

2.23 Greenfield urban precincts - section 32 evaluation for the Proposed Auckland Unitary Plan

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1 Overview and Purpose

This evaluation considers the proposed Greenfield Urban Precinct, in accordance with Section 32 of the RMA.

This evaluation should be read in conjunction with Part 1 in order to understand the context and approach for the evaluation and consultation undertaken in the development of the Proposed Auckland Unitary Plan (the Unitary Plan) as a whole.

1.1 Subject Matter of this Section

The Greenfield Urban Precinct will be applied to the following greenfield land areas which are located inside the RUB and which have an urban zoning:

- i. Belmont, Pukekohe
- ii. Helensville

The first of the key policy approaches for the Greenfield Urban Precinct is the use of a Structure Planning process via resource consent to facilitate comprehensive and integrated planning for urban development. In order to ensure a co-ordinated and holistic planning approach, the precinct uses the prohibited activity status for all urban land use, development and subdivision activities prior to the approval of a Structure Plan.

The Precinct identifies the importance of stormwater management and management of the floodplain and stream network. The second key policy approach uses the prohibited activity status for all urban land use, development and subdivision activities prior to the approval of a stormwater network discharge consent for the relevant catchment.

The policy approach also uses the prohibited activity status for all structure plans which are not accompanied by or applied for concurrently with a stormwater network discharge consent, which are not prepared for the entire area, or which cannot meet the structure plan requirements, to ensure comprehensive and integrated planning.

1.2 Resource Management Issue to be Addressed

The Rural Urban Boundary (RUB) will set a long-term limit to the expansion of urban areas for the next 30 years. The RUB will also accommodate up to 40 per cent of the region's growth in greenfield areas outside the existing metropolitan area. The Auckland Plan indicates that staged and managed release of greenfield land will occur to ensure 20 years forward supply of development capacity, with an average of seven years of unconstrained, 'ready to go' land supply.

The Greenfield Urban Precinct has been applied to three areas across Auckland which are located inside the RUB and which have an urban zoning. The Precinct identifies that a significant resource management issue is that urban development should be planned comprehensively and integrated with the necessary infrastructure.

1.3 Significance of this Subject

The use of the prohibited status within the Greenfield Urban Precinct for certain activities is a policy approach which requires a section 32 assessment.

The overall policy approach will create environmental, economic and social benefits; however they will also result in some economic and social costs. The benefits include maximising the efficient use of greenfield land through comprehensive planning and coordination with infrastructure, preventing subdivision and development from undermining the integrated and comprehensive planning and development of greenfield land, and giving effect to the directives of the Auckland Plan.

The policy approaches create short and medium term economic and social costs in terms of restricting urban subdivision, land use and development until such time that a stormwater network discharge consent and structure plan have been approved.

1.4 Auckland Plan

The Auckland Plan states that greenfield land within this RUB will be released in an orderly and sequenced manner (paragraph 533).

Directive 10.4 of the Auckland Plan seeks to locate and develop greenfield areas as sustainable liveable neighbourhoods in a way that:

- a) demonstrates the most efficient use of land
- c) provides community facilities, open space, infrastructure (including transport, communications, power and water utilities) in a timely and efficient manner.

1.5 Current Objectives, Policies, Rules and Methods

Under all of the current legacy plans for land with this Precinct, the zoning is either rural or future urban and the current objectives, policies, rules and methods reflect that zoning.

1.6 Information and Analysis

Preparation of the Greenfield Urban Precinct has involved the following steps:

- Internal discussions and meetings with planning experts about issues and options
- Drafting of plan provisions for preferred approach.

1.7 Consultation Undertaken

No public consultation has been undertaken regarding this Precinct. This reflects timelines associated with the preparation of the Plan, but also the fact that in all cases consultation has been undertaken with landowners which highlighted the need for further planning prior to any development.

1.8 Decision-Making

For the decision making process on the Unitary Plan as a whole refer to the general decision-making process part of the s32 report.

1.9 Proposed Provisions

The Precinct provides for subdivision and development to occur in a comprehensive and integrated manner. As such its primary purpose is to:

- require the preparation of a Structure Plan in accordance with the matters listed in Appendix 1 of the Unitary Plan
- prohibit urban subdivision, land use or development prior to the approval of a stormwater network discharge consent for the catchment
- prohibit urban subdivision, land use or development prior to the approval of a Structure Plan or which does not comply with the Structure Plan.

1.10 Reference to other Evaluations

This section 32 report should be read in conjunction with the following evaluations:

- 2.1 Urban form and land supply
- 2.2 Rural urban boundary location
- 2.3 Residential zones
- 2.4 Business zones
- 2.24 Urban stormwater
- 2.30 Green infrastructure corridor

2 Objectives, Policies and Rules

2.1 Objective

The following objective is proposed:-

1. The preparation and implementation of a Structure Plan provides for a comprehensive, integrated approach to development

Appropriateness of the Objective

Section 5 of the RMA seeks to sustain the potential of natural and physical resources to meet the needs of future generations (s5(2)(a)). Objective 1 achieves this part of Section 5 in that it ensures the natural and physical resources of the precinct are identified and managed through preparation of a structure plan. The precincts are logical extensions to the existing urban area and will assist in providing residential and employment opportunities for future generations.

The purpose of the precinct is to identify discrete expansions to the existing urban extent and ensure that these areas are planned and developed comprehensively. As outlined in Objective 1, the outcome for the precinct is comprehensive and integrated development which is achieved through a structure plan. The objective not only requires the preparation of a structure plan for the precinct but also ensures its implementation.

The purpose of a structure plan is to define a vision for the future and plan for growth, including:

- Setting out where landuses are appropriate (eg residential, rural, commercial, industrial and recreational)
- Providing a staging plan for the development
- Guiding infrastructure planning including roading, water, wastewater, community facilities and public open spaces
- Identifying areas for protection

Structure planning considers the natural and physical resources of the land, and identifies the future pattern of significant land uses. The purpose of structure planning in this precinct is to:

- provide integrated management of complex environmental issues
- coordinate the staging of development
- ensure coordination and compatible patterns and intensities of development
- Provide a coordinated approach to infrastructure provision and other services across land parcels in different ownership
- Provide higher levels of certainty to landowners, Council and the community regarding the layout, character and costs of development
- Ensure that new development achieves quality urban design by defining the layout pattern and density of new development and transport linkages
- Address economic, cultural and social issues alongside environmental considerations

The greenfield land that accommodates future urban development and the infrastructure that services this development are both physical resources. Ensuring the efficient use of greenfield land and infrastructure provision is not compromised by premature or ad hoc subdivision, use and development constitutes the sustainable management of these physical resources and achieves s5(2)(a) of the Act.

The comprehensive approach encouraged through the use of structure planning will safeguard the life supporting capacity of air, water, soil and ecosystems as required by s5(2)(b). The stream network is a key feature of the precinct in all localities. A comprehensive and integrated approach will ensure the life supporting capacity of the waterways in particular is protected.

The Auckland population is anticipated to grow and the use of the precinct for well planned residential and employment uses will assist the local communities to provide for their social, economic and cultural well being in accordance with s5(2). A comprehensive well planned development is far more likely to achieve this than ad hoc development based on individual parcel and land ownership patterns.

Section 6 of the RMA lists a number of matters of national importance that must be recognised and provided for by all those exercising powers and functions under the Act. All the matters of national importance will need to be addressed when developing a structure plan. It is considered that recognition of these matters of national importance are enabled by the objective.

There are a number of other matters, listed in s7 of the Act, which must be given particular regard in relation to managing the use, development and protection of natural and physical resources. A number of these matters are relevant to the objective, but Objective 1 is particularly relevant to clauses (b) and (g).

In summary, it is concluded that the proposed Objective promotes the sustainable management of precincts in a way that people and communities can provide for their social, economic and cultural wellbeing, and for their health and safety, both now and in the future.

2.1.1 Policies

Policies 1, 2, 3 and 4 have been proposed to achieve objective 1.

The direction of policies 2 and 3 sets out the approach to preparation of the structure plan to ensure a comprehensive and integrated approach to planning. The policies effectively establish an expectation baseline for the preparation of structure plans, and efficiently identifies the required outcome for the Precinct, which is a comprehensive approach to urban development.

The direction established by policies 1 and 4 seek to implement the structure plan (as required by Objective 1), to ensure that urban subdivision, land use and development does not occur in an ad hoc manner. These policies are both effective and efficient in that they ensure that the comprehensive approach to development is not compromised by development preceding a Structure Plan or development that does not accord with the approved Structure Plan.

In considering the appropriateness of the above policies, consideration was given to a number of alternatives as to how the comprehensive and integrated development of urban zoned greenfield land could be achieved. Refer discussion in section 3.0 below.

2.1.2 Rules

The rules to achieve the policies listed in section 2.1.1 above, are:

- Prohibited activity status for any urban land use, subdivision or development activity prior to the approval of a Structure Plan OR which does not comply with an approved Structure Plan.
- Prohibited activity status for a Structure Plan which does not comply with the relevant standards

The rules effectively and efficiently establish a message to landowners, developers and council that an unplanned and ad hoc approach to development is not appropriate for the precinct, and that development must be undertaken in a planned in a coordinated, integrated and comprehensive manner.

The prohibited status has been applied so as not to undermine the necessity for a structure planning process for the entire area (either Belmont or Helensville), or the necessity for stormwater catchment management planning (as discussed at length in section 2.2 below) to be undertaken in conjunction with (or prior to) the structure planning process.

If a lower activity status were to be applied, the ability of Council to meet its obligations under section 31 of the RMA in achieving the integrated management of natural and physical resources (being integration of land with appropriate infrastructure) would be undermined.

This cascade through policies, rules, and assessment criteria will effectively ensure that:

1. development is planned comprehensively through a structure plan process
2. structure planning applies a holistic approach to the entire Precinct area to achieve design which responds to the natural and physical environment
3. structure planning is integrated with the comprehensive planning of stormwater management
4. urban development does not precede the structure planning process

2.1.3 Costs and Benefits of Proposed Policies and Rules

Costs

- Holding costs of land while structure planning and stormwater catchment management planning is undertaken
- Financial costs of preparation of structure plan application
- Financial costs of preparation of stormwater network discharge application
- Significant subdivision and development costs for the landowner
- Requires landowners to collaborate and work together

Benefits

- integrated management of complex environmental issues
- coordinated approach to infrastructure provision
- Provide higher levels of certainty to landowners, Council and the community regarding the layout, character and costs of development
- Ensures that new development achieves quality urban design by defining the layout pattern and density of new development and transport linkages
- Address economic, cultural and social issues alongside environmental considerations

2.1.4 Adequacy of Information and Risk of Not Acting

There is a significant risk of not acting as uncontrolled and ad hoc development of land has the potential to undermine a comprehensively planned urban form, the coordinated and efficient provision of infrastructure, and ultimately the ability to meet the anticipated growth in greenfield areas required by the Auckland Plan.

2.2 Objective

The following objective is proposed:

2. *The structure plan is designed and implemented to reflect and respond to the natural and physical environment.*

Appropriateness of the Objective

Objective 2 directs the structure plan to consider the natural and physical environment of the greenfield urban precincts and respond to it. This achieves the purpose of the Act in that it directly reflects the need to sustain the potential of natural and physical resources to meet the needs of future generations as required by s5(2)(a). The conversion from rural land to urban by way of a structure plan will enable key features of the natural and physical environment to be identified and protected. Objective 2 will also assist in safeguarding the natural processes including freshwater systems, and associated ecosystems through the structure planning process in accordance with s5(2)(b).

While matters of national importance have been identified through other parts of the Unitary Plan (ie Significant Ecological Areas), Objective 2 will assist in achieving s6(a) - the preservation of the natural character of rivers and their margins, and the protection of them from inappropriate subdivision, use, and development. The streams in the precinct areas will be covered by Objective 2 as an important component of the natural environment.

In addition, Objective 2 is in accordance with s7 by having particular regard to:

- (b) the efficient use and development of natural and physical resources
- (c) the maintenance and enhancement of amenity values
- (d) intrinsic values of ecosystems
- (f) maintenance and enhancement of the quality of the environment

through the structure plan reflecting and responding to the natural and physical characteristics of the sites.

It is concluded that the proposed objective promotes the sustainable management of natural and physical resources in a way that people and communities can provide for their social, economic and cultural wellbeing and for their health and safety, both now and into the future.

2.2.1 Policies

Policies 2, 3 and 9 assist in the achievement of Objective 2.

The primary purpose of the policies is to ensure that the structure plan identifies and responds to natural and physical characteristics of the precinct. Policy 2 identifies features that the structure plan must address and provide for. Policy 3 ensures that structure plans are prepared in accordance with Appendix 1. Appendix 1 provides a comprehensive list of issues that a structure plan must address which includes consideration of natural and physical features.

Policies 2 and 3 will be effective at achieving Objective 2 as they ensure a range of physical and natural features are identified and provided for in the structure plan.

The policies provide an efficient way to achieve Objective 2 as the benefits of identifying important physical and natural features and ensuring the structure plan addresses them outweighs the costs. The primary benefit is that the structure plan will enable comprehensive planning of the precinct and development will then give effect to it.

Policy 9 requires subdivision and development to contribute to the restoration and enhancement of natural features. The Policy also requires long term protection of natural features through the vesting of land for stormwater / conservation / open space purposes. This policy will be effective for achieving Objective 2 as it ensures the improvement of natural features through restoration and enhancement, and long term protection.

Policy 9 provides an efficient way to achieve Objective 2 as the benefits of improving natural features and protecting them outweighs the costs. The primary benefits are that the structure planning and development of the precinct will improve and protect natural resources for future generations.

2.2.2 Rules

The rules to achieve the policies listed in section 2.2.1 above, are:

- Prohibited activity status for any urban land use, subdivision or development activity prior to the approval of a Structure Plan OR which does not comply with an approved Structure Plan.
- Prohibited activity status for a Structure Plan which does not comply with the relevant standards

The rules effectively and efficiently establish a message to landowners, developers and council that an unplanned and ad hoc approach to development is not appropriate for the precinct, and that development must be undertaken in a planned in a coordinated, integrated and comprehensive manner. This will ensure that development of the precinct is planned and then implemented in accordance with the structure plan.

2.2.3 Costs and benefits of proposed policies and rules

The costs and benefits of this approach are outlined in 2.1.1 above.

2.3 Objective

The following objective is proposed:-

3. *The stormwater network is protected and integrated into the design and layout of the Structure Plan*

Appropriateness of the Objective

Objective 3 achieves s5(2)(a) by ensuring the stormwater network as a physical and natural resource is protected and integrated into the design and layout of the structure plan. The stormwater network is critical not only for the management of stormwater but also the ecological and environment values. The stormwater network includes a number of features such as streams, wetlands, tributaries, gullies and floodplains.

The protection of the stormwater network as sought by Objective 3 will assist in protecting the life-supporting capacity of water and aquatic ecosystems in particular, in accordance with s5(2)(b). The stormwater and stream network is a key consideration of the precinct and Objective 3 recognises it as a valuable resource.

Objective 3 achieves s5(2)(c) in that it recognises the potential effects of development on the stream network and seeks to protect it. Urbanisation of the precinct areas will increase the level of stormwater and potentially contaminants and that this has the potential to create adverse effects on water quality and quantity of the stormwater network.

Comprehensively managing the stormwater network will achieve s5(2) and enable people and communities to provide for their health and safety. Effective management of stormwater will reduce the risk to people and property from flooding.

While matters of national importance have been identified through other parts of the Unitary Plan (i.e. Significant Ecological Areas), Objective 3 will assist in achieving s6(a) - the preservation of the natural character of rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.

In addition, Objective 3 is in accordance with s7 by having particular regard to:
(b) the efficient use and development of natural and physical resources
(c) the maintenance and enhancement of amenity values
(d) intrinsic values of ecosystems
(f) maintenance and enhancement of the quality of the environment
through the structure plan reflecting and responding to the natural and physical characteristics of the sites.

It is concluded that the proposed objective promotes the sustainable management of natural and physical resources in a way that people and communities can provide for their social, economic and cultural wellbeing and for their health and safety, both now and into the future.

2.3.1 Policies

Policies 2 and 3 have been proposed to achieve Objective 3.

The direction of policies 2 and 3 sets out the approach to preparation of the structure plan to ensure a comprehensive and integrated approach to planning. The policies effectively establish an expectation for the preparation of structure plans. The policies efficiently identify the required outcome for the Precinct, which is a comprehensive approach to urban development. In particular, Policy 2 requires the structure plan to:

- f) Identify areas for stormwater management including the floodplain and stormwater treatment
- g) Identify floodplains and land to be set aside for stormwater infrastructure
- h) Identify and protect the stream network

In considering the appropriateness of the above policies, consideration was given to a number of alternatives as to how the comprehensive and integrated development of urban zoned greenfield land could be achieved. Refer discussion in section 3.0 below.

2.3.2 Rules

The rules to achieve the policies listed in section 2.3.1 above, are:

- Prohibited activity status for any urban land use, subdivision or development activity prior to the approval of a Structure Plan OR which does not comply with an approved Structure Plan.
- Prohibited activity status for a Structure Plan which does not comply with the relevant standards

The rules effectively and efficiently establish a message to landowners, developers and council that an unplanned and ad hoc approach to development is not appropriate for the precinct, and that development must be undertaken in a planned in a coordinated, integrated and comprehensive manner. This will ensure that development of the precinct is planned and then implemented in accordance with the structure plan.

2.3.3 Costs and benefits of proposed policies and rules

The costs and benefits of this approach are outlined in 2.1.1 above.

2.4 Objective

The following objective is proposed:

4. Subdivision and development ensures the comprehensive and integrated management of stormwater runoff, water quality, and avoids upstream or downstream flooding

Appropriateness of the Objective

The conversion from rural land to urban will generate additional stormwater runoff which needs to be mitigated by stormwater management devices, e.g. detention and treatment ponds and wetlands. Objective 4 achieves s5(2)(a) by ensuring stormwater as a physical and natural resource is managed in an integrated manner (including quality and quantity). Objective 4 will ensure stormwater infrastructure will mitigate the adverse effects of stormwater runoff from urban activities, including water quality and flooding.

The comprehensive and integrated management of stormwater as sought by Objective 4 will assist in protecting the life-supporting capacity of water and aquatic ecosystems in particular, in accordance with s5(2)(b). The stormwater and stream network is a key consideration of the precinct and Objective 4 recognises that development has the potential to adversely affect water quality and the frequency and scale of flooding.

Objective 4 achieves s5(2)(c) in that it recognises the potential effects and seeks to manage them in a comprehensive and integrated manner. Objective 4 recognises that the urbanisation of the precinct areas will increase the level of stormwater and that this has the potential to create adverse effects on water quality and flooding. Additional stormwater runoff generated by larger scale developments needs to be mitigated by stormwater management devices, e.g. detention and treatment ponds and wetlands.

Comprehensively managing stormwater will achieve s5(2) and enable people and communities to provide for their health and safety. Effective management of stormwater will reduce the risk to people and property from flooding.

While matters of national importance have been identified through other parts of the Unitary Plan (i.e. Significant Ecological Areas), Objective 4 will assist in achieving Section 7 by having particular regard to:

- (b) the efficient use and development of natural and physical resources
 - (c) the maintenance and enhancement of amenity values
 - (d) intrinsic values of ecosystems
 - (f) maintenance and enhancement of the quality of the environment
- through the comprehensive management of stormwater

It is concluded that the proposed objective promotes the sustainable management of natural and physical resources in a way that people and communities can provide for their social, economic and cultural wellbeing and for their health and safety, both now and into the future.

2.4.1 Policies

Policies 5, 6 and 8 assist in the achievement of Objective 4.

The primary purpose of the policies is to ensure integration between the various resource management methods for managing stormwater and development. Stormwater in the precinct areas is managed by stormwater network discharge consents. The conversion of rural land to urban significantly changes the amount of stormwater generated by the site.

Stormwater network discharge consents apply to catchments rather than individual sites and thus stormwater management needs to be planned comprehensively. Stormwater management is important to address water quality as well as the quantity of stormwater. Changes in stormwater quantity in particular have the potential to increase the risk of

flooding both upstream and downstream. Policy 5 seeks to manage this by ensuring that subdivision, urban land use and development is in accordance with an approved stormwater discharge consent. Policy 5 links the two processes of stormwater management with development to ensure the two are aligned.

Although development may be on a smaller scale than the stormwater network discharge consent, Policy 5 will be effective at achieving Objective 4 as it will ensure comprehensive and integrated management of stormwater rather than a piecemeal approach. Policy 5 provides an efficient way to achieve Objective 4 as the benefits of aligning development with the approved stormwater discharge consent outweighs the costs. The primary benefit is that stormwater management can be comprehensively planned, and development will then give effect to the consent.

Policy 6 requires the application of water sensitive design to be implemented. Water sensitive design integrates urban land use development planning and design with the management of the water cycle in order to:

- a. utilise and maintain, enhance or restore natural freshwater systems;
- b. minimise hydrological changes to, and the adverse effects of land use development on, natural freshwater systems;
- c. minimise the requirement for hard (constructed) water runoff infrastructure;
- d. maintain, enhance or restore amenity, open space and other community and cultural values.

Policy 6 will be effective in achieving Objective 4 as water sensitive design requires minimising hydrological changes on natural freshwater systems. This will assist in retaining water quality and avoiding flooding in accordance with Objective 4. Policy 6 will protect the natural function of flood plains and stream networks. Maintaining or restoring the natural properties of natural freshwater systems is an efficient and sustainable approach to managing stormwater.

Policy 6 provides an efficient way to achieve Objective 4 as the benefits of undertaking a water sensitive design approach outweighs the costs. The primary benefit is that hydrological changes will be minimised and will therefore better manage effects on water quality and quantity. There are also ecological benefits associated with adopting water sensitive design.

Policy 8 ensures subdivision and development will be staged to align with the provision and upgrading of stormwater infrastructure. This ensures that development does not precede the planning and implementation of stormwater management, and more importantly does not preclude achieving effective management of stormwater. Stormwater management often requires structural elements such as wetlands, stormwater detention ponds etc. Inappropriate development may preclude these structures being constructed in the optimum locations and increase the risk to people and structures from flooding.

Policy 8 is effective in achieving Objective 4 by coordinating subdivision and development with stormwater management.

Policy 8 provides an efficient way to achieve Objective 4 as the benefits of coordinating subdivision and development with stormwater management outweighs the costs. The primary benefits are that development is able to be serviced for stormwater and does not preclude the construction of stormwater management structures or devices.

2.4.2 Rules

The rules to achieve the policies listed in section 2.2.1 above, are:

- Prohibited activity status for any land use, subdivision, or development prior to the approval of a stormwater network discharge consent
- Restricted discretionary activity status for any land use and/or development on a site which contains a proposed road, open space or stormwater management area identified on an approved Structure Plan
- Discretionary activity status for a Structure Plan or amendments to a Structure Plan or a replacement Structure Plan, complying with clause 2.1 which requires (amongst other things) a stormwater discharge consent
- Prohibited activity status for a Structure Plan, amendments to a Structure Plan, or a replacement Structure Plan that does not comply with clause 2.1 which requires (amongst other things) a stormwater discharge consent

The approach to the activity status indicates not only the importance of planning stormwater management comprehensively, but the need to align development with a stormwater discharge consent. The prohibited status has been applied to ensure that stormwater catchment management planning be undertaken in conjunction with (or prior to) the structure planning process. If a lower activity status were to be applied, the ability of Council to meet its obligations under section 31 of the RMA in achieving the integrated management of natural and physical resources (being integration of land with appropriate infrastructure) would be undermined.

This need to integrate stormwater management and development is reflected in the assessment criteria for subdivision:

- e. give effect to the requirements of the approved stormwater network discharge consent and provide for areas to be vested for stormwater management purposes*
- f. avoid adverse flooding effects (upstream or downstream)*
- g. identify and protect the stream network*
- h. identify the location of stormwater management devices*

Land use and/or development on a site where a proposed road, open space or stormwater management area is identified on an approved structure plan:

- 1. the design and layout of the proposed development should not preclude the achievement of the structural element identified in the Structure Plan*
- 2. whether the element can be achieved by another means.*

And a structure plan:

- 5. Stormwater management solution(s) should:*
 - a. be consistent with (and give effect to the conditions/requirements of) an approved stormwater network discharge consent;*
 - b. utilise the principles of water sensitive urban design, including the retention of natural water systems and the primary use of onsite flow and quality controls (and related impervious area limits) to manage stormwater from proposed sites and roads.*
 - c. avoid increasing upstream and downstream flooding*
 - d. protect and enhance the ecological value of riparian areas and aquatic ecosystems*
 - e. manage adverse effects on water quality*
 - f. protect the integrity of the 1 per cent AEP flood plain and secondary flow path*
 - g. be located in areas to be vested for stormwater management purposes*
 - h. protect the floodplain and stream network*

This cascade through policies, rules, and assessment criteria will effectively ensure that:

5. the management of stormwater is planned comprehensively
6. stormwater is managed appropriately to minimise adverse effects
7. development does not precede the comprehensive planning of stormwater management through a stormwater network discharge consent

8. development is in accordance with a stormwater network discharge consent
9. development does not preclude the construction and location of stormwater management and treatment devices

2.4.3 Costs and benefits of proposed policies and rules

Costs

- Requires landowners to collaborate and work together
- May delay development if there is no stormwater network discharge consent in place
- Development may be constrained by the conditions of the stormwater network discharge consent
- The level of development may be reduced by the need to provide stormwater management and treatment devices
- Increases the cost of development with the need to provide water sensitive design

Benefits

- integrated management of complex environmental issues
- coordinated approach to infrastructure provision
- Provide higher levels of certainty to landowners, Council and the community that the development can manage stormwater
- Ensures stormwater is managed comprehensively rather than piecemeal
- More efficient management of stormwater
- Ensures the system can cope with the level of stormwater generated
- Stormwater management treatment devices can be located in the optimum location
- Risk of flooding is reduced
- Minimises the adverse effects of stormwater runoff
- Ensures that stormwater generated by development is appropriate for the capacity of Council's reticulated stormwater network
- Ensures water quality which will better support aquatic life
- Reduces the amount of engineered stormwater solutions, enabling a more natural environment and management of stormwater closer to a natural system

2.4.4 Adequacy of Information and Risk of Not Acting

It is considered that there is sufficient information on which to base the proposed policies and methods

2.5 Objective

The following objective is proposed:-

5. *Subdivision and development occurs in a manner which reflects the coordination and delivery of infrastructure including transport, wastewater, water and stormwater services.*

Appropriateness of the Objective

Section 5 of the RMA seeks to sustain the potential of natural and physical resources to meet the needs of future generations (s5(2)(a)). Infrastructure comprises the physical structures and networks that support and provide services to communities. The coordination of development and delivery of infrastructure is critical to enabling development but also environmental outcomes and wellbeing of the community. The provisions of infrastructure enables greenfield areas to be urbanised and in doing so provides for the housing needs of present and future generations in accordance with s5(2)(a).

By ensuring development is serviced appropriately, adverse effects on the environment arising from properties being serviced on a piecemeal basis are avoided. This will assist in achieving s5(2)(c). Providing appropriate infrastructure will also enable people and local communities to provide for the social, economic and cultural wellbeing in accordance with s5(2). While the precinct envisages residential development to provide for growth, Objective 5 ensures this potential can be realised only when there is adequate infrastructure to support it. Transport networks enable social interaction between people and communities.

The efficient use and management of infrastructure has the potential to contribute significantly to a community's health and safety. As an example, water and wastewater networks are critical to people's health and safety – providing clean drinking water and sanitary disposal of waste. In this regard, Objective 5 achieves s5(2) of the Act.

2.5.1 Policies

Policies 3, 7, 8 and 10 have been proposed to achieve Objective 5.

Policy 3 ensures that structure plans address all the issues comprehensively listed in Appendix 1 which includes details of water, wastewater, stormwater and transport servicing. Policy 7 ensures that there is reticulated wastewater and water supply available to service development. Policy 8 requires the staging of development to align with the provisions of services. Policy 10 requires an infrastructure agreement to ensure that servicing can be funded and provided.

These policies are both effective and efficient in that they ensure that development can be appropriately serviced and that development is aligned with the provision of that infrastructure.

In considering the appropriateness of the above policies, consideration was given to a number of alternatives as to how the comprehensive and integrated development of urban zoned greenfield land could be achieved. Refer discussion in section 3.0 below.

2.5.2 Rules

The rules to achieve the policies listed in section 2.5.1 above, are:

- Prohibited activity status for any urban land use, subdivision or development activity prior to the approval of a Structure Plan OR which does not comply with an approved Structure Plan.
- Prohibited activity status for a Structure Plan which does not comply with the relevant standards

The rules effectively and efficiently establish a message to landowners, developers and council that an unplanned and ad hoc approach to development is not appropriate for the precinct, and that development must be undertaken in a planned in a coordinated, integrated and comprehensive manner. This will ensure that development of the precinct is planned and then implemented in accordance with the structure plan.

2.5.3 Costs and benefits of proposed policies and rules

The costs and benefits of this approach are outlined in 2.1.1 above.

3 Alternatives

The proposed preferred alternative is discussed in 2.0 above. The status quo alternative is outlined in 1.5 above.

Alternatives are:

1. Status Quo - retain existing zones, policies and objectives
2. Alternative 1 - No precincts

3. Alternative 2 - More permissive activity status
4. Alternative 3 - Proposed

The table below discusses each alternative compared to the Proposed Alternative

	Status Quo Alternative (zoning and approach as contained in the operative legacy district plans	Alternative 1 No Precinct	Alternative 2 More permissive activity status	Alternative 3 proposed
Appropriateness	<p>Precinct will not be required as land will revert to Future Urban / Rural Zone and will require a plan change to enable development.</p> <p>The land is likely to be zoned Future Urban zone under the Unitary Plan as it is located within the RUB.</p>	<p>This option would involve a live zoning with no requirement to undertake a structure plan or to undertake stormwater management planning.</p> <p>This approach does not achieve Part 2 of the Act as it does not constitute efficient use of natural and physical resources. It does not allow Council to meet its obligations under s30 of the RMA requiring integrated management of natural and physical resources.</p>	<p>A more permissive activity status would not send an appropriate message to landowners as to the importance of:</p> <ul style="list-style-type: none"> • Undertaking a comprehensive structure planning process for the entire precinct area • Undertaking stormwater network planning for the catchment and integrating this with future development <p>This approach does not achieve Part 2 of the Act as it does not constitute efficient use of natural and physical resources. It does not allow Council to meet its obligations under s30 of the RMA requiring integrated management of natural and physical resources</p>	Refer to Section 2.1 and 2.2 of this report.
Effectiveness	<p>The current zoning and rules as contained in the operative district plan do not enable development to occur. Both Future Urban and the Rural Zone have a similar approach in that they allow predominantly rural activities but no form of urban development.</p> <p>The Future Urban zoning under the Unitary Plan will prohibit subdivision and restrict other urban activities.</p>	While this option will result in an extended urban area however the result is unlikely to meet the RPS objectives and policies that require integration of land use and infrastructure and good urban design outcomes.	While this option will result in an extended urban area however the result is unlikely to meet the RPS objectives and policies that require integration of land use and infrastructure and good urban design outcomes.	Refer to Section 2.1 and 2.2 of this report.
Efficiency	<p>Enabling development with a Future Urban or Rural zone would be difficult as any form of development would essentially undermine the intent of the zone for rural activities (notwithstanding that the Future Urban zone indicates an intention for future urban development).</p> <p>Future Urban zoning would be easily implemented but will only delay the process for achieving comprehensive and integrated development through a future plan change and structure plan process.</p>	Live zoning with an urban zone will enable urban development to occur.	A more permissive activity status would still require resource consent and all associated costs and delays	Refer to Section 2.1 and 2.2 of this report.
Costs	<ul style="list-style-type: none"> • Development opportunities are limited to those associated with rural activities • Uncertainty as to the timing of development being enabled through rezoning • stormwater management and improvements to margins and downstream flows being denied, • Holding costs of land until re-zoning via Plan Change (and associated costs with plan change process) 	<ul style="list-style-type: none"> • Increased potential for ad hoc development which does not take into account a co-ordinated approach to provision of infrastructure and planning • Increased potential for inefficient use of land and lack of cohesion between small developments • Increased potential for inappropriate management of stormwater and flood hazards • Land use and development pattern which do not appropriately take into account 	<ul style="list-style-type: none"> • Potential for ad hoc development which does not take into account a co-ordinated approach to provision of infrastructure and planning • Potential for inefficient use of land and lack of cohesion between small developments • Increased risk of inappropriate management of stormwater and flood hazards • Land use and development pattern which do not appropriately take into account stormwater management • Potential for development which does not 	Refer to Section 2.1 and 2.2 of this report.

		<ul style="list-style-type: none"> Development which does not integrate and inter-relate into surrounding development and networks 		
Benefits	<ul style="list-style-type: none"> Retains land for rural uses 	<ul style="list-style-type: none"> May assist in accommodating growth Removes time and cost delay in obtaining stormwater and structure plan consents 	<ul style="list-style-type: none"> Ability to still progress development without needing a stormwater network discharge consent Ability to progress development without needing a structure plan. Removes some uncertainty in development timeframes as consents can be sought without a stormwater network discharge consent or structure plan being in place Reduces the need to work collaboratively with other land owners 	Refer to Section 2.1 and 2.2 of this report.
Risks	Does not contribute to meeting the growth expectations outlined in the Auckland Plan	<p>There are a number of significant risks associated with this approach, namely:</p> <ul style="list-style-type: none"> Lack of integrated planning Lack of coordination between different facets such as stormwater, ecology, landscape, transport etc Inability to plan comprehensively, resulting in piecemeal development Encourages ad hoc development Cumulative effects in being unable to plan for servicing and infrastructure the ability to meet the anticipated growth in greenfield areas required by the Auckland Plan. 	<p>There are a number of risks associated with this approach, namely:</p> <ul style="list-style-type: none"> Possibility for lack of integrated planning Lack of coordination between different facets such as stormwater, ecology, landscape, transport etc Reduced ability to plan comprehensively, resulting in piecemeal development Encourages ad hoc development Cumulative effects in being unable to plan for servicing and infrastructure the ability to meet the anticipated growth in greenfield areas required by the Auckland Plan. 	Refer to Section 2.1 and 2.2 of this report.

4 Conclusion

The above objectives, policies, rules and other methods are considered to be the most appropriate way to achieve the sustainable management purpose of the RMA.

The following are considered to be the most efficient and effective methods to achieve the objectives:

- prohibited activity status for any urban subdivision, land use or development prior to the approval of a stormwater network discharge consent for the catchment
- prohibited activity status for any urban subdivision, land use or development prior to the approval of a Structure Plan or which does not comply with the Structure Plan
- prohibited activity status for structures plans which do not comply with the required standards for structure plans.

The assessment of these methods is outlined in sections 3.1 and 3.2 of this report.

5 Record of Development of Provisions

5.1 Information and Analysis

The draft Unitary Plan was published for public feedback in March 2013.

The Regional Development and Operations Committee (RDOC) resolved on 29 April 2013 (Resolution number RDO/2013/70) that:

“pursuant to Clause 8D of the First Schedule of the Resource Management Act 1991, the withdrawal of Proposed Plan Change 29 (Belmont Structure Plan) (Pukekohe West) (including Variation 5 to Plan Change 14, and Variation 1 to Plan Change 24) to the Auckland Council District Plan (Franklin Section) due to the stormwater management issues with the current proposals; and as the matters covered by the plan change can be more efficiently and effectively addressed as part of the Unitary Plan process.”

As a result of the RDOC resolution and in response to feedback from the March draft of the Unitary Plan, internal discussions and meetings took place within the Regional and Local Planning unit regarding the best way for the Unitary Plan to cover the Belmont and Helensville areas.

5.2 Consultation Undertaken

No external consultation has been undertaken regarding this Precinct. The Precinct provisions have been drafted after the draft Unitary Plan was published in March 2013. The internal deadlines for the notification of the Unitary Plan do not allow for any meaningful consultation in this circumstance. In all cases consultation has been undertaken with landowners which highlighted the need for further planning prior to any development

5.3 Decision-Making

For the decision making process on the Unitary Plan as a whole refer to the general decision-making process part of the s32 report.