

Attachment 4 - Supplementary Application Information

Please provide details of the proposed project, its purpose, objectives and the activities it involves, noting that Section 20(2)(b) of the Act specifies that the application needs only to provide a general level of detail.

The application is for a referred project under Section 20 of the Act to enable the accelerated construction and delivery of the comprehensively masterplanned residential development. The Project will result in significant and on-going public benefits and will give effect to the purpose of the FTCA in terms of promoting employment in the construction sector and on-going operation of the residential development with significant FTE opportunities to support social and economic recovery from the impacts of Covid-19 while promoting the sustainable management of natural and physical resources.

The purpose of the proposed project is to carry out a retirement village development within an existing and growing residential catchment, to considerably increase the housing supply within Auckland.

The key objectives and principles of the Project are to:

- Give effect to the purpose of the Act to promote the social and economic recovery of Covid-19. The proposal will generate total direct, indirect and induced impacts of \$258.9m in GDP. The proposal will Stimulate a significant amount of employment during the construction phase, equivalent to 1,917 full time equivalent employment years in Auckland and support an ongoing level of employment of around 151 workers per year in Auckland through the accommodation of residents and the workforce employed within the Village
- Provide a comprehensively planned development that will deliver approximately 354 well-designed, high-quality Household Units within the Auckland. Kings Height Group aims to meet the growing demands for housing within Auckland by providing housing choice and variety;
- Provide a mixture of standalone, duplex and terrace housing to support the delivery of a considerable affordable and public housing supply in a location that has a significant shortage of affordable supply and is forecasting continued and sustained population growth;
- Construct buildings that respond appropriately to the surrounding environment;
- Provide a residential development which maintains and enhances pedestrian amenity and safety around the site and immediate locality through strong pedestrian links at the street level;
- Provide high quality residential activity frontages to the neighbouring residentially zoned land to the south;
- Provide for immediate employment generation in the local suppliers for goods and materials and sub trades, as well as on-going jobs and employment opportunities with an emphasis on using the services of local builders and companies with apprenticeship programmes in place; and
- Increase the supply of housing through providing quality Household Units on a currently underutilised site within a well-established settlement that has access to a range of amenities and transport options.

The project will enable the development of approximately 354 units. This comprises 42 villas (one storey duplex and attached houses), 45 care units, 267 apartment units, and associated reception / administration areas.

Please refer to **Attachment 2** for a copy of Architectural drawings

An Economic Impact Assessment has been prepared by Formative (included as **Attachment 3**). Formative consider that the project will generate a range of public benefits, primarily as a result of the location of the Site adjacent and proximate to a wide range of established retail, commercial, and employment activities, and existing infrastructure.

Please refer to Attachment 4 for further details about this application.

Where applicable, describe the staging of the project, including the nature and timing of the staging:

Timeline

2023

March to May - awaiting Minister approval for acceptance process

May to August - preparation of the stage 2 application to fast-track consenting equivalent of a resource consent application

September to November - processing and approval of the resource consent

2024

January - submit engineering plan approval

September - commencement of earthwork and civil construction

2025

February – completion of the overall earthwork and civil works for the project

March - commencement of Stage 1 of Retirement Village construction

December – Stage 1 completion first occupant move into the Retirement Village

2026

March - commencement of Stage 2 of Retirement Village construction

2027

September – completion of Stage 2 of Retirement Village construction

We anticipate the completion of 100 units per year on this project.



Figure 1: Aerial photo of site at 82 Hobsonville Road, West Harbour



Figure 2: Proposed development

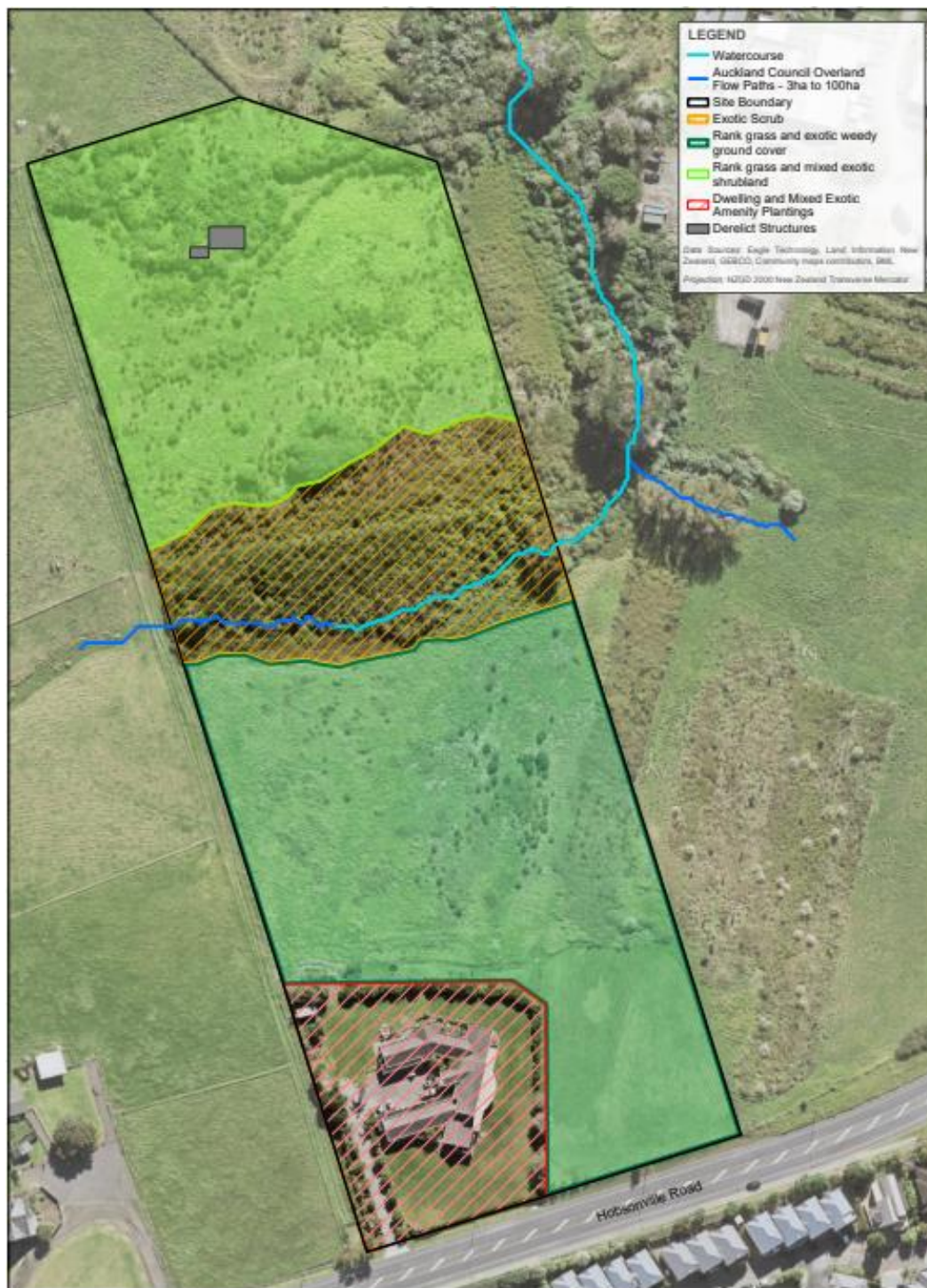


Figure 3: Freshwater features classification survey

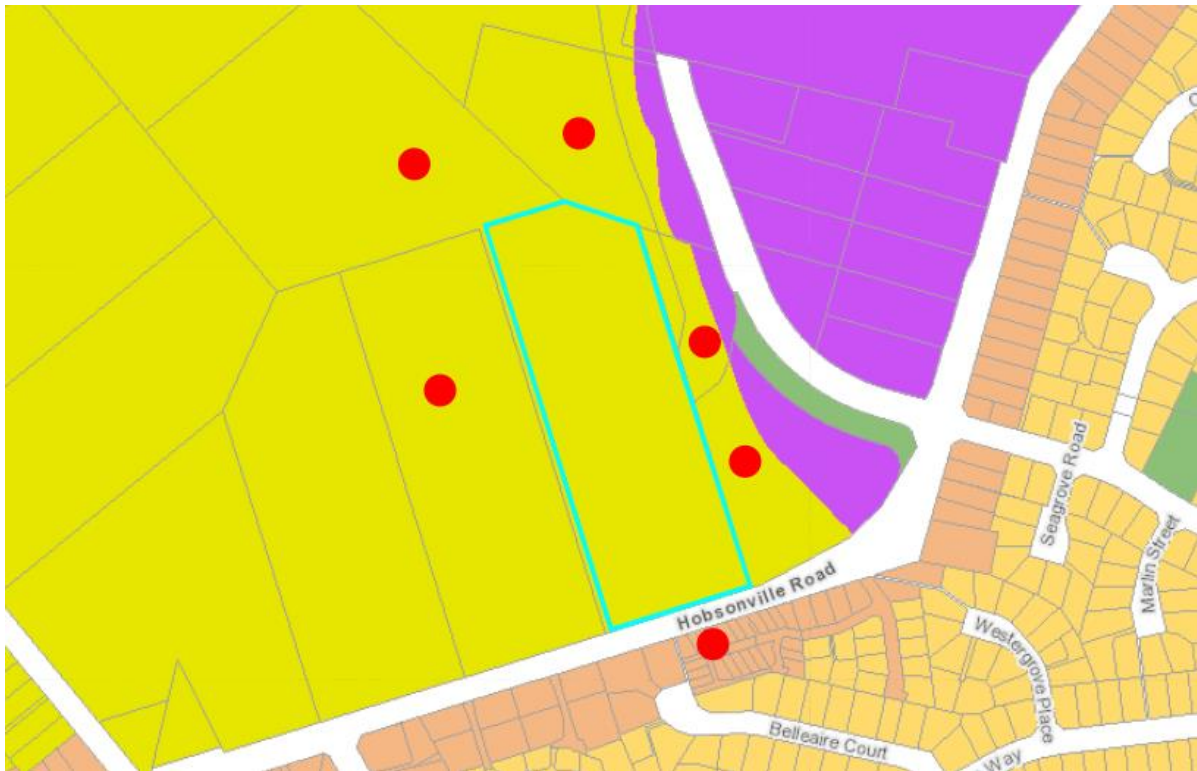


Figure 4: Neighbouring properties to the site

Relevant zoning, overlays, and other features

- *Please provide details of the zoning, overlays and other features identified in the relevant plan(s) that relate to the project location*

The site is located within the Whenuapai Structure Plan area and is anticipated to be developed for high-density residential activities. The proposed retirement village is considered to provide suitable density housing that provides a range of living options that are greatly needed in the Auckland region. The proposed buildings on the site will be a maximum of six-storeys and use a range of typologies associated with higher and medium density housing. The structure plan also anticipates a small park and this is provided for as part of the proposal. It is therefore considered that the proposal is consistent with what is anticipated under the structure plan for the site.

Part VII: Adverse effects

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

In considering whether a project will help to achieve the purpose of the Act, the Minister may have regard to, under Section 19(e) of the Act, whether there is potential for the project to have significant adverse environmental effects. Please provide details on both the nature and scale of the anticipated and known adverse effects, noting that Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail.

It is considered that the Project will have the positive effects detailed later in this application, and the Project will not have any long term, significant adverse effects on the environment.

The scale and nature of the proposal means that it has the potential to give rise to some adverse environmental effects. The below assessment considers the range of potential adverse effects, together with the methods that are proposed to avoid, remedy, or mitigate any such effects and concludes that the proposed development will not give rise to any significant adverse effects subject to imposition of conditions of consent.

Please refer to the attached supplementary information document for the figures referenced below.

Earthworks and Construction Effects

The proposed bulk earthwork will generally be undertaken as a cut to fill operation, with a moderate amount of imported or exported material, to form the proposed building platforms and proposed accessway. Final earthworks design will form an even and gradual slope towards the existing stream. The area of the northern and southern catchments is 1.5ha and 2.5ha, respectively.

Earthworks for the project will be carried out in accordance with best practice appropriate erosion and sediment control measures in (accordance with the requirements of Auckland Council's GD05) to ensure that the potential for sediment to discharge into receiving waters is avoided and minimised. This is detailed in **Attachment 5**. Proposed measures to ensure that the receiving downstream environment is protected, include:

- Construction of clean water diversion lines to divert and collect upstream catchment runoff away from the site of earthworks;
- Installation of silt fences around stream banks;
- Construction of decanting earth bunds and sediment ponds, and associated runoff/diversion bunds to allow for settlement of particulate matter and decanting of clean water prior to discharging to the Stream. PAC flocculating chemicals are proposed to be used to assist with settling particles;
- Minimising open areas of earthworks areas, and stabilizing of areas as they are complete.

The minimum 10m of riparian margins on both sides of the stream will be planted and maintained during/after the earthwork period. Planting on riparian areas can provide a natural barrier against potential chemical pollutants and soil particles getting into the stream. Therefore, riparian planting is considered to provide improvements and long-term protection to the water quality and the ecological health of the stream.

Earthworks is be programmed to be carried out during the earthworks season to further reduce potential sediment discharge to receiving waters. This will ensure sediment is not discharged into the stormwater network or wider receiving environment and that any earthworks effects are able to be managed on-site without giving rise to inappropriate effects on the environment.

Construction traffic effects will be temporary and will be managed in accordance with a Construction Traffic Management Plan ("CTMP"). The CTMP will outline measures such as the anticipated number of truck movements per day and truck routes (among other measures) to ensure that the potential construction traffic effects of the project are appropriately managed.

Construction noise and vibration will be managed in accordance with a Construction Noise and Vibration Management Plan ("CNVMP"). The CNVMP will outline measures, such as restrictions on days and hours on noisy works, consultation with neighbours and use of quieter machinery (among others) to ensure that potential construction noise effects of the project are appropriately managed.

While the scale of the works will be large in the context of the established residential and rural areas, it is noted that they will be temporary in duration and not out of character within a rural lifestyle site. Overall, it is considered that the actual and potential adverse environmental effects arising from earthworks can be appropriately managed.

Noise and Vibration Effects:

It is considered that construction noise will generally comply with the Auckland Unitary Plan standards. Both construction noise and vibrations will be appropriately managed by a Construction Noise and Vibration

Management Plan (CNVMP) which will identify Best Practicable Option (BPO) mitigation and management measures to reduce effects to reasonable levels.

With regards to operational noise, the noise levels will be in keeping with those generated by the established residential neighbourhood.

With regards to reverse sensitivity, it is considered that that noise from traffic on the State Highway and the operation of the adjacent industrial sites to the east are able to be quantified through measurement, then investigation on how this relates to the proposed development would occur through detailed noise modelling. Mitigation measures are anticipated to be confirmed once the potential noise effects are quantified, and are likely to take the form of a combination of acoustic treatment for the proposed residential building envelopes, and boundary screening where appropriate.

Overall, it is considered that the actual and potential adverse environmental effects arising from noise, vibration and reverse sensitivity can be appropriately managed.

Contamination effects

The site has a history of Horticultural use, which is a HAIL activity.

Soil testing of the site will be undertaken to confirm the extent of any soil contamination. Notwithstanding, if required, the site will be remediated in accordance with a Site Remediation Plan ("SRP"), and the earthworks undertaken in accordance with a Contaminated Site Management Plan ("CSMP") to ensure adverse effects on human health are avoided or mitigated. As earthworks will be carried out in accordance with the SRP or CSMP, it is considered that the site will either be safely remediated or earthworks undertaken in a manner which protects human health and the environment from contaminants in soil.

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

Archaeological

There are no known archaeological sites or features within the application site under the AUP. It is considered that should anything be discovered during the construction works that the accidental discovery protocols outlined in the AUP will be followed to ensure that any historic heritage identified on the site is appropriately protected. An archaeological assessment will be undertaken for the application site at the resource consent stage and an authority will be applied for if recommended by the findings of the report.

Infrastructure and Servicing Effects

The Engineering Infrastructure Report prepared by Aireys (refer **Attachment 5**) details the project's servicing strategy and confirms that the project can be sufficiently serviced in respect to stormwater, water supply, and wastewater. With regard to stormwater, water sensitive design approach will be adopted throughout the site to improve water quality runoff from the development. A Stormwater Management Plan ("SMP"), will also be submitted with the application. The SMP will outline the proposed stormwater management approach for the project to ensure adverse effects stormwater quality and quantity are effectively mitigated, and demonstrate that the proposed approach is the Best Practicable Option ("BPO").

Within site, all roads will be private and formed of concrete and asphalt. Also, separate pedestrian access is anticipated to be provided to allow for safe connectivity in the site. Specialist input from a Traffic Engineer will be provided for the detailed design stage.

With regard to wastewater, Watercare has confirmed capacity constraints in the wastewater network located south of the site. Please refer to Appendix D of the Aireys report. Therefore, a private low pressure wastewater system will be installed within the site to limit the additional flow to the existing downstream network. As a result, there will be no stormwater infiltration into the sealed LPS pipework or chambers and, eventually less

flow will be discharged into the downstream public wastewater reticulation network. All the on-site pump units, control system, storage and pipework will be owned, operated and maintained by the property owner. The LPS will be directed to a new receiving manhole located adjacent to site access at the south of the site. A new public gravity network with a length of approximately 300m is to be constructed along Hobsonville Road and Westpoint Drive to connect to the existing manhole on Westpoint Drive. Aireys have undertaken a downstream wastewater capacity assessment which is attached in Appendix E, this demonstrates that the post-development pipe capacity ratio of the downstream pipe will be less than 75%. Hence, they consider that the additional wastewater flow is appropriately managed, and the existing public downstream network has sufficient capacity to cater for the development.

Watercare has confirmed that there is a capacity in the local water supply network to serve the proposed development. A new connection would be made to the 150mm diameter water main on the northern side of Hobsonville Road. A private water supply network within the site will be provided to ensure potable water and firefighting supply to the development. Private fire hydrants will be provided as required in accordance with SNZ PAS 4509. It is expected that sprinkler systems will be provided for future multistorey buildings, but this will be confirmed at Building Consent Stage for the buildings.

Overall, the project will be adequately serviced without creating significant adverse effects on the environment.

Effects Generated by Natural Hazards and Flooding

Aireys have provided a summary with respect to Flooding, included as **Attachment 5**. The assessment details that A flood plain arising from the overland flow path is shown on the central portion of the site. The flood plain is contained to the incised gully within and downstream of the site. From the exit point of the site to the Upper Harbour Motorway, there are no habitable buildings at risk of flooding in the 1% AEP storm. The flood plain and the overland flow path is contained and running along a unlined channel showing on the Auckland Council GeoMaps. Then, the flow is likely throttled by the constructed stormwater channel under the motorway. Aireys advise that the Whenuapai 3 Precinct Stormwater Management Plan issued by Auckland Council in September 2017 states that the existing flood hazard in Whenuapai 3 Precinct is generally low. Additionally, flood modelling of future development indicated only a minor increase in risk.

Aireys advise that some minor overland flow paths arising within site will be modified as part of the development. Generally, the private roads within the site will be designed to convey overland flow in 1% AEP storm event. Constructed channels may also be provided, which will be confirmed in the detailed design stage. As such, we consider that there is no flood risk for the proposed development with the future retirement village building and associated impervious area in the 1% AEP storm.

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

It is noted that the land is not particularly steep and the application will obtain a details geotechnical report as part of any future resource consent application.

Streetscape Character, Amenity and Visual Effects

It is acknowledged that the proposal has the potential to result in a change to the residential character and amenity values of the existing neighbourhood. A level of change from 'Rural' to 'Urban' character and amenity values is anticipated by the Unitary Plan through the application of the structure planning.

The site is located adjacent to the existing urban environment and the viewing catchment of the site is relatively limited to the extent that the character of the wider environment will not be adversely affected by this proposal.

The proposal will establish a relatively directed street and block layout, which includes specific identification of open space areas.

The proposal has benefited from significant urban design input, seeking to ensure that the housing, streets, and open space layout provides a quality urban design response. Buildings have been designed to engage with the street, minimise vehicle crossings, and ensure privacy for residents. Substantial landscape treatment and planting is to be provided, as illustrated in the attached landscape plans.

The proposal includes a number of key design elements to manage potential effects pertaining to the existing residential character and amenity of neighbouring sites.

Boffa Miskell have considered the proposal. Please refer to **Attachment 6**. Boffa Miskell concludes that:

“Having undertaken a preliminary assessment of the proposal, it is considered that it represents an appropriate response to the future intensified urban built character of the area. Proposed buildings are laid out in a logical manner to respond to the Site’s shape, orientation and slope and will offer retirement village residents a good level of on-site amenity. The development will contribute to the significant change already underway to an urban character of the surrounding area on the north side of Hobsonville Road from its existing semi-rural character. This change is consistent with that anticipated by Auckland Council’s most recent strategic planning for the area.

Overall, it is considered that the development represents an appropriate urban design response to the opportunities and constraints of the Site, achieving a built form able to positively contribute to the attractiveness and safety of the street and suitably manages potential adverse effects to neighbours to a no more than minor extent.”

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

Transport Effects:

The potential transportation effects include trip generation and effects on the existing road network and the design of new roads and connectivity within the project site. A preliminary analysis of transport effects is included in the memo prepared by Team included at **Attachment 7**. Team notes that Retirement villages have very different traffic generation profiles to other residential activities, with peak generation typically being offset to traditional commuter peak periods. This is due to retirement village residents typically having the choice to avoid travel during commuter peak times, and instead travelling in quieter times throughout the day.

The design of the development is considered to be suitable for the intended residential use and is expected to operate in a safe and efficient manner from a traffic engineering perspective. The VAR status triggers assessment as a Restricted Discretionary Activity, with the access arrangements therefore being subject to review by Auckland Transport.

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

Socio-Economic Effects

The proposal will provide retirement housing. This will enable residents to age in their community. It is not anticipated that the proposal will not give rise to any adverse Socio-Economic Effects.

Ecology

Boffa Miskell has been engaged by Kings Heights Group Limited to undertake a high-level ecological assessment of the site at 82 Hobsonville Rd refer **Attachment 8**.

A high-level literature review of the Auckland Unitary Plan (AUP) and further desktop research was undertaken to assess the current and historical ecological values of the site, including any AUP overlays. Following this desktop analysis, Boffa Miskell ecologists undertook a walkover survey of the Site on 25 February 2023.

No significant native vegetation is present within the Site and it contains no Significant Ecological Area overlays under the AUP (as shown on Auckland Council's Geomaps).

Boffa Miskell advise that the site walkover traversed modelled flowpaths (as shown on Auckland Council's Geomaps) to determine whether any natural inland wetlands are present (as defined in the National Policy for Freshwater Management, 2020). All flowpaths are covered in deep swards of kikuyu, and were not distinguishable from the surrounding hillslope. There are no wetland features on the site.

Boffa Miskell Note:

"Auckland Council GeoMaps shows an intermittent/ ephemeral stream on the western side of the Site flowing from west to east and transitions to a permanent stream near the middle of the Site. The stream was inspected during the site walkover during a period of steady rainfall. The watercourse has a poorly defined but distinct, soft bottomed stream bed along the length of the reach. The western portion of the reach contained stream flow and pools, while flow disappeared below ground approximately midway along the stream section within the Site so that the eastern section contained no flow (though a poorly defined channel and local pools were present). A pool was noted directly below a culvert on the western boundary of the Site (Figure 2). We determined that the whole of the reach meets the classification of at least an intermittent stream, however we could not confirm whether or not any portion is a permanent stream as the site visit was undertaken during a period of rainfall, so permanence of the flow could not be assessed.

It is our understanding that the proposed development will retain the stream in its entirety with no anticipated loss of stream values or extent. Two bridges are proposed to provide a connection between the two halves of the Site. It was noted that at the point where the stream exits the Site to the east, there has been recent restoration activity undertaken within the riparian margins of the stream adjacent to Westpoint Drive, which appears to have involved substantial weed management and enhancement planting, and the creation of a walkway along the stream bank."

No suitable bat habitat is present on the site, therefore no specific bat assessment or management measures are required. If native lizard species are found during baseline surveys of the Site this would trigger the need for a Lizard Management Plan (LMP). A LMP will outline mitigation actions to be taken before and during vegetation removal (e.g. salvage and relocation) to avoid harm to lizards, and possibly offsetting and compensation measures (e.g. enhancement) if required.

Avifauna management will include undertaking vegetation clearance outside of the bird breeding season and/or checks for bird nesting prior to vegetation clearance to remove exotic vegetation.

It is noted that the proposal does not seek to modify the existing stream, although it will involve a stream crossing. The proposal will provide an opportunity to undertake weed management and riparian planting along the stream corridor.

Suggested enhancement actions at the Site include weed and pest management and enhancement planting within the riparian corridor for the stream that traverses the Site which will improve the ecological values and habitat for native fauna. This enhancement will extend the restoration activities that have been undertaken within the same stream corridor on the neighbouring site to the east and downstream of the Site.

In summary, the preliminary assessment of botanic and terrestrial fauna ecology values have not identified any issues associated with the Project that cannot be managed through a future consenting process. The assessment confirms that the site does not contain any natural wetlands as defined under the RMA and Freshwater NPS, and that the freshwater streams on the property are likely to be the most significant of the ecological features that can be incorporated into the design of the development and stormwater effects appropriately managed. With regard to terrestrial ecology, the project site is held in pasture and is currently grazed. There are no significant ecological areas or notable trees within the site that would create additional resource consent considerations.

Overall, it is considered that the site can be developed at the proposed intensity without creating significant adverse environmental effects on existing ecological values.

Greenhouse Gas Emissions

Further, the Household Units within the development will be designed to obtain a minimum of a Homestar 6 design rating. Homestar is an independent national rating tool that certifies the health, efficiency and sustainability of New Zealand homes. Achieving a minimum of a Homestar design 6 rating will ensure that the dwellings are warmer, healthier and more environmentally sustainable than a dwelling built only to the New Zealand Building Code. In order to achieve this rating, a variety of sustainable building elements will be considered throughout the detailed design process.

Overall, these combined factors will alone and in combination represent strong steps toward reducing greenhouse gas emissions.

Effects on Māori cultural values

The applicant will work collaboratively to ensure any adverse Māori cultural effects arising from the proposed development are appropriately mitigated.

Conclusion

The actual and potential adverse effects of the Project are of a nature and scale that are able to be appropriately managed through design and on-going management. This will ensure any adverse effects are appropriately avoided and mitigated, as well as remedied (where required). Overall, it is anticipated the Project will not result in any significant adverse environmental effects.

Additional considerations

The Ministry for the Environment has recently released some further guidance to assist in interpretation related to the protection of wetlands under the NES-F. This guidance has been reviewed and does not alter the regulatory approach in relation to the existing natural wetlands on the site.

Consent is required under the National Environment Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ('NES-CS'), as remedial works will occur in the south-western area of the site where existing sheds are located, and above background levels of contamination were detected. Consent is therefore required as a Restricted Discretionary Activity under Regulation 10 of the NES-CS. Please refer to the **attached** Soil Investigation Report for further details.

As an overall non-complying land use activity, consideration will need to be given to the gateway test contained in s104D RMA. In order for an application to pass the gateway test, a consent authority must be satisfied that the adverse effects of the activity on the environment will be minor, or the activity will not be contrary to the objectives and policies of both a district plan and a proposed district plan (if both exist). Only one limb of the test needs to be met to provide jurisdiction to grant an application for a non-complying activity.

It is considered that the effects of the proposal are no more than minor, for the reasons set out in the assessment of effects that accompanies this request for referral. The land has been identified for urban development and the nature of development proposed will not create any significant adverse effects. The development, being a retirement facility, is of a nature found throughout urban areas without any obvious adverse effects.

While the AUP identifies the land as Future Urban zone and the proposal seeks to give effect to urban development, the objectives of the Future Urban zone state (among other things) that future urban development is not compromised by premature subdivision, use or development, and urbanisation on sites zoned Future Urban Zone is avoided until the sites have been rezoned for urban purposes. It is considered that the proposal will not compromise future development because it is consistent with what is intended for the land. However, the proposal does not avoid urbanisation until *rezoning* has occurred.

For the purposes of s104D, it is not necessary to resolve the question as to whether the proposal is contrary to the objectives and policies of the operative district plan. Only one of the two limbs of s104D must be passed for an application to be eligible to be considered on its merits in accordance with the matters set out in s104. In this instance it is considered that the effects of the proposal on the environment are clearly no more than minor, therefore jurisdiction to grant consent is established.

The overlays, controls, and designations under the AUP impose no significant constraints, as discussed below.

No water take is proposed from the Kumeu Waitemata Aquifer, which is managed through the High-Use Aquifer Management Areas Overlay.

The entire site and the surrounding Whenuapai area sit beneath the Airspace Restriction Designation - protection of approach and departure paths (Whenuapai Air Base). However, written approval is not required from the New Zealand Defence Force under Designation 4311 as the site is not located within the area where land use and subdivision are subject to NZDF approval (as shown by Figure 3 in the attached supplementary information document). Nevertheless, the proposed uses will be of a height that does not impact on the airbase approach and departure paths.

Part VIII: National policy statements and national environmental standards

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

National Policy Statement for Freshwater Management 2020 (NPS-FM) and Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F)

The provided preliminary ecology assessment identified the presence of two natural wetlands (as defined in the RMA and NPS-FM) on the site. The wetlands are located in the identified stream margins towards the south-east of the site.

The proposed development has been designed to minimise the impact on the identified wetlands and streams on the site as much as practically possible. This approach is consistent with the 'effects management hierarchy' from the NPS-FM, which is copied below:

in relation to natural inland wetlands and rivers, means an approach to managing the adverse effects of an activity on the extent or values of a wetland or river (including cumulative effects and loss of potential value) that requires that:

- a) adverse effects are avoided where practicable; and*
- b) where adverse effects cannot be avoided, they are minimised where practicable; and*
- c) where adverse effects cannot be minimised, they are remedied where practicable; and*
- d) where more than minor residual adverse effects cannot be avoided, minimised, or remedied, aquatic offsetting is provided where possible; and*
- e) if aquatic offsetting of more than minor residual adverse effects is not possible, aquatic compensation is provided; and*
- f) if aquatic compensation is not appropriate, the activity itself is avoided*

In this instance, adverse effects on to the stream system are avoided and the riparian areas enhanced with planting and weed removal. The proposal has been designed to avoid any works within the wetland and works required within 10m of the wetlands can be effectively designed and/or mitigated to ensure there is no partial drainage of any natural wetland or loss of ecological value. Stormwater discharges to the stream are proposed but will be designed to manage flows and will provide quality treatment.

The proposal is also considered to be consistent with the objective of the NPS-FM, which is outlined below:

- 1. The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:*

- a. *first, the health and well-being of water bodies and freshwater ecosystems*
- b. *second, the health needs of people (such as drinking water)*
- c. *third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.*

As concluded in the provided ecological memo, the proposed development of the site is considered to be consistent with the outcomes expected by the NPS-FM. The streams identified on the site were found to have low ecological value due to being highly modified, however, the enhancement of the streams will be undertaken as part of the proposal through riparian planting and efficient management of stormwater runoff.

The proposal is considered to manage the freshwater resources of the site in a way that will not have any direct effect on the health needs of people (clause (b)), but it will assist in enabling people and communities to provide for their social, economic, and cultural well-being through the providing of additional retirement units, infrastructure, and public open space.

It is also considered that the proposal is consistent with the relevant policies of the NPS-FM, as summarised below:

- The proposal includes riparian planting to assist in ensuring the overall health and wellbeing of the freshwater resource is maintained and/or enhanced. This then also gives effect to the concept of Te Mana o te Wai (Policy 1).
- The applicant will engage with mana whenua to ensure that Māori freshwater values are effectively identified and provided for through the development (Policy 2).
- The riparian area around the stream will remain as open space to provide onsite amenity, whilst also containing the portions of the site subject to the 1% AEP floodplains to protect the development against the risks associated with flooding. The layout and design of the proposal will accommodate for the future effects of climate change through appropriate setbacks from the riparian areas on the site, and native planting to offset carbon release arising from the development activity (Policy 4).
- The identified stream on the site have been significantly modified and have little to no shading. It is considered that the enhancement of the riparian areas through the proposal will contribute to the ecological values and health of freshwater resources on and off the site (Policy 5).
- The proposal will not result in the loss (or reduction in extent) of any natural wetlands (Policy 6).
- The identified stream on the site will be retained and improved, with only the removal and upgrades of existing culverts, along with minor earthworks occurring. No reclamation of the stream is required, and the proposal has been designed to minimise the extent of works required within the riparian areas as much as practically possible (Policy 7).
- No existing water bodies that could be classified as outstanding are located on the site (Policy 8).
- Overall, the proposal enables communities to provide for their social, economic and cultural well-being (through the creation of much needed retirement housing in the Auckland region) and in a way that is consistent with the NPS-FM (Policy 15).

It is therefore considered that the proposed development is consistent with the outcomes sought under the NPS-FM.

National Policy Statement on Urban Development 2020 (NPSUD)

The NPSUD applies to planning decisions by any local authority that affect an urban environment. The NPSUD represents a significant change to national planning policy and affects all district plans for growth areas and all decisions made by planning authorities in those areas. Section 75(3)(a) of the RMA states that district plans must give effect to a national policy statement, and s104(1)(b)(iii) states that a consent authority must have regard to any relevant provisions of a national policy statement when considering an application for resource consent.

Objective 4 of the NPSUD seeks that New Zealand's, urban environments develop and change over time in response to the diverse and changing needs of people, communities, and future generations. Objective 6 seeks

that planning decisions on urban development are (amongst other things) responsive, particularly in relation to proposals that would supply significant development capacity.

Policy 6 seeks that decision makers should have particular regard to any relevant contribution that will be made to meeting the requirements of the NPSUD to provide or realise development capacity. That policy also makes it clear that significant changes to planned urban built form are likely to arise in order to give effect to the NPSUD and that such changes may detract from amenity values but are not of themselves an adverse effect.

Although the applicant's development proposal is worthy of consent on its merits under the existing AUP policy framework and is consistent with the Auckland Council's overall intentions for the land under the Council's Future Urban Land Supply Strategy (FULSS) and Whenuapai Structure Plan, it is nonetheless clear that the NPSUD requires a 'step change' in planning for urban areas that are experiencing rapid growth. The Auckland region is experiencing significant pressure in terms of addressing the need for this type of housing. The proposal will make a valuable contribution to the provision of more housing in this respect.

These outcomes are consistent with the NPSUD and can occur without giving rise to any appreciable adverse effects, particularly as they are aligned with the Council's development intentions for the Whenuapai area.

It is noted that the proposal is unique with respect to the wider Whenuapai area, due to the site not being reliant relying on any transport upgrades that were proposed as part of Plan Change 5. The site is located away from any interchanges that would require upgrading and there are no proposed roads running through the site. The site is essentially contiguous with the existing urban area and the proposed retirement village use will not exacerbate any peak commuter traffic generation concerns that might exist.

Part IX: Purpose of the Act

Your application must be supported by an explanation how the project will help achieve the purpose of the Act, that is to "urgently promote employment to support New Zealand's recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources".

In considering whether the project will help to achieve the purpose of the Act, the Minister may have regard to the specific matters referred to below, and any other matter that the Minister considers relevant.

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

The proposed development will result in direct and indirect economic benefits for people and industries affected by COVID-19 through providing both direct and indirect employment. Formative have assessed the economic benefits and costs of the proposal in the COVID-19 environment in their Economic Impact Assessment at **Attachment 3**.

In addition, in terms of economic benefits, Property Economics note that the proposal will contribute to the following economic benefits:

- Stimulate a significant amount of employment during the construction phase, equivalent to 1,917 full time equivalent employment years in Auckland.
- Support an ongoing level of employment of around 151 workers per year in Auckland through the accommodation of residents and the workforce employed within the Village.
- Generate total direct, indirect and induced impacts of \$258.9m in GDP, of which \$192m would be in the Auckland economy and \$66.9m would be directed elsewhere in New Zealand.
- Generate a range of public benefits, primarily as a result of the location of the Site adjacent and proximate to a wide range of established retail, commercial, and employment activities, and existing infrastructure.

The project will deliver a significant residential development in an accessible location that is serviced appropriately. This will, in turn, contribute to a vibrant and increasingly more attractive local settlement to visit, and increase the variety and supply of affordable housing, which in turn will create economic activity and facilitate residential growth in the wider area.

The project is therefore considered to be a significant stimulator for economic benefits. It will provide immediate economic benefits for people that have become unemployed as a consequence of Covid-19; people in the professional services sector with respect to the planning and design of the residential development; immediate economic benefits in the construction sector and long-term economic benefits of full-time employment opportunities in the operations and maintenance of this residential development.

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

The Project will generate significant positive social effects on current and future generations. The Project will enable the accelerated delivery of a significant number of residential units.

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

Not only will the project provide meaningful employment for a wide range of local workers, but gaining approval via the Fast-Track process will also help those jobs to be created sooner than they likely would otherwise. It is considered that the project would progress considerably faster by using the processes provided by the Covid-19 (Fast-Track Consenting) Act 2020 (FTCA) than would otherwise be the case. At this stage, the Auckland Council's Future Urban Land Supply Strategy 2017 identifies that this land is ready for urban development. The processes enabled by the COVID19 Recovery (Fast-track Consenting) Act 2020 would facilitate physical work on the site commencing in 2024. Were this development to follow a "standard" consenting pathway, it would first require a plan change to rezone the land (taking approximately 15–18 months), and then resource consents to provide for this specific development. If there were appeals to the plan change or subsequent resource consent applications, that would add additional time. It is noted that at present Auckland Council has a 2 week+ delay to simply allocate resource consent applications to a planner for processing. When applications are allocated, the time period for section 88 check has been extended by 10 working days, and the time period for making a decision on notification and on the substantive merits of the application has been extended by 20 working days.

In summary, a typical/simple consent application takes up to 90 working days (at a minimum), which does not take into account the additional delays experienced internally with Council specialists and multiple requests for further information. If the proposal is subjected to a notified resource consent process, this could take more than two years, with several factors prolonging the process.

They include:

- Multiple rounds of further information requests under section 92 of the RMA;
- Submitters raising unexpected or complicated issues during public consultation;
- Lengthy evidence exchange periods prior to the hearing (which can be exacerbated by the higher onus associated with non-complying consents. i.e. the gateway tests);
- The number of witnesses required to give evidence at the hearing;

- Long periods taken to reach a decision; and
- The numerous tasks associated with potential appeals to the Environment Court.

Whether the project may result in a 'public benefit':

Examples of a public benefit as included in Section 19(d) of the Act are included below as prompts only.

Employment/job creation:

The Project will bring forward in time significant employment opportunities in the civil and construction industry and supporting sectors, with construction being one of the key sectors filling the unprecedented unemployment generated by the COVID-19 pandemic. The economic assessment included as **Attachment 3** outlines that during the construction phase, up to 1,917 full time equivalent employment years will be created during construction, with a total employment count of around 151 workers per year in Auckland through the accommodation of residents and the workforce employed within the site.

Housing supply:

The Project will bring forward in time and accelerate the availability and delivery of housing stock supply. There will be approximately 354 residential units provided at a time when there are still significant shortages of housing in the Auckland region. Furthermore, the project will assist in releasing pressure on social and health services and will also have a crucial role in the general housing market because the supply of retirement village housing releases existing housing stock back into the market.

Contributing to well-functioning urban environments:

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

The project includes only small transport infrastructure upgrades to provide access points to the site, and any increased demand on existing Council infrastructure can be incorporated through existing capacity or planned future upgrades. As a result, the proposal does not require any major infrastructure installation or off-site upgrades to the surrounding road network. The infrastructure within the site will be fully funded and established by the applicant.

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

The Project will not result in any adverse outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity. The project will likely improve environmental outcomes for freshwater quality as it will remove historical farming activities from the land and treat stormwater from new impervious areas to a high level. The project will adopt water sensitive stormwater management approaches which will work to preserve, protect and enhance streams within the site. Water quality treatment will be provided to eliminate and minimise generation of contaminants and hydrological management will reduce potential for in-stream erosion.). Overall, the site has low indigenous biodiversity values, and no significant native vegetation removal or ecological modification is required. The proposal includes a large area of native landscape planting that will increase the net biodiversity values of the site.

Minimising waste:

Kings Height Group recognises the importance of minimising waste and avoiding unnecessary use of resources, and have their own sustainability and environmental policies in place. The Project will commence with the

preparation of a comprehensive Site Waste Minimisation Plan. The Site Waste Minimisation Plan will ensure the management of construction processes as to reduce, reuse, recycle and properly dispose of waste. This will be implemented from demolition stage through to completion of construction. This is one of the target items in achieving a Homestar 6 rating. In terms of on-site operations, centralised waste management and recycling systems will be implemented to ensure appropriate waste management that can also adapt to sustainable waste strategies over time.

Contributing to New Zealand'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):

The accessible location of the Project will contribute to a reduction in driving and distances driven for residents to meet their needs and increase in active transport modes, thereby contributing to a reduction of greenhouse gas emissions. The central location of the Project itself represents a contribution to New Zealand's efforts to mitigate climate change and transition more quickly to a low-emissions economy, noting that were the new supermarket and Warehouse store located on a more peripheral site, that would increase private vehicle trips, contributing to greater net emissions.

In addition to the above, Kings Height Group are committed to actively responding to climate change through sustainability initiatives and will seek to implement such initiatives to this Project by incorporating these sustainable design and construction elements. They are currently investigating the inclusion of rain water harvesting, solar panels and the provision of electric vehicle charging stations to the Project. Collectively, these measures will contribute to mitigating the effects of climate change, help contribute to a low emissions economy and help reduce greenhouse gases.

Promoting the protection of historic heritage:

There are no known archaeological sites or features located within the project site. It was determined that the accidental discovery protocols outlined in the AUP and the Heritage New Zealand Pouhere Taonga Act 2014 can be relied upon should subsurface remains be uncovered during earthworks. As such, it is considered that historic heritage will be appropriately protected within the project site.

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

Overall, it is considered that natural hazards associated with land stability can be appropriately managed and the project site can be developed to accommodate urban residential land uses in a manner that is resilient to natural hazards and the effects of climate change.

Other public benefit:

As discussed throughout the application, there are various public benefits generated by the development. In the short term, employment opportunities in the construction sector will be increased, this has been identified as one of the key sectors in assisting with the social and economic recovery of COVID-19. In the longer term, the Project will provide residential housing supply, job opportunities, and amenities.

The project will result in a significant improvement to the amenity values of the area through a new comprehensively planned and architecturally designed residential development. The site is a scarce and underutilised land resource in this central and connected part of Auckland. The project will result in the revitalization and transformation of the site through the activation of the Hobsonville Road frontage and provision of a residential development providing much needed housing choice to the surrounding residential catchment.

The project will promote the sustainable management of natural and physical resources as it is an efficient use of Future Urban Zoned land.

The proposal will increase the supply and diversity of retirement and care housing within the Auckland region, and provides a high degree of confidence that physical and social infrastructure can be appropriately provided for, environmental effects can be suitably managed, and that the development will be resilient to the risks of natural hazards and climate change.

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

It is not considered that the Project has the potential to result in significant adverse effects. The effects assessment within Part VII and the supporting technical memos confirm that the potential adverse effects of the development are able to be avoided, managed or remedied.

Whether the proposal promotes the sustainable management of natural and physical resources:

As has been outlined above, the proposal will have significant economic benefits to the local economy, including through creation of local job opportunities. The residential development will also bring numerous benefits to the social, economic, and cultural well-being of the local community. The applicant has illustrated a clear commitment to operate in a sustainable manner, through energy reduction, energy and water efficiency, and through a reduction in reliance on private motor vehicle trips. The proposal also expressly avoids the destruction of any natural resource or physical resources, and includes large areas of regeneration planting. These factors together will ensure that the proposal safeguards the life-supporting capacity of air, water, soil, and ecosystems. As has been demonstrated above, any adverse effects of the proposed activities on the environment can be avoided, remedied, or mitigated. For these reasons, both the development itself and use of the Fast Track legislation can be said to achieve the purpose of the RMA.

Part X: Climate change and natural hazards

Description of whether and how the project would be affected by climate change and natural hazards:

Climate change does not raise any particular concerns or threats to the project or the site. The site is subject to some natural hazards, in the form of the overland flow paths and the 1% AEP floodplains associated with the overland flows. These natural hazards are generally to be contained within areas that will remain undeveloped, such as the existing stream in the middle of the site. Where this is not the case, the proposal has been designed to appropriately manage these hazards by directing flows to the proposed roads and through other engineering solutions such as recontouring and drainage works.

Part XI: Track record

A summary of all compliance and/or enforcement actions taken against the applicant by a local authority under the Resource Management Act 1991, and the outcome of those actions:

No compliance and/or enforcement action has been taken against Kings Height Group by a local authority under the Resource Management Act.