

Response ID ANON-URZ4-5F86-X

Submitted to Fast-track approval applications  
Submitted on 2024-05-01 11:40:53

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:  
Wattle Downs Properties Limited

2 Contact person

Contact person name:  
Francelle Lupis

3 What is your job title

Job title:  
Partner, Greenwood Roche

4 What is your contact email address?

Email:  
s 9(2)(a)

5 What is your phone number?

Phone number:  
s 9(2)(a)

6 What is your postal address?

Postal address:  
  
Level 6, 15 Galway Street, Auckland CBD, Auckland

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

The subject site is located at 14A Carnoustie Drive, Wattle Downs, Auckland (the Site), outlined in red on the map at Attachment A.

The Site is located near the southern extent of the Wattle Downs suburb, 2.8km south of Manurewa. The Site is a square rear lot approximately 7,341m² in size, accessed from Carnoustie Drive.

The Site is zoned Residential – Mixed Housing Suburban under the Auckland Unitary Plan (AUP).

File upload:

Attachment A - Cadastral map outlining the Site.pdf was uploaded

Upload file here:

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Do you have a current copy of the relevant Record(s) of Title?

Yes

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Attachment B - Record of Title.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Wattle Downs Properties Limited (WDPL or the Applicant).

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The Site is held in freehold ownership by WDPL. As the registered owner of the above title, WDPL has full control over the Site (including legal access). This will enable WDPL to quickly and efficiently act on any work required for the project.

WDPL was founded by Frank Cui and David Bei (being experienced land developers) in 2020 as a joint venture between Sure Capital and Bei Group.

Mr. Cui has extensive experience in land development and construction in the south Auckland area, including:

- 162 lot subdivision on 64-74 Cosgrave Road, Ardmore, Papakura.
- 6 unit subdivision and build on Jutland Road, Manurewa.
- 6 unit subdivision and build on Hyde Street, Manurewa.
- 9 unit subdivision and build on Clonbern Road, Remuera.
- 4 unit subdivision and build on Lillington Road, Remuera.
- 5 unit subdivision and build on Arthur Street, Ellerslie.
- 4 unit subdivision and build on Matipo Road, Mairangi Bay, North Shore.

Sure Capital group is a diversified company that operates in the finance and real estate sectors. Sure Capital have, in partnership with other companies, developed over 500 units in Auckland over the last 10 years. Bei Group is an established development company that was founded in 2015 by David Bei. Bei Group's mission is to undertake developments that create a positive impact on Auckland's property landscape. Notable projects include:

- 473 Albany Highway precinct, being part of the former Massey University campus comprising a large 13.7-hectare residential zoned site that envisions between 1,500 to 1,800 dwellings over 15-20 years and features a mix of apartments, townhouses, and retail facilities. This development is currently being advanced through the recently approved Plan Change 54.
- 20 Scott Road, Hobsonville, being a 5-hectare subdivision on an elevated waterfront site within Hobsonville Point. The subdivision encompasses 75 lots ranging from 136 to 1165 square metres.
- 99 Grove Road, Takanini, being an expansive residential development on a 2.3-hectare greenfield site with 98 townhouses.
- 45 Benson Road, Remuera, being a prime example of upscale urban living, comprising 14 premium homes with a strong focus on architectural design and quality.

Bei Group and Sure Capital have together completed two land subdivision projects in Ardmore, Papakura at 99 Grove Road (99 units) and 122-130 Cosgrave Road (182 units).

There are no legal interests registered against the title that will impede development of the project.

## Section 2: Project details

What is the project name?

Please write your answer here:

Carnoustie Drive residential development

What is the project summary?

Please write your answer here:

The project is the subdivision and construction of 37 dwellings made up of standalone, duplex and terraced houses, with accompanying landscaping and vehicle access. As part of the project, land along the foreshore will be planted and vested with Auckland Council as a "top up" to the esplanade reserve, expanding and enhancing the public's access to the coastal environment. The project has been designed to minimise the extent of any infringements to the AUP while responding to, and protecting the unique coastal environment of the Wattle farm peninsula.

What are the project details?

Please write your answer here:

The purpose of the project is to contribute 37 additional homes to the supply of housing in central south Auckland in a manner that is sensitive to the existing environment (reflecting the adjoining coastal boundary) while also making efficient use of a site that is currently under-utilised and well-suited to absorb higher density.

Auckland has a significant shortage of affordable housing, which is forecast to continue for the foreseeable future due to sustained population growth. Accommodating Auckland's growing population while also addressing its significant affordability challenges will require the provision of additional housing through numerous large-scale greenfield developments and substantial regeneration/intensification projects. With the opportunity for those projects being relatively limited however, projects like Carnoustie Drive will need to be the backbone for Auckland's response to those challenges – utilising serviced land within existing neighbourhoods as it becomes available to increase the supply of housing consistently across the city.

The Site is uniquely well placed within the Wattle Downs suburb to achieve that outcome. Its size, shape and location mean that the housing enabled by the project can be accommodated within the Site without compromising the landscape and visual amenity of the surrounding area. The Site can be adequately serviced via Auckland Council's existing reticulated network, subject to the provision/upgrade of existing connections to be provided by the Applicant. Its adjacency to the coastal foreshore reserve provides the opportunity to achieve a high-standard of "living amenity", as envisaged by the Residential – Mixed Housing Suburban zone, as well as appropriate integration with, and enhancement of, that coastal environment through, for example, the proposed use of endemic native coastal species along the adjoining boundary. While the composition of housing is different from the existing predominantly large standalone properties in the area, the project will provide increased consumer choice across typology and price point which responds to the diverse and changing needs of people and communities.

As part of an already urbanised, well-serviced area, the Site benefits from existing connections via public and active transport to existing retail, commercial and education facilities.

In terms of the project's specific activities, these comprise:

- carrying out demolition and site clearance, bulk earthworks and remediation of the Site;
- constructing 37 residential dwellings;
- constructing private roads, pedestrian accessways, and private vehicle access;
- carrying out comprehensive landscaping including open space restoration planting and a mix of specimen trees, fruit trees, shrubs, lawn and other hard landscaping including fencing and decking throughout the Site;
- constructing three waters infrastructure; and
- vesting of land as part of the foreshore esplanade reserve;
- subdividing the Site.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

It is envisaged that the project will be undertaken as a single stage from earthworks through construction of the units and final delivery to future occupants.

To prepare the Site, earthworks are required to form the building platforms, upgrade and construct the vehicle crossing and internal roading network, install drainage and utility services, and construct retaining walls. It is anticipated that approximately 6,900m<sup>3</sup> of cut and fill (excluding removal of 2,200m<sup>3</sup> of topsoil and unsuitable material) will need to be undertaken over an area of 7,341m<sup>2</sup> (the full extent of the Site area). An Erosion and Sediment Control Plan has been prepared to ensure that any effects are contained within the Site.

It is expected that the dwellings will be ready for occupation within 24 months of the granting of a resource consent. Construction will immediately commence following the granting of a building consent.

The project also involves the construction of a private road to service the 37 dwellings. This private road and all communal landscaping will be maintained by the future residents.

What are the details of the regime under which approval is being sought?

Please write your answer here:

A combined resource consent application would be lodged addressing the following:

- Resource Management Act 1991 (RMA) Section 9 – Land use consent under District Plan and Regional Plan.
- RMA Section 11 – Subdivision consent under District Plan.

- RMA Section 15 – Discharge consent under Regional Plan and the RMA (Stormwater).
- National Environmental Standards for Assessing and Managing Contaminants to Soil to Protect Human Health Regulations (NESCS).
- All building works will be subject to a building consent application that will be lodged as soon as the resource consent has been granted.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Auckland Council.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

Resource consent was sought in 2021 for an earlier scheme. Following receipt of submissions, the Applicant placed the project on hold to enable sufficient time to respond to those submissions. During that review period, the decision was made to withdraw the application and undertake a more comprehensive redesign that incorporated community feedback. This project is the result of that redesign, which includes a reduction in the number of units (by five dwellings), retention of existing trees, changes to the internal road network and increased compliance with development standards of the Residential – Mixed Housing Suburban zone.

At the time of making the application to be listed on Schedule 2A of the Bill, the Applicant does not have any resource consent applications filed with Auckland Council.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

WDLP do not require any other approvals to undertake the project.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

It is anticipated that establishment works will be carried out from mid-2024 to early 2025. Preparation of building consents will commence late 2024, with lodgment planned to immediately follow the approval of resource consent. Those works will be staggered across 18 months with some overlap between the construction of dwellings and the preparation of building consents for subsequent dwelling types. It is anticipated that the construction of the last dwellings will be completed in early 2026.

**s 9(2)(b)(ii)**

The Applicant confirms that this project is “shovel ready”, subject to obtaining the necessary approvals.

The Applicant has already engaged the same expert consultant team that will prepare all the necessary documentation for the resource consent and is already underway with the necessary fieldwork or technical investigations to inform that documentation.

Should this project be successfully included in the Fast-track Approvals Bill as a Schedule 2A project, the application is expected to be lodged with the Environmental Protection Authority imminently following the Bill coming into force.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The following persons are considered likely warrant engagement with:

- Auckland Council (the relevant territorial authority).
- Watercare.
- Auckland Transport.
- Auckland Council Parks Department.

The following iwi authorities, iwi and hapū groups:

- Te Aakitai Waiohū;
- Ngāi Tai ki Tāmaki;
- Ngāti Maru;
- Ngāti Tamaoho;

- Ngāti Tamaterā;
- Ngāti Te Ata;
- Ngāti Whanaunga;
- Te Ahiwaru – Waiohū; and
- Waikato – Tainui.

The landowners and occupiers of the following adjacent properties:

- 14B Carnoustie Drive;
- 12 Carnoustie Drive;
- 11A Carnoustie Drive;
- 11 Carnoustie Drive;
- 20 Carnoustie Drive;
- 18A Carnoustie Drive;
- 18 Carnoustie Drive;
- 16 Carnoustie Drive;
- 5 Tington Avenue;
- 21 Mull Place; and
- 17 Mull Place.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Please refer to the consultation summary tabled, attached.

Upload file here:

Consultation summary table.docx was uploaded

Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

The project has not involved any processes under the Public Works Act 1981 in relation to the land.

#### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The project does not include an activity that will occur on land under a Treaty settlement. However, the Site is adjacent to the Coastal Statutory Acknowledgement Area under Ngāti Tamaoho Claims Settlement Act 2018. The surrounding land around the Pahurehure Marginal Strip contains several major pā and kāinga, numerous wāhi nohoanga, tauranga waka, mahinga kai and a major cultivation area for kumara (and later potato) and aruhe (fern root). One of the largest occupation sites was the Takirangaranga pā to the south east.

None of the land on which the project activities will occur is land that has been or is required to be returned under the Ngāti Tamaoho Claims Settlement Act 2018.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

N/A

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

N/A

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

N/A

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

N/A

Upload your assessment if necessary:

No file uploaded

## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

A detailed summary of the potential effects of the project on the environment is set out below, and is based on a series of technical assessments undertaken by experts appointed on behalf of the Applicant.

In addition to these assessments, the Applicant has also obtained an assessment from Property Economics of the economic impact of the project on the supply of housing within south Auckland and the other economic costs and benefits associated with the project. The findings of that assessment are addressed below.

Urban design, form, density and character

The existing environment is characterised by a mixture of large single and double storey houses with modest or generous front, small side, and large rear gardens. The wider environment is suburban in nature with pockets of higher-density to the west and northwest of the Site. In addition to the foreshore esplanade reserve on the southern boundary of the Site, the Wattle Downs Golf Course and Acacia Cove Retirement Village form the broader extent of the existing environment.

In respect of the integration of the Site with the foreshore esplanade reserve, significant effort has gone into the landscape concept and design for the project. Extensive landscaping will create an environment consistent with the "living amenity" of the receiving environment. The revised scheme will retain and protect the extensive mature trees on the edge of the Site with the foreshore esplanade reserve. The quality of the landscaping will soften and screen the project when viewed from the foreshore esplanade reserve and coastal marine area while enhancing the natural character values along the foreshore.

The scale and form of residential dwellings proposed for the Site are commensurate with the scale of existing buildings located along the coast of the Pahurehure Inlet, which in some cases are more substantial. The project complies with the maximum building height and height in relation to boundary, landscaping and overall building coverage standards for the Residential – Mixed Housing Suburban zone, indicating the project is in keeping with the scale and form of the planned outcomes for the zone, which enables intensification, while retaining a suburban built character. The design of the project generally incorporates two storey detached and attached housing in a variety of types and sizes to provide housing choice, consistent with the types of development anticipated in the zone.

Although consistent with the zone outcomes, the shift in form of housing from large single dwellings to townhouses has the potential to result in a change to the residential character and amenity values of the existing neighbourhood. However, as noted above, a level of change in character and amenity values is already anticipated by the AUP zone outcomes. In those scenarios, the National Policy Statement on Urban Development 2020 is clear that such changes are not considered to be, of themselves, adverse effects in the context of planning decisions which affect urban environments. Notwithstanding, the project includes a number of key design elements to manage potential effects pertaining to the existing residential character and amenity of neighbouring sites.

While the Site is located within an existing urban environment, the viewing catchment of the Site is relatively limited as the Site is located down a long access way away from the street entrance to the extent that the character of the wider urban environment will not be adversely affected by this project.

The project will establish a relatively directed street and block layout, which includes specific identification of open space areas and connectivity through the Site for residents.

The project has benefited from significant expert urban design input, seeking to ensure that the housing and internal street provide a quality urban

design response. Buildings have been designed to engage with the internal street and the coastal edge, minimise vehicle crossings, and ensure privacy for residents. Substantial landscape treatment and planting is provided, as illustrated in the attached plans (Attachment C).

The key urban design characteristics of the project are summarised as follows:

- The design positively responds to Site constraints and is premised on activated “streets”, which while private, will provide connectivity through the development for residents and passive surveillance.
- A consistent application of the urban design structuring principle of ‘fronts and backs’.
- A variety of housing typologies and dwelling sizes including detached dwellings, duplex dwellings and terraced housing that are distributed to balance solar access, passive surveillance of streets, and vehicle access (rear lanes).
- A one way street system to give the internal road network a higher visual quality, and promote safer and more pleasant pedestrian routes and choices.
- Integration of stormwater management.
- Provision of a buffer and landscaping screen to adjoining sites to visually mitigate the presence of the development.
- Maintenance of street amenity through the provision of quality materiality of buildings.
- Variation in the appearance of buildings to avoid adverse visual effects from excessive repetition.
- Adequate floor areas and associated outdoor space which are suitable to mitigate effects resulting from solar access, outlook and privacy.
- Provision of dedicated resident car parking areas that can be landscaped to positively contribute to the developments visual quality.

While the project for a comprehensively planned residential development on the Site will result in visual change from the previously undeveloped lot, the project responds well to its primary frontage to the coastal edge and will significantly enhance the character in this location. A range of other design measures have been incorporated to assist in ensuring that the project as a whole, appropriately addresses its surrounding environment while delivering a mix of functional residential dwellings that are commensurate with the planned residential use of the zoning consistent with the outcomes expected in the AUP.

Overall, it is considered that Site can be developed at the proposed intensity without creating significant adverse environmental effects on existing streetscape, character, amenity and visual landscape values.

#### Transport

The Site is on the southern extent of Carnoustie Drive, approximately 1.87km from the closest arterial road (Mahia Road). There is a reliable bus service that completes a full circuit of the Wattle Downs suburb, connecting the Site with the Manurewa town centre and Manurewa train station on the Auckland southern line.

The potential transportation effects include trip generation and effects on the existing road network and the design of the internal road and connectivity within the Site. A preliminary analysis of transport effects has concluded that the project will be able to be accommodated within the existing road network without creating adverse traffic congestion or safety effects, nor any noticeable any pedestrian effects.

Overall, it is considered that the project will not create significant adverse effects on the safe and efficient operation of the existing transport network, and that appropriate provision has been made for vehicular, pedestrian, and cycling access within the project site.

#### Natural hazards

With the Site being located on the coast of an inner harbor, backing onto the Pahurehure Inlet within the Manukau Harbour, it has increased potential for susceptibility to natural hazards such as coastal inundation, high tides and coastal erosion.

In that context, the Applicant commissioned a coastal hazard assessment which addressed the risk of those hazards and the project's resilience to climate change and extreme weather events including storm tide, coastal erosion, sea level rise and shoreline change.

The assessment confirmed that those risks would be adequately addressed as a result of the following features:

- The Site is set back behind the coastal foreshore reserve which is a minimum of 20m from the mean high water mark. The coastal margin is relatively vegetated and is moderately to steeply sloping, with a low cliff above the beach. The Pahurehure Inlet has relatively low wave energy.
- As part of the project, an additional area of the Site will be vested as part of the foreshore coastal reserve, furthering the setback distance from the coastal environment to the Site. The southwestern corner of the Site will be elevated through the use of retaining walls, and, along with elevated building floor levels, will ensure the project's resilience from inundation, sea level rise and coastal erosion over a 100 year period.

The coastal modelling undertaken to date demonstrates that the project has been designed to ensure the safety of people living at the Site from adverse coastal hazards, and the project will not result in adverse effects on upstream or downstream properties.

A further detailed geotechnical and coastal investigation will be to specifically address natural hazards, geotechnical stability, including subsurface conditions and recommendations for building foundation design in the context of the final schematic design of structures.

Based on the above, it is considered any effects generated by coastal hazards and flooding are able to be sufficiently mitigated.

#### Infrastructure servicing

The Site is able to be fully serviced by reticulated water services.

- **Wastewater:** A new public wastewater network will be constructed within the Site which most dwellings will gravity drain to with the rest of the lots being connected via private pressure rising mains.
- **Stormwater:** A new public stormwater network is proposed to capture stormwater runoff and discharge into the new public stormwater outlet within the coastal marine area. The stormwater runoff from the driveway impervious surface will be captured by private stormwater networks via cesspits and treated via swale drain located along the western boundary.
- **Telecommunications and electricity:** The established urban environment has existing utilities connections and can be extended to each new unit with approval from the relevant service providers at the building consent stage.

#### Geotechnical and contamination

The Site has been assessed by Lantech of the geotechnical suitability in respect of the proposed earthworks for the building platforms and driveway and the retaining wall requirements. Focus Environmental Services Limited were also commissioned to undertake a detailed site investigation and remediation plan. In regard to contamination, the assessment confirmed that:

- **Demolition of historic structures potentially containing asbestos** had occurred, in addition to maintenance and use of lead-based paint on current and historic structures. Due to the potential sources of contamination identified, there is evidence to suggest that an activity outlined in the Hazardous Activities Industries List has been, or more likely than not been undertaken at the Site.
- **For residential development, the NESCS requires remediation of the Site of the affected soils prior to any redevelopment.** However, due to the relative low levels of soil considered to be potentially contaminated, the proposed remediation is a permitted activity under the AUP and may not require resource consent.
- **The Applicant has commissioned a Remediation Action Plan to ensure that any of the contaminated soils are removed in a controlled manner and disposed of to a suitable location.**

In regard to the geotechnical assessment, Lantech has confirmed that:

- The proposed earthworks do not pose a risk to neighbouring properties and existing public services.
- Conventional earthworks and retaining wall construction are considered appropriate from a geotechnical perspective.

Based on the above, it is considered any land stability effects are able to be sufficiently mitigated.

#### Archaeological assessment

Three archaeological sites are recorded within 200m of the Site, being a midden, a potential pa, and a pit complex. However, no in-situ archaeological features or deposits were noted during the field visit although sections of the Site remain unmodified by residential development from the 1960s.

In recognition of the potential for archaeological discoveries, earthworks on the Site will be carried out in accordance with an Archaeological Management Plan for archaeological sites, taonga and koiwi tangata.

Based on the above, it is considered any archaeological effects are able to be sufficiently mitigated.

#### Economic assessment

The economic assessment commissioned by the Applicant confirms that the project will not have any adverse effects on the economic wellbeing of people and communities. Instead, that assessment confirms that:

- Housing prices in Wattle Downs have risen over 120% in the last 10 years, indicating both the desirability of the neighborhood and a limited supply of housing relative to demand.
- Accommodating the projected increase in south Auckland's population over the next 10 years will require the provision of an additional 36,500 dwellings (under a high-growth scenario).
- In that context, the delivery of an additional 37 dwellings in an already-serviced area which is well-connected to existing community amenities offers significant regional benefits in terms of:
  - increasing the supply of housing and supporting improved housing affordability;
  - increasing the diversity of housing available in the Wattle Downs residential market;
  - increasing economic activity and local employment opportunities, which is particularly significant given the various pressures currently facing New Zealand's economy; and
  - potentially catalysing commercial activity and interest in other residential developments in the neighbourhood.
- Consenting this project via the Schedule 2A Fast-track Approvals process will accelerate its construction and the consequential realisation of its



economic and social benefits.

Based on those findings, the economic assessment concludes that enabling the consenting of the project through the Fast-track Approvals Bill as a Schedule 2A project will generate a net positive contribution to the future economic and social wellbeing of the local communities, and through flow-on effects, to other areas of the regional economy.

Upload file:

Appendix C - Site plans.pdf was uploaded

## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The following national policy statements are relevant to, and have directly informed the design of, the project:

- National Policy Statement on Urban Development 2020 (NPS-UD).
- New Zealand Coastal Policy Statement 2010 (NZCPS).

The general assessment of the project in relation to the above national policy statements is set out below. In summary, the project will enable a form of development that gives effect to all relevant national policy statements.

National Policy Statement on Urban Development 2020.

The NPS-UD sets the national direction for how, when, and to what extent urban development is to take place in New Zealand. To that end, it sets objectives regarding:

- realising well-functioning urban environments that enable all people and communities to provide for their wellbeing, and for their health and safety, now and into the future (objective 1);
- planning decisions that improve housing affordability by supporting competitive housing and development markets (objective 2), and are integrated with planning and funding decisions, strategic over the medium and long term, and are responsive, particularly in relation to projects that supply significant development capacity (objective 6);
- planning documents enabling more people to live in areas which are well connected to employment opportunities and public transport, and have high demand for housing (objective 3); and
- the role of New Zealand's urban environments in supporting reductions in greenhouse gas emissions, and improving resilience to climate change (objective 8).

The project meets all of the above objectives and, critically, will contribute to increasing the supply of housing in Auckland and improving housing affordability and choice within Wattle Downs.

The population within the Auckland region is projected to grow by another 650,000 people by 2050 which will place increasing pressures on existing communities, the environment, housing and roads. Within the south Auckland catchment, the population is expected to increase by 20% over the next 10 years alone. Accommodating that increase will require the construction of nearly 40,000 additional homes in that catchment. Although not the only factor, the availability of housing is a significant contributor to the affordability of housing – and the extreme price escalation within Wattle Downs over the last 10 years (over 120%) indicates that additional supply is much needed.

As noted above, responding to these challenges will require a range of approaches, including greenfield developments and large-scale regeneration projects. However, to increase the supply of housing in areas that are already serviced/integrated with good accessibility (as primarily envisaged by the NPS-UD), projects like Carnoustie Drive need to play a major role.

In that context, the Site will contribute to a well-functioning urban environment by providing a more diverse housing typology that meets the needs of different households. It adjoins, and seeks to enhance, the publicly accessible coastal environment which contributes significantly to the on-site amenity for residents and the wider community. It has been designed to be resilient to the likely current and future effects of climate change, and it is located in an area which is already supported by infrastructure.

As noted above, the economic assessment included as Attachment D, confirms that the project will support improved housing affordability and will increase the diversity of housing typologies to meet different needs within the Wattle Downs community.

The project is therefore wholly consistent with the objectives and policies of the NPS-UD.

New Zealand Coastal Policy Statement 2010.

The NZCPS sets the baseline for environmental protection of the coastal environment and management of the effects of urban development on the coastal environment in New Zealand. To that end, it sets objectives regarding:

- maintaining and enhancing the public open space qualities and recreation opportunities (objective 4);

- ensuring that coastal hazard risks are managed by locating new development away from areas prone to such risks and considering responses for existing development (objective 5); and
- enabling people and communities to provide for social, economic and cultural wellbeing through subdivision, use and development recognizing that the values of the coastal environment does not preclude use and development in appropriate places and forms (objective 6).

To that end, the project meets the described objectives to the extent that the project does not change the public open space qualities of the coastal esplanade and provides for passive connection between the private and public realms. Consistent with the coastal hazards assessment, the project is located away from areas prone to coastal hazard risk while also enabling the development of the Site. The project has been sufficiently developed consistent with the NZCPS in terms of preserving the coastal environment while also allowing for residential development consistent with the NPS-UD.

The project would not be contrary to objectives 4, 5, 6 and 9 and policies 3, 6, 13(1)(b), 18, 19, 24 and 25 of the NZCPS as:

- the maximum building height and form, and proposed landscaping will protect and preserve the natural character of the coastal environment;
- the project will sufficiently consider and provide for coastal hazards or sufficiently address the risks of coastal hazards;
- the project will sufficiently consider the size and function of the existing Open Space – Informal Recreation zone and Coastal – General Coastal Marine zone and how public access to the coast is to be achieved;
- conditions of consent will manage soil runoff during the construction period; and
- stormwater runoff from the completed project will be subject to quality treatment to maintain the ecological values of the coastal environment.

Overall, it is considered that the project is acceptable and will not be inconsistent with the outcomes sought by the NZCPS.

Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011. The NESCS ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed and, if necessary, the land is remediated or the contaminants managed to ensure there are no adverse effects on human health. As previously discussed, consideration will be given to the relevant provisions, with consent being sought under the NESCS as relevant and required to manage the effects of contaminants in soil to protect human health.

A number of historical buildings that were, at some stage, present on the Site fall within the timeframe for lead based paint which may have potentially been used. A number of soil samples around the Site found elevated levels of heavy metals present in the soil and around the main dwelling above the human health criteria. On that basis, a remediation action plan has been prepared which demonstrates how contaminated soil can be safely handled and disposed of.

Overall, the scale and nature of environmental effects associated with contaminated land are limited, and it is considered that the potential adverse effects associated with land contamination can be appropriately managed and will not create significant adverse effects on the environment or human health.

File upload:

Attachment D - Economic assessment - Carnoustie Drive residential development (Property Economics).pdf was uploaded

## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

As noted above, a number of changes have been made to the project in response to the public feedback received on the previous application that was lodged (and subsequently withdrawn). Regardless, should an application for the current project be lodged under normal processes, it inevitable that a contested hearing process would follow, resulting in a significantly longer and less cost-efficient process compared to the Fast-track process. Specifically, if the project went to a contested hearing, then it could be between 12-18 months from lodgment before a decision was issued. That decision would be subject to normal appeal rights to the Environment Court which could add a further 12-24 months.

By comparison, if the project was included as a Schedule 2A project under the Bill, the Applicant could immediately apply to the expert consenting panel for resource consent for the project. Based on existing timeframes within the Bill, recommendations from the panel in respect of that resource consent could be issued within six months of lodgment. A decision from the Ministers in respect of those recommendations would then follow, and would not be subject to the same risk of appeal. In this context, the Applicant is committed to expediting the benefits of the Fast-track process and implementing the consent as soon as it is granted, consistent with the construction timeline set out above.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Referral of this project will require the dedication of some resource within the Environmental Protection Authority (EPA) to manage the approvals process as well as the appointment of an expert consenting panel to consider and make recommendations on any application. This project is not unique in the requirement of EPA resources in that respect. The Applicant is, however confident that referral of the project will not adversely impact the efficient operation of the fast-track process for the following reasons:

- The combined experience of Bei Group and Sure Capital in the multi-unit residential development and subdivision sector in Auckland is extensive. Both companies demonstrate, through the list of successful residential subdivisions outlined earlier in the application, that they have the experience to undertake the successful completion of the project. In addition, through building successful relationships with other companies, WDPL is able to manage and finance the project from start to completion when the dwellings will be either rented or sold. The Applicant recognises the uniqueness of the Site and understands that intensification in this location, adjacent to a coastal area, requires careful consideration. The Applicant has therefore commissioned a significant body of assessment on its behalf regarding the Site, commensurate with the scale of the project. It can therefore be expected that any application for resource consent would be comprehensive, well-considered and supported by robust technical evidence that addresses the needs of the community, thereby reducing the likely need for numerous requests for further information which negatively impact the efficient operation of the fast-track process.

- The feedback received on the project through the previous public notification process has significantly informed the re-design of the project by expert planners and urban designers. As a result of rigorous consideration and assessment, the project, as directed by the NPS-UD, contributes to a well-functioning urban environment by providing for intensification and variation of housing typology to meet the diverse needs of people and communities.

- The Applicant has engaged an expert team who have previous experience in utilising and navigating fast-track processes. For example, the Applicant's legal counsel engaged for the project have led or contributed to the preparation of 9 resource consent applications or notices of requirement processed under the COVID-19 Recovery (Fast-track Consenting) Act 2020, and have had direct involvement (including as a panel member) in at least two others.

In short, this project is well-advanced and the Applicant is ready to apply for resource consent. It is being led by an experienced land development company which is supported by an expert team that has particular experience with fast-track consenting processes. It is therefore considered that referral of the project will contribute to, rather than compromise, the efficient operation of the fast-track process.

Has the project been identified as a priority project in a:

Not Answered

Please explain your answer here:

N/A

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

N/A

Will the project:

increase the supply of housing, address housing needs, contribute to a well-functioning urban environment

Please explain your answer here:

As noted above, the project will increase the supply of housing in Auckland; address housing needs by providing a more diverse typology than currently available in Wattle Downs; and will contribute to a well-functioning urban environment. The cumulative impact of smaller housing developments on sites that are appropriate for intensification across Auckland will have a beneficial impact on housing affordability without materially impacting already constrained community infrastructure provision. While enabling larger housing developments in greenfield area is necessary for accommodating growth, the NPS-UD specifically directs for greater intensification in already urbanised areas. The project provides a unique opportunity to respond to this directive and the culmination of expert input into the revised scheme ensures that it will support a well-functioning urban environment.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Based on a high-level forecast and assuming a two year development timeframe, the total economic impact of the project on business activity within the Auckland region is estimated to be **s 9(2)(b)(ii)**. The direct impact on the construction and construction services sectors is approximately **s 9(2)(b)(ii)**.

If the project is included on Schedule 2A, the Applicant will progress a resource consent application imminently once the Fast-track Approvals Bill is passed. Utilising this process (as opposed to the standard RMA pathway) would enable those benefits to be realised an estimated three years earlier than if the project went through the standard resource consenting pathways. Given the current challenges facing the New Zealand economy, that outcome is significant.

In addition to the direct benefits, there are a number of other economic and social benefits associated with the project:

- The construction of a different housing typology to what is typical within Wattle Downs provides more options that will improve community wellbeing. Most of the residential properties in the immediately surrounding area were built between 2000 and 2009, reflecting trends prior to 2014 for predominantly standalone dwellings. Since 2014, there has been a noticeable increase in townhouses and terraces, making up 67% of all residential dwelling consents in south Auckland in 2022. As such, the growth suggests that although there has been historically limited interest in higher-density dwellings, the demand is now significant and growing at a faster rate in south Auckland than the rest of the region. The project is consistent with those trends particularly in an area with limited housing typology choice.
- A contributing factor to the significant 120% rise in median house prices in Wattle Downs is due to, in part, the undersupply of new homes in the market relative to the increase in demand from the population growth. The increase in housing supply, provided by the project, is generally positive for housing affordability.
- Increased density in existing residential areas, utilising rare vacant sites in proximity to significant urban environments rather than greenfield areas, aligns with Policy 1 of the NPS-UD by supporting a well-functioning urban environment.
- The project's contribution to increasing the local population base will result in a net increase in the number of full time equivalent employees able to work in the surrounding suburbs which results in a net gain for the local economy and stimulates further growth and amenity improvements for the area.
- As noted above, growth from residential developments works as a catalyst for further growth in the area and the project has the potential to increase interest for additional residential activity in the area and provides impetus for growing the local economy.
- The project and its injection of people into an already urban area has the potential to improve the amenities of receiving environment and generate community benefits.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

N/A

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

N/A

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

Compared to greenfield developments further afield, the accessible location of the project within central south Auckland will reduce reliance on private vehicle trips for residents as well as the likely distance of travel, which will contribute to a reduction of greenhouse gas emissions.

The stormwater management approach for the Site takes into account climate change projections. The flood modelling scenarios and stormwater events have been undertaken taking into account future rainfall and climate change scenarios. There are no known other natural hazards (including coastal hazards) that could be exacerbated through climate change to the extent that they would impact the project.

Overall, the project is designed to reduce dependency on private motor vehicles and encourages the residential population of this catchment to take up more sustainable modes of public transport, thereby reducing greenhouse gas emissions. The project has also been designed to ensure that the chances of the project being affected by climate change and resulting natural hazards are minimal.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

As noted above, ensuring resilience of the project against natural hazards (coastal inundation, coastal erosion, high tides in particular) has shaped the design and layout of the project. Through specific features of the design of the project including raised building platforms and retaining walls where appropriate, the project will ensure that the adverse effects of coastal hazards up to 100 years in the future will be adequately mitigated. Extensive landscaping and retention and protection of the coastal foreshore reserve will also support adaptive management of natural hazards.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The project will address the following significant environmental issues:

- The project responds to the direction in the NPS-UD by providing intensification in an existing-urban area contributing to the improvement of housing affordability in Auckland.
- The project provides for variation in housing typology not yet seen on a broader scale in Wattle Downs which, in turn, will contribute to positive variation in the community and the overall functioning of the environment as a whole.
- By vesting a portion of the Site with Auckland Council for a coastal foreshore reserve, the distance between residential development and the mean high water mark will be retained as 20m which, as demonstrated in the coastal hazards assessment, will support the resilience of residential development against coastal erosion for 100 years.
- As part of the project, existing contamination on the Site will be remediated, and the replacement of a dwelling with lead based paint on the Site will terminate the use of hazardous substances at the Site.
- Intensification of the Site will reduce overall impermeability of the broader environment relative to greenfield development. Consequently, this will reduce the total stormwater runoff from urban development benefiting the environment.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The project has been designed to align with the activity standards of the Residential – Mixed Housing Suburban zone in the AUP as it relates to:

- Design standards including building height, height in relation to boundary, maximum impervious areas and outlook space.
- The servicing of new urban development.
- Land disturbance regarding earthworks.
- The design of transport connections, including provision for fire trucks within the Site.
- Subdivision.

The project will contribute to the efficient use of brownfield land and provides a compact urban form that will:

- achieve the planned suburban built character of the zone;
- achieve attractive and safe streets and public open spaces;
- manage the effects of development on neighbouring sites, including visual amenity, privacy and access to daylight and sunlight; and
- achieve high quality on-site living environments.

Anything else?

Please write your answer here:

The project will deliver 37 additional houses in an area that does not have diversity in urban form or housing typologies and where an increase in housing supply is much needed. The Site is particularly suitable to deliver that outcome given its size, servicing and development-readiness, i.e. unconstrained by reliance on financial partners.

The benefits of listing smaller housing projects on the Schedule will deliver upon the “pipeline of projects” envisioned by Minister Bishop as these can be processed and approved expediently, without complication. Although the project will not itself not “turn the tide” on housing affordability challenges facing Auckland today, it is a contribution that meets the relevant planning criteria for new development; and all sensible opportunities to deliver quality housing to the market in a timely fashion should be carefully considered for inclusion.

The development of a thoughtful scheme in respect of the project demonstrates the appropriate use of the Site that will deliver much-needed variation in housing in an already urbanised environment that will support the functioning of the wider urban and will protect the key features of the coastal environment. The contribution to Auckland’s severe housing shortage attributes the project with regional significance, as one of a number of quality, shovel-ready intensification projects that will be required to meet on-going demand.

The project is being led by an experienced land development company and legal support with extensive experience in the fast-track process. In short, it is a project which has significant benefits and warrants inclusion within Schedule 2A of the Bill.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

N/A

## Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

As previously noted, the Site, like much of broader Auckland is coastal and is susceptible to natural hazards associated with a coastal environment. The risk of natural hazards has been comprehensively considered by the Applicant and its team of expert consultants, and the project has included specific initiatives to ensure that the adverse effects of such events are appropriately managed.

## Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

The Applicant confirms that no action has been taken against WDLP, Sure Capital or Bei Group by any territorial authority with enforcement power under the Resource Management Act 1991 or any other Act referred to in the Bill.

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## Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Francelle Lupis

Important notes