

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

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

**Address:** 1-139 Carrington Road, Mt Albert

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

<b>Question</b>	UD1
<b>Specific request</b>	Please clarify what methodology has been used for urban design assessment
<b>Reasons for request</b>	<p>Chapter 2.0 – Methodology lists 3 elements that have informed the assessment but does not provide a clear methodology for assessment. What recognised good practice urban design principles have been used to make an assessment?</p> <p>The NZ Urban Design Protocol is quoted, but the UD Assessment then makes no further mention of any of the qualities listed in the Protocol and does not use recognised urban design principles to make the assessment.</p> <p>In the absence of a clear assessment methodology, the UD Assessment focusses on matters more related to planning such as shading, privacy etc, but fails to address bigger picture urban design principles such as how to create a neighbourhood with a clear character and its own identity; creating a place where public and private spaces are distinguished; a place with attractive and successful outdoor areas; creating a place that is easy to get to, and move through and that is easy to understand; a place that is adaptable over time; a place that is sustainable and enduring; and a place that has variety and choice etc.</p> <p>The assessment should demonstrate how the proposal (and the Precinct Plan) meets these urban design objectives.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>1 The reason for the request is to clarify the urban design principles that have been used to inform the assessment.</li> <li>2 The RFI states that the New Zealand Urban Design Protocol (<i>the Protocol</i>) is referred to in the methodology section of the urban design assessment (<i>UDA</i>) but that no further reference is made to either the Protocol or other recognised urban design principles within the assessment section of the report.</li> </ol>

## Responses to Auckland Council RMA cl 23 Requests | UD1 | 2

- 3 The assessment in the UDA is underpinned by the broader principles of the Protocol (in addition to an understanding of the characteristics of the precinct and the expected built form outcomes from relevant planning documents, as stated at section 2.0 of the UDA). While the broad themes represented in the Protocol's principles are weaved throughout the report, in order to respond to the specific request, I have prepared a detailed assessment of the Proposed Plan Change xx (Private) – Te Auaunga (*plan change*) against the Protocol which is attached as **Attachment 1**.
- 4 By way of context, while the plan change proposes changes to operative provisions, including additional height in some areas which would enable greater density, an intensified urban built form is already provided for by the operative Wairaka Precinct across the Residential, Special Purpose and Business zones. The framework for the bigger-picture urban design principles that the RFI refers to is therefore already largely established within those operative provisions.

**Attachment 1: Assessment of Te Auaunga Precinct against New Zealand Urban Design Protocol**

<b>Context</b>	
<p><i>Quality urban design recognises and builds on landscape context and character</i></p>	<p>The operative Wairaka Precinct provisions enable development over large parts of the precinct up to 27m, creating a higher density urban form in the area around a required road and open space network that will change the landscape character and context of undeveloped parts of the precinct from one of low-density, predominantly low-rise buildings separated by large areas of open space to a much more intensified urban built form.</p> <p>The plan change proposes some areas of increased height (while retaining the structuring road and open space network of the operative Wairaka Precinct, with some modifications), further defining the precinct as a distinctive higher density urban living community.</p> <p>The plan change proposes up to three taller buildings at the northern end of the precinct (Height Area 1), in addition to two areas of height up to 35m (Height Area 2) and an increase in height from 18m to 27m along the Carrington Road frontage (current provisions require a 20m set back at 18m stepping to 27m).</p> <p>The taller buildings within Height Area 1 will be visible within the wider landscape, for example, when travelling east along the SH16 North-Western Motorway and causeway. That level of visibility positively responds to the opportunity that this part of the precinct offers for 'landmark' buildings that act as a marker for the new community in a logical location close to the Point Chevalier town centre.</p> <p>The placement of the Height Area 2 locations is a response to the sloping nature of the precinct, placing potential 35m high buildings on lower lying land separated from Carrington Road.</p> <p>The increase in height along the Carrington Road frontage from 18m to 27m recognises the increased heights enabled along the eastern side of the road by both operative zonings (Special Purpose Healthcare Facility and Hospital zone which enables 27m) and Auckland Council's Plan Change 78.</p> <p>Changes are not proposed by the plan change to height in the southern part of the precinct in order to maintain a stepping down of built form to the adjoining residential neighbourhood.</p> <p>In summary, development that would be enabled by the plan change is consistent with the intensified urban built form already provided for by the operative Wairaka Precinct. Areas of additional height proposed by the plan change are a positive response to the landscape character and opportunities for comprehensive urban intensification that the precinct offers.</p>

## Responses to Auckland Council RMA cl 23 Requests | UD1 | 4

<p><i>Quality urban design celebrates cultural identity and recognises the cultural values of a place</i></p>	<p>The plan change is proposed by HUD on behalf of the Marutūāhu, Ngāti Whātua, and Waiohua-Tāmaki Rōpū. As the future land owners, the Rōpū will have the ability to set the brief for development to respond as they see appropriate to their cultural identity and values, consistent with HUD’s Treaty of Waitangi obligations at the site.</p>
<p><i>Quality urban design ensures incremental development contributes to an agreed and coherent overall result</i></p>	<p>Wairaka: Precinct plan 1 sets out an agreed spatial framework for development of the site that was developed through the Proposed Auckland Unitary Plan process.</p> <p>The Precinct plan sets out an arrangement of development areas and structuring elements for the precinct, including a required open space and road network and retention of the scheduled Former Oakley Hospital Building and identified trees.</p> <p>This earlier framework was based on extensive masterplanning, led by Oculus and the Wairaka Land Company, to inform the structure of the original precinct.</p> <p>This framework was revisited in accordance with the Rōpū’s own vision for the precinct when it commissioned a new masterplan prepared by Grimshaw (Sydney) in collaboration with Boffa Miskell in 2019, as set out in further detail in response to the UD9 clause 23 request.</p> <p>The plan change retains the spatial framework set by Wairaka Precinct plan 1, with some modifications – largely focused on refinement of the location of open space.</p> <p>The plan change also retains operative provisions which require proposed development to be consistent with Precinct plan 1, providing a means to ensure that incremental development contributes to the spatial outcomes of the Precinct plan.</p>
<p><b>Character</b></p>	
<p><i>Quality urban design protects and manages our heritage, including buildings, places and landscapes</i></p>	<p>The plan change seeks to protect and manage heritage, including buildings, places and landscapes as stated in objective I334.2(6):</p> <p style="padding-left: 40px;">Identified heritage values are retained through the adaptation of the scheduled building and retention of identified trees, together with the management of the historic heritage, and Māori sites of significance on <u>Te Auaunga</u> land, and the contribution they make to the precinct’s character and landscape, are recognised, protected and enhanced in the precinct.</p> <p>Specifically with respect to the Former Oakley Hospital Building, the relationship between this heritage building and the development enabled by the plan change is set out in the Assessment of Landscape and Visual Effects and the Heritage Assessment by Adam Wild.</p>

## Responses to Auckland Council RMA cl 23 Requests | UD1 | 5

<p><i>Quality urban design protects and enhances distinctive landforms, water bodies and indigenous plants and animals</i></p>	<p>The Wairaka Stream arises from the puna and passes through the precinct, joining to Te Auaunga (Oakley) Stream along the precinct's western boundary. The open space network shown on the plan change's Precinct plan 1 follows the path of the Wairaka Stream, using it as a foundation for recreational, walking, cycling and ecological connections. Previously piped sections of the Wairaka Stream within the Rōpū's landholding have been daylighted and enhanced as part of celebrating wai, the awa, pedestrian connectivity to Te Auaunga and open space / ecological corridors.</p> <p>The plan change retains operative provision I334.6.7, which protects identified trees, including a number of native species, and the open space network provided for both contains some of these trees, and will allow for additional, extensive native plantings.</p>
<p><i>Quality urban design creates locally appropriate and inspiring architecture, spaces and places</i></p>	<p>The vision and masterplan for the precinct (articulated in response to clause 23 UD9) include social elements that seek to provide appropriate building form reflecting the precinct's character and landscape.</p> <p>New development within the precinct (with the exclusion of up to three dwellings in the Mixed Housing Urban and Terrace Housing and Apartment Buildings zones in Sub-precinct C, permitted through the Medium Density Residential Standards (<i>MDRS</i>) will generally require resource consent, with assessment against design based criteria proposed as part of the plan change that reflect the vision and masterplan for the precinct, including building form and character and landscape.</p> <p>Through the design review phase of the consenting process this will enable the architectural and design response of the proposal to be assessed. Larger scale development proposals within the precinct are likely to also be reviewed by the Auckland Council Urban Design Panel, as was the case with the recently consented Maungārongo resource consents 1 and 2, increasing the degree of design interrogation as to the appropriateness of response to context.</p>
<p><i>Quality urban design reflects and celebrates our unique New Zealand culture and identity and celebrates our multi-cultural society</i></p>	<p>Development on the precinct is based on the spatial foundation set by the Former Oakley Hospital Building, open space along the Wairaka Stream, and retention and protection of identified trees. These elements provide a basis for urban form that responds to its site and its key sense of place elements.</p> <p>As discussed above, development throughout the precinct will generally be subject to design review through the resource consenting process. This will enable the extent to which development appropriately responds to its context to be assessed. Taller buildings within Height Area 1 are subject to a greater degree of design interrogation, including the extent to which they relate to the Tāmaki Makaurau cityscape and contribute to making a visual landmark, setting a greater expectation for the quality and uniqueness of response.</p>

**Responses to Auckland Council RMA cl 23 Requests | UD1 | 6**

<b>Choice</b>	
<p><i>Quality urban design ensures urban environments provide opportunities for all, including the disadvantaged</i></p>	<p>The plan change provides a range of opportunities for all members of the future community. These include:</p> <ul style="list-style-type: none"> <li>• <i>Residential living:</i> The plan change continues the Wairaka Precinct’s use of the Mixed Housing Urban, Terrace Housing and Apartment Buildings and Business Mixed Use zones, which enable and provide for a wide range of housing, including stand-alone, terraced and apartment typologies.</li> <li>• <i>Access to open space:</i> Proposed Precinct plan 1 provides access to an open space network throughout the precinct, in addition to connections to the adjoining Te Auaunga open space network that provides for extensive open space and passive transport mode connections.</li> <li>• <i>Tertiary education:</i> The plan change provides for the continued operation of the Unitec tertiary campus, providing access to a high quality education institute offering a range of vocational and on-going learning opportunities.</li> <li>• <i>Mana whenua cultural promotion:</i> The plan change provides for papakāinga and whare manaaki, and includes objectives and policies that seek to ensure an environment is created that contributes to Māori cultural promotion, consistent with the aspirations of iwi to provide these opportunities within the Tāmaki Makaurau urban area.</li> <li>• <i>Retail services:</i> The plan change provides for the establishment of retail within the site to serve the local demand of the precinct (in the nature of a 15 minute walkable city), and provides for convenient access (a 5-10 minute walk) to the services of Point Chevalier town centre to the north and Mount Albert town centre to the south. These facilities will also offer residents within the wider community access to walkable retail amenities.</li> <li>• <i>Access to public transport:</i> The precinct is located within a 5-15 minute walk of Baldwin Avenue and Mount Albert train stations and there are also frequent service bus routes along Carrington Road and Great North Road to the west.</li> </ul>
<p><i>Quality urban design allows people to choose different sustainable lifestyle options, locations, modes of transport, types of buildings and forms of tenure</i></p>	<p>Refer the response to the above. In addition, the precinct is well connected to multi modal access including good cycle connectivity and access to public transport.</p>
<p><i>Quality urban design supports designs which are flexible and adaptable and which will remain useful over the long term</i></p>	<p>As with the operative Wairaka Precinct, Te Auaunga Precinct sets a design framework for development at the overall level of the precinct, providing flexibility to adapt to changing demographic and community needs over time. Proposed development is expected to provide the spatial elements shown in Precinct plan 1 (including road and open networks and pedestrian and cyclist connections) but otherwise the precinct does not specifically prescribe the particular mix of uses, including housing typologies and, in that way, is therefore adaptable to changes in demand over the term of development of the precinct.</p>

## Responses to Auckland Council RMA cl 23 Requests | UD1 | 7

	<p>Specifically in regards to design at the scale of the individual building, the Business Mixed Use zone, which applies to approximately half of the Wairaka Precinct and is proposed to expand in area by the plan change, has provisions that apply to new buildings which encourage flexible and adaptable design. These are:</p> <ul style="list-style-type: none"> <li>• Policy H13.3(6): Encourage buildings at the ground floor to be adaptable to a range of uses to allow activities to change over time; and</li> <li>• Matter of discretion H13.8.1(3)(b): The provision of floor to floor heights that will provide the flexibility of the space to be adaptable to a wide variety of use over time.</li> </ul>
<p><i>Quality urban design ensures public spaces are accessible by everyone, including people with disabilities</i></p>	<p>The open space required by proposed Precinct plan 1 is located both centrally within the precinct and at its northern end, adjoining the Former Oakley Hospital Building. These locations place the primary open spaces within a 400m radius of most parts of the precinct, providing open space within a short walk of future development within the site. Refer <b>Appendix 1</b> for a map of the precinct and surrounding area which shows the distribution of open spaces.</p> <p>The potential challenges to level access between buildings and open space in the context of slope across the precinct is addressed by proposed matter of discretion I334.8.1(1A)(a) which retains discretion over whether proposed finished contour levels across the subject area where consent is being sought manage variations between the ground level of future buildings and adjoining existing and proposed public open space.</p>
<p><b>Connections</b></p>	
<p><i>Quality urban design creates safe, attractive and secure pathways and links between centres, landmarks and neighbourhoods</i></p>	<p>Accessibility and the provision of appropriate connections was a key component of the social element of the Rōpū's vision for the precinct (as articulated in the clause 23 UD9 response), and has been carried through into the various provisions proposed through the plan change as referenced below:</p> <ul style="list-style-type: none"> <li>• I334.8.1(1A)(c) retains to Council the discretion to consider whether new buildings are designed in accordance with Crime Prevention Through Environmental Design principles, including by providing passive surveillance of publicly accessible areas.</li> <li>• I334.8.1(1A)(h) retains to council the discretion to consider whether landscaping is provided to contribute to the achievement of quality amenity that is integrated with the built environment.</li> <li>• I334.8.1(1A)(b) has many provisions which retain to Council discretion to consider the appearance of buildings – relating back to policy I334.3(14) which requires new buildings to be designed in a manner that, where appropriate, enhances the streetscape and gateway locations of the precinct.</li> </ul> <p>These provisions are in addition to the objective, policies, matters of discretion and assessment criteria in the underlying zones that also focus on enhancing the attractiveness and safety of streets.</p>

## Responses to Auckland Council RMA cl 23 Requests | UD1 | 8

	<p>Overall, it is considered that these provisions enable the safety, attractiveness and security of pathways and links across the precinct to be appropriately managed.</p>
<p><i>Quality urban design places a high priority on walking, cycling and public transport</i></p>	<p>The plan change requires transport planning to be integrated with subdivision and development (policy I334.3(20)), specifically referencing integration with rail, bus, pedestrian and cycle connections, enabling Council to ensure that high quality connections are achieved as they develop alongside adjoining built development proposals.</p>
<p><i>Quality urban design anticipates travel demands and provides for a sustainable choice of integrated transport modes</i></p>	<p>I334.8.1(1A)(f) retains to Council discretion to consider whether proposed developments are consistent with any existing or new integrated transport assessment or other traffic assessment, allowing consideration of the extent to which sustainable travel modes are provided for.</p>
<p><i>Quality urban design improves accessibility to public services and facilities</i></p>	<p>Policy I334.3(20) requires subdivision and development to be integrated with transport planning in a way that:</p> <p style="text-align: center;">Supports the provisions of passenger transport services, linking to key public transport nodes such as the Mt Albert train station and Point Chevalier public transport services</p>
<p><i>Quality urban design treats streets and other thoroughfares as positive spaces with multiple functions</i></p>	<p>As referenced earlier in this response, the plan change places a high priority on pedestrian and cyclist / micro mobility safety and amenity. This, combined with provisions that seek to provide for activation of, and passive surveillance over, publicly accessible spaces will result in streets internal to the precinct that provide high quality pedestrian and cyclist / multi modal environments.</p>
<p><i>Quality urban design provides formal and informal opportunities for social and cultural interaction</i></p>	<p>In addition to the required open spaces shown on Precinct plan 1, new buildings are expected to provide landscaping which contributes to the achievement of quality amenity. These spaces will complement the more formal opportunities for social interaction provided for via the Precinct plan 1 open spaces with smaller spaces that provide for informal social and cultural interaction and</p> <p style="text-align: center;">... may be provided in the form of courtyards, plazas and other areas that are accessed by residents, visitors or the public including lanes and pedestrian accessways (I334.8.1(1A)(h)).</p>
<p><i>Quality urban design facilitates access to services and efficient movement of goods and people</i></p>	<p>The precinct is located within a 5-10 minute walk of Point Chevalier town centre and Mount Albert town centre, offering a future residential population access to the services within those centres.</p> <p>The precinct is also within the walkable catchment of two train stations and rapid transit bus corridor.</p>

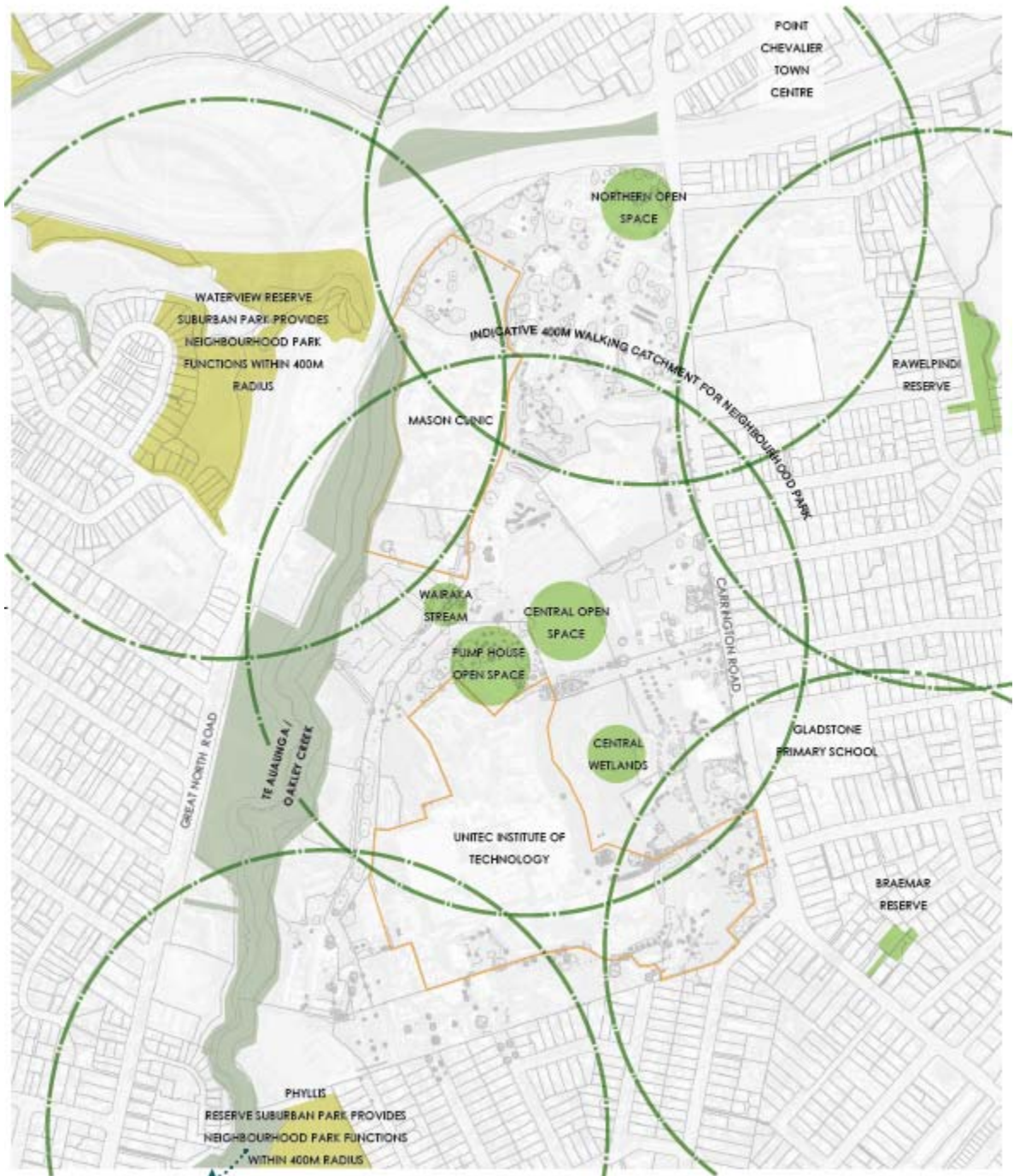


**Responses to Auckland Council RMA cl 23 Requests | UD1 | 9**

	<p>Additionally, the plan change retains the operative Wairaka Precinct policy which references provision of retail activities in identified locations which serves local demand within the precinct (I334.3(29)). The location (and maximum gross floor area) of retail is specified at standard I334.6.2. This refers to capped levels of retail within the Mixed Use zone, the Special Purpose – Tertiary Education zone and in the Historic Heritage Place (Former Oakley Hospital Building). Provision of retail within the precinct is not required by the plan change but it is anticipated that retail to a level that serves local demand needs is likely to form part of development proposals. By way of example, a 1,500m<sup>2</sup> 'metro' supermarket at the base of a multi-level apartment building on Farm Road near the intersection with Carrington Road and a further 2,000m<sup>2</sup> of retail has been consented as part of the Maungārongo resource consents 1 and 2.</p>
<p><i>Quality urban design provides environments that encourage people to become more physically active</i></p>	<p>Development within Te Auaunga Precinct is based around a network of open space and pedestrian and cycle links that provide connections through the precinct and to Te Auaunga Stream open space corridor and regional cycling network. This spatial configuration places open space and pedestrian and cyclist movement routes as a key structuring element for future development. Neighbourhood parks and open space within the precinct are distributed to provide future residents with easy walkable (400m radius) access to local open space. Future buildings will be assessed as to the extent to which they provide for passive surveillance and attractive frontages to these spaces. The outcome is anticipated to be well-used open connections between open space that encourage physical activity.</p>
<p><b>Creativity</b></p>	
<p><i>Quality urban design builds a strong and distinctive local identity</i></p>	<p>The plan change will result in an intensified urban built form developed around an open space and pedestrian and cyclist network and retention of protected trees and heritage buildings, which will form a distinct urban living community within the wider area. The design assessment generally required of new buildings provides the opportunity for further development of place-responsive building designs. A distinctive sense of place for the precinct at a wider landscape level would also result from the development of the three taller buildings (as would be enabled by the plan change) at the northern end of the precinct in Height Area 1.</p>
<p><b>Custodianship</b></p>	
<p><i>Quality urban design creates buildings, spaces, places and transport networks that are safer, with less crime and fear of crime</i></p>	<p>As discussed earlier, new buildings will generally require consent in the precinct (unless they comply with the MDRS provisions in the underlying residential zones), with assessment against matters such as the extent to which the development is consistent with Crime Prevention Through Environmental Design Principles.</p>

<b>Collaboration</b>	
<p><i>Quality urban design supports a common vision that can be achieved over time</i></p>	<p>The plan change is based on a consistent vision for the precinct as an urban living community that is reflected in the operative Wairaka Precinct and was further developed in the February 2019 Reference Masterplan and Strategic Framework for the precinct, as set out in further detail in the clause 23 UD9 response.</p> <p>The 2019 document, which was the result of a strategic visioning process by the Marutūāhu, Ngāti Whātua, and Waiohua-Tāmaki Rōpū, refined the common vision for the precinct as:</p> <ul style="list-style-type: none"> <li>• A medium to higher density living environment where a range of connected open spaces provide residential amenity and create the structure for urban form.</li> <li>• A complete community, providing the opportunity for people to live, work and learn within the precinct, while benefiting from access to public transport and a well-connected walking and cycling network.</li> <li>• An inclusive community with a range of housing typologies.</li> </ul> <p>The proposed provisions in the plan change enable that vision to be achieved.</p>
<p><i>Quality urban design involves communities in meaningful decision-making processes</i></p>	<p>As discussed above, the Marutūāhu, Ngāti Whātua, and Waiohua-Tāmaki Rōpū have been through an extensive visioning process to arrive at a common vision for development of the precinct. This vision is consistent to that which underpins the operative Wairaka Precinct, while furthering realising the precinct's potential for development as an urban living community. Wider community engagement on this vision has occurred at a number of 'touchstones' over several years, including through the submission process on the Auckland Unitary Plan (Operative in Part), community meetings, and will be provided for again with the public notification of the plan change.</p>

**Appendix 1:** 400m radius from primary areas of the plan change required open space. Source: Carrington Open Space Framework, December 2022, Boffa Miskell.



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<b>Question</b>	UD2
<b>Specific request</b>	Please provide details of the design rationale and design principles used to inform the location of the taller buildings.
<b>Reasons for request</b>	<p>In many places throughout the application documentation, the argument is made that taller buildings are suitable in the north-west part of the site due the presence of the motorway interchange.</p> <p>For instance, p.103 of the Planning Report states:</p> <p>It provides a range of housing typologies with high rise residential development in a part of the isthmus, because of the motorway interchange, that is well suited for more intensive forms of development.</p> <p>It would be helpful to understand why the presence of the motorway interchange is used to justify additional height.</p> <p>There is actually no access to the motorway in this location (the nearest access point is Western Springs over 2km away) and in any case, access to a motorway system is not typically regarded as a design principle for justifying intensive residential development and taller buildings. Tall buildings policies around the world use proximity to important public transit (not just transport infrastructure), important nodes or centres, access to employment and other amenities (retail etc).</p> <p>Whilst there may be a case for taller buildings, it is unclear why the presence of the interchange is used as a justification.</p>
<b>Applicant response provided by</b>	Rachel de Lambert & Matt Riley, Boffa Miskell, John Duthie, Tattico
<b>Applicant response</b>	<p>1 The reasons for the request provided in respect of this question seek clarification on the relevance of the North-Western Motorway interchange to the provisions that enable the opportunity for up to three mid to high-rise buildings in the northwest corner of the precinct.</p>

## Responses to Auckland Council RMA cl 23 Requests | UD2 | 2

- 2 The proposition of including a cluster of buildings of greater, mid to high-rise tower height within the precinct has been advanced both to take advantage of the considerable residential amenity offered by elevated views in all directions from the precinct (diversifying the housing choice and typology of the precinct) and in respect of establishing the new community's legibility within a wider urban context.
- 3 Height Area 1, located in the north-western corner of the precinct, is considered an appropriate location for buildings of the heights enabled by the provisions (being one building up to 43.5m, one building up to 54m and one building up to 72m) due to a number of factors. The relationship of this part of the precinct to the North-Western Motorway creates an open space context to the north and west which provides generous separation to adjacent established residential neighbourhoods to the north – Point Chevalier, and west – Waterview, thereby avoiding the potential for associated off site effects on residential amenity.
- 4 It is not any suggestion of access to the motorway that is considered to make this location, relative to its North-Western Motorway proximity, appropriate. Rather, the large scale nature of the motorway interchange infrastructure with its elevated overbridges creates a context in which taller tower elements have a level of comfortable fit. Other locations in Auckland where buildings of greater height are accommodated proximate to larger scaled motorway infrastructure include Smales Farm relative to the Northern Motorway, the mid-rise towers clustered on Hopetoun Street / Howe Street and Union Street relative to Spaghetti Junction and the emerging apartment development in the Central Park office park at Penrose relative to the Southern Motorway.
- 5 This part of the precinct has good walkable proximity to the Point Chevalier Town Centre and public transport on Great North Road and Carrington Road. The inclusion of a cluster of taller towers in this location reinforces the precinct's proximity to Point Chevalier and its legibility as a place as experienced by passers-by on the core transport routes adjacent.
- 6 This part of the precinct is also well away from the Regional Volcanic Viewshaft that traverses the precinct.
- 7 Additional commentary on those factors that render development at the additional height sought appropriate in landscape terms is provided in clause 23 response L7.

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<b>Question</b>	UD3 & L10
<b>Specific request UD3</b>	<p>Please clarify how the maximum dimension has been derived and how building form will otherwise be controlled.</p> <p>NB: The response to this RFI can be combined with the response to L10.</p>
<b>Reasons for request UD3</b>	<p>The control of taller buildings is recognised as important, but it is unclear what building forms may be possible using the suggested method of maximum dimension. The concept of tall, slender towers is quoted, which are widely accepted as more appropriate forms than squat or slab-type buildings.</p> <p>Yet if a residential building of 18m depth is provided (quite reasonable for double-loaded apartments) the maximum dimension of 50m would allow a 46m long building up to a height of 54m. Even the tallest tower at 72m high could be 38m long. These forms would not be considered slender "towers" and could result in building forms not entirely suitable. Indeed, the Visual Simulations show buildings that are more slabs than towers.</p> <p>It would be helpful to understand how these dimensions have been derived and the range of building shapes that could be produced, together with a commentary on how the building shape will be controlled. The design quality of such buildings will be crucial, and it would be helpful to understand what additional design controls / assessment criteria could be used to ensure these taller buildings are of exemplary design quality.</p>
<b>Specific request L10</b>	<p>Please explain why no maximum tower dimension is stipulated for development up to 35m high, given that this still comprises development up to 13 storeys high within Height Area 2 and effectively controls development across most of the PC site.</p>
<b>Reasons for request L10</b>	<p>Height Areas 2 and 4 cover most of the PC site, so that the future streetscapes and built form landscape of the site will be largely determined by development within those areas. In effect, the more qualitative outcomes across the precinct will be reliant on the controls applicable to those two Height Areas. In addition, there could be significant height and building coverage variations across the Precinct, so that controls over the form of lower towers may still be required.</p>

Consequently, some justification for the absence of any Maximum Tower Dimension standard for development up to 35m high is considered necessary.

**Applicant response provided by** Rachel de Lambert & Matt Riley, Boffa Miskell and John Duthie, Tattico

**Applicant response**

**Height Area 1**

- 1 The maximum tower dimension is one of the tools used in the Auckland Unitary Plan (Operative in part) (*AUP*) to control the bulk and scale of buildings in identified areas. For example, in the Business – City Centre zone a maximum plan dimension of 50m applies to buildings above 28m in height in the 'special height area' (being the core central city area) and in the Business – Metropolitan Centre Zone a maximum plan dimension of 55m applies to buildings above 32.5m in height.
- 2 This same form of tower dimension control has been adopted in respect of the three potential towers in Height Area 1 with the lesser 50m dimension proposed for the two lower towers and a reduced 42m dimension for the enabled 72m tower.
- 3 In addition to this control, comprehensive matters of discretion are proposed to ensure quality building form and appearance are achieved for all new buildings within the precinct, for example:

I334.8.1(1A)(b) Building form and character:

- (i) whether building design and layout achieves:
  - (f) high quality visual interest through the use of façade modulation and articulation, and/or the use of materials and finishes and ensures any otherwise unavoidable blank walls are enlivened by methods which may include artwork, māhi toi, articulation, modulation and cladding choice to provide architectural relief;
  - (k) long building frontages are visually broken up by façade design and roofline, recesses, awnings, balconies and other projections, materials and colours.

**Height Areas 2 and 4**

- 4 The clause 23 request identifies that Height Areas 2 and 4 apply to most of the area subject to the plan change and seeks justification for the absence of any maximum tower dimension standard for development up to 35m high.
- 5 The maximum tower dimension standard has not been proposed for buildings up to 35m in height for the following reasons:

### **Responses to Auckland Council RMA cl 23 Requests | UD3 & L10 | 3**

- (a) HUD's consultant team considers that the likely maximum number of levels achievable within 35m is 10 storeys, or two storeys more than are expected to be achieved in the 27 metre Business – Mixed Use height control applying to the precinct - where 8 storeys is considered achievable. In respect of clause 23 request L10, it is unclear how Council's reviewer considers a 13 storey building could be achievable within 35m (Height Area 2). That would require a 2.6m floor to floor which is not considered to be realistic.
- (b) The maximum tower dimension control applies in the Business – City Centre and Business – Metropolitan Centre zones in the AUP above 28 and 32.5m respectively, as set out above. The maximum tower dimension control is not considered to be a helpful additional control in respect of the two storeys above 27m in relation to the precinct and would likely result in poor building form outcomes (if applied).
- (c) Discretion is retained to Council when assessing new buildings, including those in Height Areas 2 and 4, over aspects of building form and appearance that may result from larger scale buildings such as those enabled in Height Area 2, as set out above. These provisions are considered to appropriately address any potential additional visual dominance effects which may result from the non-application of a maximum tower dimension standard in Height Areas 2 and 4 – which is understood to be the concern of this particular clause 23 request.



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

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

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

<b>Question</b>	UD4
<b>Specific request</b>	Please clarify how good quality design outcomes can be delivered with the heights proposed across the site.
<b>Reasons for request</b>	<p>The UD Assessment and Planning Report focus on the increased yield that additional height will bring, but with little discussion on the impact on the quality of the urban environment. There is discussion around the effects on property outside of the site, but little discussion around the impact that having many 35m buildings (which could be 11 storeys) would have on the quality of the urban environment, the spaces between the buildings and amenity of residents (privacy, outlook, access to sunlight). If the Precinct Plan is relying on the AUP for standards, then these 11 storey high buildings could be just 12m apart. Also the character of the precinct and the quality of the environment is partly informed by the massing of the buildings as much as the height. Many slender buildings, with plenty of space around them, and variation in height, will produce one type of environment. A few slab-type buildings with less space, and consistency in height could produce quite a different outcome.</p> <p>It would be helpful to understand how potentially adverse effects can be managed through the application of the proposed plan change provisions. Some precedents of neighbourhoods of predominantly 35m buildings would be helpful to understand the impact and how any adverse effects could be managed.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>1 Clause 23 query UD4 seeks further information on the quality of the urban environment that may be created within those areas of the precinct which enable 35m high buildings, including effects of these areas on the character of the precinct, the quality of spaces between buildings of up to 35m in height, and the amenity for residents within these buildings. <ul style="list-style-type: none"> <li><u>Number of 35m high buildings</u></li> </ul> </li> <li>2 The clause 23 query refers to the possibility of the plan change enabling many 35m high buildings. A combination of the total size of Height Area 1 and Height Area 2 and site slope</li> </ol>

## Responses to Auckland Council RMA cl 23 Requests | UD4 | 2

(as discussed below) means that 35m high buildings are unlikely to be significant in number and, furthermore, will form a relatively small proportion of the total built form of the precinct.

- 3 The plan change enables buildings up to 35m in height over approximately 10 percent of the precinct (6.5ha). This comprises the 0.9ha Height Area 1 (within which three taller buildings above 35m are also enabled, as discussed in other clause 23 responses) and the 5.6ha Height Area 2. This compares to approximately 24 percent of the area of the precinct in which 27m high buildings are enabled – being within Height Area 4 (15.37ha).
- 4 Height Area 1 (HA1) and Height Area 2 (HA2) are on sloping land, falling from east to west by approximately 10m. Around half of HA1 is rolling land (8 – 15 degrees). The HA2 land to the south of HA1, which includes the Taylors Laundry site, has flat to gently undulating platforms of ground separated by more steeply sloped banks. The HA2 land to the west of the Spine Road has areas of flatter land that begins to slope more steeply down in its south-west corner towards Te Auaunga. These topographical characteristics are likely to place some restrictions on the positioning of building platforms and again will reduce the number of multi-level buildings that would be more easily developable on flatter land.

### Character of the precinct

- 5 While not framed as a question, the clause 23 query states that:

...the character of the precinct and the quality of the environment is partly informed by the massing of the buildings as much as the height. Many slender buildings, with plenty of space around them, and variation in height, will produce one type of environment. A few slab-type buildings with less space, and consistency in height could produce quite a different outcome.

- 6 Seen as a silhouette, variations in the collective roof and skyline profile of buildings across the 35m HA1 and HA2 areas will be created by their stepping down with the slope of the land. The relatively small size of HA1 and HA2, relative to the size of the precinct, means that 35m high buildings in these areas will be seen within, and as part of, the varied height and built form context across the wider precinct created by its topography, in addition to its differing height areas. It is considered these factors will mean that, in built character terms, the 35m height of buildings enabled in HA1 and HA2 will not result in uniform or consistent apparent height.
- 7 This stepping of buildings with the land in HA1 and HA2 is also considered to assist in modulating the collective massing of buildings as seen within these areas. For this reason, the application of Business – Mixed Use (B-MU) zone Standard H13.6.4 Maximum tower dimension and tower separation is not considered necessary in the precinct (refer I334.6(2)(a)(i)).

### Quality of spaces between buildings

- 8 The clause 23 query states that if the plan change is relying on the Unitary Plan for standards, then *'these 11 storey high buildings could be just 12m apart'*. (Note that a 35m building height is anticipated to accommodate 10 storeys – to a potential maximum of 11 storeys. Refer to the discussion on storey height in Attachment 1 to the response to clause 23 query UD5.)
- 9 The author of the query is correct – the precinct relies on the underlying Unitary Plan zone provisions in terms of managing the separation distance between buildings. Application of

## Responses to Auckland Council RMA cl 23 Requests | UD4 | 3

B-MU zone standard H13.6.9 Outlook space, which applies in HA1 and HA2, would – as referred to in the query – separate neighbouring buildings by up to 12m depending on the orientation of outlook spaces. The plan change does not propose to separate buildings up to 35m in height by any greater distance than the requirements of the underlying B-MU zone. This may mean that some 35m buildings within HA1 and HA2 are relatively closer together, which may be a desirable outcome, such as when they are adjacent to each other along street frontages. In other instances, buildings are likely be further apart. For example, when on opposite sides of the road within the precinct's street network. This flexibility is consistent with the approach in the underlying B-MU zone and allows development latitude to respond to differing locational characteristics.

- 10 The reasonably small size of HA1 and HA2 and their slope (discussed above), combined with their relatively short east-west dimensions means that there is unlikely to be sizeable contiguous groupings of buildings up to 35m in height. Within this context, the potential for reduced sunlight and daylight access to streets and public open spaces is considered to be low. For these reasons, it is considered not necessary to apply Standards H13.6.3 Building setback at upper floors and H13.6.4 Maximum tower dimension and tower separation, which manage these outcomes in the underlying B-MU zone, within the precinct (refer I334.6(2)(a)(i)).

### Amenity of residents

- 11 The clause 23 query requests further information on how privacy, outlook and access to sunlight is managed for residents within buildings of up to 35m height in the precinct.
- 12 A primary tool used in the underlying B-MU zone to manage privacy and outlook is the Outlook space standard H13.6.9. This standard applies in the precinct. Privacy is also managed by matter of discretion I334.8.1(1A)(b)(iii). This provides to Council the discretion to assess whether:

outdoor living areas and internal living spaces achieve privacy from publicly accessible areas while maintaining a reasonable level of passive surveillance.

- 13 Additionally, assessment criterion I334.8.2(1A)(b)(i) refers back up to policies including policy I334.3(13) for new buildings that comply with Standard I334.6.4 Height. This policy, with its requirement for new buildings to be designed in a manner that '*provides for a high standard of amenity*' gives a pathway to Council to consider the residential amenity offered within HA1 and HA2 buildings, including privacy, outlook and access to sunlight.
- 14 In combination, these provisions are considered to be satisfactory to manage residential amenity, including privacy, outlook and sunlight, in buildings up to 35m height within the precinct's HA1 and HA2 areas.

### Precedent neighbourhoods

- 15 The clause 23 query requests precedents of neighbourhoods of predominantly 35m buildings as a point of comparison to the 6.5ha total area of HA1 and HA2. Neighbourhoods of mid-rise residential buildings are emerging across Auckland's urban areas. While these neighbourhoods do not yet comprise predominantly 35m (10 storey) buildings, several include buildings in the range of 9 to 11 storeys (or greater) in height, amongst other mid-rise buildings. These are generally recently constructed, consented or proposed developments. This suggests that the number of these buildings, within the greater number of mid-rise residential neighbourhoods enabled by Plan Change 78 (Auckland Council's

response to the National Policy Statement on Urban Development) will increase over time. Examples of such neighbourhoods are discussed below.

*Wynyard Quarter*

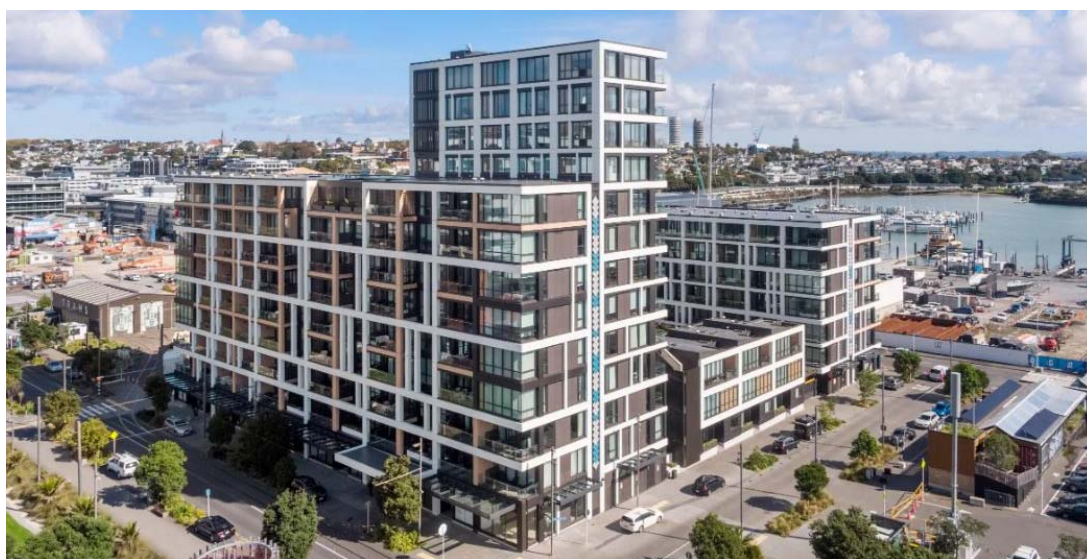
- 16 The Wynyard Quarter is an approximately 37ha highly mixed use neighbourhood on Auckland's waterfront that has been under development for the last two decades. 30 Madden Street is a recently constructed building which is 9 storeys in height along its Daldy Street frontage and 13 storeys in height along part of its Madden Street frontage (refer **Figure 1** below). The Northbrook development at 200 Pakenham Street West is a consented scheme (LUC60410747 March 2023), not yet constructed, of two 11 storey buildings (44.6m height) one at the corner of Pakenham Street West and the Daldy Street linear park and the other on the corner of Beaumont Street with the new east / west lane (refer **Figure 2** below).

*Te Tauoma residential development*

- 17 This is a masterplanned development of mixed use residential buildings on a site over 12ha in area formerly owned by the University of Auckland at 231 and 263 Morrin Road, Saint Johns. Stage 1A was approved in September 2020 (LUC60335181) and includes adjoining apartment buildings along Morrin Road of 9 – 10 storeys in height. Stage 1B of the masterplan, for a 14 level building and an 18 level building, was approved in February 2023 by an Expert Consenting Panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (refer **Figure 3** below).

*Alexandra Park Raceway*

- 18 Along Green Lane West in Epsom, a masterplanned neighbourhood of mid-rise residential buildings on 5.4ha of B-MU zoned land that was formerly part of Alexandra Park Raceway is now partially completed and occupied, with additional buildings planned. 223B Green Lane West is an existing, occupied 9 level building (refer **Figure 4** below). 223C Green Lane West is a planned complex of two 11 level buildings adjoining 223B Green Lane West (refer **Figure 5** below).



**Figure 1:** The 10-13 storey 30 Madden Street building in the Wynyard Quarter.



**Figure 2:** The 11 storey consented Northbrook development in the Wynyard Quarter.



**Figure 3:** The Te Tauoma residential development, showing the consented Stage 1A development of three 9-10 storey apartment buildings along Morrin Road and the consented Stage 1B development of a 14 storey and an 18 storey apartment building behind.



**Figure 4:** The 9 storey apartment building at 233B Green Lane West.



**Figure 5:** One of the two proposed 11 storey apartment buildings at 233C Green Lane West.

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

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

**Address:** 1-139 Carrington Road, Mt Albert

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

<b>Question</b>	UD5
<b>Specific request</b>	Please provide a more detailed assessment of what effects 27m buildings will have on the streetscape.
<b>Reasons for request</b>	<p>Much of the assessment focusses on the effects of the increased height on the properties on the east side of Carrington Road, but there is little discussion on the impact on the streetscape itself. Whilst it is acknowledged that the character of this street will change to urban, there is quite a difference between 5/6 storeys (18m) to 8/9 storeys (27m) in terms of the potential over-bearing / over-shadowing of the street and the impact on all the users of the street. Jan Gehl in particular talks about the connections and relationship of occupiers of upper floors to people within the street.</p> <p>The intended character of the street is unclear. 8/9 storey buildings with active (non-residential) uses on the ground floor will result in a different character than one where residential is used along the ground floor, and the intended character will help to inform the debate about the appropriate height.</p> <p>It would be helpful to add some commentary on these issues and understand some precedents for this scale of building in a non-central city location.</p> <p>Furthermore, the cross-sections provided suggest the land is flat either side of Carrington Road. In reality there are changes in levels (both rising up and falling away), which could have further impact on the relationship of buildings to the street and it would be helpful to understand these impacts.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell
<b>Applicant response</b>	<p>1 This request for information has four components. They are:</p> <ul style="list-style-type: none"> <li>(a) streetscape effects;</li> <li>(b) character;</li> <li>(c) precedent examples; and</li> </ul>

- (d) changes in level relative to Carrington Road.

**Streetscape effects**

- 2 The potential streetscape effects on Carrington Road of the increase in height referred to in the clause 23 request are related to visual dominance and shading. Reference is also made to the connection between occupiers of upper floors of buildings with increased height to people on the street. These matters are discussed below. Separate discussion on the storey height referred to in the clause 23 request is also included as **Attachment 1** to this response.

*Visual dominance*

- 3 Pages 23-28 of the urban design assessment (*UDA*) assess the potential visual dominance effects generated by removal of the Wairaka Precinct's 18m height area for a 20m depth along the Carrington Road frontage, and its replacement with a 27m height area. (Note that the developable depth of this frontage in the operative plan sits at around 12m – not 20m – as around 8m in width for road widening is required along the frontage.) The *UDA* considers potential visual dominance effects on both properties on the east side of Carrington Road and streetscape effects on the road itself. Conclusions of the assessment, at page 28 of the *UDA*, are:
- (a) The operative Wairaka Precinct provisions enable an urban built form along the precinct's future Carrington Road frontage.
  - (b) The plan change will enable buildings of increased scale (up to 27m) along the precinct's future Carrington Road frontage. However, these can be comfortably accommodated across the approximately 30m width of Carrington Road (building front to building front), which is what is provided for in the operative plan for the road widening. These buildings will be opposite potential 26m high buildings on the Point Chevalier Clinical centre site (Special Purpose – Healthcare Facility and Hospital zone) and 21m high buildings on the proposed Residential – Terrace Housing and Apartment Building (*THAB*) zoned sites south of Fifth Avenue within Proposed Plan Change 78's (*PC78*) walkable catchment.
  - (c) Potential visual dominance effects of the proposed 27m height on that part of Carrington Road with enabled 11m (12m with qualifying roof form) buildings on Residential – Mixed Housing Urban (*MHU*) zoned sites on the eastern side of the road between Fifth Avenue and Segar Avenue are discussed at page 24 of the *UDA*. This analysis applies to both the *MHU* zoned sites themselves and to that part of the Carrington Road streetscape. (It is noted that several submitters on *PC78*, including the applicant, have requested that these properties be rezoned *THAB*, given the isolated nature of this pocket of lower zoned land in the middle of an area targeted for urban intensification.) To reiterate its conclusion, the potential for visual dominance effects along this part of the streetscape are reduced by the width of the road (approximately 30m building front to building front) and are appropriately managed by the bespoke matters of discretion that manage the form and appearance of frontages of new buildings to Carrington Road (I334.8.1(1A)(i)).



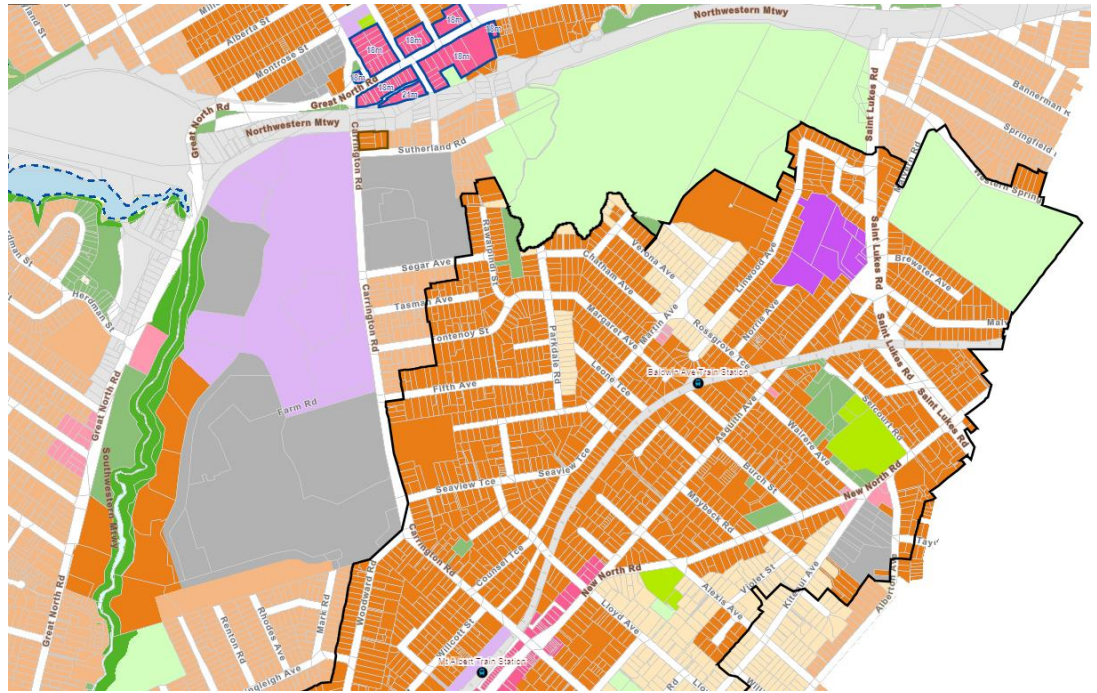


Figure 1: PC78 proposed zoning around the precinct. The orange area with dark line boundary is the THAB zone walkable catchment.

*Shading effects*

- 4 Pages 27 – 29 of the UDA assess shading effects of the height requested by the plan change on neighbouring properties, including residential properties on the eastern side of Carrington Road. The UDA concludes that any potential sunlight access effects on residentially zoned properties opposite the precinct are low.
- 5 The shadow diagrams attached to the UDA show a low level of additional shadow cast on Carrington Road itself from the plan change’s requested increase in height, with it largely limited to some additional shading on the footpath on the eastern side of the road from 3pm at certain times during the year. Overall, that part of Carrington Road (including its footpaths) which adjoin the precinct retain access to sunlight through much of the day and throughout the year, contributing to the maintenance of a good level of pedestrian amenity. Any effects on pedestrian amenity from the additional shadow are considered to be low.
- 6 Specific analysis follows:
  - (a) Up until at least 1pm throughout the year, the shadow diagrams show no shadow cast beyond the precinct’s Carrington Road boundary by either built form enabled under the operative Wairaka Precinct provisions or that which would be enabled by the plan change – leaving the road and footpaths on both sides in full sunlight.
  - (b) At 3pm on the Summer Solstice, the footpath on the eastern side of Carrington Road is clear of shadow from built form enabled under both the operative Wairaka Precinct and from built form enabled by the plan change provisions. Differences emerge at 5pm on the Summer Solstice, where the shadow cast by built form enabled by the operative Wairaka Precinct remains clear of the footpath on the eastern side of the road, whereas it is in shadow cast by the built form enabled by the plan change provisions.

## Responses to Auckland Council RMA cl 23 Requests | UD5 | 4

- (c) At 3pm on both the Winter Solstice and Spring Equinox, shadow from built form enabled by both the operative Wairaka Precinct and plan change provisions covers the western side of Carrington Road, extending over the northern end of the footpath on the eastern side of the road for the operative Wairaka Precinct and covering a greater length of this footpath for built form enabled under the plan change provisions. At 5pm, the footpath on the eastern side of the road is in full shadow under both the operative precinct and proposed plan change provisions.
- (d) Carrington Road is largely free from any additional shadow cast by the three proposed taller buildings in Height Area 1. Additional shadow is limited to 5pm on the Spring Equinox, across a short segment at the northern end of Carrington Road in the vicinity of the Point Chevalier Clinical Centre.

### *Relationship between upper floor residents and pedestrians*

- 7 The clause 23 request makes the comment that:

Jan Gehl in particular talks about the connections and relationship of occupiers of upper floors to people within the street.

- 8 It is presumed that the context for this comment is the idea that there is a more direct sensory (ie: visual and acoustic) relationship between residents of lower floors of a building and pedestrians on the street, where for example, voices can be heard and faces seen, and a greater perceived 'connection' to the street for residents of lower floors because of their physical proximity to it.
- 9 There is no clear nexus between this concept and potential effects on the streetscape amenity of Carrington Road. Applying the concept to the provisions proposed by the plan change, residents within the lower floors of a 7 – 8 storey building (refer to Attachment 1 for a discussion on storey height) that would be enabled along the Carrington Road frontage would have a more direct sensory connection with the street, whereas residents within upper floors are likely to retain some sensory connection with it, while also benefiting from the amenity of potential mid to longer distance views over the landscape.

### **Character**

- 10 In responding to this element of the clause 23 request, it is first relevant to consider the planned character along Carrington Road, as enabled in the Auckland Unitary Plan (Operative in Part) (AUP) provisions and proposed by PC78. These provide for a moderately intensive urban character, resulting from both building scale and a mix of land uses, as discussed below:

- (a) Building scale: The operative Wairaka Precinct enables buildings of at least 5 storeys along the precinct's Carrington Road frontage within the 18m height area that applies along that boundary. Enabled building heights along much of the eastern side of the road, opposite the precinct (except for buildings up to three storeys on MHU zoned sites between Fifth Avenue and Seagar Street) are of a complementary but potentially greater urban scale: 7-8 storeys is enabled along the frontage of the Point Chevalier Clinical Centre site (via the 26m height provided for in its Special Purpose – Healthcare Facility and Hospital zoning) and a 6 storey (21m) height, is proposed via PC78 on THAB zoned walkable catchment sites south of Fifth Avenue.
- (b) Land use: The operative Wairaka Precinct provides for a wide range of activities, including (but not limited to) education, business, health, community and recreation

## Responses to Auckland Council RMA cl 23 Requests | UD5 | 5

facilities and residential accommodation (refer Policy I334.3(1)). This includes retail uses being provided for along Carrington Road up to a gross floor area cap, in order to not adversely affect the role, function and amenity of Point Chevalier and Mt Albert town centres (Policy I334.3(30)). These uses support the diverse urban community described in the operative Precinct Description. The Wairaka Precinct's Carrington Road frontage south of Farm Road currently has an education land use emphasis, reflecting its Special Purpose – Tertiary Education zoning. Its frontage north of Farm Road has a stronger residential land use emphasis (dwellings are a permitted activity) while also enabling a range of other land uses, as described.

- (c) The eastern side of Carrington Road also has an existing (and planned) mix of uses, although these are more spatially defined with a greater residential emphasis. There are medically related lands uses on the Point Chevalier Clinical Centre site towards the northern end of the road; a school (Gladstone Primary) opposite the southern end of the precinct's Carrington Road frontage; with the balance of those sites on Carrington Road opposite the precinct anticipating medium (MHU) to higher density (THAB) residential land use.
- 11 The plan change will result in some, but not a significant, change to the planned urban character of Carrington Road adjoining the precinct. There will be a moderate increase in the enabled height of the buildings directly along the precinct's Carrington Road frontage, but these will be complementary in scale to those enabled on sites along much of the eastern side of the road (as described above). Changes in scale to the MHU zoned Carrington Road properties are appropriately managed, as discussed in the UDA at page 24, by bespoke criteria relating to building form and appearance along Carrington Road (I334.8.1(1A)(i)). The limited changes proposed to provisions managing retail uses along Carrington Road within the precinct will not result in change to the planned diversity of land uses.
- 12 In summary, the operative AUP and proposed PC78 provisions result in a planned, moderately intensive, urban scale of buildings and mix of land uses along that part of Carrington Road adjoining the precinct. The plan change will result in some increase in that intensity due to the proposed increase of height along the precinct's Carrington Road frontage, but that is both responsive to the precinct's context close to two town centres and public transport and, as discussed earlier, is able to be accommodated across the approximately 30m width (building front to building front) of the road corridor.
- 13 Also relevant to the analysis of character above is the recent approval (March 2023) through the COVID-19 Recovery (Fast-track Consenting) Act 2020 (*Fast-track Act*) process of Maungārongo resource consent 1 (RC1) and resource consent 2 (RC2) for apartment buildings with supporting ground level retail and commercial uses along the Carrington Road frontage of the precinct. Refer to **Attachment 2** which provides a summary of the Maungārongo consents. For assessment purposes, these buildings now form part of the receiving environment, bringing about a significant change in that environment. RC1 occupies a 160m length of the Carrington Road frontage directly to the north of Gate 3. It comprises two 7 storey buildings (up to approximately 25m height) along Carrington Road with two 9 storey buildings (up to approximately 34m height) to the rear. RC2 occupies 120m a length of the Carrington Road frontage directly south of the consented position of Gate 1 and comprises four buildings along Carrington Road: two are 7 storeys (up to approximately 26m height), one is 9 storeys (approximately 30.5m height) and one is 10 storeys (approximately 36m height). All of the consented buildings are taller than the operative 18m maximum height where within 20m depth of the Carrington Road frontage and four are taller than the operative 27m maximum height where 20m or greater from

the frontage. Ground floor uses to Carrington Road within the buildings include a 1,500m<sup>2</sup> metro sized supermarket and small retail units with a combined gross floor area (GFA) of 1,600m<sup>2</sup> (RC1 and RC2 total retail GFA of 3,100m<sup>2</sup>). The RC1 and RC2 buildings establish a changed urban context of larger scale residential buildings with active (non-residential) retail uses at ground floor.

- 14 These consented 7 – 10 storey buildings occupy 280m (39%) of the 716m frontage of the precinct to Carrington Road between Gates 1 and 4 (being that part of the precinct's frontage to Carrington Road, south of the Former Oakley Hospital Building, with contiguous existing or proposed Business – Mixed Use (BMU) zoning). They will significantly change the existing character of the road to one of urban scale buildings. Visual simulations of the buildings prepared for the consent applications (refer Figures 2 – 4 below) show the degree of change, with the RC1 and RC2 buildings appearing as a continuous edge along the western side of Carrington Road when approaching from the north and from the south, with the break between the developments along the road not visible from the selected positions.



Figure 2: Looking south along Carrington Road from the intersection with Sutherland Road to the RC2 development in the foreground and the RC2 development in the background. Image source: Maungārongo RC1 and RC2 Assessment of Landscape Effects.



Figure 3: Looking north along Carrington Road from outside Gladstone Road Primary School to the RC1 development in the foreground and the RC2 development in the background. Image source: Maungārongo RC1 and RC2 Assessment of Landscape Effects.



Figure 4: Looking north along Carrington Road from existing Gate 4 to Unitec, just north of Seaview Terrace. The RC1 development is to the fore and the RC2 development is in the background. Image source: Maungārongo RC1 and RC2 Assessment of Landscape Effects.

- 15 The building scale enabled by the plan change is consistent with that, in character terms, of the intensified urban scale of the consented Maungārongo RC1 and RC2 buildings.

### Precedents

Examples of non-central city buildings of the scale proposed along Carrington Road are requested.

### Response

- 16 Examples include the 10 storey Ockham 'The Greenhouse' apartment building at 16-20 Williamson Avenue in Ponsonby and two 9 storey apartment buildings with ground floor retail on Greenlane West, adjacent Alexandra Park in Greenlane, designed by RTA Studio.

## **Responses to Auckland Council RMA cl 23 Requests | UD5 | 8**

Both developments share characteristics in common with the precinct. They are located outside the city centre in areas identified for urban intensification, on main roads of similar width to Carrington Road, and close to centres which offer a range of amenities. They are also located within BMU zoned sites. The Greenhouse Building is on a site with a 27m Height Variation Control (with the consented Greenhouse building being well above this – refer Figure 5 below). The Alexandra Park buildings are on land with a 35m Height Variation Control along an approximately 450m length of Greenlane West. Additionally, they are opposite THAB zoned land, although with a lower 16m permitted height (outside a PC78 six storey walkable catchment) and opposite a Special Purpose – Healthcare Facility and Hospital zoned site (Greenlane Hospital) with a 25m height area enabled to the road frontage.

- 17 Additional examples, as they now form part of the existing environment, are the 7-10 storey Maungārongo RC1 and RC2 buildings (refer Attachment 2 images).



Figure 5: Elevation from Council approved plan set (LUC60339808) for 10 storey 'The Greenhouse' apartment building (to the right).



Figure 6: 9 storey apartment buildings with retail ground floors on Greenlane West.

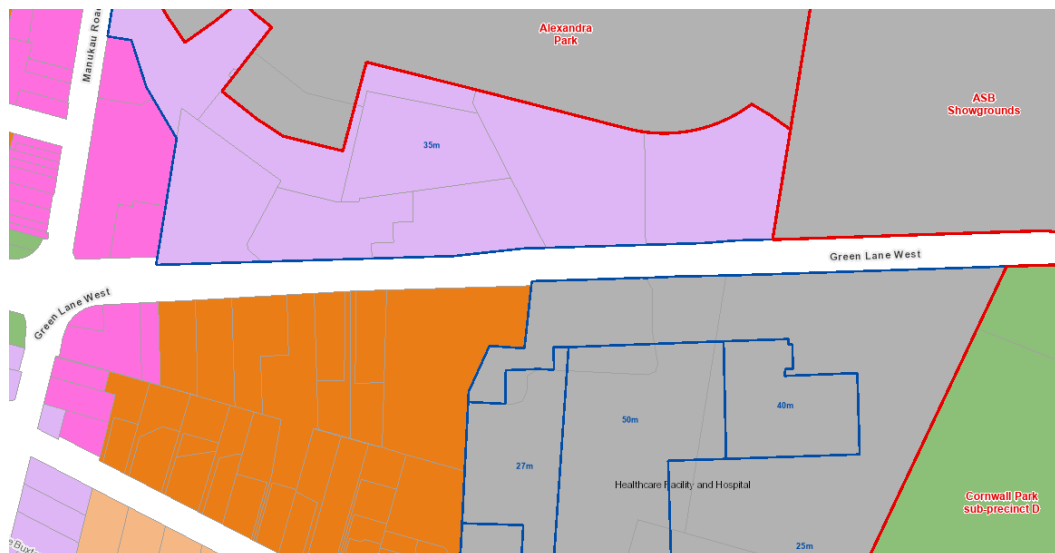


Figure 7: Operative zoning plan for the Alexandra Park apartment buildings showing the 35m Height Variation Control land it is located on (purple).

**Changes in level relative to Carrington Road**

- 18 Land along the precinct's Carrington Road frontage generally falls away from the road. The cross sections within Attachment 1 to the UDA assume a finished ground level height level with Carrington Road and therefore present a conservative scenario of building bulk relative to the road. There are few areas of developable land adjoining Carrington Road within the precinct which are relatively flat and level with it to any great depth. To the south of the Former Oakley Hospital Building and north of Gate 2 is an area of such land which is 130m – 150m deep. This is the only part of the precinct south of the Former Oakley Hospital Building that rises up from Carrington Road. It has a gentle 3m slope up to a point at 90m depth from the frontage. This length of frontage is where the four Maungāroho RC2 buildings have been consented (now forming part of the existing environment) and will be largely occupied by those buildings. South of this, there is rolling (8-15 degree slope) to strongly rolling (16-20 degree slope) land falling down from the Carrington Road frontage to the Taylors Laundry site. Continuing south through to Gate 4, land steps down from Carrington Road in a series of discrete flat to gently undulating platforms, with few of significant width adjoining the frontage, separated by short undulating to rolling breaks (up to 15 degree slope – typically considered undesirable for building purposes). From Gate 4 through to Woodward Avenue, the fall away from Carrington Road is more pronounced and steep.
- 19 The practical effect of the confined areas of flatter land adjoining Carrington Road is that there is a first line of buildings adjoining Carrington Road with ground floors generally level with it. Immediately to the west of this buildings will step down with the slope, managing and reducing overall building scale as seen from the road.
- 20 Refer **Attachment 3**: Elevation Map and Slope Map.



**Attachment 1: Storey height**

- 1 The request for further information refers to an 18m building height accommodating 5-6 storeys and a 27m building height accommodating 8-9 storeys. It is considered that in assessing the potential effects of building scale, height in metres is the primary consideration, as this is objectively measurable and quantifiable, whereas height in storeys may differ depending on a combination of factors (as is discussed below). Notwithstanding this, it is considered that 18m typically accommodates 5 storey buildings (not up to 6 storeys) and 27m typically accommodates 7-8 storeys (not up to 9 storeys), as also seen in the existing Maungāroho RC1 and RC2 consents.
- 2 Total building height is comprised of the following elements:
  - (a) the height of the ground floor, including any above ground foundation structure;
  - (b) the height of upper floors; and
  - (c) height for roof structure.
- 3 In the writer's experience, floor to floor heights of upper levels used for residential purposes in contemporary apartment buildings vary from a minimum of 2.95m to 3.5m. A 3.2m floor to floor height on residential levels is common, with heights generally in the range of 3.1m – 3.3m.
- 4 Ground floor heights in residential apartment buildings vary depending on site slope, how building services are integrated, and whether the floor accommodates any non-residential use such as retail (as is enabled in both the operative Wairaka Precinct and the plan change provisions). Depending on a combination of these factors, ground floors may be up to around 5m in height.
- 5 The height of roof structures can vary widely but are typically up to 1.5m (and are often taller where used as part of the design/architectural expression of the building).
- 6 For more detailed analysis, refer also to the Boffa Miskell 21 July 2022 report entitled '6 Storey Apartment Buildings: Auckland Case Studies', which was a supporting document to the Auckland Council Residential and Business zones s32 Evaluation Report of PC78, and is at page 221 of that document.<sup>1</sup> The report refers to a survey of nine 6 storey buildings, finding that their total height, based on a combination of the factors described above, varied from 19.55m to 23m – i.e. all above the 18m for 6 storeys the request for further information refers to. (For clarity, it is not out of the question that 6 storey buildings can be accommodated within 18m where a site is flat and where very efficient construction systems are used, however, in the writer's experience, this is not common.)
- 7 Based on a reasonably conservative 3.1m residential upper level floor to floor height, with a reasonable height at the ground floor of 4.5m (assuming some site slope, foundation structures, and design flexibility to accommodate retail uses), with additional roof structure of 1m, results in:
  - (a) a 5 storey building being accommodated within 18m (total height 17.9m);

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<sup>1</sup> This report is available on the Council website at: <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=140>

## Responses to Auckland Council RMA cl 23 Requests | UD5 | 12

- (b) a 6 storey building being 21m in height (the same height proposed in PC78 for buildings of 6 storeys within walkable catchments: refer PC78 THAB zone rule H6.6.5(1)(c)); and
  - (c) a 7 storey building being 24.1m in height and an 8 storey building being 27.2m in height (being respectively 2.9m less and 0.2m more than the 27m maximum building height proposed by the plan change in Height Area 4).
  - (d) a 10 storey building being 33.4m (being 1.6m less than the 35m maximum building height proposed by the plan change in Height Area 2).
- 8 As noted, the above are reasonably conservative estimates of the number of storeys that may be achieved at the given heights. A small increase in ground floor height to 5m, upper level floor to floor height to 3.2m, and roof structure to 1.5m results in 5 storeys in 19.3m, 6 storeys in 22.5m, 7 storeys in 25.7m, 8 storeys in 28.9m, and 10 storeys in 35.3m.
- 9 In VS10 and VS11 in the Landscape and Visual Effects Graphic Supplement these variabilities in floor to floor and roof heights are represented in an averaged ground floor and upper level floor to floor height of 3.6m.
- 10 The consented Maungārongo RC1 and RC2 buildings are relevant to the discussion points above as examples of floor to floor and total buildings heights of contemporary residential apartment buildings:
- (a) Building 1 (in RC1 – street adjoining part) is 7 storeys and has a total building height of approximately 25m. It has a ground floor height of 5m, which accommodates (in part) retail use, and 3.2m floor to floor upper residential levels. Its roof structure accommodates the building's top floor in a pavilion type form.
  - (b) Building 3 (in RC2) is 7 storeys and has a total height of approximately 26m. It has a relatively compact 3.6m ground floor height which accommodates (in part) retail use, 3.1m floor to floor upper residential levels, and a roof structure of up to 2.5m in height.
  - (c) Building 5 (in RC2) is 9 storeys and has a total height of approximately 30.5m. It also has a 3.6m ground floor height which accommodates (in part) retail use, and 3.1m floor to floor upper residential levels. Its roof structure is 1m in height.

**Attachment 2: Maungārongo resource consents 1 and 2**

- 1 On 29 March 2023 the Marutūāhu-Ockham Group, on behalf of the Marutūāhu Rōpū, gained two resource consents via the Fast-track Act listed project consenting process for several multi-level apartment buildings (with supporting ground level commercial / retail activities) along the Precinct's Carrington Road frontage.
- 2 The purpose of the discussion below is to provide a summary of the consented developments as relevant to UD5 (and of broader relevance to an urban design assessment of the plan change). Copies of the consent decisions and application documents for both resource consents are available on the Environmental Protection Authority website at <https://www.epa.govt.nz/fast-track-consenting/listed-projects/>.
- 3 The urban design statement provided as part of the lodgement documentation for the developments was prepared by Ockham Architects and the Landscape and Visual Effects Assessment (LVEA) was prepared by Peter Kensington (Kensington Planning and Landscape Consultants Ltd / KPLC), with Mr Kensington concluding in both assessments that the buildings were appropriate and would make an overall positive contribution to the landscape character and values of the site and of the wider Wairaka Precinct (refer to the website link above for a copy of the LVEAs).
- 4 The Maungārongo resource consent 1 ('RC1') development site is located midway along the precinct's Carrington Road frontage directly to the north of Farm Road / Gate 3. The Maungārongo resource consent 2 ('RC2') development site is located towards the northern end of the precinct's Carrington Road frontage directly to the north of Gate 2 and to the south of the consented intersection of the new Gate 1 road with Carrington Road. Refer Figure 1 below.



Figure 1: Location of Marutūāhu-Ockham's RC1 and RC2 development sites along the precinct's Carrington Road frontage. Image source: Maungārongo RC1 and RC2 application documents.

**Maungārongo resource consent 1**



Figure 2: Render of the Maungārongo RC1 buildings as seen from Carrington Road. Building 1 East is in the foreground with the western tower of Building 1 behind. Building 2 is to the right of the picture. Image source: Maungārongo RC1 Urban Design Statement.

- 5 RC1 (BUN60412010) comprises two 7 – 9 storey buildings, with a total of 381 apartments, a 1,500m<sup>2</sup> 'metro-sized' supermarket, and a total of 1,136m<sup>2</sup> of 11 small retail premises.
- 6 Building 1 (to the south) comprises two 'towers' (as referred to in the application's Assessment of Environmental Effects) above a one storey podium separated by a 19m wide space: a 7 storey (including podium) eastern tower and a 9 storey (including podium) western tower:
  - (a) The eastern tower of Building 1 ('*Building 1 East*'), being that part of the building closest to Carrington Road, has a total maximum height of approximately 25m, infringing the Wairaka Precinct's 18m maximum height within 20m of the Carrington Road frontage by approximately 7m. The building has a 4.3m setback from the future road extent, post-widening. It has a 6 storey façade to the street (total parapet height approximately 22.5m) with a 4m setback to the seventh floor.
  - (b) The western tower of Building 1 has a total maximum height of approximately 34m, infringing the operative maximum 27m height where 20m or greater from the Carrington Road frontage by approximately 7m.
  - (c) Building 1 contains 219 apartments, six small retail premises, one small office space, and the metro-sized supermarket.
- 7 Building 2 (to the north) comprises two 'towers' above a one storey podium separated by a 19m wide space: a 7 storey (including podium) eastern tower and a 9 storey (including podium) western tower.
  - (a) The eastern tower of Building 2 ('*Building 2 East*'), being that part of the building closest to Carrington Road, has a total maximum height of approximately 25m, infringing the Wairaka Precinct 18m maximum height where within 20m of the Carrington Road frontage by approximately 7m. The building has a 6 storey façade to the street (total

## Responses to Auckland Council RMA cl 23 Requests | UD5 | 15

parapet height approximately 22.5m) with a 4m setback to the seventh floor. It has a 2.5m setback from the post road widening boundary.

- (b) The western tower of Building 2 has a total maximum height of approximately 33.5m, infringing the operative maximum 27m height where 20m or greater from the Carrington Road frontage by approximately 6.5m.
- (c) Building 2 contains 162 apartments, five small retail premises, and two small office spaces.

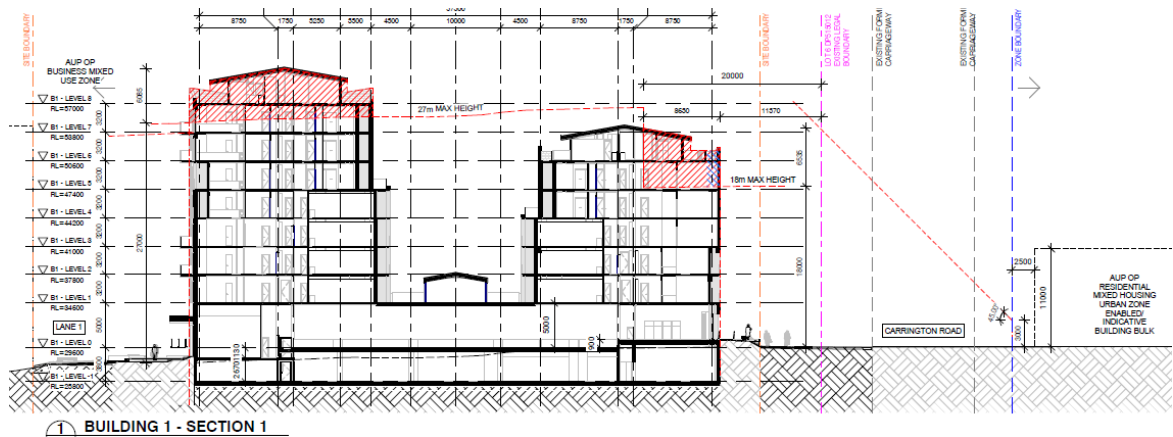


Figure 3: Section through Maungāroho RC1 Building 1 showing overall building height and infringements (red hatched) of the Wairaka Precinct operative 18m and 27m height areas. Image source: Maungāroho RC1 architectural drawings.

### Maungāroho resource consent 2

- 8 RC2 (BUN60412010) comprises four 7 - 10 storey buildings, set 5.3m back from the Carrington Road frontage (post road widening) with a total of 266 apartments and 464m<sup>2</sup> of 6 small retail premises.
- 9 Building 3 (the northernmost building) is 7 storeys in height. It has a total maximum height within the operative 18m height area of approximately 26m, infringing the standard by approximately 8m. It has 65 apartments and 2 small retail units.
- 10 Building 4 is 10 storeys in height. It has a total maximum height of approximately 36m, infringing the operative 18m maximum height standard by approximately 18m. It has 77 apartments and 2 small retail units.
- 11 Building 5 is 9 storeys in height. It has a total maximum height within the operative 18m height area of 30.5m, exceeding the standard by approximately 12.5m. It has a total maximum height within the operative 27m height area of 29m, infringing the standard by approximately 2m. It has 69 apartments and 2 small retail units.
- 12 Building 6 (the southernmost building) is 7 storeys in height. It has a total maximum height within the operative 18m height area of approximately 25m, infringing the standard by approximately 7m. It has 55 apartments.

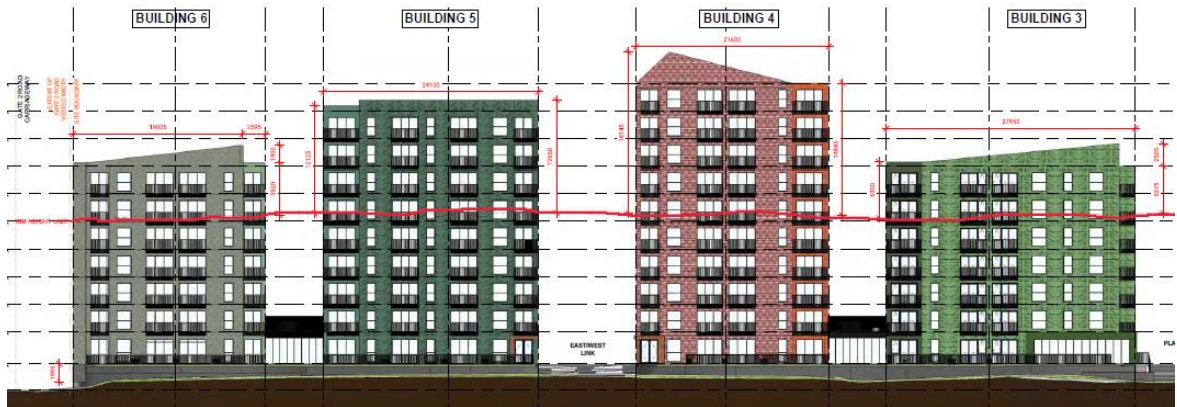


Figure 4: East Elevation of Maungārongo RC2 Buildings 3-6 to Carrington Road. The red line is the Wairaka Precinct's operative 18m height area along Carrington Road. Image source: Maungārongo RC2 architectural drawings.



Figure 5: Render of the Maungārongo RC2 development (showing Buildings 3-5) as seen from Carrington Road. Image source: Maungārongo RC2 architectural drawings.

**Attachment 3:** Elevation Map and Slope Map

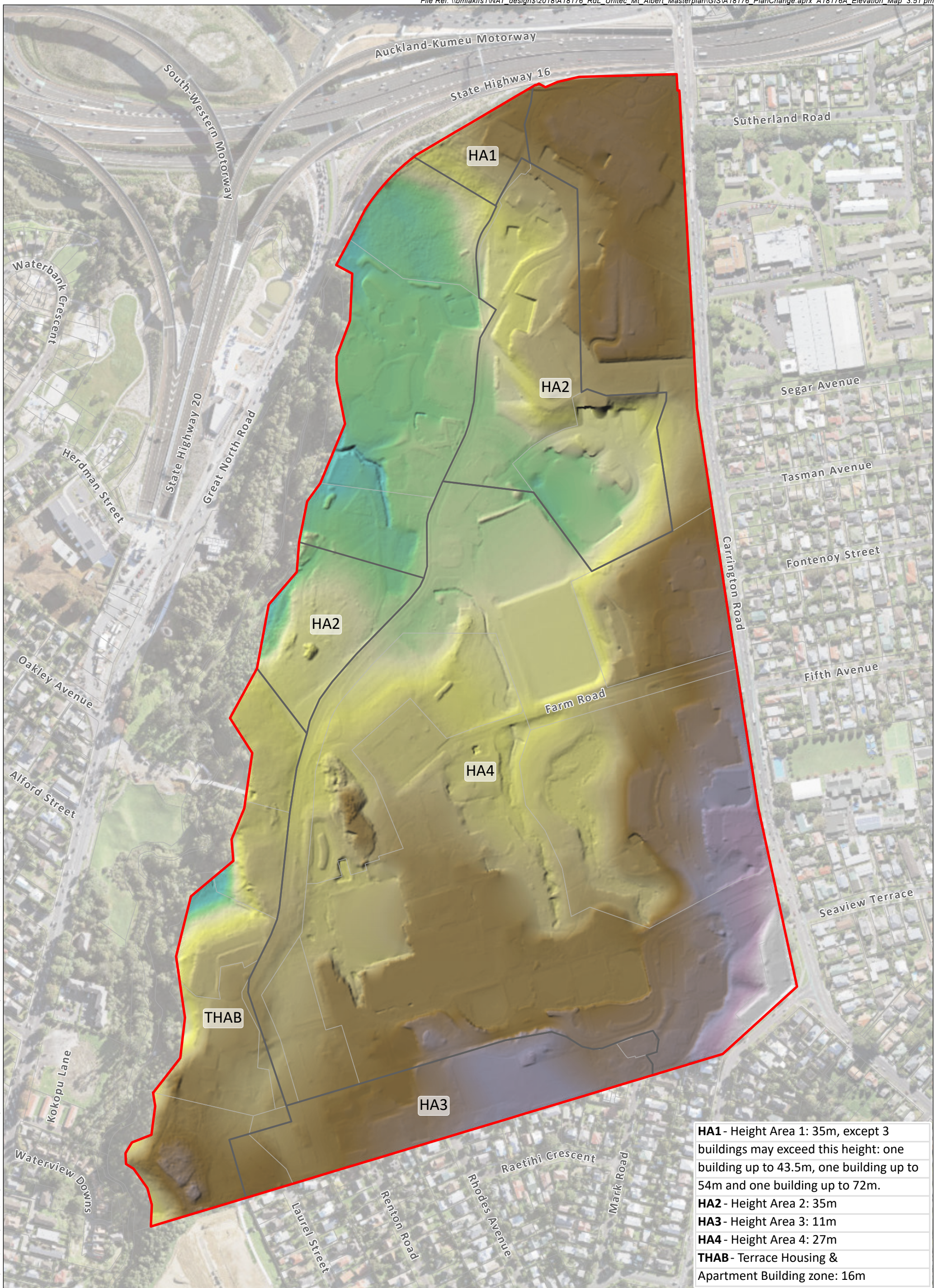
This plan has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use in accordance with the agreed scope of work. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.



**HA1** - Height Area 1: 35m, except 3 buildings may exceed this height: one building up to 43.5m, one building up to 54m and one building up to 72m.  
**HA2** - Height Area 2: 35m  
**HA3** - Height Area 3: 11m  
**HA4** - Height Area 4: 27m  
**THAB** - Terrace Housing & Apartment Building zone: 16m



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<b>HA1</b> - Height Area 1: 35m, except 3 buildings may exceed this height: one building up to 43.5m, one building up to 54m and one building up to 72m.
<b>HA2</b> - Height Area 2: 35m
<b>HA3</b> - Height Area 3: 11m
<b>HA4</b> - Height Area 4: 27m
<b>THAB</b> - Terrace Housing & Apartment Building zone: 16m

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

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

**Address:** 1-139 Carrington Road, Mt Albert

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

<b>Question</b>	UD6
<b>Specific request</b>	Please provide clarification as to how retail and community facilities will be appropriately provided, size and located to serve the needs of the scale of community enabled by the retail provisions.
<b>Reasons for request</b>	<p>The Precinct Plans do not show the proposed location of retail or other community facilities within the Precinct.</p> <p>With a potential population of 10,000+ residents and with parts of the site not within easy walking distance of Pt Chev or Mt Albert centres, the role of retail and supporting uses (such as early childhood education, medical / healthcare) will become critical to the success of this community.</p> <p>Acknowledging that the Business Mixed Use Zone provides some enabling provision it is difficult to understand the amount and location of such uses, how people will be able to access them (noting car ownership is intended to be low and walking will be promoted) and how these will be successfully integrated into the neighbourhood. The provision of these facilities could help to create a heart / gathering place for this new community and be the centre-piece of the neighbourhood. But there is little to no discussion around the amount, location and design principles that will need to be employed to ensure a successful "centre" is created.</p> <p>Related to this is the issue of walkability. The centres of Pt Chev and Mt Albert are relatively close, but not necessarily accessible by walking. There is no analysis around the actual walking catchment from these centres, how much of Te Auaunga precinct falls within these catchments and the safety, efficiency and quality of connections required / to be provided. This will help determine the amount of services required on the site as well as the provision of pedestrian / cycle routes within and to / from the site.</p> <p>The above assessment should make comment about the EPA applications currently being processed include provision for retail. They should be assessed as to their appropriateness in meeting, or partly meeting, the ultimate needs of the precinct as a whole.</p> <p>(see also EA1 and P9)</p>

**Applicant response provided by** John Duthie, Tattico

**Applicant response**

**Context - retail location**

- 1 This question is closely related to question E1.
- 2 Mr Heath of Property Economics has undertaken an analysis of retail provision within the precinct. His response is set out at E1 and E2. That work is not repeated here but is relied on in terms of answering the questions in terms of the scale of retail activity.
- 3 The location of retail activity does not change the existing location of retail within the Wairaka Precinct provisions, which was considered in depth through the original precinct creation. The planning analysis as part of this plan change has confirmed that the original location remains the appropriate centralised provision for the hub.
- 4 The context to this was that when the Auckland Unitary Plan (Operative in Part) (*AUP*) was first developed and the provisions of the Wairaka Precinct contemplated, there was the desire to reinforce the town centres of Point Chevalier and Mount Albert, and not to dissipate economic activity by the inappropriate location or size of an alternative retail facility within the precinct.
- 5 The National Policy Statement on Urban Development 2020, Regional Policy Statement and zoning provisions within the AUP all reinforce the Council's growth strategy of targeting growth around existing town centres and on key high frequency public transport routes.
- 6 However, there was a recognition that with the original expected projected population within the precinct, plus the Unitec campus population, plus the associated Unitec business park, that a level of local retail services was necessary to provide for the needs of the community.
- 7 This retail facility was located adjacent to Gate 3 on the currently named "Farm Road". This location was seen as appropriate given:
  - (a) It is essentially midway between the Mount Albert and Point Chevalier town centres. Therefore it assisted in filling in the gap in the walkable catchment for the two town centres.
  - (b) By locating it in the Gate 3 vicinity adjacent to Carrington Road, it was able to service both the existing community east of Carrington Road, and the new community.
  - (c) Carrington Road will also become an enhanced public transport corridor, assisting with access.
  - (d) With the new backbone consent and the enhanced walking and cycling connections, the retail location is located on a committed separated cycleway network and with good pedestrian connections.

**The plan change**

- 8 The additional intensification provided for in this plan change:

## Responses to Auckland Council RMA cl 23 Requests | UD6 | 3

- (a) is along Carrington Road and central to the precinct, so will have good access to the node at Farm Road, including along the internal consented walking and cycling networks as noted above, or along the upgraded Carrington Road networks; and
  - (b) is in the north, within easy walking distance of the existing town centre at Point Chevalier.
- 9 Other retail opportunity is provided within the precinct. In particular:
- (a) The Unitec campus has existing retail provision and is able to expand its retail offer targeted to the student / staff population complemented by general public.
  - (b) The opportunity for some retailing is available as part of adaptive reuse, particularly of the Former Oakley Hospital Building.

### Existing consents

- 10 The clause 23 request seeks feedback on the existing consents.
- 11 Consent has recently been granted for a mixed use development including a retail hub in the location referred to above. It is not for this plan change process to comment on existing consents other than to note that the approved resource consent by Marutūāhu (RC1) has consented a small supermarket and associated specialty shops as part of that development. Effects in terms of size and location of the retail were evidently examined as part of the processing of that consent. The Panel, for reasons set out in their decision, approved the consent.
- 12 The plans forming part of the application, the consent itself, and the Hearings Panel report, are all public record and available to the assessors of this private plan change request.<sup>1</sup>

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<sup>1</sup> Refer to the EPA webpage here: <https://epa.govt.nz/fast-track-consenting/listed-projects/maungarongo-rc1/>.

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

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

**Address:** 1-139 Carrington Road, Mt Albert

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

<b>Question</b>	UD7
<b>Specific request</b>	Please clarify how a range of housing types can be secured.
<b>Reasons for request</b>	Successful neighbourhoods rely on a range of typologies, sizes and tenures. A precinct dominated by one typology could create unwanted social and design outcomes, especially if dominated by small one-bedroom apartments. It is not clear what mechanisms / controls will be employed to manage / deliver a range of typologies, particularly if buildings are being provided by different parties.
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell and John Duthie, Tattico
<b>Applicant response</b>	
1.	There is considered to be no urban design or planning rationale to require (as opposed to enable) a range of housing types within the precinct.
2.	The precinct description states that the purpose of the precinct, amongst other matters, is to provide for a diverse, compact urban residential community. Furthermore, that the precinct will provide for a variety of housing typologies which help cater for Auckland's growth and the diverse community that will establish in this location.
3.	Key to the above is that the precinct enables a range of residential forms. However, it does not require a specified mix of typologies nor require houses with a specified range of bedroom numbers. This is consistent with the enabling approach to housing provision used in the Auckland Unitary Plan (Operative in Part) (AUP).
4.	The use of a prescriptive framework that secures, for example, a specific percentage of certain housing types is considered to be insufficiently flexible, and likely to lead to perverse outcomes. The precinct is part of the wider Mount Albert, Point Chevalier and Waterview neighbourhoods where there are considerable volumes of single-storey two to three+ bedroom stand-alone houses. If this remains the case for the next 10 - 15 years, then the precinct development will be an opportunity to provide for a wider range of housing typologies, including provision of one bedroom dwellings, currently significantly unprovided for in this location.
5.	We are unaware of any AUP zone or precinct that prescribes a specific range of housing typologies or dwellings with a specific range of bedroom numbers. There are no unique characteristics within the plan change area that require a different approach in Te Auaunga Precinct.

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

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

**Address:** 1-139 Carrington Road, Mt Albert

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

<b>Question</b>	UD8
<b>Specific request</b>	Please provide up to date maps.
<b>Reasons for request</b>	The Precinct Plan maps are all based on old cadastral maps that do not show SH16. This makes it difficult to fully assess the spatial relationships at the northern part of the site. The maps should be updated to reflect the current environment.
<b>Applicant response provided by</b>	
<b>Applicant response</b>	
1	Updated Precinct plan maps have been provided together with the revised plan change provisions as part of the clause 23 response package.

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

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

**Address:** 1-139 Carrington Road, Mt Albert

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

**Question**

UD9

**Specific request**

It is a concern that the plan change is not based on an explicit vision for the type of community envisaged. There is no master plan provided and thus little confidence that each part of the site will be developed within an overall plan that ensures adequate provision of facilities for all of the community and recognition of the local and wider context within which each development should be assessed.

Whilst it is acknowledged that this proposed Precinct Plan is an amendment of an existing plan, the current precinct does not anticipate the levels of (predominantly) residential development now proposed.

A new community is proposed of 4,000+ dwellings / 10,000+ people. This is a significant development (a medium sized town in New Zealand terms) and delivering such a community in a well-functioning urban environment is a complex process.

A masterplan would typically be expected for such a project to demonstrate how all the elements are expected to come together to produce good urban outcomes.

It is not clear at what point the overall / high-level design approach to this site can be assessed by Council.

It is assumed that if successful, this Precinct Plan will then allow for individual consents to be submitted. At that point, assessment of the bigger picture will not be possible, which means that this stage of the process is the only time to assess the design qualities of the intended approach.

The two most successful large-scale urban environments in Auckland in recent times have both been guided by comprehensive masterplans and associated design quality controls and processes – Wynyard Quarter and Hobsonville Point.

Yet for this Precinct, no masterplan is supplied and the provisions within the Precinct Plan and the AUP are being relied upon to deliver quality design outcomes.

## Responses to Auckland Council RMA cl 23 Requests | UD9 | 2

For clarity, a “masterplan” is not simply a pretty illustration showing the intended buildings, streets, landscape etc. It is understood such a picture is hard to produce for multiple landowners and represents just one potential scenario at a point in time.

On the contrary, a masterplan is a complex document with many parts, including a framework to guide development over a long time that allows for flexibility and adaptability to changes in market demand.

But a masterplan should provide:

- A clear vision and design principles, against which all subsequent developments are assessed.
- A three-dimensional framework to guide the location of open space, uses, movement and buildings, including identifying development parcels in the form of words and plans / images.
- An implementation plan defining the delivery strategy and staging as well as the design quality control process – e.g., the use of design guides or design panels.

Without this information it is difficult to assess the proposed urban design qualities of the Precinct.

It is hard to understand if this Precinct is intended to function as a new community in its own right, or whether it is simply new (predominantly) residential development that is intended to support and rely on existing neighbouring services and amenities. Although this may be a subtle point, it is vital in understanding how the Precinct will be designed and what ancillary services will be required, where they will be located and how they will be integrated.

The assessments provided are unclear on this point. In parts, it suggests this is intended to function as a new community in its own right.

“A complete community, providing the opportunity for people to live, work and learn within the precinct, while benefiting from access to public transport and a well-connected walking and cycling network.”  
P.16 UD Assessment

Yet there is little discussion on the provision of ancillary services to support a community such as schools, early childcare education, medical / healthcare, employment and what is the appropriate level of retail. It is understood there is a tension between providing competition to nearby local centres and providing sufficient on-site facilities to avoid excessive vehicle movements. A retail demand study would help to assess the appropriate levels.



It would also be helpful to understand the proposed design quality control process. As stated above, successful new precincts often rely on a combination of design guides and design panels. With such a large precinct, reliance on the AUP and basic consenting process alone is unlikely to result in consistently high-quality design outcomes and an urban environment that is more than just a collection of buildings.

See also P9 and P10.

**Applicant response provided by** John Duthie of Tattico, Rachel de Lambert and Matt Riley of Boffa Miskell

**Applicant response**

- 1 This matter is raised by the Council as a non-clause 23 issue. Essentially the issue raised is that:
  - (a) the plan change is not based on a “vision” for the land; and
  - (b) there is no masterplan that can inform the progress of the plan change and that a masterplan is a critical element.
- 2 This response provides detail on the significant work that HUD and the future developers of the land under Treaty settlement, the Marutūāhu, Ngāti Whātua and Waiohua-Tāmaki Rōpū have carried out to date in relation to these matters, noting that as the Crown has purchased the land the subject of this application from Unitec, it is no longer required for tertiary education. The Crown also purchased the Sub-precinct B land (Taylor’s Laundry), so that when its lease expires it can be integrated into the future housing development. The plan change seeks to ensure land which is held by the Crown for housing under the Housing Act 1955 can be developed for housing, rather than retain its current education zoning.

**Vision**

- 3 HUD disagrees that this plan change is not based on a vision for the land. For context, the Crown will transfer this land to the Rōpū for development as required under its Treaty settlement obligations to them, which are contained in the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed 2012 and Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014. Those obligations anticipate the Rōpū being provided with the development opportunity at the precinct.
- 4 At the overarching level in the hierarchy, the shared vision for the land is contained in the Reference Masterplan and Strategic Framework, produced jointly by the Rōpū and the Crown in 2019. That vision is “He hononga tika ki te hangai ngā hapori toitū me he tāone taioereore mai ngā auahatanga me ngā ahurea taukiri o te hapori: A true partnership to establish inclusive, sustainable communities and world class city building through vibrant and innovative place-making”.
- 5 The vision identifies the values and principles that will be applied to the plan change, as well as the key structuring moves. However, the Reference Masterplan and Strategic Framework envisages a project that will advance and evolve around its key values and principles, which are not suitable for embedding into a planning framework.
- 6 The shared vision for the land addressees the following core elements, outlined in further detail below:

- (a) cultural;
- (b) social; and
- (c) environmental.

*Cultural*

- 7 The vision for this land is based on cultural parameters, including:
- (a) restoration of ownership of this land to iwi;
  - (b) the opportunity for Māori economic development, which is strongly leveraged through this plan change; and
  - (c) Māori cultural promotion of the land.
- 8 This vision and over-arching cultural objective is clearly outlined within the objectives and policies of the precinct as proposed to be amended through the plan change. For example:
- (a) Proposed new Objective 10(f) directs that an integrated urban environment is created which contributes to Māori cultural promotion and economic development.
  - (b) Proposed new Objective 12 seeks that the restoration and enhancement of Māori capacity building and Māori cultural and economic development within the precinct is provided for, promoted and achieved.
  - (c) Policy 4(e) is proposed to be amended to specifically include supporting Māori capacity building and Māori cultural promotion and economic development.
  - (d) Policy 5 is proposed to be amended to specifically include Māori as a group for which opportunities for employment growth will be created through the precinct provisions.

*Social*

- 9 As noted above, part of the vision is to establish an integrated and diverse community. The application of the Business – Mixed Use zone enables a residential focus for the land but also enables the opportunity to create employment, retail and other community and servicing activities integrated into the predominantly residential development.
- 10 The residential vision for the precinct is that a mix of social housing, a range of affordable housing, and full market housing will be provided. Over time it is expected there will be a diverse range of typologies. The combination of a mix of typologies and a range of price points is expected to help encourage a diverse community within the neighbourhood.
- 11 Similarly, there is a shared vision in respect of both quality access for all modes - cycling, pedestrian and vehicular access – as well as commitment to improved connectivity within and between the precinct and the adjacent neighbourhoods (which has been demonstrated in respect of the enabling works resource consents and delivery on these to date within the precinct).
- 12 These aspects of the vision are included within the objectives and policies of the precinct as proposed to be amended through the plan change. For example:
- (a) Objective 3 is proposed to be amended to specifically refer to providing for a variety of built form typologies.

## Responses to Auckland Council RMA cl 23 Requests | UD9 | 5

- (b) New Objective 13 seeks to provide for increased heights in appropriate parts of the precinct so as to provide greater housing choice, increase land efficiency, benefit from the outlook from the precinct, and create 'landmark' buildings in the north western part of the precinct.
- (c) Existing Policy 6 relates to encouraging a mix of residential lifestyles and housing typologies, with amendment to specifically refer to encouraging a high density residential community.
- (d) New Policy 14B seeks to provide for additional height in the central and northern parts of the precinct, recognising the topographical and locational characteristics of this part of the precinct, and the ability to provide greater housing choice, increase land efficiency, benefit from the significant views and outlook from the precinct, and leverage the proximity and amenity of Te Auaunga.
- (e) Key roading, walking and cycling connections are identified on Precinct plan 1.

### *Environmental*

- 13 The precinct vision also seeks enhanced environmental outcomes in terms of stormwater management, erosion and sediment control, and the incorporation of environmental outcomes into the landscape.
- 14 These are set out in the objectives and policies in the plan change, and also recognised in the standards, and explicitly within the assessment criteria. For example:
  - (a) Objective 10(b) seeks that the environmental attributes of the precinct are protected and enhanced in its planning and development.
  - (b) Objective 10(c) seeks that adverse effects of the environment and existing stormwater, wastewater and road/s infrastructure are avoided, mitigated and remedied.
  - (c) Policy 10 enables subdivision and development that is compatible with and sensitive to the ecological qualities of Te Auaunga and the Motu Manawa Marine Reserve.
  - (d) Policy 14 requires proposals for new, or additions to existing, buildings, structures and infrastructure adjoining or adjacent to the significant ecological area of Te Auaunga to provide appropriate native landscaping and contemporary high-quality design, which enhances the precinct's built form and natural landscape.
  - (e) Specific stormwater standard I334.6.3 requires all subdivision and development to be consistent with an approved stormwater management plan.
  - (f) Proposed new matters of discretion relating to all new buildings at I334.8.1(1A) include provisions related to stormwater management, landscaping, and controls over built form.

### *Vision summary*

- 15 There is a clear vision for the land. This is reflected in the objectives and policies of the plan change and is carried through into the activities, standards, assessment criteria and the Precinct plans themselves, noting that there are a wide range of matters which are beyond the scope of the Resource Management Act 1991 (RMA) which are also relevant to creating a new community at this location.

- 16 As noted above, the collective vision has already been used to inform the:
- (a) enabling works resource consents granted to the Marutūāhu Rōpū and the Waiohua-Tāmaki Rōpū (referred to in the plan change application) and associated delivery on these to date within the precinct; together with
  - (b) the Maungārongo resource consent 1, Maungārongo resource consent 2, and Wairaka Precinct Stage 1 fast-track consents recently approved under the COVID-19 Recovery (Fast-track Consenting) Act 2020.
- 17 The Council feedback does not ask for any more information on the various aspects of the existing vision. It is HUD's view that the relevant RMA planning aspects of the vision are set out within the plan change as lodged.

**Masterplan**

- 18 The master-planning of the precinct spans over the last decade and has included the preparation of two complete masterplans.
- 19 Oculus was originally engaged by Unitec and then the Wairaka Land Company between the years of 2013 to 2018 to form, in collaboration with Boffa Miskell, a masterplan for the land to meet the then growing tertiary education, business, residential and recreational demands.
- 20 This work informed the development of the operative Wairaka Precinct through the Proposed Auckland Unitary Plan process.
- 21 The relevant RMA aspects of that masterplan were distilled down into the current operative Wairaka Precinct provisions, including Precinct plan 1.
- 22 That distillation included:
- (a) identification of the key connections into the precinct, particularly the road interchanges along Carrington Road;
  - (b) the internal street network;
  - (c) the location and extent of public and private open space;
  - (d) the protection of key trees and ecological areas;
  - (e) connections to Te Auaunga (Oakley Creek) parkland and walkways;
  - (f) stormwater management;
  - (g) the location of a core retail area;
  - (h) cycleways and walkways;
  - (i) special yard setbacks from the southern boundary and Te Auaunga (Oakley Creek); and
  - (j) Carrington Road set back.
- 23 When the Crown purchased the land for housing, it worked with the three Rōpū to develop an updated masterplan, reflecting the new direction and intention for how the precinct was

## Responses to Auckland Council RMA cl 23 Requests | UD9 | 7

to be developed and incorporating the vision, values and principles of the Rōpū into the plan. A new masterplan was prepared by Grimshaw (Sydney) in collaboration with Boffa Miskell in 2019. That masterplan has been made publicly available and sits within the Ministry of Housing and Urban Development's website relating to the Carrington Road properties.<sup>1</sup>

- 24 As with the original Oculus masterplan, the key RMA aspects have been distilled from the Grimshaw masterplan into the precinct provisions and Precinct plans as proposed to be amended through the plan change.
- 25 In particular:
- (a) The core entrances off Carrington Road have been confirmed (with a small refinement to the alignment of the Gate entrances).
  - (b) The cycleway and walkway network has been adjusted to reflect the new approach on the Unitec campus and expanded in the north to address the extended cycleway network.
  - (c) Stormwater management has been included within the plan change taking account of the Healthy Waters' more recent approaches to stormwater management.
  - (d) The open space network has been refined acknowledging the significant opportunity to substantially increase the area of public open space (subject to Council approval to acquisition).
  - (e) The different parts of the precinct suitable for different height of development have been carefully defined and included within the Precinct plan.
  - (f) The Carrington Road widening setback (8m width) is confirmed (and in fact these upgrade works, primarily for public transport, cycling and walking are now funded by the Crown).
  - (g) The Te Auaunga (Oakley Creek) set back is confirmed.
  - (h) The access to Te Auaunga (Oakley Creek) is protected. The access is built and the related section of formerly piped stream daylighted as an early establishment project.
  - (i) The southern yard is confirmed. The stone wall within this yard is also proposed to be retained as set out in the clause 23 response HH2.
- 26 The Grimshaw plan has also informed the urban design analysis and assessment by Boffa Miskell of the plan change (who were closely involved in that master-planning process), and the detailed assessment criteria proposed to be included in the precinct as part of the plan change.
- 27 Accordingly:
- (a) The key planning information is now reflected in the precinct provisions and Precinct plans themselves, as these are proposed to be amended through the plan change.

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<sup>1</sup> A Reference Masterplan & Strategic Framework: Ngā Mana Whenua o Tāmaki Makaurau & Crown, Grimshaw, 4 February 2019. Available at: <https://www.hud.govt.nz/our-work/carrington-residential-development/>.

## Responses to Auckland Council RMA cl 23 Requests | UD9 | 8

- (b) That is all that is required and appropriate for this plan change stage. This is not a resource consent. No buildings are approved as part of this plan change application. It is not appropriate to seek the level of detail that would apply to a resource consent. In our view the key planning parameters are included within the precinct, and specifically Precinct plan 1. That should be the focus of this process.
- (c) There is no need to update the Grimshaw masterplan to incorporate the next level of detail, or to otherwise incorporate additional detail into the provisions.
- (d) Following the plan change process, if approved, the Rōpū will each develop their portion of the land in accordance with the amended precinct provisions and Precinct plans. Each Rōpū will be responsible for their own further detailed master-planning, design, planning and assessment. The assessment criteria set up the framework and level of information that is required to advance development of the precinct.
- (e) There is no need, and in fact it is counter-productive, to include a further masterplan within the precinct provisions themselves, and there is no consistent precedent for this approach in the Auckland Unitary Plan (Operative in Part) (*AUP*). Factors that influence the scale and characteristics of the development inevitably change over time and the timeframe for the development of the precinct as a whole is long. Communities' priorities, preferences and the approaches to the creation of communities evolve over time. Innovations such as the creation of car free living, higher rise living, remote working alongside access to private and public communal open space amenity, and true mixed use communities are evolving; fixed masterplans have the potential to limit innovation and should not be prescribed. The regulatory provisions therefore need to be sufficiently flexible to respond to change.
- (f) The established procedure used in the AUP for this is to set a series of objectives, policies, standards and assessment criteria which means that as individual development of key parts of the precinct proceed, they can be assessed against those provisions. The provisions enable development of the precinct in the knowledge of what the AUP is seeking but retain flexibility so individual developments can be assessed at the appropriate time.
- (g) This is the way the AUP operates across the city and has been applied in the preparation of this plan change. It is unreasonable and unnecessary to expect a further detailed masterplan(s) in contrast to the established approach under the AUP.