APPLICATION BY THE FOUNDATION VILLAGE PARTNERSHIP FOR REFERRAL TO EXPERT CONSENTING PANEL UNDER THE COVID-19 RECOVERY (FAST TRACK CONSENTING) ACT 2020

FOR

FOUNDATION VILLAGE – BUILDING 3
PARNELL, AUCKLAND

PREPARED BY

BENTLEY&Co
Resource Management Consultants

21st February 2023

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1. EXECUTIVE SUMMARY

1. This is an application for referral to an Expert Consenting Panel under the COVID-19 Recovery (Fast Track Consenting) Act 2020 (“**FTCA**”) for The Foundation Village Partnership Limited's proposal to construct and operate Stage 3 of a comprehensive retirement village (the "**Project**") within the central portion of the site at 16 Titoki Street, Parnell, Auckland, together with those parts of the neighbouring land within the block bound by Titoki Street, Maunsell Road, Parnell Road, and George Street (the "Foundation site").

2. The Foundation Village Partnership ("the **Applicant**") was formed between Foundation Properties Village Limited and Generus Foundation Limited ("**Generus**"), and is the holder of resource consents (including variations) for development within the Foundation site. Resource consents are held by the Applicant for the construction of a mixed-use development on the north-eastern part of the Foundation site for up to 116 retirement units, together with ancillary facilities and amenities, and offices for the Royal New Zealand Foundation of the Blind (now Blind Low Vision NZ). The approved development is located within two purpose-built buildings (Buildings 1 & 2 – at 537-541 Parnell Road and 4 Maunsell Road), and also includes the refurbishment and use of Pearson House (10 Titoki Street). The consents held for Buildings 1 and 2 (and Pearson House) correspond to Stages 1 & 2 (in terms of construction).

3. Foundation Properties Limited is the landowner of all of the properties and buildings that are contained within the Foundation site, with the exception of the ACG building located within the north-west corner of the Foundation site. It holds lease agreements with the various tenants of the buildings located within the Foundation site. The relationship of the application site (and the scope of the proposal) and the Foundation site is illustrated in **Figures 1 & 2**.

4. The Project relates to 'Stage 3' of the comprehensive retirement village development, and corresponds to an 11-13 storey (average of 42m high excluding lift overrun) modulated building form, which provides for 65 apartment style retirement units, a range of associated communal and administrative facilities, and basement parking, together with landscaping and general improvements to the existing at-grade spaces around the building. Building 3 will be integrated physically and functionally with the approved Building 1 & 2 developments that are currently under construction, and with Pearson House.

5. The application site is zoned Business – Mixed Use under the Operative Auckland Unitary Plan ("**Unitary Plan**") and is located within the central portion of the Foundation site. The application site has been determined by the project team (through various 'height studies') to be able to accommodate higher density residential development within the form of the building proposed. Integrated residential developments (inclusive of retirement villages) are an activity provided for as a Permitted Activity in the Business – Mixed Use Zone, subject to achieving compliance with the zone standards. Other than height, the proposal will comply with all relevant zone standards, and requires resource consent for the height exceedance as a Restricted Discretionary Activity, together with resource consent being required overall as a Discretionary Activity for other matters (as set out in Section 4 of this report).

6. The Applicant is not dependent on pre-sales to fund any aspect of the Project. Therefore, no delays are expected relative to the construction commencing on the Project following grant of the consent. The intention is to commence construction on the Project soon after the approved Building 2 reaches 80% completion (expected mid-2025). Completion of the Project as soon as possible is the Applicant's priority. In all respects, the Project is "shovel ready".

7. The construction period for the Project is approximately 3 years following commencement. Generus will be responsible for the development management of the construction of the Project and the subsequent operation of all components of the village. Generus directly oversee all its construction projects (and have offices located on the Foundation site), resulting in a high degree of control over the building delivery process including quality and the careful management of temporary construction effects. Generus is ready and able to proceed immediately with the design and delivery programme following approval of the consent.

8. The Project has been assessed from an economic perspective and is anticipated to result in approximately $143 million dollars of direct and indirect economic benefits as a result of the various activities associated with the Project. The planning / design / consenting work required to be undertaken for the Project is anticipated to create full-time employment for approximately 20 people for 30 months, generating approximately s 9(2)(b)(ii) in wages / salaries.

9. Site preparation (including the implementation of infrastructure) is anticipated to generate full-time work for approximately 40 people for 8-10 months, with approximately s 9(2)(b)(ii) in wages / salaries paid. Construction of the retirement units and associated communal facilities is anticipated to provide full-time work for approximately 325 people for 3 years (split across various stages), with approximately s 9(2)(b)(ii) paid in wages and salaries.

10. The Project will generate 15 FTE roles (in respect of the ongoing operation of Building 3), including staff roles for village management, administration, sales, maintenance and gardening, restaurant and ancillary services, and aged care support. The approved retirement village is anticipated to sustain a total of 40-50 FTE jobs on an ongoing basis (inclusive of the 15 FTE roles anticipated to be generated by the Project).

11. There will be direct benefits for construction workers and project managers, architects, engineers and health and safety consulting service providers. There will also be associated financial and development contributions and infrastructure growth charges for Auckland Council and its related organisations as part of the development. Indirect benefits include supplies and services purchased by the Applicant's construction delivery partner, or by contractors engaged independently. These include wholesale and retail building supplies, and legal, telecommunications, administrative and accounting services.

12. The provision of the 65 apartment style retirement units by the Project in an urban tower form of 11-13 storeys will reduce land demand pressure and make residential housing / land available as new residents of the retirement village move out of their existing properties, representing a more efficient use of the land. This increase in housing / land supply will help to relieve pressure on the housing market (particularly critical in Auckland) and contribute towards improved housing affordability in the long term.

13. The proportion of New Zealand's population over the age of 75 is anticipated to grow rapidly over the next 50 years. As a component of the larger comprehensive retirement village, the Project will contribute to reducing the fiscal burden on the Government by supplementing aged-care related services that are currently provided by the District Health Board, as well as meeting the needs of older people that, in terms of carer burden, would otherwise often fall on the working aged population.

14. 16 iwi authorities have been identified as potentially having an interest in the Project. The Applicant sent a letter to each of the iwi authorities in November 2022 to provide an overview of the Project and to inform of the intention to utilise the fast-track process, and invited a response in regards to their aspirations for consultation in relation to the Project. To date, one iwi authority (Ngati te Ata Waiohua) has indicated their interest in the Project, and consultation

undertaken with them has determined that a cultural impact assessment will be required. This will be progressed following the referral stage, and the iwi authority has been advised of this.

15. The Applicant consulted with Auckland Council initially in November 2022 by way of an on-site meeting to discuss the high-level scope of the Project, the process under which consent was to be sought under the FTCA, and to agree on locations for visual simulations to be prepared. Feedback provided by Council following this meeting (**Attachment 1**) has been considered by the Applicant and reflected in the Project, as considered to be appropriate.

16. The Applicant has held combined meetings with Heritage New Zealand ("**HNZPT**") and the Council's heritage specialist on several occasions to discuss the scope of the Project, including the proposed integration and interface of the proposed building with the existing heritage buildings located within the Foundation site. Feedback received by HNZPT as part of this process (refer **Attachment 2**) has been incorporated into the development of the Project to this stage, and it has been agreed that consultation will be ongoing as the detail of the Project is developed for the resource consent application.

17. There is no potential for the Project to have significant adverse environmental effects and, as outlined in Section 8, adverse effects will be avoided, remedied or mitigated, and / or readily managed through conditions of resource consent.

2. APPLICATION DETAILS

18. Applicant details

Person or entity making the request:	The Foundation Village Partnership
Contact person:	Richard Mora
Job title:	Development Manager
Phone:	s 9(2)(a)
Email:	s 9(2)(a)
Postal address:	PO Box 3861, Christchurch 8140

19. Address for service (if different from the above)

Organisation:	Bentley & Co Ltd
Contact person:	Craig McGarr
Job title:	Director - Resource Management Planner
Phone:	s 9(2)(a)
Email:	s 9(2)(a)
Postal address:	PO Box 4492 Shortland Street, Auckland 1010

3. PROJECT LOCATION

20. The application (click to place an "X" in the relevant box):

☒ does not relate to the coastal marine area

☐ relates partly to the coastal marine area

☐ relates wholly to the coastal marine area.

Site Location & Description

21. **Figure 1** identifies the application site, which incorporates parts of several properties located within the Foundation site, as explained below:

- 16 Titoki Street, Parnell – being the existing area of at-grade car parking and landscaping located central to the Foundation site (and is the location of the proposed building).
- 10 Titoki Street, Parnell – which is occupied by Pearson House, and being refurbished to form part of the approved retirement village activity. The Project includes a pedestrian connection to Pearson House and urban landscape works within this site.

- 4 Maunsell Road, Parnell – which is approved for the development of a retirement village activity (Buildings 1 & 2), currently under construction. The Project includes a pedestrian connection to Building 2 and urban landscape works within this site.

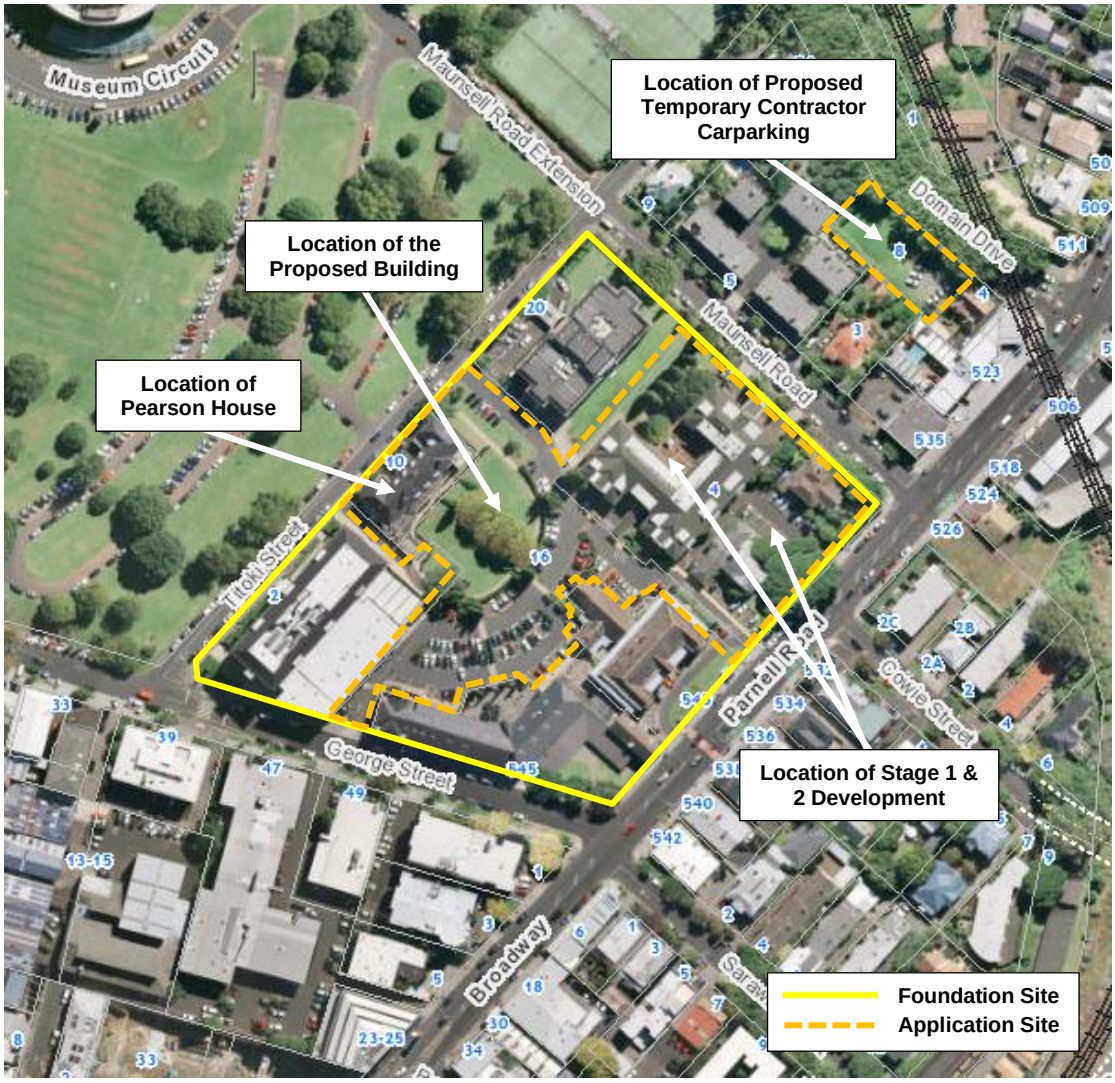

Figure 1 – Extent of application site and its interface / relationship with the Foundation site.

22. The application site (identified in orange dashed lines) comprises a total area of approximately 15,522m^2, with the Foundation site comprising an area of approximately 25,950m^2 overall.

23. In addition, the Project proposes to utilise 8 Domain Drive, Parnell, for temporary parking for construction vehicles. The location of 8 Domain Drive is shown on **Figure 1**.

24. The resource consents for the Building 1 & 2 developments (Stages 1 & 2) currently under construction within the Foundation site are explained in Paragraphs 107 – 110.

25. With reference to Figure 2, the remainder of the Foundation site is occupied by:

- Birthcare Auckland (located at the corner of Titoki Street and Maunsell Road), which is a 3-4 storey building, with basement parking accessed from Titoki Street.

- ACG Parnell College (located at the corner of Titoki Street and George Street), which is a 4-6 storey building; and

- Blind Low Vision NZ office and workshops, and Jubilee building, located at the corner of (and fronting to) George Street and Parnell Road.

26. The Jubilee Building is currently occupied by the Parnell Community Centre. The building also comprises the Parnell Community Library, managed by Panuku Development Auckland.

27. The office / workshop buildings are currently occupied by a variety of retail, office and food and beverage tenancies (including KNK Architectural Hardware, Foundation on George, BQH Quantity Surveyors, Auckland Physiotherapy, TrieBeca, Designers Collection, European Ceramics & Stone, Corso De'Fiori, and Experiences by Coopers) .

28. The location of the proposed building within that part of the application site at 16 Titoki Street is shown in **Figure 2**, with the scope of the works required in association with the proposal identified in red dashed lines. The proposed building is located to the rear (south-east) of Pearson House at 10 Titoki Street. The footprint of the proposed building is some 1,296m^2.

Figure 2 – Site features and other activities occurring relative to the Project (Building 3).

29. As identified in Figure 1, the central portion of the Foundation site is currently occupied by a combination of at-grade car parking and landscaping, accessed variously from George Street, Titoki Street, and Parnell Road. The at-grade parking area is used in common by a number of tenants within the Foundation site. The overall Foundation site has a high degree of public through-site pedestrian and vehicular accessibility / permeability.

30. The Foundation site is well serviced by public transport, with the Newmarket Train Station and frequent bus routes located within an 800m walkable catchment. A bus stop and shelter are located on Parnell Road, in front of the Jubilee Building.

31. Bus services along Parnell Road include the Inner Link and Outer Link services, which operate at 5 – 15 minute frequencies, connecting to Parnell, Newmarket, Ponsonby, Auckland CBD, Wynyard Quarter, Mt Eden, Point Chevalier, and other inner isthmus suburbs.

32. The wider area surrounding the Foundation site is of a mixed commercial and residential character, which has developed in response to its location on Newmarket's commercial periphery and proximity to Parnell and the City Centre, together with its accessibility to the transport network and the open space amenity of the Auckland Domain.

33. To the west, the significant open space of Auckland Domain and the landmark of the Auckland War Memorial Museum are prominent features in the urban landscape.

Legal description

34. The legal descriptions and record of title references for the application site are listed below:

- 16 Titoki Street, Parnell - Lot 11 DP 561771 (record of title: 994968) – 6,403m^2.
- 10 Titoki Street, Parnell - Lot 7 DP 362696 (record of title: 255820) – 1,086m^2.
- 4 Maunsell Road, Parnell - Lot 9 DP 561771 (record of title: 994967) – 6,875m^2.
- 8 Domain Drive, Parnell – Lot 2 DP 562904 (record of title: 999473) – 1,158m^2.

35. Copies of the Record of Titles for the application site are included as **Attachment 3**.

36. The following interests are relevant to development of the application site:

Record of title 994968 (16 Titoki Street):

a. *Benefits from the pedestrian right of way in instrument number 7613079.6:* The pedestrian right of ways are shown outlined in red on **Figure 3**. These pedestrian connections will be maintained as part of the Project.

Figure 3 – Pedestrian right of ways identified in red outline.

b. *Subject to a right of way, right to convey water, gas, electricity and telecommunications, right to drain sewage and stormwater and a parking easement in instrument number 12179797.3* – This interest grants to the other six records of title comprising the Foundation site a right of way, rights to convey water, gas, electricity, telecommunication, to drain sewage and stormwater and to park over that part of the site marked "AC" on DP 561771 – which is the area highlighted in yellow on **Figure 4**, and forms the entirety of record of title 994968 (16 Titoki Street):

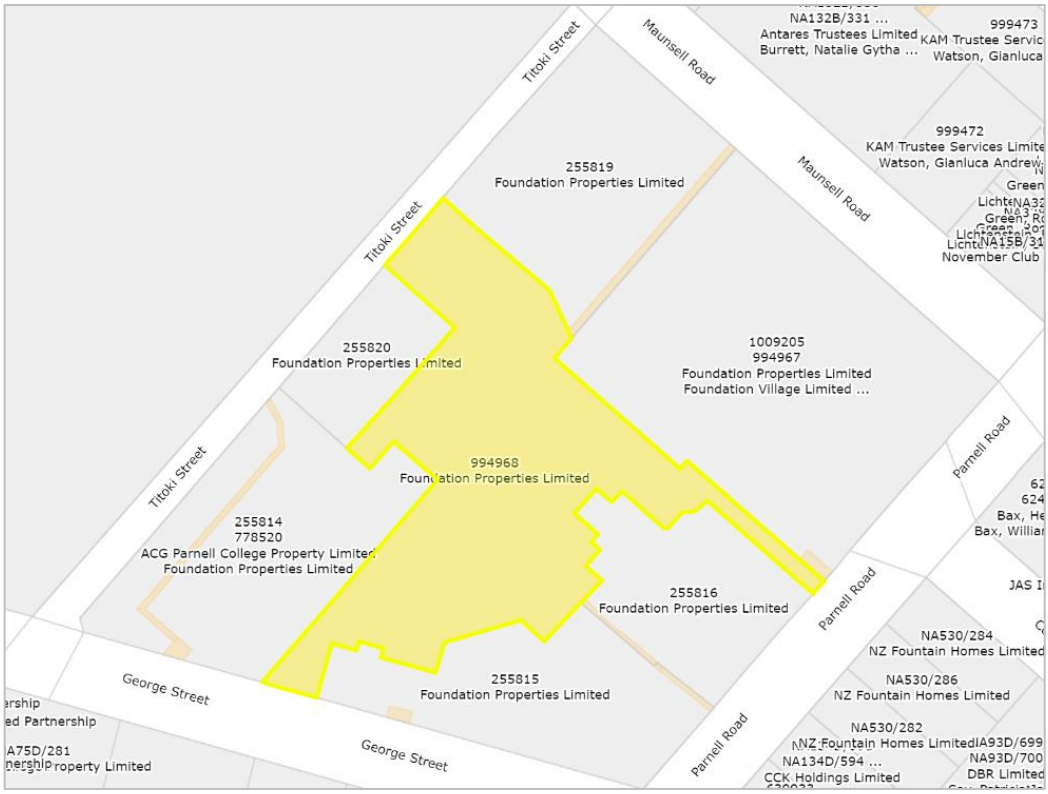

Figure 4 – Area of various rights identified in yellow outline.

This interest grants the benefitting lots rights to use the easement facilities at all time, and rights of entry to the entirety of record of title 994968 for the purposes of accessing and maintaining the utilities where no less than seven days' written notice is provided. There is no specificity as to the location of the respective ROW's/easement within the record of title. The parking right contained in the instruments further enables the burdened landowner to amend the benefitting landowner's use of the area from time to time.

These rights and amenity will be maintained as part of the Project.

Record of title 994967 (4 Maunsell Road):

a. *Subject to a lease for a term of 105 years from 6 May 2021 in instrument number 12179797.5* – This record of title is subject to a leasehold interest recorded in record of title 1009205 to Foundation Village Limited, which expires on 5 May 2126.

The lease will not be affected by the Project.

Registered Legal Land Owners

37. Foundation Properties Limited ("**FPL**") owns all of the properties and buildings within the Foundation site, with the exception of the ACG building. FPL holds lease agreements with the various tenants of the buildings located within the Foundation site.

38. The Applicant has an ongoing lease arrangement with the owner of 8 Domain Drive that enables contractor parking on the empty site.

39. There are no land owner or leaseholder constraints affecting the Applicant's ability to undertake the works required for the Project.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the works that is required for the project

40. The Foundation Village Partnership ("the **Applicant**") is a partnership that was formed between Generus Foundation Limited ("**Generus**") (who provide the development expertise) and Foundation Village Limited ("**FVL**"), the commercial entity of Blind Low Vision NZ.

41. The Applicant is the holder of resource consents (including variations) (explained in Paragraphs 107 – 110) to develop a retirement village within the Foundation site, which includes the redevelopment of the north-eastern corner of the Foundation site with two 4-5 storey buildings (Building 1 and Building 2), together with the refurbishment of Pearson House (fronting Titoki Street).

42. The Project relates to Building 3, being the third stage of the retirement village development within the Foundation site. Building 3 is proposed to be integrated functionally and operationally with the Building 1 and 2 developments (Stages 1 and 2), and Pearson House.

43. The following explains the respective Applicant parties:

Generus Living Group ("**Generus**")

44. Generus is a New Zealand owned company that is known for creating superior retirement living environments for its residents. Over the last 10 years, its team has built a strong reputation for building and managing outstanding retirement villages of impeccable quality in premium locations - including Auckland (Ranfurly Village), Christchurch (Holly Lea Village and Russley Village) and Mount Maunganui (Pacific Lake Village and Pacific Coast Village).

45. Generus is recognised for designing high quality retirement village environments and apartment style retirement units to exacting standards, with a high level of consideration given to the local heritage of the surrounding environment. The retirement living environments created by Generus all have their own sense of community, creativity and personality - supporting the independence of the residents of each village. Generus Foundation Limited as the joint-venture party to the Foundation Village Partnership, is wholly-owned by the Wilkinson Management Trust and is a sister company to Generus Group.

46. The Generus development team is currently constructing the approved Stage 1 and 2 (Buildings 1 and 2) components of the retirement village within the Foundation site. The Project will be the final stage of this comprehensively planned retirement village.

Foundation Properties Limited (FPL)

47. FPL is a company that is owned by Blind Low Vision NZ to manage and operate their property portfolio. Foundation Village Limited is the joint venture partner to the Foundation Village Partnership, and is a wholly-owned subsidiary of FPL.

48. Blind Low Vision NZ is a registered charity and is New Zealand's main provider of practical and emotional support for people who are blind or have low vision. It seeks to equip people with the necessary skills to participate fully in society. This includes the provision of support in independent living, tending to day-to-day activities, the use of technology, continuing to read and communicate, being socially active and staying in (or looking for) work.

49. Blind Low Vision NZ originated in 1890 as the Jubilee Institute for the Blind. The Jubilee Building at 545 Parnell Road was subsequently opened in 1908 and originally housed a school for the vision impaired, as well as a library, dormitories, dining hall and kitchen facilities.

50. Blind Low Vision NZ has chosen to partner with Generus for the Project to provide for the development and lease of its land holdings to contribute to its long-term financial sustainability and independence – which is critical to continuing the provision of essential services to people who are blind or have low vision.

51. The Project, and its integration with the Stage 1 and 2 components of the retirement village under construction will assist with achieving this outcome by enhancing the productivity and return provided by the assets Blind Low Vision NZ holds on the Foundation site.

52. Blind Low Vision NZ will continue to maintain its office and support services at the Foundation site within the ground floor of Building 1 (a component of Stage 1) – thereby continuing its physical and historical association with the Parnell community.

4. PROJECT DETAILS

Project Name

53. The Foundation Village – Building 3.

Project Summary

54. The Project is for the construction and operation of Building 3, being Stage 3 of a comprehensive retirement village development an 'Integrated Residential Development'[1] (as defined by the Unitary Plan), for a comprehensive retirement village activity.

55. Previous stages for which resource consents have been approved (and amended by subsequent variation consents) and are under various stages of construction correspond to:

- 'Building 1' and 'Building 2', located at the corner of Parnell Road and Maunsell Street (4 Maunsell Road). These buildings provide for a total of 106 retirement units, together with basement carparking accessed off Maunsell Road.

[1] "A residential development on sites greater than 2,000m^2 which includes supporting communal facilities such as recreation and leisure facilities, supported residential care, welfare and medical facilities (inclusive of hospital care), and other non-residential activities accessory to the primary residential use. For the avoidance of doubt this would include a retirement village".

- Alterations and refurbishment of Pearson House at 16 Titoki Street to accommodate administration offices for staff and communal amenities for residents of the proposed retirement village, including lounges, café, and cinema amenities.

56. Further details on the consents held by the Applicant are provided in Paragraphs 107 – 110.

57. The Project (Building 3) is the third and final stage to complete the comprehensive retirement village activity on the Foundation site. The Project will comprise the following:

- The construction of a 11-13 storey modulated building with a height of some 42m (excluding lift overrun).
- 65 apartment style retirement units.
- Associated staff and administrative functions.
- A range of resident amenities, including reception, lounges, bar, café, therapy, salon, swimming pool, health/wellness centre, library, and outdoor amenity areas.
- Internal circulation and the provision of parking within the application site in the form of two levels of basement car parking, as well as at-grade parking.
- Soft and hard landscaping around the footprint of Building 3, as well as ground level improvements to other areas with the application site.
- A connecting (pedestrian) paved link to the southern façade of Pearson House to provide access between Building 3 and resident facilities approved within Pearson House.
- A suspended pedestrian link between Level 1 of Building 3 and the approved Building 2.
- A vehicle connection between Building 2 and Building 3 at basement level.

58. The pedestrian connections proposed between Building 3 and Building 2 (and to Building 1 via Building 2) and Pearson House will provide convenience to residents, visitors, and staff, and seamlessly integrate the various elements of the retirement village.

59. Each of the retirement units will be able to be occupied by a maximum of two residents, with the industry average occupancy rate per unit being 1.2 persons. The average age of people when they move into a Generus retirement village is 78 years old.

60. The number of full-time equivalent ("**FTE**") staff required to service the overall retirement village following the completion of Building 3 is anticipated to be 40-50 FTE staff. This includes a combination of health care professionals, management, administrative staff, and maintenance staff. The Project is expected to require 15 FTE staff.

61. The proposed layout of the Project relative to Stages 1 and 2 is shown in **Figure 5**, and further illustrated on the Project Drawings appended as **Attachment 4**:

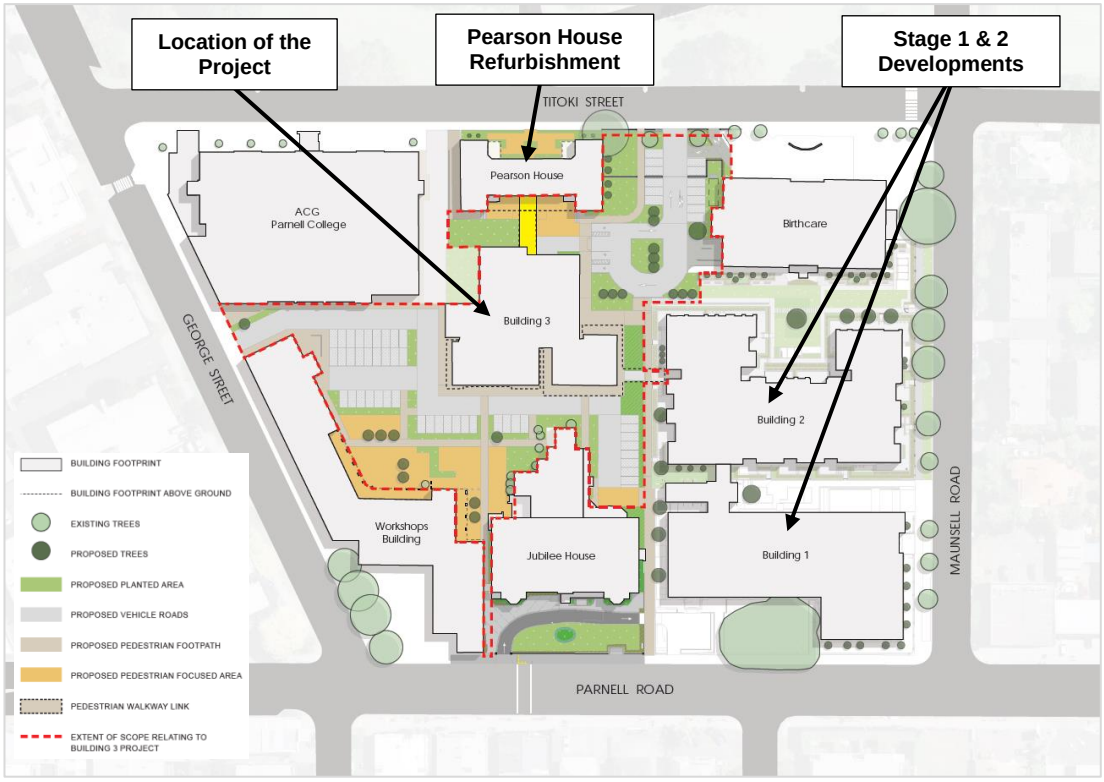

Figure 5 – Proposed project layout and scope relative to Stages 1 & 2 (Source: Boffa Miskell).

62. In order to construct Building 3, it will be necessary to:

- Erect site security fencing and hoardings as appropriate to the perimeter of the construction area, including temporary project advertising and site identification signage.
- Undertake bulk earthworks to provide for suitable building platforms (including basement levels), and to accommodate the proposed in-ground infrastructure. The estimated earthworks area is 3,000m^2 and volume is 20,200m^3.
- Undertake standard site remediation works to remove legacy contaminated soils (this will coincide with the bulk earthworks stage).
- Install network utility connections to relevant infrastructure.
- Undertake construction activities to construct the Project.[2]

63. The Project also includes the following temporary activities:

- temporary car parking for construction related vehicles within the Foundation site;
- temporary car parking off-site for contractor vehicles at 8 Domain Drive, consistent with the current off-site construction parking arrangements for Stage 1 and Stage 2;
- temporary advertising hoardings;

[2] The nature of the construction will not be dissimilar to that undertaken for the approved Stage 1 and 2 buildings, which similarly involved basement excavations proximate to the existing (including heritage listed) buildings within the Foundation site.

Staging and Timing of the Project

64. It is intended that the construction of the Project will occur when other (separately consented) components of the retirement village have reached certain milestones. This includes:

(a) Building 1: Completed in its entirety and fully operational. The target completion date for the building is July 2023.

(b) Building 2: 80% completed (with cladding on and fit out activities ongoing). The target completion date in March 2023.

(c) Pearson House: Completed and operational. Target completion date June 2024.

65. The bulk earthworks and civil infrastructure for the Project is intended to be completed coincidently with the final stage of the Building 2 construction programme.

66. The Applicant intends to commence works promptly after the forecasted date of obtaining consent (via the FTCA process), with this being in the 2024-2025 earthworks season, which provides for the commissioning of the necessary documentation and building consents, contractor engagement, following receipt of the resource consent.

67. As set out in **Table 1**, the total construction period is anticipated to be approximately 3-4 years:

Construction Activity	Approximate Construction Period
Site Establishment and Enabling Works	
Stage 1: Bulk Earthworks (including Civil & Infrastructure Works)	8 - 10 Months
Building Construction	
Stage 2: Basement Construction	6-8 Months
Stage 3: Above-Ground Building Construction	18 - 24 Months
Stage 4: Soft and Hard Landscaping	2 Months

Table 1 – Construction stages and approximate timing.

68. The key milestones for delivering the Project (with estimated dates), are set out below:

(1) Fast Track Referral – May 2023

(2) Lodge Resource Consent Application – June 2023

(3) Resource Consent Approval – October / November 2023

(4) Bulk Earthworks – Commence April 2025

(5) Construction – Commence December 2025

69. The Applicant intends to implement the documentation to facilitate construction upon receipt of the resource consent, to align with the programme outlined above, and maintain (rather than interrupt) a construction sequencing and presence on the application site, relative to the delivery of Buildings 1 and 2, and the refurbishment of Pearson House.

Consent / Approvals Required

70. Relevant local authorities: Auckland Council

Resource consent(s) / Designation required (click to place an "X" in the relevant box/s):

☒ Land-use consent	☐ Subdivision consent	☐ Coastal permit
☒ Water permit	☒ Discharge permit	☐ Designation
☐ Alteration to designation		

71. An assessment has been undertaken in respect of the relevant provisions of the Unitary Plan, and the following resource consents are considered to be required for the Project:

Table 2: Consent Triggers

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
Unitary Plan	C1.9(2)	The Project does not comply with the following Business – Mixed Use zone standards: - H13.6.1(1) (Building Height) - H13.6.1(2) (Occupiable Height)	Restricted Discretionary Activity	Central portion of the application site.
Unitary Plan	H13.4.1(A45)	New buildings in the Business – Mixed Use Zone.	Restricted Discretionary Activity	Central portion of the application site.
Unitary Plan	D17.4.1(A9)	Modifications to, or restoration of, buildings, structures, fabric or features of a scheduled historic heritage place, except where provided for as a permitted, controlled or restricted discretionary activity in another rule in this overlay	Restricted Discretionary Activity	North-western portion of the application site, between Building 3 and Pearson House.
Unitary Plan	D17.4.1(A10)	New buildings or structures within the scheduled	Discretionary Activity	That portion of the basement levels, and the upper

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
		extent of place of Category A building		levels of the building, located with the extent of place of Pearson House and the Jubilee Building.
Unitary Plan	E7.4.1(A20)	Dewatering or groundwater level control associated with a groundwater diversion authorised as a restricted discretionary activity under the Unitary Plan, not meeting permitted activity standards or is not otherwise listed: • E7.6.1.6(2) • E7.6.1.6(3)	Restricted Discretionary Activity	Entire extent of application site.
Unitary Plan	E7.4.1(A28)	The diversion of groundwater caused by any excavation, (including trench) or tunnel that does not meet the permitted activity standards or not otherwise listed: • E7.6.1.10(1)(d) • E7.6.1.10(2)(b) • E7.6.1.10(4)(a) • E7.6.1.10(4)(b) • E7.6.1.10(6)(b)	Restricted Discretionary Activity	Entire extent of application site.
Unitary Plan	E12.4.1(A6)	Earthworks greater than 2,500m^2	Restricted Discretionary Activity	Entire extent of application site.
Unitary Plan	E12.4.1(A10)	Earthworks greater than 2,500m^3	Restricted Discretionary Activity	Entire extent of application site.
Unitary Plan	E12.4.1(A30)	Earthworks greater than 50m^2 within a Historic Heritage Overlay	Restricted Discretionary Activity	Those portions around Building 3 within the Historic Heritage Overlay where earthworks are proposed.

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
Unitary Plan	E12.4.1(A32)	Earthworks greater than $5m^3$ within a Historic Heritage Overlay	Restricted Discretionary Activity	Those portions around Building 3 within the Historic Heritage Overlay where earthworks are proposed.
Unitary Plan	E23.4.2(A53)	Comprehensive development signage.	Restricted Discretionary Activity	Various locations, including George Street and Titoki Street entrances, and within the Foundation site.
Unitary Plan	E25.4.1(A2)	Construction noise and vibration activities that do not comply with a permitted activity standard. The following infringements to the permitted standards are proposed: • Standard E25.6.27(1) - Construction Noise (Activities sensitive to noise) • Standard E25.6.27(2) - Construction Noise (Any other activity not sensitive to noise) • Standard E25.6.30(1)(b) – Vibration (Vibration limits in buildings).	Restricted Discretionary Activity	Entire extent of application site.
Unitary Plan	E30.4.1(A6)	Discharges of contaminants into air, or into water, or onto or into land not meeting permitted activity Standard E30.6.1.1; E30.6.1.2; E30.6.1.3;	Controlled Activity	Entire extent of application site.

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
		E30.6.1.4; or E30.6.1.5		
Unitary Plan	E40.4.1(A24)	The construction of the Project will exceed the permitted 24 month period pursuant to E40.4.1(A20).	Restricted Discretionary Activity	Entire extent of application site, as well as temporary construction parking at 8 Domain Drive.

72. Resource consent is also required under Regulation 9 of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ("**NES-CS"**), as a Controlled Activity, to disturb soil that has the potential to be contaminated, when a Detailed Site Investigation has been undertaken.

73. The Project does not include any activity that is a Prohibited Activity under the Resource Management Act 1991 ("**RMA**"), its regulations, a Plan or Proposed Plan.

Relevant Zoning, Overlays and Other Features

74. The application site (and the Foundation site) is zoned 'Business – Mixed Use' ("**BMU**") under the Unitary Plan (**Figure 6**), with the exception of 8 Domain Drive (to be used for off-site contractor parking), which is zoned 'Residential – Terraced Housing and Apartment Buildings'.

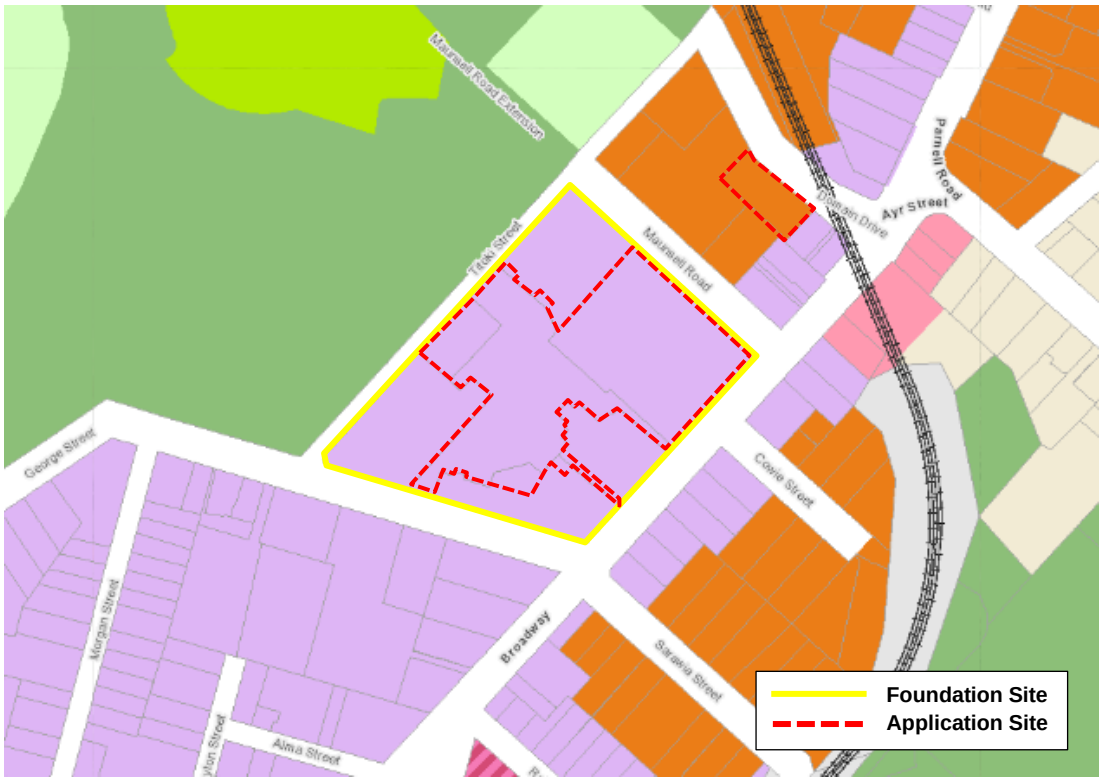

Figure 6 – Zoning of the Site relative to the surrounding environment (Source: Auckland Unitary Plan Maps).

75. As set out in Section H13.1 of the Unitary Plan, the BMU Zone "*is typically located around centres and along corridors served by public transport. It acts as a transition area, in terms of scale and activity, between residential areas and the Business – City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone. It also applies to areas where there is a need for a compatible mix of residential and employment activities*".

76. The widespread nature of the zone encapsulates a variety of site sizes and building typologies, and, in doing so, acknowledges the presence of (and ability of the zoning to accommodate) larger scale development (residential and / or commercial), which is typically located on larger sites within the zone. Such developments, together with the more 'standard' developments enabled in the zone, are provided for to facilitate choice, and currently form part of the overall zone characteristic.

77. In providing for intensification (with no intensity constraint), the BMU Zone envisages a variety of forms of residential development, particularly where:

(a) the size of the site and its context enable the land to be utilised in a more efficient manner;

(b) the effects on neighbouring sites and urban character can be managed through quality design, building setbacks, and integrated landscaping; and

(c) the development can occur in a way which maintains a reasonable standard of amenity.

78. The BMU Zone provides for 'Integrated Residential Development' (including retirement villages), and a range of other accommodation activities, including dwellings as a Permitted Activity. There are no controls limiting the 'intensity' of such development, and no standards restricting building coverage or impervious area, and no standards prescribing a minimum landscaped area, with built development able to optimise the available site area.

79. There are no yard or height in relation to boundary standards applicable to the neighbouring BMU zoned land within the Foundation site, or in respect of the frontages to George Street / Titoki Street, Maunsell Road, Parnell Road. Therefore, at the interface with neighbouring properties and the street, buildings up to 18m are permitted within the BMU Zone.

80. In addition to the proposed use, activities reasonably anticipated within the BMU Zone (as Permitted Activities) include a range of commercial, office and retail activities, including:

- Commercial services;
- Drive-through restaurants;
- Entertainment facilities;
- Food and beverage;
- Offices up to 500m² gross floor area per site;
- Retail up to 200m² gross floor area per tenancy; and
- Supermarkets up to 450m² gross floor area per tenancy.

81. The BMU Zone also provides for 'dwellings', 'supported residential care', 'visitor accommodation' and 'boarding houses', together with a range of community activities and industrial activities (subject to limitations).

82. The BMU Zone requires resource consent as a Restricted Discretionary activity for 'New buildings'. The design and layout of such buildings is required to be assessed through such a consent process to ensure they are of a quality and design that positively contributes to:[3]

- the planned future form and quality, creating a sense of place;
- the planning and design outcomes identified for the zone;
- the visual quality and interest of streets and other public open spaces; and
- pedestrian amenity, movement, safety and convenience for people of all ages and abilities.

83. Relevantly with respect to development in the BMU Zone:

- The permitted height standard provides for an occupiable building height of 16m and a total building height of 18m (with 2m allowed for the roof form of the building).
- There is no requirement for recession planes where the abutting site is not zoned for residential, open space or special purposes (which do not abut the application site).
- There is no requirement to set back buildings at the upper levels[4] until the total height of the building exceeds 18m.
- There is no requirement for side, rear or front yards - unless the site adjoins a residential or special purpose zone (which does not apply to the application site).
- A landscape buffer along the street frontage is only required to be provided between a street and car parking, loading or service areas, where these are visible from the street (not relevant to the Project).
- There are no maximum site coverage or impervious area controls.

Overlays and Controls

84. In terms of overlays and controls, the following apply to the application site:

- Overlay: Historic Heritage and Special Character: Historic Heritage Overlay Extent of Place [rcp/dp] - 1892, Pearson House (refer **Figure 4**).
- Overlay: Historic Heritage and Special Character: Historic Heritage Overlay Extent of Place [rcp/dp] - 1794, Royal New Zealand Foundation for the Blind office and workshops (former) (refer **Figure 4**).
- Controls: Centre Fringe Office Control (refer **Figure 5**).
- Controls: Macroinvertebrate Community Index - Urban.

85. There are no designations which apply to the application site.

86. No works or alterations are proposed to notable trees or street trees as part of the Project.

[3] Objective H13.2(3) and Policy H13.3(3).

[4] Above which the setback from the site boundary is 6m.

Historic Heritage Overlay Extent of Place [rcp/dp] - 1892, Pearson House; and 1794, Royal New Zealand Foundation for the Blind office and workshops (former).

87. The purpose of the 'Historic Heritage Overlay' is to manage the protection, conservation, maintenance, modification, relocation, use and development of scheduled historic heritage places. Scheduled heritage places with "outstanding significance" are identified as 'Category A Places'. This Category includes 'Pearson House' and the former 'Royal New Zealand Foundation for the Blind office and workshops', as identified in **Figure 7**.

88. For completeness, reference is made to Section D17.1 of the Unitary Plan, which states "*a scheduled historic heritage place can be an individual feature, or encompass multiple features and/or properties, and may include public land, land covered by water and any body of water. A historic heritage place may include; cultural landscapes, buildings, structures, monuments, gardens and plantings, archaeological sites and features, traditional sites, sacred places, townscapes, streetscapes and settlements"*.

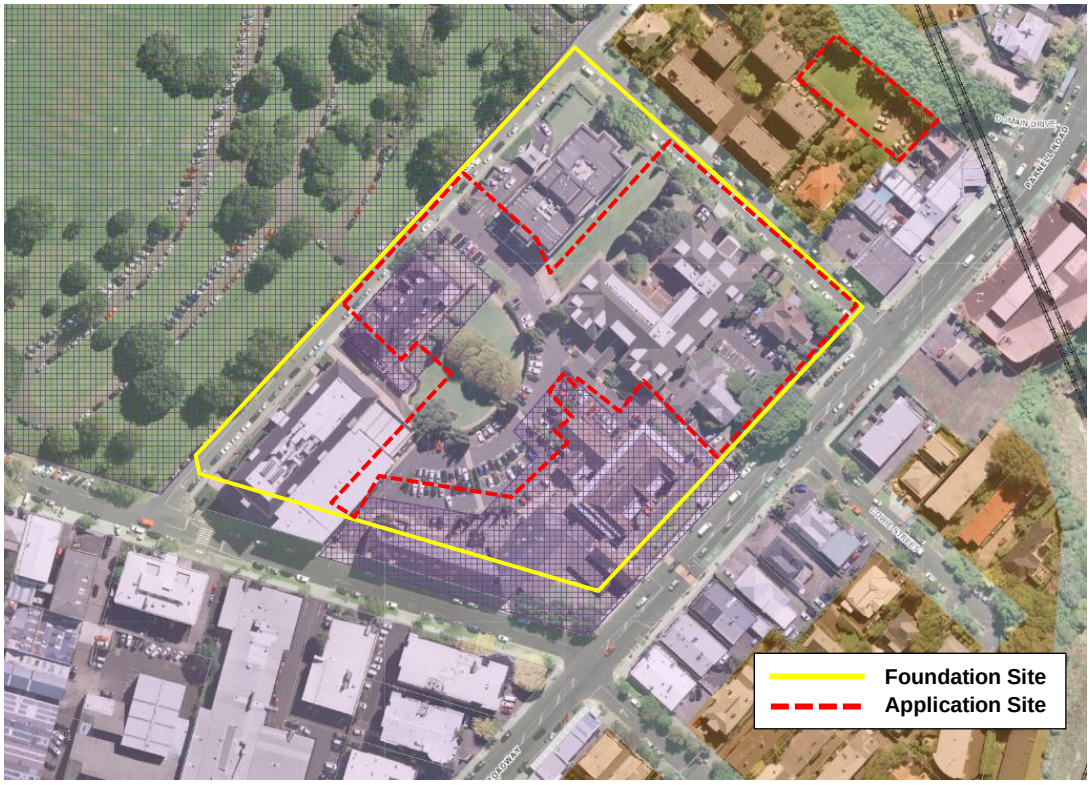

Figure 7 – Map showing historic heritage overlay in purple hatching (Source: Unitary Plan Maps).

89. Modifications to Category A buildings require resource consent as a Restricted Discretionary Activity, and new buildings or structures within the scheduled extent of place of a scheduled item require resource consent as a Discretionary Activity.

90. The Project includes elements that are located within the extent of place of Pearson House and the former Royal New Zealand Foundation for the Blind office and workshops, including:

- The Project includes an uncovered paved pedestrian link to the south-east east / rear of Pearson House connecting Building 3 with Pearson House that is both within the extent of place, which may require minor modifications to the building.

- A portion of the basement (at its south-east extent) and a portion of the south-eastern elevation (above ground level) is proposed within the extent of place of the former Royal New Zealand Foundation for the Blind office and workshops (Jubilee Building).

91. The various components of the Project that are proposed within the heritage extent of place for Pearson House and the former Royal New Zealand Foundation for the Blind office and workshops are illustrated in **Figures 8 and 9,** and the Project Drawings (**Attachment 4**).

Figure 8 – Building footprint and basement extent in relation to the scheduled heritage curtilage.

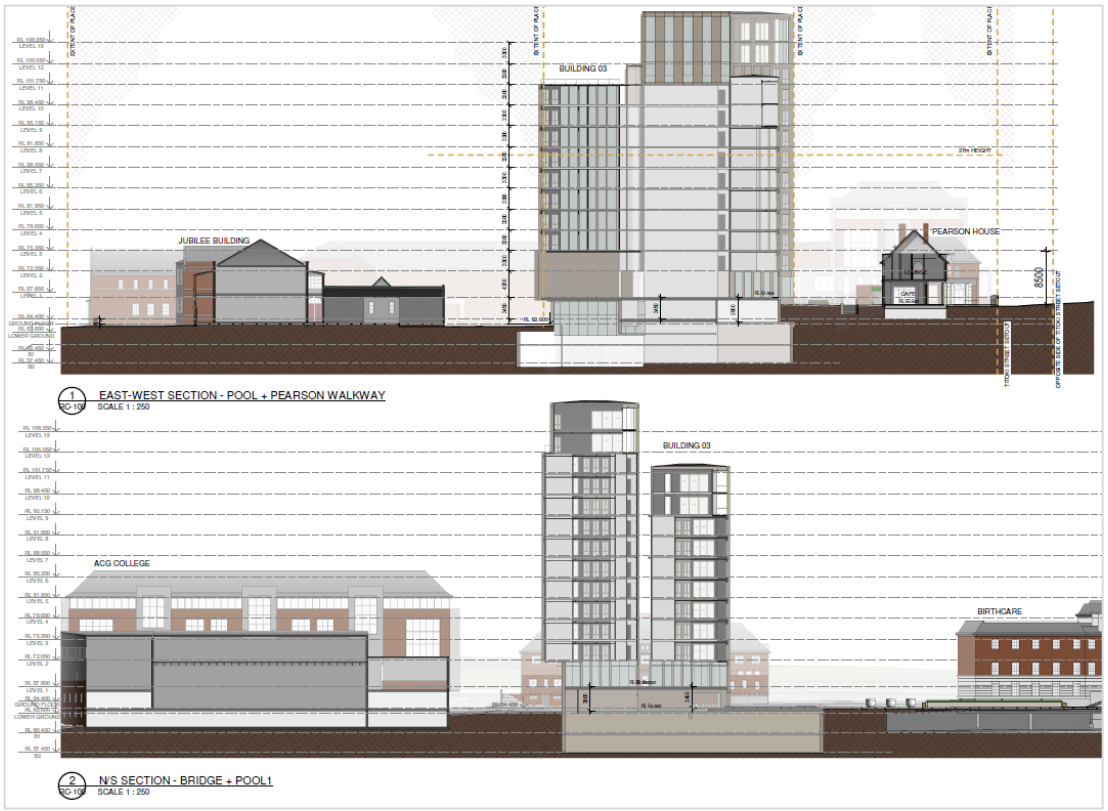

Figure 9 – Proposed building and basement in elevation in relation to the scheduled heritage curtilage.

Centre Fringe Office Control

92. The Centre Fringe Office Control applies to areas of the BMU zone and the Business - Local Centre Zone, on the fringe of the City Centre.

93. The extent of the control encompasses the Foundation site and neighbouring BMU zoned land, shown in **Figure 10**.

94. The purpose of the Centre Fringe Office Control is to enable intensive office activities close to the city centre, where there is a high level of accessibility to public transport, to minimise the growth in private trips by commuters during peak periods.[5] The control requires that office activities provide no more than 1 parking space per 60m^2 GFA.

95. There is no minimum or maximum parking requirement for any other activities on land that is subject to the Centre Fringe Office Control.

Figure 10 – Map showing Centre Fringe Office control in purple hatch (Source: Unitary Plan Maps).

Macroinvertebrate Community Index – Urban

96. The 'Macroinvertebrate Community Index – Urban' control relates to objectives and policies for the management of freshwater and sediment quality, the maintenance and improvement of the mauri of freshwater, the management of stormwater and wastewater networks to protect public health and safety, and to prevent or minimise adverse effects of contaminants on freshwater and coastal water quality.

97. The 'Macroinvertebrate Community Index – Urban' control does not contain any particular standards to be complied with.

[5] Policy E27.3(11).

Height Variation Control

98. Although not applying to the application site (or the wider Foundation site), in the context of the surrounding environment, the 'Height Variation Control' applies to a number of nearby sites. The control applies a permitted building height between 19.5m and 22.5m in the neighbouring Residential – Terrace Housing and Apartments Building Zone, 27m in the neighbouring BMU Zone, and 28-55m to parts of the Business – Metropolitan Centre Zone (further south).

99. Those sites located proximate to the application site that the Height Variation Control applies to are shown in **Figure 11** (identified with dark blue lines around the perimeter of the sites).

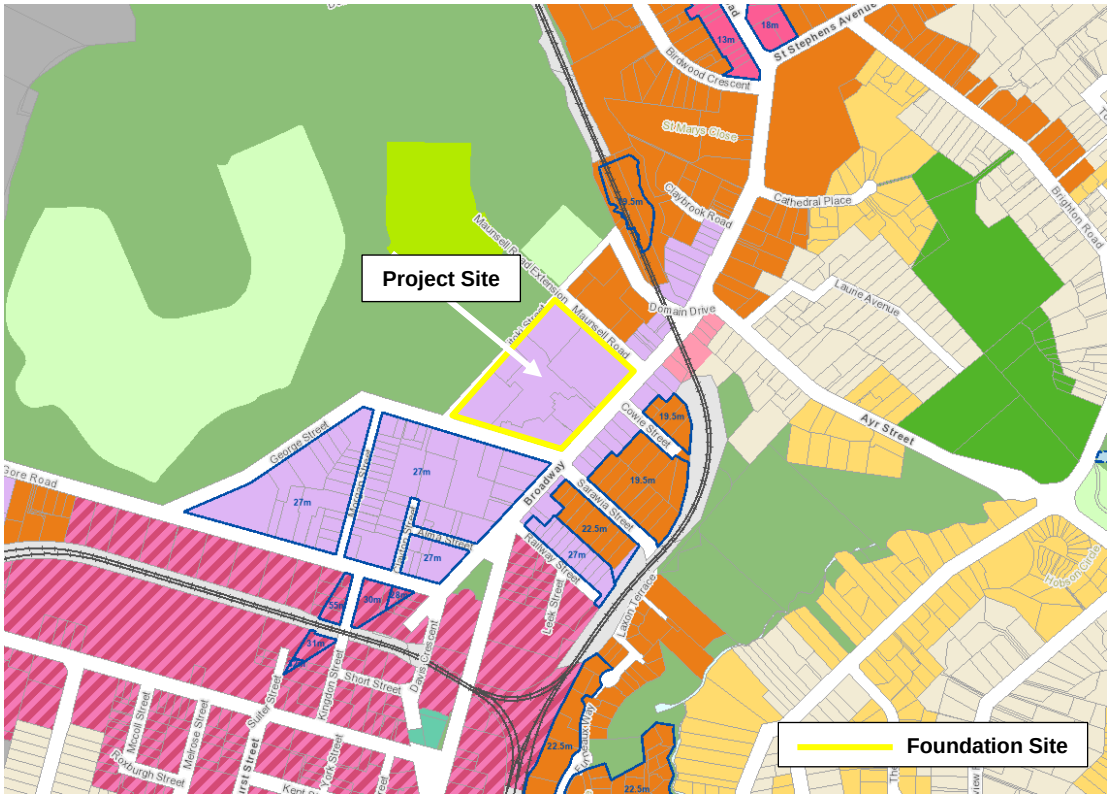

Figure 11 – Map showing Height Variation Control (Source: Auckland Unitary Plan Maps).

Plan Change 78

100. On 18 August 2022, Auckland Council notified 'Plan Change 78: Intensification' ("**PC78**") to implement changes to the Unitary Plan to give effect to Policy 3 and 4 of the National Policy Statement on Urban Development 2020 ("**NPS-UD**") and to incorporate the Medium Density Residential Standards ("**MDRS**") as required by the amendments that have been made to the RMA (which were introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021).

101. PC78:

(a) Retains the BMU Zone for the application site.

(b) Retains the Permitted activity status of 'Integrated residential development' (inclusive of retirement villages) within the BMU Zone.

(c) Retains the Restricted Discretionary activity status for 'New buildings' activity within the BMU Zone.

(d) Increases the permitted height standard to 21m (6 storeys), compared with the operative standard of 18m (16m occupiable space +2m roof).

102. Submissions on PC78 closed on 29 September 2022. Council released a summary of submissions on 5 December 2022 and further submissions closed on 20 January 2023.

103. The Council's Section 32 assessment in respect of the rationale for the proposed height standard of 21m (6-storeys) for the BMU Zone states:[6]

> *Where Policy 3 refers to "at least" six storeys this means that a minimum of six storeys must be enabled, but six storeys is not necessarily the maximum height – it could be higher (but not lower) than six storeys.*
>
> *The MfE guidance states that six storeys "is the minimum and not a target and, in many cases, local authorities should enable higher than six storeys, especially where there is evidence higher buildings would be appropriate."*
>
> *The guidance notes that "this will depend on local circumstances and evidence."*
>
> *As explained in the s32 on development capacity and demand, there is a large surplus of development capacity in Auckland. Therefore, simply based on capacity there is no need to identify areas of more than six storeys. However, that is not to say that additional height in some areas may be appropriate for other reasons.*
>
> *Due to the time constraints on the council in preparing PC78 (along with other related plan changes) no new areas within walkable catchments have been identified for additional height beyond six storeys. Existing Height Variation Controls that enable buildings beyond six storeys (i.e. 21m) remain unchanged. Further work is required to determine where heights of more than six storeys might be appropriate.*

104. In response to this, Generus made a submission on PC78, seeking the application of the Height Variation Control to the application site to provide for a permitted height of 45m (corresponding to some 12 storeys), on the basis that:

- The application site is within the walkable catchment of the Newmarket Rail Station and the Newmarket Metropolitan Centre zone.
- The application site is not subject to any Qualifying Matter that otherwise constrains height.
- The height of the existing and consented development on the Foundation site provides a buffer to neighbouring residentially (THAB) zoned land to the north, which is well separated from the application site.
- A height of 12 storeys will sit comfortably with the height enabled in the BMU Zone to the south (27m) and the Newmarket Metropolitan Centre Zone (72.5m).
- The mass enabled by providing for a 45m height opportunity would fit well within, and positively contribute to, the varied building height within the Foundation site and this northern part of Newmarket.
- The extent of the presence of Historic Heritage features within the Foundation site otherwise limits the opportunity for urban intensification in an appropriate location. Enabling height on the application site compensates for the lost opportunity.

[6] PC78 to the Auckland Unitary Plan (Operative in part): Section 32, Implementation of Policy 3 of the National Policy Statement – Urban Development: Evaluation Report, section 6.7.1.2.

- The intensification of a large proportion of land within the Newmarket Metropolitan Centre zone (which contains a hub servicing high frequency transport) is constrained by the presence of Qualifying Matters (Volcanic Viewshafts Overlays), increasing the importance of enabling urban intensification of adjacent land to support the Centre as a focal point for community interaction and commercial growth and development.

- There is high demand for urban intensification in this market attractive location and the outcome sought would contribute to development capacity.

- The form of development that is proposed for the application site will contribute to enabling people to live in (and support businesses and community services in) areas of an urban environment in which all of the following apply: the area is in or near a centre zone or other area with many employment opportunities; the area is well-serviced by existing or planned public transport; and there is a high demand for housing in the area, relative to other areas within the urban environment.

- The form of development that is proposed for the application site will contribute to housing choice by providing typologies that meet the needs of different households, in particular the older members of the community.

- The outcome sought will better enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

- The application site benefits from the adjacent open space amenity of the Auckland Domain and attraction of the Auckland War Memorial Museum; both of which support urban intensification and access to quality environments for future residents. Other development surrounding the Auckland Domain reaches heights similar to or greater to that proposed, including a number of buildings on the Auckland City Hospital campus.

105. A review of the summary of submissions that were lodged by others on PC78 reveals a common theme in respect of the suitability of the Council's approach to responding to the NPS-UD, being that the Council's proposed height limits do not respond appropriately to the NPS-UD, and greater height can be sustained in the locality, including the application site.

106. While the proposed rules under PC78 do not have immediate legal effect as they relate to the Project, the policy and legislation referred to above require that these changes are implemented. At the conclusion of the hearings process for PC78, it is therefore reasonable to expect that, at a minimum, a base height of at least 21m will apply to the application site.

Resource consent applications already made, or notices of requirement already lodged, on the same project

107. No other resource consents or notices of requirement have already been lodged for this, or a similar, project by the Applicant.

108. The Applicant holds the following resource consents for the Foundation site:

- BUN60343924 (LUC60343866, DIS60343867, WAT60343925)
- BUN60343924 (LUC60343926-A, DIS60343867, & WAT60343925-A)
- BUN60343924 (LUC60343926-B, DIS60343867, & WAT60343925-B)
- LUC60401436

109. The following explains the nature of the resource consents held:

- Foundation Village Limited and Generus Foundation Limited (The Foundation Village Partnership (i.e. the Applicant)) were granted resource consent BUN60343924 (LUC60343866, DIS60343867, WAT60343925) on 22 November 2019 by Auckland Council for the construction, operation and maintenance of a mixed-use development on the Foundation site. The consents granted were subsequently varied on 8 December 2020 to incorporate amendments to the original design.
- With reference to the approved Site Plan (**Figure 12**), the approved development comprises two 5-6 storey buildings (Buildings 1 and 2) on the Foundation site, providing for the establishment of up to 116 retirement units, and offices on the ground floor of Building 1 (to be occupied by the Royal New Zealand Foundation of the Blind).

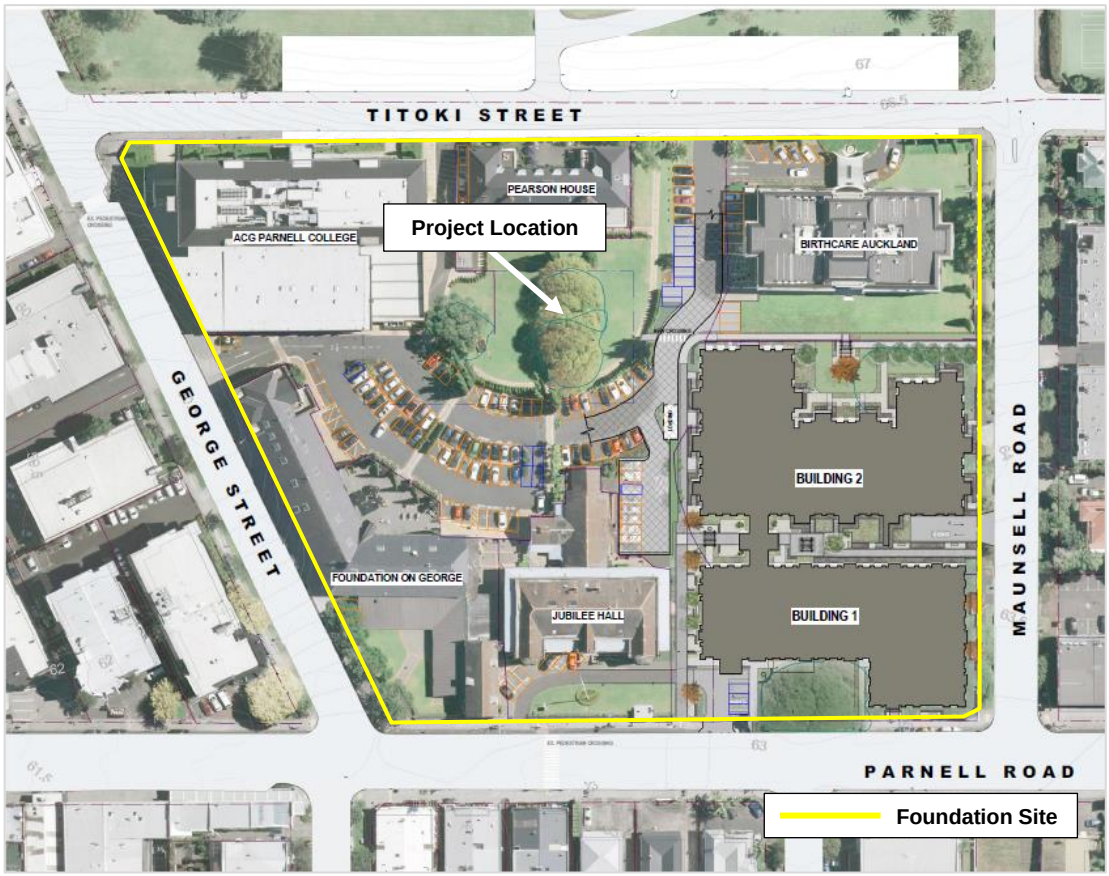

Figure 12: Approved Site Plan for the resource consent held.

LUC60401436

110. Resource consent was approved 11 August 2022 to undertake internal and external alterations and seismic strengthening to the scheduled heritage building at 10 Titoki Street, known as 'Pearson House', to accommodate administration offices for staff and communal amenities for residents of the approved retirement village, including lounges, café, and cinema amenities.

111. The approved internal layout of Pearson House is shown in **Figures 13** and **14**.

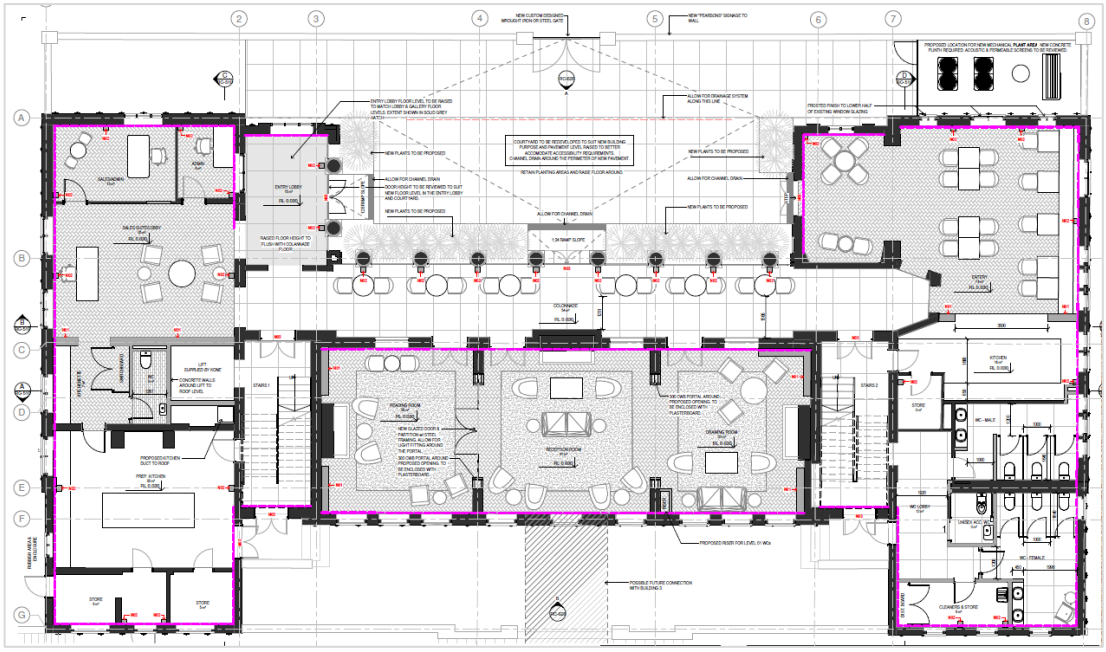

Figure 13: Approved Ground Floor Plan for Pearson House alterations approved 11/08/2022.

Figure 14: Approved Level 1 Floor Plan for Pearson House alterations approved 11/08/2022.

Resource consent(s)/designation required for the project by someone other than the applicant, including details on whether these have been obtained

112. No other resource consents or designations are required for the Project by someone other than the Applicant.

Other legal authorisations required to begin the project

113. The Project will require Engineering Plan Approval and Building Consent from Council prior to construction commencing, and these will be sought once resource consent has been obtained.

114. An Archaeological Authority under the New Zealand Pouhere Taonga Act 2014 has been sought (lodged 27th January 2023) relative to the scope of works, as the application site has been identified as potentially containing remnants of pre-1900 buildings that have previously been demolished.

115. The application has been accepted for processing, and consultation with HNZPT is ongoing in respect of this matter.

116. No other legal authorisations are required to begin construction of the Project.

Construction Readiness

117. Generus has significant experience in developments of this nature, gained over its 10 years of operation, and the Applicant has financing to fund the Project to completion.

118. The Applicant is not dependent on pre-sales of any of the units within Building 3 to fund any aspect of the Project. As such, no delays are expected relative to the programme, and the intention is to commence construction on the Project soon after Building 2 reaches 80% completion (expected mid-2025). Completion of the Project as soon as possible is the Applicant's priority. In all respects, the Project is "shovel ready".

119. The Applicant intends to commence works for the Project promptly after the forecasted date of obtaining consent via the FTCA process, with this being in the 2024-2025 earthworks season, to provide for the commissioning of the necessary documentation and building consents, contractor engagement etc, following receipt of the resource consent.

120. The Project will be built over approximately 3-4 years following the commencement of construction. Generus directly oversee its construction projects, resulting in a high degree of control over the building delivery process including quality and the careful management of temporary construction effects. This is evident in the processes associated with the current construction that is being undertaken for Buildings 1 and 2, and alterations to Pearson House.

121. The internal expertise Generus has developed over the delivery of multiple other high-quality projects will assist to facilitate the delivery of the Project. Independent delivery and quality assurance processes (outside of the engaged consultants) are being successfully implemented for the construction of Buildings 1 and 2 (currently under construction), and Building 3 will follow the same processes. At each stage of the build process for Buildings 1 and 2, the quality for the building has met or has exceeded that of a typical building development. The learnings and standards implemented and achieved for Buildings 1 and 2 will be applied to Building 3.

122. The management of construction traffic and construction related noise and vibration has been addressed in detail during the construction of Buildings 1 and 2, and the management measures implemented have been successful in mitigating the respective effects generated. Engagement with stakeholders at an early stage in respect of these measures and construction management generally has built a relationship of trust and accountability. In developing Building 3 the same rigorous processes put in place to manage construction traffic and construction noise and vibration effects will be adopted.

123. Generus occupies offices within the Foundation site currently to oversee the construction of the Stage 1 and Stage 2 developments, and this will continue for the Project (Stage 3).

124. The Applicant is ready and able to proceed immediately with the design and delivery programme and is comfortable committing resources early with a view to optimising the delivery programme.

125. Following the referral of the Project by the Minister and the subsequent approval of the resource consent, building works for the Project would be commenced within18 months.

126. The table below outlines the status of other key milestones:

Status		✓	**Expected Date**
Land Acquired	All land has been acquired	✓	N/A
Business Case or Investment Case	Draft business case presented	✓	July 2019
	Final business case presented	✓	October 2021
Procurement	Suitable tenderers for construction identified and early procurement discussion commenced		October 2023
	Tender process commenced		October 2024
	Tender evaluation completed & contract negotiation commenced		February 2025
	Contract awarded to preferred contractor		April 2025
	Commence construction		May 2025
Design	Preliminary design commenced		October 2023
	Preliminary design completed		January 2024
	Detailed design commenced		May 2024
	Detailed design completed		October 2024
Consents	Building Consent lodged		October 2024
	Building Consent approved		February 2025

127. While the Applicant intends to proceed with the Project as soon as possible, there are a number of constraints that may have an impact on the timing of the Project, which the fast-track process would ameliorate, including:

- Contractors are able to undertake earthworks at any time of the year, however the summer periods are preferable for earthworks. The fast-track process will enable earthworks to utilise the summer period of 2024-2025, subject to the timing of a decision from an Expert Consenting Panel. It is unlikely that resource consent would be obtained under the 'normal' RMA process prior to the summer period of 2023-2024, and should any appeals be made to the Environment Court, resource consent may not be obtained in time for the summer period of 2024-2025.

- The availability of contractors. This may in turn affect the Applicant's ability to use locally sourced contractors for the Project. The sooner consent can be obtained for the Project, the sooner the Applicant can commence design, procurement, and then secure the

services of the preferred contractors, including those who have been engaged on Buildings 1 and 2, and who are familiar with the application site.

- The availability and cost of materials. Record demand for construction materials and ongoing COVID-19 disruptions to supply chains have led to rapid increases in the costs of materials, and many materials becoming unavailable.

- Expediting the consent process for the Project through the FTCA will enable the Applicant to secure the procurement of relevant materials and provide certainty to its suppliers.

- Both the Applicant's costings for the Project and the pricing of contractor tenders will be affected by increases in material costs.

- Any delay to construction activities that are ongoing to the wider Foundation site will have a carry-on effect to the commencement of onsite activities to this Project. It is intended that the Foundation site is developed sequentially, however the ongoing effects of COVID-19 still remain within the construction industry and may have wider impacts to the delivery of development within the Foundation site.

5. CONSULTATION

Government ministries and departments

128. The Minister for the Environment was contacted via email on 6 December 2022 with an outline of the proposal and intention to lodge an application seeking referral for the Project. As part of this, a request was made to hold a pre-application Meeting with the Ministry.

129. The Applicant's experts engaged in a pre-application Meeting with staff at the Ministry of the Environment on 24 January 2023, which involved a 'briefing' of the Project. Feedback received as part of this meeting has informed the Project and the application documentation provided.

130. The Applicant has not consulted with any other Government ministries or departments.

Local authorities

131. A pre-application meeting was held on the application site with Auckland Council's Premium Consents Team on 21 November 2022 to discuss the scope of the Project and seek agreement from Council's Landscape Architect and Urban Designer on appropriate viewpoint locations for the visual simulations that have been prepared by Boffa Miskell for the Project.

132. Following the initial meeting held with Council on-site, preliminary feedback was provided by the Council's experts (refer **Attachment 1**). This has been considered by the Applicant and reflected in the application where the Applicant considers it to be appropriate to do so.

133. The Applicant's Civil Engineer (Tonkin & Taylor) sought preliminary feedback from Watercare as part of the preparation of the Civils Assessment, which included confirmation that the reticulated network has sufficient water and wastewater capacity to support the Project.

Mana Whenua

134. The Applicant sent letters to the 'relevant' iwi authorities, as identified in Section 6 of this report, on 22 November 2022 to ascertain whether there was any interest in consulting on the Project.

135. Responses were received from Ngāti Whātua o Kaipara and Te Kawerau ā Maki, stating that they defer their interest to other iwi authorities.

136. A response was received from Ngāti Te Ata Waiohua confirming their interest and desire to prepare a Cultural Impact Assessment. The Applicant will continue to consult with Ngāti Te Ata Waiohua to facilitate the Cultural Impact Assessment to inform the resource consent application, and this has been communicated to Ngāti Te Ata Waiohua.

137. The Applicant will continue to seek feedback from, and consult with, other iwi and / or confirm that no consultation is required in preparing the application for resource consent.

138. Further details on consultation with mana whenua are set out in Section 6 below.

Other persons / parties

139. A meeting was held with HNZPT on 29 November 2022 (with Auckland Council's Heritage Specialist in attendance) to discuss the scope of the proposal and the intention to proceed via the fast-tracking consenting process.

140. The purpose of the meeting was to discuss the potential effects that the Project might have on heritage extents of place and buildings located within the Foundation site. Subsequent to this meeting, minutes were circulated of the feedback received. These minutes are appended as **Attachment 2** and were confirmed by the attendees as being accurate.

141. A further meeting was held with HNZPT and Auckland Council's Heritage Specialist on 9 February 2023 to discuss how the initial feedback received at the previous meeting had been addressed, as well as to how this would be addressed further as the detail of the design is developed for the subsequent resource consent application, including ongoing consultation to be undertaken during that process. Minutes of the meeting held with HNZPT on 9 February 2023 are included within **Attachment 2**.

142. It is the Applicant's view that no other parties are affected by the Project. Accordingly, the Applicant has not engaged with any other groups or neighbouring property owners.

6. IWI AUTHORITIES AND TREATY SETTLEMENTS

Iwi authorities

143. The following sets out the iwi authorities who have an interest[7] in the application site and the consultation that has been undertaken within these parties in respect of the Project.

IWI AUTHORITY	CONSULTATION UNDERTAKEN
Ngāi Tai ki Tāmaki	Letter sent 22 November 2022. No response received.
Ngāti Maru	Letter sent 22 November 2022. No response received.
Ngati Pāoa Iwi Trust	Letter sent 22 November 2022. No response received.
Ngati Pāoa Trust Board	Letter sent 22 November 2022. No response received.

[7] As identified by the Auckland Council's 'Mana Whenua Contacts'.

IWI AUTHORITY	CONSULTATION UNDERTAKEN
Ngāti Tamaoho	Letter sent 22 November 2022. No response received.
Ngāti Tamaterā	Letter sent 22 November 2022. No response received.
Ngāti Te Ata Waiohua	Letter sent 22 November 2022. Response received 22 November confirming interest in the proposal. Agreement to prepare a Cultural Impact Assessment (to be progressed as part of the resource consent application).
Ngāti Whanaunga	Letter sent 22 November 2022. No response received.
Ngāti Whātua o Kaipara	Letter sent 22 November 2022. Response received 22 November deferring to Ngāti Whātua Ōrākei.
Ngāti Whātua Ōrākei	Letter sent 22 November 2022. No response received.
Te Ahiwaru - Waiohua	Letter sent 22 November 2022. No response received.
Te Ākitai Waiohua	Letter sent 22 November 2022. No response received.
Te Kawerau ā Maki	Letter sent 22 November 2022. Response received 22 November deferring to Ngāti Whātua Ōrākei.
Te Patukirikiri	Letter sent 22 November 2022. No response received.
Te Rūnanga o Ngāti Whātua	Letter sent 22 November 2022. No response received.
Waikato - Tainui	Letter sent 22 November 2022. No response received.

Treaty Settlement Entities

144. The tables below outline the relevant treaty settlement entities identified by the Applicant, as per the information provided on the Te Puni Kokiri Ministry of Māori Development website.

TREATY SETTLEMENT ENTITY	CONSULTATION UNDERTAKEN
Te Rūnanga o Ngāti Whatua	Letter sent 22 November 2022. No response received.
Ngāti Whātua o Ōrākei	Letter sent 22 November 2022. No response received.
Te Kawerau a Maki	Letter sent 22 November 2022. Response received 22 November deferring to Ngāti Whātua Ōrākei.
Ngāti Tamaoho	Letter sent 22 November 2022. No response received.

TREATY SETTLEMENT ENTITY	CONSULTATION UNDERTAKEN
Te Ākitai Waiohua	Letter sent 22 November 2022. No response received.
Te Patukirikiri	Letter sent 22 November 2022. No response received.
Ngāti Pāoa	Letter sent 22 November 2022. No response received.
Ngāti Tamaterā	Letter sent 22 November 2022. No response received.
Ngāi Tai ki Tāmaki	Letter sent 22 November 2022. No response received.
Ngāti Whanaunga	Letter sent 22 November 2022. No response received.
Waikato – Tainui	Letter sent 22 November 2022. No response received.

Treaty Settlements

145. There are no Treaty Settlement Statutory Acknowledgement areas identified on the Auckland Council GIS for the application site or any adjacent properties (**Figure 15**).

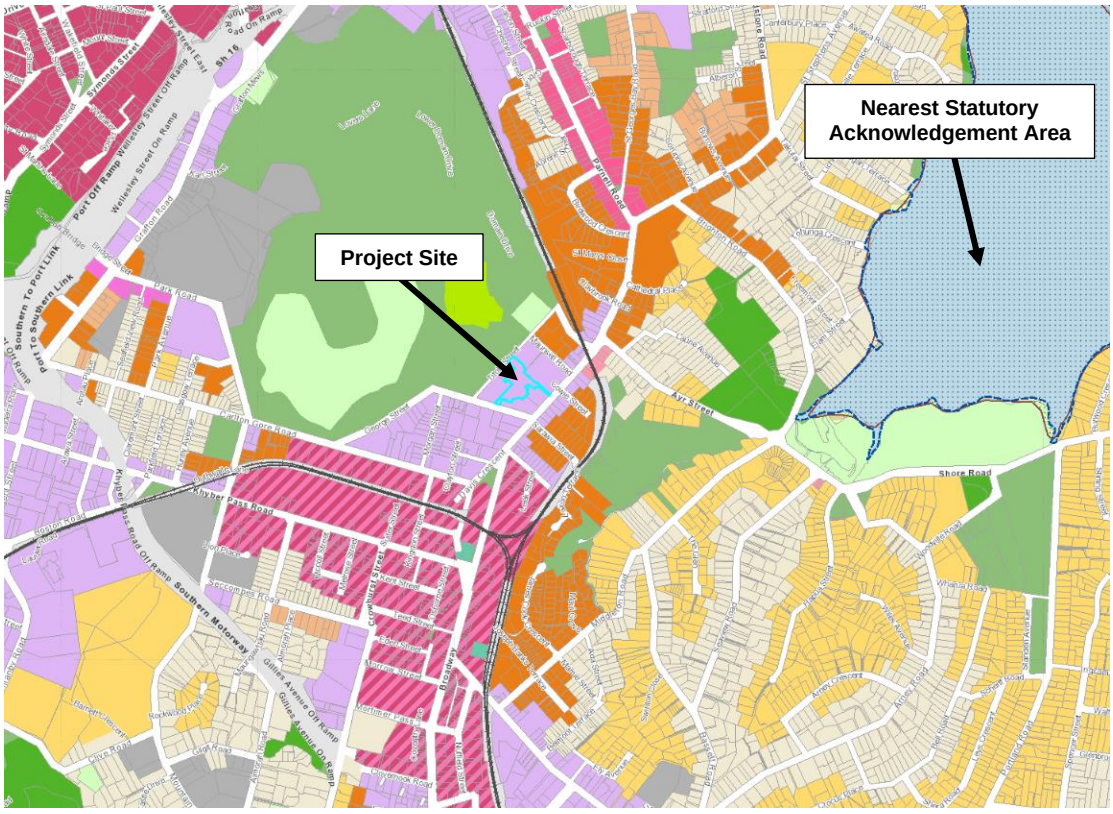

Figure 15: Treat Statutory Acknowledgement Areas (Source: Auckland Council GIS).

7. MARINE AND COASTAL (TAKUTAI MOANA) ACT 2011

146. The Project is not within a customary marine title or protected customary rights area.

8. ADVERSE EFFECTS

Description of the anticipated and known adverse effects of the project on the environment, including greenhouse gas emissions

Summary of Effects

147. The anticipated and known adverse effects of the Project have been extensively assessed by the Project Team, who confirm that these can be appropriately managed through the inherent design and layout of the Project, its operational attributes, and suitable conditions of consent.

148. The Project will include temporary adverse effects associated with construction activities, including noise and vibration, earthworks (sediment, silt, dust), and construction traffic. Such temporary construction related effects are typical, and generally anticipated as part of new development of this scale in urban environments, and are able to be appropriately managed through standard industry best-practice measures (and conditions of consent).

149. Those effects that are not temporary relate to the establishment and ongoing operation of the Project, and the scale, location, form, and appearance of the building, and its relationship to the historic heritage attributes of the Foundation site and neighbourhood (including the Auckland Domain), and the wider environment.

150. These effects are considered to be largely positive and relate to the provision of a high-quality retirement accommodation building in a location where high density residential developments are anticipated, and supported by a walkable catchment to various goods and services, and frequent public transport modes.

151. The key effects have been determined to relate to those associated with:

- Economic impacts.
- The landscape and visual effects of the scale, location, form, and design of the building (including amenity effects in respect of dominance, overlooking, and shading).
- The urban design effects of the built form and activity, including in relation to its interface and integration with the public realm.
- The scheduled heritage buildings / places.
- Transportation (operational and construction).
- Earthworks (including sediment and erosion control).
- Archaeological values.
- Geotechnical matters (including stability and groundwater).
- Infrastructure (stormwater, wastewater, water, contamination).
- Noise and vibration (operational and construction).

- Signage (permanent and temporary).
- Greenhouse gas emissions.
- Wind effects.

152. With regards to the above, the Applicant and its Project Team has had the benefit of having preliminary discussions with key staff from Auckland Council who were involved in the resource consent process for the Stage 1 and 2 developments, and have had regard to the management measures proposed (and implemented during construction) to address the effects of these other stages of the approved integrated residential development, which are similar to those anticipated for the Project.

153. The following technical reports have been prepared to the support the following assessment:

- Economic Impact Assessment (Insight Economics).
- Urban Design and Landscape Effects Assessment (Boffa Miskell).
- Heritage Impact Assessments (Salmond Reed and Archifact).
- Transportation Assessment (Flow Transportation Specialists).
- Civil Engineering Assessment (Babbage Consultants).
- Archaeological Assessment (Clough & Associates).
- Geotechnical Assessment (Tonkin & Taylor).
- Contaminated Land Assessment (Tonkin & Taylor).
- Noise & Vibration Assessment (Styles Group).
- Pedestrian Wind Assessment (RWDI).

154. The Economic Impact Assessment (**Attachment 5**), Urban Design and Landscape Visual and Assessment (**Attachment 6**), and Heritage Impact Assessments (**Attachment 7** and **Attachment 8**), are appended to this application, and should be read in conjunction with this report. The balance of the specialist reports are available upon request.

Economic Effects

155. With reference to the Economic Impact Assessment (**Attachment 5**), the Project will have considerable positive economic effects in respect of impacts on Gross Domestic Product ("**GDP**"), employment, incomes, and social and cultural wellbeing.

156. The assessment undertaken by Insight Economics has determined that the Project will create a significant uplift in jobs and incomes for the local workforce, particularly during the construction period, while also generating a range of wider economic benefits by providing a boost in general residential housing supply (through the release of existing housing being exited by elderly people moving into the retirement village, and through the provision of 65 apartment style retirement units), achieving an intensive land-use on the site, infrastructure efficiency, and meeting the needs of the elderly population.

157. The following sets out the anticipated economic impacts of the Project:

- The Project is estimated to stimulate a total of $143 million dollars ($42 million of direct and $101 million of indirect) economic benefits as a result of the activities that are enabled by the Project.

- The planning / design / consenting work is estimated to create full-time employment for approximately 20 people for 30 months, generating approximately s 9(2)(b)(ii) in wages / salaries.

- Site preparation (including infrastructure provision) is estimated to generate full-time work for approximately 40 people for 8-10 months (split across various phases of work), with approximately s 9(2)(b)(ii) in wages/salaries paid.

- Construction of the 65 apartment style retirement units and associated communal facilities will provide full-time work for approximately 325 people for 3 years (split across various stages), with approximately s 9(2)(b)(ii) paid in wages and salaries.

- Once the Project is integrated with the approved Stage 1 and Stage 2 developments, the overall retirement village activity is estimated to sustain approximately 40-50 FTE jobs on an ongoing basis. The proposed Building 3 aspect of the retirement village (i.e. the Project) is anticipated to sustain 15 of these FTE jobs.

158. The Project will also contribute to the creation of a wide range of employment opportunities to service the ongoing retirement village activity, including carers and medical staff.

159. The construction of the 65 additional retirement units will provide a boost in housing capacity and will be able to accommodate up to 130 residents (maximum of 2 persons per unit).

160. In constructing the Project, existing housing stock / land will be 'freed up' and will become available for rent or purchase by other members of the public. Alternatively, the availability of such ('freed-up') land will enable redevelopment opportunities for higher-density uses.

161. The redevelopment of an existing site in an urban environment will also have infrastructure and transportation efficiencies, such that existing utilities (water, wastewater, stormwater, telecommunications) and roading can be utilised, compared with new infrastructure that would be required should the Project have been undertaken in a greenfield environment.

162. The Project relates to a purpose-built retirement activity that generates less peak infrastructure and travel demand than typical residential apartment developments and commercial activity, which are otherwise provided for in the BMU zone, and thereby has a lesser impact / demand on Council's infrastructure (with less reliance on vehicles for travel).

163. In addition to these Project-specific benefits, when combined with the approved retirement village activity for the Stage 1 and 2 buildings, the Project will contribute to overall operational efficiencies, including staff, infrastructure, and servicing.

164. Overall, the Project will have positive effects on the economy.

Landscape and visual effects of the scale, location, form, and design of the building (including amenity effects in respect of dominance, overlooking, and shading)

165. With the exception of the 18m building height standard (16m occupiable + 2m roof form), the Project complies with all relevant standards of the BMU Zone.

166. The scale, location, form, and design of the proposed building, together with its positioning, and orientation, has been informed by the site characteristics (including the location and context of the scheduled heritage buildings within the Foundation site and their extents of place). The Project responds appropriately to the scale and intensity of development that is envisaged by the BMU Zone, which provides for "moderate to high intensity residential activities and employment opportunities […] in areas in close proximity to, or which can support the […] Business - Metropolitan Centre zone […] and the public transport network"[8].

167. The proposed building will occupy the central portion of the Foundation site, which is defined by a number of street facing buildings that range from 2-6 storeys in height (inclusive of the approved Stage 1 and 2 developments that are under construction). Building 3 will be integrated with the Stage 1 and Stage 2 development, and sit comfortably within the established and evolving context of the highly urbanised neighbourhood.

168. The landscape and visual effects of the bulk and scale, location and form of the Project (including amenity effects in respect of dominance, overlooking, and shading) relative to the adjacent land uses and the wider environment (including the Auckland Domain) have been assessed by Boffa Miskell (as contained within the Urban Design and Landscape Effects Assessment - **Attachment 6**), who conclude that:

> The Proposal has been carefully developed and located, being cognisant of the important heritage qualities of the Foundation site and the scheduled heritage buildings (and their extent of place), with a well-considered, refined architectural design and materiality. Building 3 is the third and final stage of the comprehensive redevelopment of the Foundation site to develop exemplar quality retirement living. The building responds to the high quality architectural vernacular established by Buildings 1 and 2, but with a varied approach to reflect the building's mid-rise scale. The 2 storey podium base has a strong relationship to the character and materiality of the consented buildings and the heritage context, with the upper tower levels adapting this materiality to provide for a refined residential tower façade. The proposed quality of the building is befitting of, and will enhance, the overall character and identity of the Foundation site[9].
>
> In terms of landscape effects, […], a low level of adverse landscape effects in respect of the character and established values of the Foundation site and this part of Parnell / Newmarket will be generated, given the urban character of the context, the spaciousness of the adjacent Domain, the location within the site, and the well-modulated and refined bulk of the building - with its vertically expressed form and façade treatment (and quality of materials)[10].
>
> In terms of visual effects, adverse effects ranging from low to moderate low are anticipated. However, the introduction of a well-modulated and finely crafted taller, mid-rise, building is also considered to bring beneficial urban amenity and cityscape effects that will contribute to the visual quality and character of an intensified Newmarket and Auckland[11].

169. The proposed built form (and scale), when viewed in the context of the environment, is not uncharacteristic or unusual in the BMU Zone, where taller and more intense forms of development are envisaged, and where the effects of such scale (dominance, shading, overlooking, privacy) can be suitably managed by setbacks, landscaping, and quality design.

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[8] Objective H13.2(6).

[9] Urban Design and Landscape Effects Assessment, Section 9.

[10] Urban Design and Landscape Effects Assessment, Section 8.1.

[11] Urban Design and Landscape Effects Assessment, Section 8.1.

170. In the context of the wider Parnell / Newmarket commercial environment, the form, scale and orientation of the proposed residentially styled building, together with the articulation, modulation, and the residential aesthetic that is to be provided (consistent with the Stage 1 and 2 buildings of the retirement village), will not visually dominate or impose upon adjacent land uses and, in the context of the wider business and metropolitan environment, will integrate positively with the established and evolving character that is envisaged with the future intensification of the neighbourhood, in response to the NPS-UD, as discussed further below.

171. Shading cast beyond the boundaries of the Foundation site by the proposed building is expected to maintain a reasonable level of sunlight access to the neighbouring residentially (THAB) zoned properties, with its design providing for variation and interest when viewed from the wider context (including the Domain land). Detailed shading studies will be undertaken as part of the resource consent application package to confirm this relative to the built form of the proposed building.

172. Overall, any effects from the infringement to the 18m height standard will have (at most) moderate-low adverse landscape and visual amenity effects.

Urban design effects of the built form and activity, including in relation to its interface and integration with the public realm

173. The design and form, together with the articulation, materiality, and colour palette of the proposed building is an appropriate response to the context of the Foundation site (which includes the Stage 1 and 2 buildings) and the mix of residential, commercial, and open space activities in the neighbourhood and the form of development and nature of activity that is occurring in the vicinity.

174. The overall design, layout, and form of the proposed building, including pedestrian and vehicle circulation, outdoor amenity areas, and landscaping, has been developed (relative to the residents who will occupy the building, the tenants of the Foundation site, and the wider public who utilise / traverse the site) as an integrated scheme that will provide a high quality on-site living environment for residents, maintain public connections through the Foundation site, and have complementary character and architectural qualities to other nearby buildings.

175. The proposed configuration and layout, including the enhancements that are proposed to the Foundation site (and the maintenance of the through-site connections between Parnell Road and Titoki Street (and subsequently through to Auckland Domain)), will positively contribute to the pedestrian amenity, movement and safety of the spaces, and the continued use of these spaces for other activities (including food and beverage, hospitality, retail and offices).

176. The setting of the proposed building will positively assimilate with the scale and nature of the large public open space of Auckland Domain and, when viewed from the surrounding streets, sitting centrally within the suite and viewed beyond the existing 2 – 4 storey buildings on the site, and the 5-6 storey Building 1 and Building 2 developments, will not appear out of context.

177. The urban design effects of the built form and activity in relation to its interface and integration with the public realm and the neighbourhood has been assessed by Boffa Miskell in the Landscape Visual Effects and Urban Design Assessment (**Attachment 6**), who conclude that:

> The form of the building with its four component vertical elements and stepped height profile will contribute to the skyline from both closer and more distant locations, giving the building a dynamic varied form and appreciable series of different perspectives. This will enhance the residential qualities of the building form and make the identification of individual ‘homes’ within the building more apparent. When viewed

> from the public realm, and neighbouring sites, the built form and scale of the building will be compatible with the existing and planned future urban environment[12].

178. Overall, the Project is considered to be an appropriate outcome from an urban design perspective, and in respect of the interface and integration of the building in the public realm.

Effects on Scheduled Heritage Buildings / Places

179. The Project has been informed by an understanding of the heritage values and the historic heritage places that are present within the Foundation site, and recognised as important 'Category A' buildings by the Unitary Plan, as well as being classified as Category 1 ("Pearson House" and "Royal New Zealand Foundation of the Blind Main Building") and Category 2 ("Royal New Zealand foundation for the Blind Workshop (Former)") buildings by HNZPT.

180. The proposed building includes elements that are located within the heritage extents of place for these buildings. In respect of the heritage curtilage of Pearson House, this includes a portion of the proposed basement, and the pedestrian connection that is proposed between the north-western façade of the proposed building and Pearson House.

181. In respect of the curtilage of the Royal New Zealand Foundation office and workshop buildings, this includes a portion of the proposed basement and a portion of the north-eastern facade of the building above ground level, as it relates to the Jubilee building.

182. The design and positioning of the Project responds to, and engages with, the scheduled heritage places and activates the spaces between these heritage buildings and the proposed building, in a manner that respects their curtilage and contributes to and enhances the visual interest and attractiveness of the Foundation site's 'public' spaces.

183. The Project's heritage specialists (Archifact and Salmond Reed) have assessed the proposal relative to the 'Category A' historical heritage values that apply to the scheduling of Pearson House and the Royal New Zealand Foundation office and workshop buildings, with the analysis undertaken concluding the Project will not adversely affect these heritage values:

> The heritage values of each individual scheduled building (and their collective context) will be maintained and, critically, the inner spaces of the site will be greatly improved as the existing expanse of carparking makes way for pedestrian spaces - opportunities - through the Foundation site.[13]
>
> The application represents an appropriate development within a recognised historic heritage context, which has been mindful of not just its immediate historic heritage setting, but a wider context that includes and acknowledges the Domain and the Auckland War Memorial Museum.[14]
>
> The form and proportions of the Proposal will not compromise heritage significance of the respective places, or their cumulative value. The layout and placement will:[15]
>
> (a) minimise the loss of fabric that contributes to the heritage values and level of significance of the place;

[12] Urban Design & Landscape Effects Memo, Section 9.

[13] Salmond Reed Heritage Assessment, Page 16.

[14] Archifact Heritage Assessment, Page 16.

[15] Salmond Reed Heritage Assessment, Page 16.

(b) not compromise the ability to interpret the place and the relationship to other heritage places;

(c) complement the form, fabric and setting which contributes to, or is associated with, the heritage values of the place;

(d) retain and integrate with the heritage values of the place;

(e) avoid significant adverse effects, including from loss, destruction or subdivision that would reduce or destroy the heritage values of the place; and

(f) avoid, remedy or mitigate adverse effects on the heritage values of the place.

184. The design, layout, and spatial arrangement of the proposed building (and other site improvement works) has been discussed, and HNZPT, and Auckland Council's heritage specialist, are supportive of the direction the Project is heading in (refer **Attachment 2**).

185. Overall, the Project is considered to be appropriate in respect of its historic heritage setting and wider context, and will be complementary to the heritage qualities of the adjacent buildings within the Foundation site and its wider relationship with the Domain and Museum.

Transportation

Transportation effects from the operation of the activity

186. The application site is well served by the adjacent roading network, which comprises Titoki Street, Maunsell Road, George Street, and Parnell Road. Each road is two-way (one lane in each direction), with Parnell Road being classified as an 'Arterial Road' by the Unitary Plan.

187. The application site has excellent walkable access to rapid and frequent public transport services (located nearby).

188. Vehicle access to the Project will occur from Titoki Street, east of Pearson House. This access arrangement will maintain access to the Birthcare basement carpark. This access will service the 'front door' of the proposed building, and the associated porte-cochere, and provide access/egress to the servicing area within the building.

189. The Project includes the provision of a two-level basement below the building that will accommodate a number of parking spaces for residents, visitors and staff. Access to the basement parking is proposed via a connection to the neighbouring Building 2 basement, which is accessed from Maunsell Road.

190. The Project will curtail vehicle access through the Foundation site (between Titoki Street and Parnell Road / George Street), with the space between the proposed Building 3 and Building 2 limited to pedestrian circulation.

191. Flow Transportation Specialists have reviewed[16] the functionality and capacity of the surrounding road network (inclusive of the traffic generated by the consented Stage 1 and 2 development) and have confirmed that the anticipated volume of traffic generated by the Project can be readily accommodated, with no mitigation or upgrades required to the road network.

[16] A copy of this assessment can be provided upon request.

192. Relative to the above, it is important to note that the peak hour movements associated with residents, staff and visitors of a retirement village activity do not coincide with normal peak hour residential / commercial traffic movements due to the timing of the staff shift changes, and the typical behaviour of elderly residents and their visitors.

193. The proposed access arrangements and internal manoeuvring arrangements are suitable for all vehicles that will access the application site and the amount of parking provided will be sufficient to mitigate the prospect of off-site parking occurring. In this regard:

- The application site has excellent level walkable access to frequent public transport services, high quality walking and cycling paths, and complementary activities and services.
- The proposed use of the vehicle accesses for the anticipated vehicle movements will not result in adverse effects on the surrounding road network, or conflict with other users accessing the Foundation site or neighbouring properties.
- The traffic generated by the activity can be readily accommodated by the capacity of the adjacent road network.
- The Proposal complies with the transport standards (Chapter E27) of the Unitary Plan.
- The Project will operate safely and efficiently from a transport perspective.

194. Overall, the operational transport effects of the Project will not adversely affect the surrounding road network, and the internal design and layout is appropriate.

Transportation effects from construction

195. Effects from construction activities will be undertaken and managed in accordance with an approved Construction Management Plan ("**CMP**") and Construction Traffic Management Plan ("**CTMP**"), consistent with standard practice for development projects of this nature.

196. The CTMP will ensure that, from a transport point of view, the surrounding road network continues to operate in a safe and efficient manner for all modes of travel, and will set out the necessary measures required to be employed to achieve this.

197. The management measures proposed for the Project will be consistent with those employed for the Stage 1 and Stage 2 developments, which have been undertaken to date without incident, and will include:

- Location of construction loading spaces within the legal road, following discussion with, and approval from, Auckland Transport, without affecting two-way vehicle movements.
- Temporary changes to line markings and raised islands at the intersections of Maunsell Road and Parnell Road, and Maunsell Road and Titoki Road, to accommodate truck tracking. These changes will require a Corridor Access Request from Auckland Transport.
- Temporary removal of a number of on-street parking spaces located within the surrounding local roads (during construction only), to enable periods of heavy vehicle access, subject to discussion with and approval from Auckland Transport.
- Location for parking for construction staff / contractors.

198. The Applicant has experience in delivering these types of projects across the country (and specifically within the Foundation site), with transportation effects from construction being appropriately managed by standard construction traffic management conditions, including the preparation and implementation of a CTMP.

Earthworks

199. Bulk earthworks are required to excavate the two basement levels, reconfigure / recontour the surrounding vehicle circulation and at-grade parking areas within the application site, and for the installation of necessary retaining walls and inground infrastructure / servicing.

200. Adverse effects associated with the earthworks will be temporary in nature and limited to its interim visual impact, noise and vibration, erosion and silt / sediment control, dust management, and the disposal of contaminated material, which all can be appropriately managed with the implementation of standard construction management measures, and compliance with appropriate conditions of consent.

Visual impact of Earthworks

201. The application site is located centrally within the Foundation site and largely screened by existing buildings that are situated around the perimeter of the Foundation site.

202. The proposed earthworks will not be readily visible from the surrounding streets and will therefore have a low visual impact to the wider environment.

203. The earthworks will be managed using standard construction management measures to ensure that worked land is not left exposed for extended periods of time, with the application site progressively occupied by the basement levels, vehicle circulation, and landscaping.

Erosion and Sediment Control

204. Babbage has assessed the nature and extent of earthworks required to construct the Project, and confirmed that the sediment generated from the proposed earthworks will be almost entirely contained within the basement excavation.[17]

205. All excavation works on the application site will be undertaken in accordance with Council's GD05 Erosion and Sediment Control Guidelines, with appropriate erosion and sediment controls implemented prior to excavation commencing, and maintained throughout the works, including the implementation of an Erosion and Sediment Control Plan ("**ESCP**").

206. The ESCP will detail the construction methodology and the erosion and sediment controls that will be put in place prior to excavation commencing (and maintained throughout their duration) to control dust and sediment effects, and will include those measures that have been recommended in the Civil Engineering Assessment prepared by Tonkin & Taylor, including:[18]

- multi-chamber settlement devices to treat sediment laden water pumped from the basement excavation, prior to be discharged to the public stormwater network; and
- truck wheel wash to minimise sediment tracking onto roadways.

[17] A copy of the Civil Engineering assessment can be provided on request.

[18] A copy of the Civil Engineering assessment can be provided on request.

207. The Applicant has engaged with relevant mana whenua who have expressed an interest in the proposal and the Newmarket / Parnell area (refer to Section 6 of this report).

208. Overall, with the measures proposed, the actual or potential effects of the land disturbance activities will be appropriately managed, with less than minor effects.

Soil Contamination

209. The Contaminated Land Assessment prepared by Tonkin & Taylor[19] confirms there to be arsenic present on the application site at levels that exceed the land use criteria under the NES-CS and the permitted activity criteria under the Unitary Plan. These are not extensive or of a nature that cannot be suitably managed / mitigated by 'standard' measures.

210. Prior to the earthworks activities commencing, a Contaminated Site Management Plan ("**CSMP**") will be submitted to Council for certification. The CSMP will set out the measures to address the effects from the soil disturbance, and that they are managed appropriately.

211. A Site Validation Report ("**SVR**") will be prepared following completion of the earthworks to detail the results of soil validation testing, disposal receipts, soil validation results, compliance correspondence and unexpected discoveries during works.

212. Overall, with these measures proposed, there will be no offsite adverse effects generated.

Archaeological and Tangata Whenua Effects

213. A field survey and historical research undertaken by Clough & Associates[20] confirms that the application site is not a known archaeological site, however there is the possibility that archaeological remains may be present from a previously demolished gymnasium and band room that was constructed in the 1890s, and which may be uncovered as part of the earthworks activities.

214. An Authority to Modify from HNZPT has been sought by the Applicant for completeness (lodged 26t^{h} January 2023), and to provide an appropriate mechanism for addressing such matters, in the event of an accidental discovery during the earthworks activities.

215. The Authority to Modify is expected to be approved early-to-mid March.

216. Overall, the Project will not impact any known subsurface archaeological remains, and suitable measures will be in place in the event that such remains are discovered during the works.

Geotechnical and Land Stability

217. The proposed building is to be founded on bored reinforced concrete piles embedded in underlying East Coast Bays Formation ("**ECBF**") rock, (which was encountered during site investigations at a depth of 15-16m). Preliminary geotechnical analysis undertaken by Tonkin & Taylor[21] confirms that this will be appropriate to accommodate the proposed building.

[19] A copy of the Contaminated Land assessment can be provided on request.

[20] A copy of the Archaeological assessment can be provided on request.

[21] A copy of the Geotechnical assessment can be provided on request.

Groundwater

218. Investigations undertaken by Tonkin & Taylor on-site have determined that perched groundwater is situated approximately 3-4m below ground level. The basement floor level is expected to be up to 4m below the groundwater table, with overlapping perimeter secant or sheet piles proposed to provide groundwater cut-off to provide for water tightness.

219. The recharge from the groundwater and infiltration is expected to be greater than the water seeping beneath the secant / sheet piles and back up to the basement floor. Further testing will be undertaken at the resource consent stage to confirm this. If necessary, the basement floor will be drained, with any minor seepages discharged to the reticulated network.

220. Temporary dewatering of groundwater will be required during the basement excavation works, and permanent diversion of groundwater will be required following the construction of retaining walls and basements. As discussed, permanent dewatering may also be required should it be determined that drainage for minor groundwater seepages is required to be provided.

221. The preliminary geotechnical analysis undertaken by Tonkin & Taylor confirms that there would be less than 100mm settlement of adjacent structures, with differential settlement of less than 1 in 1000, which is considered to be acceptable.

Infrastructure Effects

222. The Project will be sufficiently serviced with water supply, wastewater and stormwater infrastructure, electricity, and telecommunications.

Stormwater Infrastructure

223. The Project will increase the total impervious area on the application site. To mitigate the effect of this on the network, runoff will be attenuated to pre-development levels for primary (10 year) stormwater flows, with this to be achieved by detention tanks on-site with controlled outlets.

224. Primary stormwater flows from the Project will be discharged to the 675mm diameter public stormwater pipe located in Parnell Road (which has sufficient capacity) via the private stormwater system on-site, which is being constructed as part of Stages 1 and 2.

225. Stormwater quality will be managed through proprietary stormwater treatment devices, which will provide appropriate stormwater treatment before it is discharged to the public network, consistent with the stormwater management approach taken for Stages 1 & 2.

Wastewater Infrastructure

226. Wastewater generated by the Project will be discharged to the 225mm diameter public wastewater pipe located in Parnell Road (which has sufficient capacity) via the private wastewater system on-site, being constructed as part of the Stage 1 and 2 developments.

227. Babbage has undertaken a capacity check[22] of the existing public wastewater system and has confirmed that there is sufficient capacity for the wastewater generated from the Project. Watercare have also confirmed that there is sufficient capacity to service the building.

[22] A copy of the Civil Engineering assessment can be provided on request.

Water Infrastructure

228. The Project will be supplied with potable water by an existing 300mm public watermain located within the western side of Titoki Street, which will be connected to the proposed building.

229. The 300mm public watermain has been confirmed by Watercare to have sufficient capacity to service the proposed building and firefighting supply. If necessary, water storage tanks and firefighting booster pumps will be installed as part of the design of the Project.

Noise and Vibration Effects

230. Noise and vibration effects of the Project relate to those associated with construction activity and the subsequent day-to-day operation of the retirement village.

231. The construction works for Building 3 will comprise excavation, compacting, piling, and concreting activities for foundations, and the subsequent construction of the above ground structure. The scale and methodology of the proposed works are common for the type of development relative to its context within an urban environment.

Construction Activities

232. The construction methodology and related likely equipment for the Project has been assessed by Styles Group, and it is predicted that the permitted construction noise standards of the Unitary Plan will be exceeded. The effect of this, including the likely duration, frequency, and timing of the anticipated exceedances, are not considered unreasonable, and will be managed by a certified Construction Noise and Vibration Management Plan ("**CNVMP**"), which will be prepared and submitted to Council prior to works commencing.

233. The CNVMP will detail the measures to be adopted to manage noisy works which exceed the standard (and other noisy works generally), to ensure that these are undertaken in an appropriate manner relative to the time of day, their duration, and the best practicable option available. A draft of the CVMP will be submitted as part of the resource consent application.

234. Vibration generating activities will also be managed by the CNVMP, and are expected to largely comply with the relevant Unitary Plan permitted activity standards.

235. Overall, having regard to the temporary nature of the works, and taking into account the management procedures that will be put in place, the noise and vibration generated during construction will not result in the unreasonable effects.

Operational Activities

236. As a residential activity, any noise generated from the retirement village activity will not be inconsistent with that generated from those activities present within the surrounding environment.

237. The primary sources of noise for the Project can be attributed to vehicles entering and exiting the site, mechanical plant equipment (e.g. air conditioning / heat extracts / ventilation) and the use of communal spaces (e.g. lounge areas/cafes and outdoor recreational activities).

238. All mechanical plant (that is anticipated to be required for the proposed building) can be designed, selected, positioned and shielded to control noise at any receiver to comply with the standards – with the use of standard commercially available solutions.

239. The location of the parking and manoeuvring areas are sufficiently remote from neighbouring boundaries and/or screened to achieve compliance with the Unitary Plan standards.

240. With regards to the above, the Project will have no adverse operational noise effects, and will not result in the unreasonable emission of operational noise.

241. The proposed building will be designed to incorporate suitable cladding and ventilation to ensure that the amenity of the internal spaces is not adversely implicated by noise that may be generated by activities enabled by the Business-Mixed Use zoning of the adjacent land.

Signage Effects

242. Permanent signage is proposed and will be limited to identifying / naming the building and the village operator, and for general way-finding within the site. The scale and location of such signage will be appropriate to its context and appear as a well-integrated element as part of design of the building, and the wider retirement village development. The signage will not contribute to any visual clutter and will not appear dominant or incongruous.

243. Temporary signage that will be erected during the construction period (including site hoardings and tower crane signage) is typical (and an expected component) for a construction project of this scale and nature. The scale and type of the temporary signage is not obtrusive, and will provide information concerning the activity occurring on the application site and contain graphics to communicate the nature of the village to be developed, and display / explain the types of accommodation available, as well as contain contact details for relevant staff.

244. The location and nature of these signs and the form of advertising, and identification for a site under development, is not uncommon and when undertaken comprehensively (as proposed) can provide visual relief to the construction activity, as well as avoid the accumulation of uncontrolled contractor hoardings. The signage will be legible and convey simple messages and images, and will not implicate traffic or pedestrian safety, or neighbouring amenity.

245. The scale and location of the signage will not generate traffic or pedestrian safety effects, or amenity effects, and their duration will be limited to the timeframe of the construction hoarding and presence of the crane on the application site. These elements are limited to the site, and are remote from any similar signage, with no cumulative effects generated.

246. Overall, the permanent and temporary signage elements will not have adverse effects.

Greenhouse Gas Emissions

247. The Project represents an efficient use of a relatively small area of land, providing for 65 retirement village units, in a well-suited location that has many services and amenities within a walkable catchment. Retirement village operations also have advantages over traditional lower density development in reducing greenhouse gas emissions.

248. Retirement villages inherently include a range of amenities and services that are provided on-site, which means residents are less likely to need to travel to other locations, thereby reducing emissions from private vehicle usage. The integration of the Project with the approved comprehensive retirement village development on the Foundation site will enhance these efficiencies.

249. The average entry age to the village is expected to be 78 years old, with a low number of residents expected to own vehicles.

250. The location of the retirement village is in close walkable proximity to a range of recreation, open spaces, and commercial / retail service activities, which reduces the need for travel to access these services/facilities. The sites proximity to excellent public transport services and the provision for bicycle parking and of end of trip facilities provides the opportunity for staff and service providers to reduce their reliance on private vehicle usage.

251. The village will have a 'residents van' that will be utilised for group outings, as well as several communal vehicles for shared use. A number of electric vehicle charging stations will also be available for use on-site. Together with the already low travel demands by residents, these elements will further contribute to minimising resident vehicle movements and emissions.

252. The area surrounding the building will be extensively landscaped to provide high-quality on-site amenity for residents, staff, visitors, and members of the public. The landscaping will include specimen trees and shrubs that will have the effect of absorbing carbon (carbon sink) from the atmosphere. The landscaping will be maintained by full time onsite gardeners.

253. With regards to the day-to-day operation of the village, Generus strives to make a difference in providing upscale sustainable living environments and leading best practice within the industry. Sustainability is embedded in key business systems, decisions and organisational culture. The sustainability strategy is underpinned by nine sustainability aspirations /categories in the areas of Health and Wellbeing, Nature, Energy, Water, Waste, Community, Employment, Conversation and Innovation. Generus has introduced extensive sustainability programmes in all of its developments, including:

- **Nature:** minimisation of harmful solid and liquid emissions, soil nutrient management.
- **Energy:** use of solar energy, residential solar capacity, passive ventilation, sensor lighting, LED lighting, pool covers, rapid EV chargers.
- **Water:** water conservation, rainwater & stormwater collection, industry leading irrigation systems.
- **Waste:** extensive waste minimisation programmes (operational & residential), waste audits, green waste and e-waste diversion.
- **Community**: regenerative projects, partnership with iwi and charitable trusts, educational programmes, intergenerational projects etc.
- **Conversation**: Generus is part of the Retirement Village Association's newly formed Sustainability Committee. Generus villages have been featured as case studies and nominated for sustainability awards, funding received for waste minimisation projects.

Wind Effects

254. To address the prospect of the amenity of the application site being affected by wind, the design of the building has been assessed with reference to the relevant wind standards of the Unitary Plan and a preliminary wind assessment has been undertaken by RWDI.

255. The key outdoor pedestrian accessible areas for the Project include the at grade areas around Building 3 within the application site, including the entrances to the building, and the various amenity spaces at ground level.

256. As set out in RWDI's assessment, the building form includes several positive design features that collectively will mitigate the overall impact of wind within the site, including the modulation of the building form, and the incorporation of porous façade elements at the lower levels.

257. Subject to the incorporation of the recommendations made in RWDI's assessment for the detailed design of the building (and landscaping), the Project is expected to comply with the Unitary Plan's wind standards, and this will be confirmed (including through the use of wind tunnel testing) in the resource consent application.

Summary

258. Having regard to the technical assessments prepared by the Applicant's experts, it is considered that the Project will not have any significant adverse effects.

259. The majority of the anticipated and known adverse effects relate to matters that are able to be mitigated by either the design of the Project, or by conditions of consent.

260. Further to this, the Project has been determined to have considerable positive effects associated with the economic benefits of the proposed Building 3 development.

9. NATIONAL POLICY STATEMENTS AND NATIONAL ENVIRONMENTAL STANDARDS

General assessment of the project in relation to any relevant national policy statement and national environmental standard

261. The National Policy Statements and National Environmental Standards that are relevant to this Project are the:

- National Policy Statement on Urban Development ("**NPS-UD**").
- National Policy Statement for Freshwater Management ("**NPS-FM**").
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ("**NES-CS**").

NPS-UD

262. The NPS-UD came into effect on 20 August 2020 and was amended on 11 May 2022.

263. The NPS-UD applies to planning decisions by any local authority that affect an urban environment. The NPS-UD directs decision makers to give effect to the objectives and policies of the NPS-UD, which recognise the national significance of:

(a) having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; and

(b) providing sufficient development capacity to meet the different needs of people and communities.

264. The aim of the NPS-UD is to ensure that planning decisions enable the sufficient supply of housing needed to meet demand, and improve the general affordability of housing around the

country. Auckland is identified by the NPS-UD as being located within a Tier 1 high-growth urban environment, and therefore expected to accommodate high intensity development.

265. The objectives that are relevant to the Project are:

> **Objective 1**: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
>
> **Objective 2**: Planning decisions improve housing affordability by supporting competitive land and development markets.
>
> **Objective 4**: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations.
>
> **Objective 6**: Local authority decisions on urban development that affect urban environments are:
>
> - integrated with infrastructure planning and funding decisions; and
> - strategic over the medium term and long term; and
> - responsive, particularly in relation to proposals that would supply significant development capacity.
>
> **Objective 8**: New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the effects of climate change.

266. The corresponding relevant policies of the NPS-UD include:

> **Policy 1**: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:
>
> (a) have or enable a variety of homes that:
>
> (i) meet the needs, in terms of type, price, and location, of different households; and
>
> (ii) enable Māori to express their cultural traditions and norms; and
>
> (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
>
> (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
>
> (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
>
> (e) support reductions in greenhouse gas emissions; and
>
> (f) are resilient to the likely current and future effects of climate change.
>
> **Policy 6:** When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement.

(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and

(ii) are not, of themselves, an adverse effect.

(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1).

(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity.

(e) the likely current and future effects of climate change.

267. The Project will give effect to these objectives and policies in the following ways:

- The Project will utilise a site that is zoned for intensive urban/residential development.
- The Project will provide for social and economic wellbeing through the provision of retirement accommodation for the elderly population, which in turn will free-up existing housing stock and therefore assist with fulfilling housing demand in Auckland.
- The scale and form of the proposed building is appropriate in relation to the context of the application site, the Foundation site, and the surrounding urban environment, and is consistent with the outcomes that are sought to be achieved by the NPS-UD.
- The form and intensity (and layout) of the Project is consistent with a well-functioning urban environment, and will contribute to meeting the requirements of the NPS-UD to provide for, and realise, development capacity.

268. Overall, it is considered that the Project is strongly aligned with the relevant objectives and policies of the NPS-UD.

269. As discussed, the Council has responded to the requirements of the NPS-UD by notifying PC78, which proposes to increase the height limit on the application site and to introduce the MDRS. The Project is consistent with the intentions of PC78.

NPS-FM

270. The NPS-FM provides local authorities with an updated direction on how to manage freshwater in a way that gives effect to Te Mana o te Wai, including new requirements for improving (and avoiding degradation of) the quality of streams, and requirements to avoid further loss of the extent of natural inland wetlands, to protect their values, and to promote their restoration.

271. The application site does not contain any freshwater streams or natural inland wetlands and there are no such freshwater features within close proximity of the site.

272. Insofar that the discharge of stormwater from the application site relates to downstream freshwater environments, the Project will incorporate stormwater quality features to treat

stormwater runoff sent to the network that is generated from parking and access areas, which in turn will ensure the quality of stormwater discharged from the site to the network is appropriate.

273. The Project will be consistent with the outcomes sought to be achieved by the NPS-FM.

NZCPS

274. For completeness, it is noted that the application site is located inland from the coast, and therefore the Project has no impact on the coastal environment (given its location).

NES-CS

275. The NES-CS is relevant to the Project. A Ground Contamination Assessment has been undertaken for the application site. The conclusion of that assessment is that a resource consent is required under the NES-CS as a Controlled Activity.

276. The nature and extent of earthworks proposed will be undertaken and managed in accordance with an appropriate Site Management Plan, which will ensure that the effects of the works on human health are managed in accordance with the purpose of the NES-CS.

NES-F

277. The NES-F contains regulations relating to certain works in and around wetlands. As noted above, there are no freshwater streams or natural inland wetlands within or close to the application site, and the Project does not require resource consent under the NES-F.

10. PURPOSE OF THE ACT

Project's economic benefits and costs for people or industries affected by COVID-19

Economic benefits during construction

278. As discussed in Section 8, the Project is estimated to stimulate some $143 million in the economy by providing jobs and significant flow-on economic benefits to the local community through the construction phase. Of the $143 million, $42 million is expected to be in direct benefits, and $101 million in indirect benefits.

279. 88% is expected to remain within the region, with the remaining 12% being spent within the wider New Zealand economy. For every dollar spent by on construction, 40% is spent on salaries to local employees and on local supplies. This will provide jobs and significant flow-on economic benefits to the local community affected by the economic impacts of COVID-19.

280. There will be direct benefits for construction workers and project managers, architects, engineers and health and safety consulting service providers, with future planning/design/consenting work estimated to create full-time employment for about approximately 20 people for 30 months, generating s 9(2)(b)(ii) in wages/salaries.

281. Site preparation (including infrastructure provision) is estimated to generate full-time work for approximately 40 people for 8-10 months (split across various stages), with s 9(2)(b)(ii) in wages/salaries. Construction of the 65 apartment style retirement units and associated

community facilities will provide full-time work for around 325 people for three years (split across various phases of work), with around s 9(2)(b)(ii) paid in wages and salaries.

282. There will also be associated financial and development contributions for Auckland Council (and its associated organisations) as part of the development.

283. Indirect benefits include supplies and services purchased by the Applicant's construction delivery partner, or by contractors engaged independently. These include wholesale and retail building supplies, and legal, telecommunications, administrative and accounting services.

284. The vast majority of the builders, contractors and materials will be locally sourced, ensuring that the benefits remain within the local economy. Other professional services, such as real estate and conveyancing services, are expected to benefit as housing is released into the market as residents release housing stock / land.

Economic benefits during operation

285. The Project will result in 15 FTE roles, which will include staff roles (and support) for village management, administration, property management sales, maintenance and gardening, restaurant and ancillary services, nursing, therapists, and aged care support. The wider village that Building 3 will form part of is anticipated to sustain a total of 40-50 FTE jobs on an ongoing basis (inclusive of the 15 FTE roles for the Project).

286. The Project operations will also generate a variety of roles for the staffing associated with the delivery of the resident amenities, providing opportunities for those in the hospitality sector – being an opportunity for people in that sector that are likely to have had their businesses affected by COVID-19.

287. Generus, as the operator of the retirement village, will also seek to recruit locally where possible, and will engage a range of local contract resources on an ongoing basis.

288. The provision of healthcare as a component of the Project contributes to efficiencies in respect of:

- Earlier identification of health problems as residents are regularly assessed.
- Reduced emergency or unnecessary call outs with assessments accessible on-site.
- Centralised location for healthcare and social welfare services (as a component of the comprehensive retirement village that the Project forms part of).
- Lower healthcare costs (hospital stays), and more efficient care with multiple people visited by healthcare professionals in the same location.

289. The Project would also be cost effective in relation to Council and public services, with the provision of on-site amenities reducing pressure on these services within the local community.

290. Furthermore, capital expenditure and maintenance costs for infrastructure (such as drains and vehicle accessways) within the application site would be borne by the operator of the retirement village. Rates would also be charged on the retirement village as a whole. This reduces both administrative and capital costs for the Council.

Flow on effects

291. The economic impacts of the Project will include flow-on effects that arise indirectly from the construction and operation of the retirement village, these include:

- increased business for local firms and industries supplying goods and services to the retirement village during construction and thereafter during the village operation;
- salaries earned by local residents being spent on purchasing household goods and services, boosting the regional economy;
- increased supply of housing both through the provision of new apartment style retirement units and the coinciding release of what are typically large family homes / land, which are released back on the market for more efficient / intensive use;
- "new money" coming into the area as a result of the retirement village, for example residents and staff relocating from outside the area, and spending by relatives and friends of the village residents who live outside the Newmarket / Parnell area;
- increased household incomes flowing through the local community; and
- possible increased visitor benefits.

Project's effects on the social and cultural wellbeing of current and future generations

292. The Project would have a range of positive effects on the wellbeing of multiple generations. In terms of older generations, there are the following social benefits:

- The residents and staff within a retirement village are familiar with each other and will build rapport, which provides a sense of community and security to the residents. This is a key advantage of a retirement village model of accommodation, which enables elderly residents to have a strong sense of community, rather than being potentially isolated within their individual homes.
- The Project will provide communal outdoor and indoor areas which will enable residents and their visitors to socialise in a comfortable setting, as well as providing spaces within which social events and activities can be provided to encourage residents to be active and outgoing. The buildings and facilities are also able to be utilised by outside communities and organisations, which will assist with integrating the retirement village and its residents with the wider community.
- Elderly people are more vulnerable to fraud and other forms of "elder abuse", which can often be unnoticed or unreported to the wider community. A retirement village environment provides a sense of security as retirement village units are well protected and residents have support networks within the retirement village.
- Other measures to provide a safer community are outdoor lighting, CCTV and well-illuminated pathways which are provided in accordance with of Crime Prevention Through Environmental Design standards, and integrated across the Foundation site.

293. For the working aged generations, there would be increased employment opportunities and a decreased burden for the family and loved ones of the residents where they would otherwise be family carers (with resulting emotional, financial, and physical benefits). Local residents

will also have an opportunity to stay within their local communities and remain connected with friends and family.

294. The development of the application site in the manner proposed provides a 24/7 residential activity, which in turn improves safety and security in the local neighbourhood streets, and adjoining open spaces, with the presence of activity, and passive surveillance.

295. The construction of high-density retirement village units will reduce land demand pressure and make further residential housing available as new village residents release their properties to the market, which will both increase housing stock for other household typologies and land for redevelopment and intensification. This increase in housing supply will help to relieve pressure on the housing market and will contribute towards improved housing affordability in the long term. A shortage of housing is widely considered to be one of the biggest issues nation-wide, and disproportionately affects younger people.

296. This Project provides an inclusive environment for older people that is designed so that people remain connected to their communities and have different living options to meet their needs as they change over time. The housing options available will also be in close proximity to Auckland Domain, support services, transport nodes, employment opportunities, shops, and social and cultural networks. Having inclusive environments ensures effective integration with the wider community by providing spaces that encourage positive socio-cultural activity. The Project recognises these spaces are critical for the wellbeing of residents and community cohesion.

297. The Project also strongly aligns with the Government Policy Statement on Housing and Urban Development by enabling further use for urban development in an area that is experiencing strong demand for retirement housing, but lacks supply. The Project will enable more homes to be built, which will increase supply (and therefore contribute to housing affordability), ensure housing meet the needs of our ageing constituents, support housing solutions for older people in care, and plan for our ageing population.[23]

Whether the project would be likely to progress faster by using the processes provided by the Act than would otherwise be the case

298. The FTCA process offers a number of advantages over the standard RMA process, particularly in respect of public and limited notification being precluded under the FTCA.

299. Within the current operative planning framework (including the status of Proposed PC78) there is a high risk that the Project would be subject to either a limited or publicly notified process, were an application to be progressed through the standard RMA process.

300. Notification significantly increases delays and the likelihood of an Environment Court appeal. The RMA process would create a much longer consenting timeframe and the risk of delay from a subsequent Environment Court appeal would be avoided under the FTCA.

301. The Applicant does not consider the standard RMA process to be an efficient use of time and resources. The experience of the Applicant's experts is that comprehensively and carefully designed retirement villages and large-scale development proposals that go through the Environment Court process (whether by appeal or direct referral) can take at least two years to obtain consent, and will often be consented largely without modification from the proposal represented in the application.

[23] Government Policy Statement on Housing and Urban Development (September 2021), Page 31.

302. Notwithstanding the statutory timeframes, if there were to be appeals to the Environment Court, consent may not be obtained in time for the summer period of 2024-2025. Further to this, in the experience of the Project Team, Auckland Council are currently doubling (at least) the statutory timeframes as a consequence of the lack of resource availability and continued covid related delays. The approximately 6 month timeline under the FTCA reflects a significant saving by comparison.

Whether the Project may result in a 'public benefit'

Employment / Job creation

303. The Project represents an approximate $180 million investment in the local area including providing jobs and significant flow-on economic benefits.

304. Buildings 1 and 2 have contributed around $280M to the local economy in direct costs. Development within the overall Foundation site represents an investment of approximately $450M and Building 3 itself represents an investment of $180M. It is expected to see direct economic value added from the present to completion of the Project of $42 million (GDP) and it is also expected that the Project will stimulate a total of $138 million of direct plus indirect value added (GDP) – including by providing jobs and significant flow-on economic benefits to the local community.

305. As detailed above, there are also likely to be flow on effects from the Project for employment and job creation in:

- local firms and industries supplying goods and services to the Project during the construction phase and thereafter during the future village operation; and
- "new money" coming into the area with residents and staff relocating from outside the area, and spending by relatives and friends of the village residents who live outside the Parnell / Newmarket area.

306. It is anticipated that approximately 5 FTE Generous staff will be employed by the Applicant over the course of the construction of the Project. A further 325 FTE construction staff per year of construction will also be employed during various stages of the works.

307. The Applicant does not directly procure any materials, furniture or equipment from overseas. All materials will be sourced from the region's suppliers and construction is undertaken by New Zealand based contractors. Where possible, the Applicant will seek to source materials locally and a significant portion of construction spending is on local contractors and suppliers.

308. As well as the direct employment generated from construction, there will be significant indirect employment. During the Project, supplies and services will be purchased, and numerous contractors will be engaged, including wholesale and retail building supplies, design, technical consultant input, legal, telecommunications, administrative and accounting services.

309. More broadly, constructing the Project will generate hundreds of construction jobs and millions of dollars in GDP. This supports more jobs within supplier industries and in turn enables construction workers to spend their income in the regional economy.

310. Once the activity is operational, it is expected to directly create approximately 15 FTE local jobs, including caregivers and housekeepers, as well as many more jobs indirectly through demand on local suppliers being used to provide goods and services required to operate the

village. These positions are expected to be filled by workers living in the region and as outlined above, Generus seeks to recruit locally where possible.

Housing supply

311. As the elderly population continues to increase, the continued supply of suitable aged care and retirement accommodation will need to increase.

312. The Project will provide for 65 apartment style retirement units, being in addition to the 116 retirement units that will be accommodated within Buildings 1 and 2 for the comprehensive retirement village activity on the Foundation site. Cumulatively, this will reduce land demand pressure and make further residential housing available as new village residents move out of their properties, and these are made available for more efficient use by families.

313. This increase in housing supply will help to relieve pressure on the housing market (particularly critical in Auckland) and contribute towards improved housing affordability in the long term.

314. While the Project does not involve delivering standard housing, it will cater for an important and fast-growing demographic of older people that require age specific housing and associated amenities and services.

Contributing to well-functioning urban environments

315. The Project is to be located within the undeveloped (other than temporary carparking) central portion of the Foundation site, which is zoned BMU under the Unitary Plan and is appropriate for urban development and intensification. The application site has excellent access to a range of services within a flat walkable catchment, and good access to public transport. The development opportunities are proposed to further increase under PC78 in response to the NPS-UD, which reinforces this intended outcome, and forecasts a corresponding change to the characteristics of the current neighbourhood.

316. The Project, being an integrated residential development activity (retirement village), is an appropriate and anticipated use of the land (reinforced by its Permitted activity status under the Unitary Plan), and represents an efficient use of the application site in a manner that will contribute to an increase in the provision of housing capacity, intensity, variety and choice for the elderly, as well as the wider neighbourhood. Such an activity and intensity of development will also enhance and support the social and economic well-being of the community, building upon the outcomes envisaged by the consents held.

317. The scale of the Project, while being a change to the prevailing built characteristic, has been carefully designed in respect of its relationship with neighbours, and the interface of the application site to adjoining properties and the wider context (including the Auckland Domain and War Memorial Museum. With the exception of building height, the Project complies with all other relevant standards of the BMU zone. While of a greater scale than that currently provided for in the BMU zone, the Project will integrate with (and contribute to) the established urban neighbourhood and the future planned character, and the Stage 1 and 2 developments.

318. The Project will generate less daily traffic movements than the level of traffic that would otherwise be generated should a ‘standard’ residential apartment development be constructed on the application site, with such movements also occurring outside of the peak commuter periods. The arrangement of access, parking and servicing have been assessed as being appropriately designed and will meet the relevant standards of the Unitary Plan, and industry recognised best practice standards, with traffic outcomes that match the needs of the Project, and which can be readily sustained by the local transportation and roading environment, with access and connectivity for the full spectrum of travel modes.

Providing infrastructure to improve economic, employment, and environmental outcomes, and increase productivity

319. The Project will contribute to improving housing infrastructure in the Parnell and Newmarket area, and through both construction and ongoing operations, will increase employment outcomes and productivity.

320. The Applicant will also contribute approximately s 9(2)(b)(ii) in financial and development contributions to Auckland Council (and Council controlled organisations) from the development, which will support local public growth infrastructure, public community reserves (including environmental initiatives) and employment from infrastructure and reserve projects.

Improving environmental outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity

321. There are no open watercourse located within or proximate to the application site, and the Project will not have any adverse effects on air quality or indigenous biodiversity.

Minimising waste and contributing to NZ's efforts to mitigate climate change and transition more quickly to a low emissions economy (in terms of reducing New Zealand's net emissions of greenhouse gases)

322. Generus operates eco-active retirement villages that embraces sustainable practices at their various contemporary locations across the country.

323. For example, Generus and its Bay of Plenty partner Mangatawa Papamoa Blocks Inc have led an extensive sustainability pilot in their Pacific Coast and Pacific Lakes Villages, achieving remarkable results and attracting nationwide interest since its commencement.

324. Generus was recently recognised for this and announced as a finalist in the newly founded Retirement Village Association ("**RVA**") Sustainability awards under the APL Best Operator Led Sustainability Initiative category.

325. The Generus project at Pacific Coast and Pacific Lakes Villages focused on three key aspiration areas: waste, nature and conservation. One of the main goals was to assess and adopt the best approach for waste minimisation within a retirement village setting while introducing a targeted resident educational programme. Remarkable results have been achieved with the diversion of over 90% of the waste, including all green waste and operational food waste. In addition, other waste initiatives are underway, ranging from worm farms to soft-plastic and residential green waste separation. Both of the Generus Bay of Plenty retirement villages are also part of Tauranga City Council Resource Wise programme - a programme designed to help organisations to reduce their waste to landfill.

326. In respect of the Foundation site, the comprehensive retirement village development (including the Project), will implement the same initiatives.

327. Retirement village densities have advantages over traditional lower density developments in reducing greenhouse gas emissions through the density of development (including the development of vertical accommodation). The location of the application site, which has excellent access to public transport, commercial facilities, and recreational amenities, and its integration with the approved Stage 1 and 2 developments, together with the range of amenities provided on-site, reduces the need for residents to utilise private vehicle travel, and will positively benefit staff and contractors that are engaged.

328. When compared to traditional residential developments, a retirement village is inherently a lower generator of vehicle movements from residents, minimising resultant emissions. Residents of Building 3 will have access to an electric vehicle car pool system, thereby further minimising vehicle emissions created by residents. The Project is also located in close proximity to a range of key amenities (recreational and commercial) that are readily accessible on foot or by mobility scooter.

329. Generus takes pride in the landscaping and the landscape amenity of its villages. The Project will integrate with and enhance the extensive public realm amenity and landscaping throughout the application site, which is maintained by full time onsite gardeners. That new flora will have the effect of absorbing carbon (carbon sink) from the atmosphere.

330. In terms of the Project's day-to-day operations of its retirement villages, Generus has a number of initiatives in place to reduce carbon emissions, as set out in Paragraph 253.

331. The Project will utilise land and construction resources efficiently with the density of the development, and contribute (through the provision of retirement accommodation) to the re-use (or redevelopment) of existing housing stock, as residents move to the village.

332. Through the provision of extensive on-site amenities, services and recreation opportunities, communal transport for residents and provision for cycle/ mobility parking and end of trip facilities, the village will reduce the vehicle use (and the associated carbon emissions), compared with more standard residential development.

Promoting the protection of historic heritage

333. The Project has been informed by an understanding of the heritage values and the historic heritage places that are present within the Foundation site, and which are recognised as important 'Category A' buildings by the Unitary Plan, as well as being included on the HNZPT List. Those elements that are proposed within the heritage extent of place will not adversely impact the overall character and heritage values of the buildings and their site context.

334. The Project is considered to be appropriate in respect of its historic heritage setting and wider context, and will be complementary to the heritage qualities of the adjacent buildings within the Foundation site, and its wider relationship with the Domain and Museum.

335. The application site is not identified as containing any recorded and unrecorded archaeological deposits, however there is the potential for uncovering remnants from pre-1900 buildings that previously occupied the site and have since been removed. Accidental discovery protocols will be employed (as conditions of consent) during the earthworks to manage any discoveries.

336. An Authority to Modify application was lodged with HNZPT on 26 January 2023 in respect of the proposed earthworks, and is pending approval (expected early-to-mid March).

337. To date, the Applicant has not received any feedback from mana whenua in respect of the potential effects of the Project on the nearby scheduled historic heritage buildings. Ongoing consultation with iwi will be undertaken as part of the resource consent application.

Strengthening environmental, economic, and social resilience, in terms of managing the risks from natural hazards and the effects of climate change

338. The application site is not subject to flood hazards, or at risk of coastal inundation, and is therefore not considered to be at risk from natural hazards and the effects of climate change.

339. The Project will increase the social resilience of its residents in the event of a natural disaster (compared with those elderly people who otherwise may be vulnerable if living on their own) by providing assistance and care.

Other public benefits

340. The proportion of New Zealand's population over 75 is anticipated to grow rapidly over the coming decades, thereby creating additional demand for suitable housing and a greater need for age-specific services.

341. Traditionally, the Government has subsidised a large portion of the aged care sector cost and with the increasing population this results in a fiscal burden. The Project would be part of an alternative solution to reduce this fiscal burden by meeting the needs of older people.

Whether there is potential for the project to have significant adverse environmental effects

342. As set out in Section 8 of this report, adverse effects will be appropriately avoided, remedied or mitigated through both the design of the village and its integration with the approved development and the Foundation site generally, and through conditions of consent. There is no potential for the Project to have significant adverse environmental effects.

11. CLIMATE CHANGE AND NATURAL HAZARDS

343. The Project will not be impacted by climate change or natural hazards.

344. The Auckland Council GIS does not indicate the presence of any flooding risk on the application site. Due to the location of the site and its elevation, it is not at risk of sea level rise.

345. The Geotechnical Assessment confirms that the application site is suitable to accommodate the Project, with no natural hazards posing risk to the development.

12. TRACK RECORD

346. The Applicant has a good environmental record of compliance across its projects with local councils and has not been the subject of any environmental prosecution.

347. The Applicant has not had any compliance or enforcement actions taken against it by a local authority or the EPA in the last five years.