

20 October 2022

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142



Attention: Aidan Wackrow
aidan.wackrow@aucklandcouncil.govt.nz

Dear Aidan,

**RESPONSE TO CLAUSE 23 REQUEST FOR FURTHER INFORMATION
HG REF: A2010091.01 – 80 MCLARIN ROAD, GLENBROOK - REZONING**

This letter and the following attachments are in response to Council's Clause 23 request for further information:

- Attachment A – Easement Instrument 6663883.1
- Attachment B – Stormwater Management Plan (SMP)
- Attachment C – Infrastructure Memo
- Attachment D – Letter responding to transportation matters
- Attachment E – Context Analysis
- Attachment F – Minutes of meeting with Healthy Waters
- Attachment G – Letter prepared by Pattle Delamore Partners (PDP) Ltd
- Attachment H – Amended Structure Plan Document
- Attachment I – Amended Section 32 Analysis
- Attachment J – Amended Assessment of Environmental Effects (AEE)
- Attachment K – Amended proposed plan change/ precinct provisions

1.0 GENERAL

Matter# P1

We attach a copy of Easement Instrument 6663883.1 (**Attachment A**). The easement relates to a right to convey water in favour of Auckland Council (i.e., in gross) and is identified as Easement A on the Title Plan at **Attachment A**. This easement effectively protects a corridor for water supply infrastructure that connects Lot 1 DP 204733 to the public reticulated network to the west of 80 McLaren Road, within the Glenbrook Beach Recreation Reserve.



The rezoning process will not affect the easement or undermine water supply to Lot 1 DP 204733; however, I note that upon the future subdivision and development of the plan change land a new public reticulated water network will be installed that will enable Lot 1 DP 204733 to connect directly to that network making Easement A redundant. This can be addressed at the time of subdivision and development of the plan change land.

2.0 INFRASTRUCTURE

Matter # P2

Please refer to the memo prepared by Song Khoo, Senior Engineer, Harrison Grierson (**Attachment C**).

The infrastructure memo notes that no wider infrastructure works are required to support the outcomes of the proposed plan change, which excludes independent council (Watercare Services Limited) upgrade projects already being undertaken or planned.

The proposed development will have a less than minor impact on the local and wider roading network, while the wastewater system will be upgraded by 2026 to support future development and increased service levels. Utility and stormwater systems have been assessed as not requiring additional capacity to service future development in the area.

Furthermore, the proposed Glenbrook 4 Precinct provisions provide assurance to Council that infrastructure will be in place ahead of use and development and will not need to be established ahead of other funded priorities to respond to growth enabled by the Glenbrook 4 precinct. Specifically:

- a) Development and subdivision within the Glenbrook 4 precinct will need to be serviced by publicly available reticulated water and wastewater networks (Standard IXXX7.1 – Infrastructure). If no connections can be made to a publicly available reticulated water and wastewater networks, resource consent would be required for a non-complying activity under proposed rules IXXX.4.1(A6) and IXXX.5.1(A11). This is supported by strong policy direction, such as:

IXXX.3(2) – *“Require publicly reticulated wastewater and water supply network to be available to service any subdivision or development in the precinct.” (Emphasis added).*

IXXX.3(3) – *“Avoid subdivision, use or development prior to the availability of bulk water, wastewater and roading infrastructure to service development in the Glenbrook 4 precinct.” (Emphasis added).*

- b) The Integrated Transportation Assessment (ITA) prepared by TPC Ltd identifies that only minor, localised road upgrades are necessary to avoid and mitigate adverse traffic effects on the transportation network from residential development anticipated by the Proposed Private Change (PPC). This includes upgrades of McLarin Road frontage of the site (which will be responsibility of the land developer), and a new roundabout intersection adjacent to the planned neighbourhood centre McLarin Road. These upgrades are acknowledged in the Glenbrook 4 precinct. Development and subdivision need to be undertaken in accordance with the Glenbrook 4 precinct and precinct plan; otherwise, resource consent for a discretionary activity will be required (Standard IXXX7.1(2) – Precinct Plan). This is supported by the following policies:

IXXX.3(4) – *“Require that any subdivision and development within the precinct incorporates the following elements of the precinct plan:*

- a. Linkages to adjacent land, including a pedestrian/ cycle lane between Glenbrook Beach Recreation Reserve and the future local centre on McLarin Road; and
- b. **A roundabout intersection on McLarin Road.” (Emphasis added).**

IXXX.3(3) – “Avoid subdivision, use or development prior to the availability of bulk water, wastewater and **roading infrastructure to service development in the Glenbrook 4 precinct.” (Emphasis added).**



3.0 TRANSPORTATION MATTERS

Please refer to the letter prepared by Andrew Temperley of TPC Ltd (**Attachment D**).

Matter # T1

TPC Ltd has provided crash data analysis before and after the various road network upgrades have been completed under the requirements of the Glenbrook 3 precinct. The data reveals that there has been a reduction in the number of crashes reported following these improvements.



Matter # T2

There are no confirmed plans, or triggers for, a bus service serving the subject site and the wider Glenbrook Beach area. TPC Ltd state that the Glenbrook 3 Precinct includes Collector Roads that have been designed and vested to potentially provide for future bus services. Therefore, the ITA refers to the expectation that a future bus service will follow McLarin Road, past the subject site, to service the Glenbrook 3 precinct.



Matter # T3

The McLarin Road frontage will be upgraded to an ‘urban’ standard at the time of subdivision and development, with berm, kerb, and footpath configuration. TPC Ltd recommend that road form/ configuration is consistent with the Glenbrook 3 cross section/ requirements for a Principal Road to ensure an integrated and legible road layout is achieved for the area.



Matter # T4

The speed measurement technology used to provide speed data to inform the sight distance assessments was by means of a floating vehicle driving appropriately for the environment. Speed data was also influenced by the location of the roundabout intersection with Okoreka Road and the curved alignment and newly urbanised frontage of McLarin Road bordering the north-western boundary of the subject site.



4.0 URBAN DESIGN MATTERS

Please refer to the Context Analysis prepared by Harrison Grierson (**Attachment E**). The Context Analysis was prepared following discussions with Lisa Mein, Council’s consultant urban design specialist.

Matter # UD1

The Context Analysis provides commentary on the wider context that has been considered in preparing the PPC and it supplements the urban design assessment that was lodged with the PPC application. This includes an assessment of constraints and





opportunities. For instance, parts of the PPC land that are adjacent to the future neighbourhood centre have been identified as being appropriate for higher density development, while the steep topography of the southern portion of the site limits the density that can be achieved.

5.0 STORMWATER AND FLOODING MATTERS

Please refer to the amended SMP prepared by Harrison Grierson (**Attachment B**).

Matter # SW1

Amendments have been made to the SMP, Section 32 Analysis (**Attachment I**) and AEE (**Attachment J**) with regards to the marine Significant Ecological Area (SEA). It is considered that the proposed precinct provisions, along with the existing region-wide objectives and policies of Parts E8 and D9 of the AUP(OP), can be relied upon to maintain the values of the marine SEA. No additional site/ plan change area specific provisions are required.

Matters # SW2, SW3, SW4, SW5, SW6 and SW7

Harrison Grierson addressed these matters with Danny Curtis (Healthy Waters) in a meeting on 30 August 2022, as confirmed in the attached meeting minutes (**Attachment F**).

6.0 PARKS AND OPEN SPACE

Matter # OP1

The Residential – Mixed Housing Suburban (MHS) zone provides flexibility across the development site to respond to the opportunities and constraints identified in the attached Context Analysis (**Attachment E**). This includes topographic constraints that we expect will influence development yield and density in the southern portion of the site that is closest to properties that reflect the original Glenbrook Beach settlement.

HG anticipates that density will vary across the PPC area, with potentially more intensive development forms in the flatter northern and eastern portions of the site than may occur on the steeper southern portion of 80 McLarin Road, which is closest to the original Glenbrook Beach settlement. Furthermore, the stormwater infrastructure requirements outlined within the SMP, as well as the presence of the identified flood hazard constraints, will provide a buffer between development at 80 McLarin Road and established surrounding development.

HG has been unable to find reference to any public document, prepared by Council, that indicated or favoured the land at 80 McLarin Road be zoned Residential – Single House. We also note that PC78 proposes that the MHS zone is the most appropriate zone in settlements outside of urban areas that are or can be serviced by a public reticulated wastewater network. The proposed wording of H4.1 reads that the MHS zone is:

“...applied to discrete areas in wastewater serviced rural and coastal towns and settlements with a residential population of less than 5,000 (as determined in the 2018 census).”

HG maintains that the MHS zone provides a reasonable transition from properties that are zoned Residential – Single House. In this location, the transition is assisted by



the Glenbrook Beach Recreation Reserve alongside the western boundary, and the McLarin Road corridor along the northwest and northeast boundaries.

The proposed precinct provisions will also assist with activating the Glenbrook Beach Recreation Reserve edge. This will promote the safe use of the reserve by residents of the original settlement properties south of 80 McLarin Road and residents of the more recent residential developments within the Glenbrook 3 precinct. In this manner, the development enabled by the PPC will improve connectivity within Glenbrook Beach and integrate with the residential development that surrounds the PPC area.

Matter # OP2

We have considered Council's suggestion for the precinct to show a road alongside the boundary shared with the Glenbrook Beach Recreation Reserve.

We maintain that road alignments are best confirmed during the resource consent process when more detailed information is available. Our initial thoughts are:

- a) A road alignment that follows the reserve boundary could result in an inefficient road layout across the PPC area. Such a road edge would serve the reserve and the side/ eastern boundary of 78 McLarin Road. The road could not serve the rear of property at 34, 36 and 38 Ronald Avenue due to the presence of a steep bank. The proximity of the intermittent stream to the road would also limit the property that could be developed and served along the road's eastern edge.
- b) A park edge road alignment could undermine the efficient development of the site, given the proposed requirement for a 10m planted riparian margin on the western side of the intermittent stream and wetlands. (The proximity of the road to the stream may also have implications for the treatment and discharge of stormwater from the road).
- c) There is no obvious alignment for such a road south of the reserve, due to site topography, the presence of natural wetlands and existing stormwater infrastructure in the southern corner of 80 McLarin Road. It is therefore likely that the road would need to terminate at the reserve. It is unlikely that this road would connect to Future Urban zone land south of the site.

For the above reasons, we are of the opinion that it is unnecessary to show an indicative park edge road in the precinct plan as an element that is to be encouraged by the proposed objectives and policies. The overall approach to not show road alignments on the Glenbrook 4 Precinct Plan supports flexibility at resource consent stage where the location and design of roads can be effectively integrated with future subdivision and development, with the protection and enhancement of freshwater assets and with stormwater management.

In summary, it is likely that a park edge road would serve a limited number of properties and would lack the people movement needed to activate the park edge. A park edge road could therefore also result in an inefficient use of resources to maintain and construct the road.

The Glenbrook Beach Recreation Reserve can be activated by ensuring that development overlooks this space, and a suitable pedestrian connection is provided, as is promoted by the PPC.

7.0 ECOLOGY

Please refer to the letter prepared by Pattle Delamore (PDP) Ltd (**Attachment G**).

Matter # E1

We note that PDP recommends that freshwater features, including streams and wetlands be identified on the Glenbrook 4 Precinct Plan. HG position is that it is unnecessary to map freshwater waterbodies in the precinct plan.

The streams are not permanent, they are shallow with poorly defined channels, which have not been surveyed in detail and they have low ecological and landscape value. The majority of such streams and wetlands are not generally identified on precinct plans Auckland-wide and where they have been this is usually only for significant watercourses, incised/gully form, where vesting of land as drainage reserve is expected and where there is existing indigenous vegetation.

The existing region-wide provisions are adequate to manage and enhance freshwater resources on site without adding further detail on the precinct plan that may be subject to change, for instance to respond to changes to the definition of a natural wetland.

We also note that the drainage pattern is already indicatively shown on Council's GIS viewer.

HG anticipates that the freshwater resources will be properly surveyed at subdivision resource consent stage, and this will result in the streams, wetlands and riparian margins being accurately defined and protected, most likely through either a consent notice and/ or covenant registered on the title.

Matter # E2

The proposed riparian planting requirements of the Glenbrook Beach 4 Precinct have been reviewed and amended to include a minimum riparian planting requirement of 10m either side of a stream, in accordance with the guidance provided in TP 148.

Riparian planting will enhance the existing and potential values of the intermittent watercourses and wetlands within the precinct and exceeds the requirements of the MHS zone where there is a 10m yard setback applying to streams (but not wetlands), and there is no requirement to plant within the riparian yard.

The amended precinct provisions will allow Council to consider proposals that do not provide a 10m wide planted margin as a restricted discretionary activity. This will provide a mechanism for Council to consider situations where it makes little practical sense to provide the full 10m wide riparian planted margin and it also provides Council with an opportunity to consider proposals that offset the planting requirement to achieve a net ecological benefit.

This flexibility is important to achieve the efficient development of the precinct and provides an opportunity for the land developer to maximise ecological benefits across the precinct. For example, the northern reaches of the intermittent watercourses have less potential ecological value than in the southern portion of the site where there is greater capacity to enhance ecological values. A wider riparian margin provides space to plant larger species, which will contribute to the diversity of habitat available in the Glenbrook Beach area and in a way that cannot be achieved with a standard 10m wide margin.

Offsetting also allows flexibility for a land developer in the vicinity of the western and northern boundaries, where a 10m wide riparian margin could leave limited space to





develop viable housing projects alongside the Glenbrook Beach Recreation Reserve edge and McLarin Road edge.

This approach is entirely consistent with the approach taken to managing natural resources in the proposed National Policy Statement – Biodiversity and is proposed in the changes in the exposure draft to the NES-F and NPS-FM. It also aligns with Part E3 of the AUP(OP) that relate to the management of watercourses across the Auckland Region.

Matter # E3

The proposed objectives and policies of the precinct have also been modified to increase emphasis on enhancing the ecological functions across the precinct. We have adopted the recommendations of the project ecologist (PDP Ltd) in replicating the wording of objectives and policies that were included in Drury Central Precinct (PC48) and Drury East Precinct (PC49).

We trust that this letter, and attachments, satisfies the Clause 23 matters. Please contact me should you have any questions.

Yours sincerely,

Bryce Powell
Senior Planner