient capacity within the pipe network to cater for stormwater runoff associated with the development in a 10% AEP event including incorporating flows from possible contributing catchments at maximum probable development.
Flood Hazard Management	The proposed form of the development will avoid the 100 year floodplain. A reticulated public stormwater network discharging to new outfalls will be provided to convey the 10% AEP event safely through the development. An overland flowpath network will be provided within the road corridors to ensure safe conveyance of the 1% AEP with CC through the development site and ensure no adverse effects to downstream properties in the catchment. 10 year and 100 year peak flow controls will be provided on site as required. Ann new dwellings to ensure floor level freeboard in line with the NZ building code.

With future resource consent applications, more detailed SMPs will be provided at each stage, allowing these outcomes to be integrated into the detailed design phases of development. The desired outcomes, as summarized here, can be assured through consent conditions and further reinforced in the Engineering Plan Approval process.

The PPC SMP demonstrates that, with appropriate design and management, potential effects from development and subdivision, including flooding and stormwater discharge impacts, can be effectively managed to ensure they remain less than minor.

6.7 Transport

The effects of the proposed rezoning on the safety and efficiency of the transport network have been thoroughly evaluated in the Traffic Assessment Report (TAR) by Landev, included in Appendix 7. The existing transportation network, including road layout and current traffic volumes, has been detailed in Section 3.5.2 above. The TAR assesses the proposal's impact on the current transportation network with respect to:

- Traffic generation (Section 6.0);
- Roading (Intersection) Network Review (Section 7.0);
- Crash analysis (Section 8.0);
- Construction Traffic Effects (Section 9.0);
- Public Transport (Section 10.0); and
- Auckland Unitary Plan provisions (Section 11).

The conclusion in Section 11 states, "*Overall, the proposal will construct approximately 105 to 110 dwellings, and the resulting traffic effects are likely to be minor. Therefore, there is no traffic-related reason why the proposed change should not be granted*."

A specific traffic assessment will be required at the time of land use and subdivision resource consent application. This assessment must consider the effects of any significant increase in traffic volumes on the existing road network, ensuring the safe and efficient operation of the surrounding transport infrastructure.

Overall, the PPC is not anticipated to impact the efficiency and safety of the existing surrounding traffic network, and future development can be adequately supported.

6.8 Geotechnical

A *Geotechnical Assessment Report* has been prepared for the site, as detailed in Section 3.8.2 – Geotechnical Assessment. The report concludes that the PPC area is generally suitable for development in Zones A and B, while Zone C is not recommended for development without further detailed investigation, which may include identifying "no-build" areas and other hazard avoidance measures.

Overall, the potential development areas in the proposed MHSZ and SHZ are able to be primarily located within the more stable Zones A and B. Some portions could be located in Zone C, with development in these areas being feasible, subject to detailed geotechnical investigations and recommendations at the resource consent stage, with conditions to ensure safety and stability. There are no geotechnical reasons to prevent the PPC's approval, as, with appropriate assessments, recommendations, and consent conditions, any development impacts will be minor.

6.9 Contamination

Section 3.7 – Contamination summarizes the findings from multiple Preliminary Site Investigations conducted by Soil and Rock Consultants in 2013, updated by an addendum from Thomas Consultants in 2023, and the latest memo by Thomas Consultants in September 2024 (Appendix 8). All investigations conclude that no identifiable HAIL (Hazardous Activities and Industries List) activities have occurred on the site, and thus the contamination provisions of Chapter 30 of the AUP and the NES-CS regulations do not apply.

The risk of adverse health effects for future site occupants is therefore considered less than minor. If deemed necessary by the Council during the resource consent application process, a *Detailed Site Investigation* (DSI) can be requested.

The findings of these PSIs suggest that contamination is unlikely to be a barrier to development and subdivision on the site. Should any contamination be identified during a DSI, it could be managed through a *Site Management Plan* or *Remediation Action Plan*, with enforcement through consent conditions.

Accordingly, the potential effects from soil contaminants are considered less than minor.

6.10 Mana Whenua values

The site is not located within any Iwi Statutory Acknowledgement Area, however, it is recognised that Ngati Whatua o Kaipara has significant connections with the land. The following iwi groups were sent a PPC summary letter seeking feedback via email on 2nd September 2024:

- Ngāti Maru
- Ngāti Manuhiri
- Ngāti Te Ata Waiohua
- Te Ākitai Waiohua
- Ngatiwai
- Ngāti Whatua o Kaipara
- Ngāti Whatua Orakei
- Te Kawerau a Maki
- Te Runanga o Ngati Whatua

In response to the initial correspondence sent to iwi groups, Ngāti Manuhiri advised deferral to Ngāti Whatua o Kaipara on the 2/09/2024, and Te Kawerau a Maki also advised deferral to Ngāti Whatua o Kaipara on the 3/09/2024.

A follow up email and telcoms were made to Ngāti Whatua o Kaipara on 18/09/2024.

An attempt was made to hand deliver the consultation documents to the Ngati Whatua o Kaipara office in Parakai on the 14th October 2024, but it was discovered the office was not open despite being office hours. Further, the documents were posted to the postal address taken from the website for Ngati Whatua o Kaipara on the 18th October 2024. No responses to these consultation efforts have been provided to date.

No responses have been received from other iwi groups.

Further consultation with all identified iwi will be required for any subsequent resource consent applications, providing additional opportunities to engage and consider cultural values.

The proposed extent of CLZ has been proposed in order to protect significant natural features and watercourses and to ensure effective stormwater management, preventing adverse impacts on downstream water catchments.

The principles of the Treaty of Waitangi/Te Tiriti o Waitangi have been acknowledged in preparing the PPC. Consultation has been conducted with iwi groups potentially interested in the PPC to ensure Mana Whenua values are identified, protected, and enhanced.

No significant concerns were raised by iwi groups during this consultation, and the PPC aims to avoid any adverse effects on Mana Whenua values. As such, any adverse impacts on Mana Whenua values are considered less than minor.

There are additional opportunities for mana whenua engagement throughout the PPC process, as we remain open to engagement at any time upon contact. Further input from mana whenua can also be provided at the public notification stage, with the option to submit feedback and present evidence at a hearing if needed. Moreover, further consultation will occur at the resource consent application stage, offering several opportunities for mana whenua to raise any issues or provide recommendations on Mana Whenua values.

6.11 Archaeology and Built Heritage

Section 3.9 – Archaeology and Built Heritage discusses the archaeological aspects of the site. An Archaeological Assessment, prepared by CFG Heritage Ltd on June 27, 2024, and included in Appendix 10, concludes that there is minimal likelihood of archaeological items being located on this site, with no recorded archaeological sites present.

The field assessment indicates that the soils are of poor quality, making the property unsuitable for pre-European Māori kūmara cultivation or storage. Accordingly, it is concluded that there is no reasonable basis to expect archaeological findings at 40 Mahi Road.

Since any resource consent for earthworks or development will include an accidental discovery protocol condition and given the low likelihood of discoveries as noted in the Archaeological Assessment, unacceptable adverse effects related to archaeology and built heritage are not anticipated from the PPC.

6.12 Summary of Effects

In summary, having considered the actual and potential positive and adverse effects on the environment as a result of changes that can be anticipated by the PPC:

- The PPC will not give rise to significant adverse effects on the environment.

- There will be positive effects such as providing opportunity for residential development of various typologies assisting with affordable housing options, and through the protection of areas of significant ecological value.
- The PPC would provide the best practicable and most efficient use of this land resource, noting that land outside of flood plains and areas of geotechnical instability are relatively scarce in Helensville and Parakai and providing opportunity for more people to live in this location is a positive outcome.
- The effects of the PPC will generally be consistent with what the Regional Plan provisions seek to avoid, minimise, remedy, maintain or enhance.
- The existing AUP provisions will manage effects pertaining to protection of the environment and mitigation of any potential adverse effects, and achieving an integrated movement network.

7. SECTION 32 ANALYSIS

Clause 22, Schedule 1 of the RMA states that a request for a plan change must contain an evaluation report prepared in accordance with section 32 of the RMA. Section 32 of the RMA sets out the requirements for an evaluation report as follows:

(1) An evaluation report required under this Act must-
(a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and
(b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by-
(i) identifying other reasonably practicable options for achieving the objectives; and
(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
(iii) summarising the reasons for deciding on the provisions; and
(c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

The following sections address the matters set out under Section 32 of the RMA.

7.1 Objective of the Proposed Plan Change

The general objectives of the PPC are based on the objectives and policies outlined in the Regional Policy Statement (RPS). This alignment ensures that the PPC objectives are consistent with both the RPS and the Resource Management Act (RMA), recognizing that the RPS is designed to achieve the purpose of the RMA:

Urban growth and form

- The development of land is integrated with the provision of appropriate infrastructure (B2.2.1(5)).
- Enable rezoning of future urban zoned land for urbanisation following structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines (E2.2.1(3)).
- Respond to the intrinsic qualities and physical characteristics of the site and area, including its setting (B2.3.1(1)(a))
- Contribute to a diverse mix of choice and opportunity for people and communities (B2.3.1(1)(c))
- Maximise resource and infrastructure efficiency (B2.3.1(1)(d))
- Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area (B2.4.1)

Infrastructure

- Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development (B3.2.1(6)).

Natural Hazards

- New subdivision, use and development avoid the creation of new risks to people, property and infrastructure (B10.2.1(3)).
- The functions of natural systems, including floodplains, are protected from inappropriate subdivision, use and development (B10.2.1(4)).

Recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation

- The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised and provided for in the sustainable management of natural and physical resources including ancestral lands, water, air, coastal sites, wāhi tapu and other taonga (B6.2.1(1)).

7.2 Achieving the purpose of the RMA

Section 5 of the RMA identifies the purpose of the Act as being the sustainable management of natural and physical resources. This means managing the use, development and protection of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while sustaining those resources for future generations, protecting the life-supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

In achieving the purpose of the Act, all persons shall:

a) recognise and provide for the matters of national importance under Section 6;
b) have particular regard to the other matters set out under Section 7; and
c) take into account the principles of the Treaty of Waitangi.

Since the general objectives of the PPC are based on the RPS objectives and policies, which have already been assessed as fulfilling the purpose of the RMA, further assessment is not required.

The PPC will enable the land to be developed for residential use, adding approximately 105 - 110 new homes – noting this is variable and is based on the Concept Masterplan, and accordingly not a definitive subdivision proposal at this stage. However, this is considered a suitable yield assessment based on maximum yield possible under the proposed MHSZ and SHZ. This will support social, economic, and cultural well-being, as well as health and safety, through job creation during design, consenting, and construction phases, along with the economic benefits of a larger urban population and the provision of high-quality, diverse housing options close to the Helensville town centre and public transport.

This development can proceed while ensuring that future use is responsibly managed within existing AUP provisions, sustaining natural and physical resources for future generations and ensuring that adverse environmental effects are appropriately avoided, remedied, or mitigated.

Section 6 of the RMA sets out a number of matters of national importance which need to be recognised and provided for in achieving the purpose of the RMA. For this proposal, it is considered the relevant matters of national importance relate to:

a) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:
b) the protection of historic heritage from inappropriate subdivision, use, or development.
c) the management of significant risks from natural hazards.

Section 7 of the RMA identifies a number of "other matters" to be given particular regard by Council. The proposed zoning objectives have particular regard to these matters as:

- The plan change will enable the efficient use and development of natural and physical resources through the facilitation of appropriate density of residential development in a location that has already been deemed generally suitable for residential use and development (Objectives 1 and 4).
- A Concept Masterplan has been developed based on the proposed zoning, which could be given effect to, (or something similar) at resource consent stage, while maintaining and enhancing amenity values and the quality of the environment (Objective 1).
- The values of ecosystems and the quality of the environment will be maintained and enhanced through the appropriate CLZ areas for the receiving environment and the enhancement by landscaping at resource consent stage (Objectives 2 and 5).
- The PPC will enable the development of finite natural and physical resource in a manner that reflects an appropriate balance between urbanisation and protection of the environment (Objectives 1-5). This is particularly the case for Helensville and Parakai with limited land available for residential development and subdivision outside of flood plains and areas of geotechnical instability.
- The PPC has regard to the effects of climate change by providing for residential development in a location and in a manner that encourages walking, cycling and use of public transport (Objective 4).

Section 8 of the RMA requires the Council to consider the principles of the Treaty of Waitangi. The objectives of the PPC reflect these principles. Consultation has been undertaken with iwi groups, and while no detailed comments or recommendations have been received, the plan change application has been designed to identify and protect values important to mana whenua. The archaeological assessment has not indicated a likelihood of discovering significant cultural heritage items, and the Precinct Provisions prioritize protecting ecologically significant terrestrial and aquatic habitats. Additionally, any future development will be required to follow accidental discovery protocols in case any cultural heritage items are uncovered during earthworks or construction. Consultation with iwi will remain open throughout the process.

Thus, the objectives of the PPC are considered the most appropriate way to achieve the sustainable management purpose of the RMA. The following options analysis demonstrates that these objectives are effectively and efficiently achieved through the proposed zoning provisions.

7.3 Options Analysis

The following options are identified for the purposes of evaluating other 'reasonably practicable options for achieving the objectives' of the PPC, derived from the RPS. Refer to **Appendix 14** for the detailed analysis of each option as they relate to relevant RPS topics and the corresponding objectives.

The options have been considered in terms of:

i. the efficiency and effectiveness in achieving the objectives of the proposal; and
ii. the scale and significance of the benefits and costs of environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

Residential Zoning Options

1. Option 1: Status quo – retain Future Urban zone for the plan change area
2. Option 2: Rezone plan change area from Future Urban zone to lower intensity Residential zone (Residential – Large Lot Zone).
3. Option 3: Rezone plan change area to Residential – Single House Zone, Residential – Mixed Housing Suburban Zone, and Countryside Living Zone to enable appropriate higher intensity and avoidance of ecological features.

4. Option 4: Rezone plan change area to medium to high intensity Residential zone (Residential - Terrace Housing and Apartment Building)
5. Option 5: Rezone plan change area to Residential – Single House Zone with precinct plan and provisions to enable intensification for smaller internal lots.

Preferred Option and Summary of Reasons for Decision

Option 3 is preferred.

Rezoning to SHZ, MHSZ and CLZ aligns well with the Helensville South Structure Plan, the Future Urban Land Supply Strategy (FULSS), and the Future Development Strategy (FDS). General assessments for future zoning have already been undertaken as part of the Helensville South Structure Plan and related planning frameworks, making this rezoning option suitable within today's planning context, guided by the NPS-UD. Both the FULSS and FDS support upzoning for this site, building on the Helensville South Structure Plan's designation of the area for "Medium Intensity Urban" zoning.

The SHZ, MHSZ, and CLZ provisions are consistent with the NPS-UD and other recent planning documents. The options analysis indicates that retaining the current zoning or applying a less intensive alternative would not effectively meet the area's density, typology needs, or demand, while also addressing site-specific constraints and minimizing adverse residential development effects. The Helensville Housing Market Analysis (**Appendix 4**) supports demand for smaller, more affordable lots and housing options in this location, with a variety of lots and associated housing typologies suited to the site. This approach also maximizes land use efficiency, acknowledging that much of Helensville and Parakai are impacted by flooding and geotechnical instability.

This option (Option 3) is the most efficient and effective way to provide housing typologies aligned with local demand, while delivering strong returns on infrastructure investments. The rezoning under this PPC aligns closely with the FULSS's 'development ready' timeline for the area, which is seen as more realistic than the FDS's timeline of 2035+, given the demonstrated readiness and absence of specific prerequisites.

7.4 Risk of Acting or Not Acting

Section 32(2)(c) of the RMA requires an evaluation of the risks associated with acting or not acting when there is uncertain or insufficient information about the provisions' subject matter. In this case, it is considered that sufficient information is available regarding the provisions of the PPC, and therefore, further assessment under this section of the RMA is not necessary.

7.5 Advice Received from Iwi Authorities

Section 32(4A) of the RMA states:

> *If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—*
> *(a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and*
> *(b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.*

All consultation with iwi, including advice and responses by the Applicant team, have been summarised and considered under *Section 6.10 – Mana Whenua values* of this report which assesses effects on mana whenua values from the PPC. Two had deferred to Ngati Whatua o Kaipara and no others have responded, including Ngati Whatua o Kaipara.

7.6 Summary of Section 32 Analysis

An analysis has been conducted in accordance with Section 32 of the RMA to assess whether the proposed plan change objectives are the most suitable means of achieving the RMA's purpose, and whether the proposed methods are the most effective and efficient for meeting these objectives.

The proposal is considered to effectively achieve the sustainable management purpose of the RMA, as evaluated in Section 6 – Assessment of Environmental Effects of this report.

It is also considered that the proposed SHZ, MHSZ, and remaining CLZ across the Site; together with the existing AUP provisions, overlays and controls that will remain applicable to the Site best achieves the objectives and the PPC, with the reasons for deciding on each option and its relevant provisions summarised under *Section 9.3 – Options Analysis* of this report.

8 CONSULTATION

Prior to the formal preparation and submission of this PPC request, a number of interested groups and stakeholders were consulted. The details of the consultation with these groups are provided below.

8.1 Mana Whenua

Consultation with Mana Whenua has been set out above in *Section 6.10 Mana Whenua Values* setting out the process of consultation undertaken and the responses to date, being nothing identifying any recommendations or concerns with the proposal.

It is noted that these responses are only what has occurred to date, and that the door remains open for consultation with iwi throughout the application process, including after notification of the application if necessary.

Further, noting that additional consultation with all identified iwi is required for any subsequent resource consent application, any issues or recommendations can be raised at that time by iwi, and it is suggested that sharing of conditions of consent be extended to iwi at the time draft conditions review.

8.2 Rodney Local Board

Consultation with the Rodney Local Board was initiated on the 2nd September 2024, and followed up on the 18th September 2024. A response was received via email on the 19th September 2024 from the Local Board advising that Local Board members are not in a position to comment on the application, and that it will come to the Local Board in due course for their formal views to be advised.

It is considered that due to the extent of anticipation for this land to be re-zoned and provide safe and varied housing options for future occupants in Helensville, that the outcomes would align with Local Board expectations, but this is subject to confirmation from the Board.

8.3 Auckland Council

No pre-application meeting was sought with Auckland Council for this application, aside from consultations with Watercare, Healthy Waters, and Auckland Transport.

However, since lodgment of the PPC, there has been further communications and discussions with Plans and Places (Austin Fox and Peter Vari), and these discussions have assisted the final details of this PPC application.

Auckland Council has signalled the potential for live zoning and development of this site for some time. Now that wastewater capacity is available, and all other servicing and access requirements are achievable, there appear to be no substantive concerns from the Council regarding this PPC proposal.

8.4 Council Controlled Organisations (CCOs)

8.4.1 Watercare

Consultation with Watercare was initiated by Civix planning on the 14th February 2024 and by Civix engineers on 3 April 2024.

Over several months this consultation has resulted in confirmation that the Wastewater Treatment Plant (WWTP) upgrade was completed and operational in June 2023[6]. Further consultation confirmed that there is sufficient capacity in the WWTP to accommodate the anticipated growth in population over the next 30 years to 2054, including the proposed re-zoned Future Urban Area. Watercare also confirms there is sufficient capacity in the local wastewater network including the Ruatawhiri wastewater pump station to service the catchment. A consultation letter dated 9 August 2024 to this effect is included in Appendix 2.

While Watercare advises there is currently insufficient potable water supply for the catchment, it is noted in the Appendix 2 consultation letter that the capacity issues with the Helensville Water Treatment Plant (WTP) are likely to be resolved around late 2026, however, this is subject to provision of a suitable water supply source for the WTP. It is also noted that the FDS defers timing for this until 2035+ so that may end up delaying the delivery. The letter further notes that there is a new 250PE (200mmID) laid from the WTP through the reserve and east along Ruatawhiri Road, extending to Mahi Road. Noting the elevation of the site, if connection is possible at the time of development (instead of the currently proposed roof water tank supply) a booster pump station would be needed to serve the development.

Due to the uncertainty around water supply, it is proposed to provide on-site tank water supply in the first instance. Details of these services and the resulting connection aspects are set out in the Infrastructure Report included in Appendix 3.

While the Appendix 2 letter concludes that it is "*required to align with Council in opposing private plan changes that are not in accordance with the FDS*" and accordingly that because of the FDS timing of 2035+ for live zoning, this is considered "*out of sequence*" with the FDS and is not anticipated by the Unitary Plan or the Council growth scenario.

This AEE sets out why this approach is erroneous (including *Section 5.2.3 – Future Development Strategy*) as the 'prerequisites" for live zoning are proven as not applicable or sufficiently obstructive to enabling live zoning now, and the FDS itself recognizes that live zoning can be brought forward upon suitable demonstration that prerequisites can be met or do not obstruct reasonable servicing of the related area.

8.4.2 Auckland Transport

Details of the application were shared with Auckland Transport for initial feedback on 2nd September 2024; however, no response was received. It is assumed that Auckland Transport will provide formal comments during the notification phase of the application.

[6] Email from Nathaniel Wilson of Watercare to Dianne Kidd of 1 June 2023)

8.4.3 Healthy Waters

On August 14, 2024, Civix contacted Healthy Waters regarding the PPC, seeking feedback on whether the wet detention pond in the adjacent subdivision (SW_GIS_ID-WRTF543730) was designed to accommodate the upstream catchment, including the PPC site, along with any relevant stormwater management considerations. Healthy Waters responded on August 22, 2024, providing the Stormwater Management Plan (SMP) for the nearby subdivision to the east (Kanono Way and others) and noting that the SMP did not account for urban development of the PPC site. They specified that water quality and hydrology mitigation for all impervious areas, including roads, would need to be incorporated into the site's design per the Network Discharge Consent (NDC). Communal-scale devices were preferred if proposed for vesting, and flood modelling was also required. Details on SMP requirements were provided, and Healthy Waters expressed willingness to collaborate with Civix on the SMP approach, with the option for a pre-application meeting if necessary.

Healthy Waters received preliminary planning details of the PPC on September 2, 2024, for review and feedback. They confirmed that their previous comments to Civix remained applicable, emphasizing that the primary requirement from Healthy Waters' perspective is an SMP that meets NDC standards. They also noted that the need for Precinct Provisions would depend on the selected stormwater management approach.

The SMP, Infrastructure Report, and associated plans in **Appendix 3** have incorporated this advice, providing the necessary details to address the NDC requirements.

8.5 Affected Properties

It is considered that there are no significantly affected properties adjacent to or near the application site. The site has been earmarked for residential development since it was designated for SHZ, with medium-density urban development envisioned in the Helensville South Structure Plan within the legacy Rodney District Plan (2000). This designation has been carried through to the FULSS and FDS, which also identify the site as suitable for urban zoning.

The property immediately north, already within the SHZ, is being developed by Cabra Developments. The applicant has maintained close communication with Cabra to explore potential efficiencies and collaborative opportunities in terms of development, access, and other areas of mutual benefit.

Other properties surrounding the site are at a significant distance, resulting in low visual impact (as noted in the Landscape Visual Assessment in **Appendix 13**). The transition from vacant land to SHZ with the proposed Precinct Provisions is anticipated, as signalled by its FUZ status, the Helensville South Structure Plan, the FULSS, and the FDS. While the proposed MHSZ included in the PPC allows for a higher density than if all the site were to be SHZ, the site's location and the careful design of the internalised MHSZ location areas, and the placement of larger lots near CLZ-zoned neighbouring sites, helps to mitigate potential impacts related to activity, noise, and lighting. Consequently, the difference between effects from development under just SHZ density and the proposed SHZ and MHSZ would not be substantial.

The PPC SHZ and MHSZ provides for a variety of lot sizes. This approach aligns with the recently developed "Parkview" subdivision to the east, which features lot sizes from 200m² to over 1,000m² (as discussed in Section 6.3 of the Housing Market Analysis in **Appendix 4** and Section 3.2 – Surrounding Areas Description).

Further details on design effects in this location are provided in the Urban Design Assessment by Ian Munro in **Appendix 11.**

Additionally, any future resource consent applications for land development and subdivision will undergo assessment concerning effects on affected parties, allowing for a more detailed consideration of impacts based on specific development plans.

Given the above considerations, no consultation with neighbouring or nearby properties has been undertaken.

9 CONCLUSION

The PPC seeks to rezone approximately 10 hectares of FUZ land within a 17.4773-hectare site, bordered by SHZ to the north and east and CLZ to the west and south.

While the proposed SHZ and MHSZ enables higher density than just SHZ provisions alone, the potential lot sizes are complementary to those in the adjacent "Parkview" subdivision to the east. This ensures that the proposed residential character aligns with the context of surrounding developments, as confirmed by the Landscape Visual Assessment and the Urban Design Assessment, both of which conclude that the proposed development is appropriate for this location.

The Helensville Housing Market analysis in Appendix 4 highlights the need for diverse housing options in Helensville, with smaller lots enhancing affordability and larger lots catering to broader market demand. This aligns with the NPS-UD's objectives for increasing housing availability and affordability.

The PPC site's elevated position, above the floodplain, and its stable geotechnical conditions make it well-suited for higher-density housing, especially given the extensive nearby areas impacted by the 1% AEP flood plain and geotechnical instability due to alluvial substrates in Helensville and Parakai.

All essential services are available to support immediate zoning. Watercare has confirmed wastewater capacity, and water supply can be managed via on-site rainwater tanks, as established in the Parkview development. Access has been designed in compliance with the Auckland Transport Design Manual, and traffic impacts have been assessed as acceptable, as detailed in the Traffic Assessment (Appendix 7).

The site is conveniently located near public transport and the Helensville Town Centre, with nearby schools, recreational facilities, and parks.

This request follows Schedule 1 and Section 32 provisions of the RMA, with assessments based on specialist reports supporting the application. It concludes that environmental effects from the plan change will be avoided, remedied, or mitigated, resulting in an overall positive outcome.

The Section 32 assessment includes an analysis of how the PPC objectives best achieve the RMA's purpose and examines whether the proposed provisions are the most effective approach to meeting these objectives, including consideration of alternatives.

In conclusion, the proposed plan change aligns with the sustainable management principles of Part 2 of the RMA, meets Section 32 requirements, and is well-suited for Council approval.

Appendix 1

Record of Title

Appendix 2

Watercare Consultation Letter

Appendix 3

Infrastructure Report and Plans including Stormwater Management Plan

Appendix 4

Helensville Housing Market Study

Appendix 5

Concept Master Plan

Appendix 6

Ecological Assessment

Appendix 7

Traffic Impact Assessment

Appendix 8

Contamination Memo and Original Contamination Assessment

Appendix 9

Geotechnical Memo and Original Geotechnical Investigation Report

Appendix 10

Archaeological Assessment

Appendix 11

Urban Design Assessment

Appendix 12

Proposed Rezoning Plan

Appendix 13

Visual Landscape Assessment

Appendix 14

S32 RMA Analysis