

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Auckland Council
Contact person (if follow-up is required)	Hailey Kim (s 9(2)(a))
	Ian Smallburn (s 9(2)(a))
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Hobsonville Road Retirement Village Project
General comment – potential benefits	<ul style="list-style-type: none"> 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. The riparian planting along Rawiri Stream will enhance the ecological values of the stream.
General comment – significant issues	<ul style="list-style-type: none"> It is considered that the proposal could potentially contribute to and exacerbate misalignment between the timing of the infrastructure delivery and the urbanisation of greenfield areas. This compromises the ability to sequence and deliver future urban development in a sustainable, coordinated, and cost-efficient way. Further details on this are contained in the responses from Auckland Transport, Watercare and the Council's policy planner. There is no immediate funding solution to respond to the cumulative effects from the unplanned urbanisation as explained in the Local Board Chairperson's response. The application is inconsistent with the Auckland Unitary Plan and although the proposal aligns with the timeframe suggested in the Future Urban Land Supply Strategy, there are significant concerns on the infrastructure capacity issue (please see the Watercare's and Policy planner's comments). There may be also potential reverse sensitivity issues as there will not be an appropriate regulatory framework in place to manage those effects. Opportunities to provide a network of high-quality open spaces and recreational areas to meet the growing amenity and recreational needs of Whenuapai communities have not been explored (see the Parks planner's comments).
Is Fast-track appropriate?	<p>There are issues associated with the infrastructure needed to service this development which have not been resolved and would be ahead of the integrated provision of appropriate infrastructure. We have no immediate funding solutions to mitigate any actual and potential adverse effects to the wider environment from the unplanned urbanisation of the greenfield.</p> <p>It is therefore Auckland Council's view is that the application should appropriately proceed through the existing RMA consenting processes. We consider the greenfield areas, where the</p>

	subject site sits in, should have comprehensive and coordinated planning carried out before they are urbanised.
Environmental compliance history	<p>The following companies/stakeholders have been reviewed for previous compliance history:</p> <ul style="list-style-type: none"> • Kings height Group Limited • Kester Ko • Hong LU <p>No enforcement action has been taken against any of the stakeholders above. There are no significant outstanding compliance concerns for the parties above that we are aware of.</p>
Reports and assessments normally required	<ul style="list-style-type: none"> • An AEE • Acoustic assessment • Archaeological assessment • Lighting impact assessment • Integrated transport assessment • Ecological impact assessment • Geotechnical assessment • Groundwater effects assessment • A contaminated land detailed site investigation Report/Site Validation Report • Water and wastewater capacity assessment • Stormwater infrastructure report including a stormwater management plan and flood assessment • Urban design assessment • Visual impact assessment • Construction and erosion and sediment effects assessment • Economic assessment • Arboricultural assessment • Crime prevention through environmental design (CPTED) assessment • Cultural values assessment
Iwi and iwi authorities	<p>Ngāti Manuhiri - Ngāti Manuhiri Settlement Trust Ngāti Maru - Ngāti Maru Rūnanga Trust Ngāti Pāoa - Ngāti Paoa Iwi Trust Ngāti Pāoa - Ngāti Paoa Trust Board Ngāti Tamaterā - Ngāti Tamaterā Settlement Trust Ngāti Te Ata - Te Ara Rangatu o Te Iwi o Ngāti Te Ata Waiohū Ngāti Whātua o Kaipara - Ngā Maunga Whakahī o Kaipara Development Trust Ngāti Whātua Ōrākei - Ngāti Whātua Ōrākei Trust Te Ākitai Waiohū - Te Ākitai Waiohū Iwi Authority Te Kawerau ā Maki - Te Kawerau Iwi Settlement Trust Te Rūnanga o Ngāti Whātua - Te Rūnanga o Ngāti Whātua</p>
Relationship agreements under the RMA	NA
Insert responses to other specific requests in the Minister's letter (if applicable)	<ol style="list-style-type: none"> 1. This is answered above. Detailed reasons are available below. 2. This is answered above. 3. This is answered above.
Other considerations	We suggest a more detailed analysis of the environment within 100 metres of the site and proposed development in respect of wetland identification is undertaken.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Asset Owner / Specialist Response

From: *Todd Elder, Senior Policy Planner, Plans and Places*

Date: 17 April 2023

Overall Summary:

- (1) The following is Plans and Places comments on the 'Hobsonville Road Retirement Village Development' application under the COVID-19 Recovery (Fast-track Consenting) Act 2020 ("FCTA"), requested by the Resource Consents Department of Auckland Council.
- (2) Plans and Places considers that if this application is to proceed under the FCTA, this will urbanise the Site and influence the land-use of the site for more than the lifetime of the Auckland Unitary Plan (Operative in part) ("AUP").
- (3) Plans and Places oppose this application, and request that this application goes through the Schedule 1 process of the Resource Management Act 1991 ("RMA") and then obtain resource consent through the AUP. The Council opposes this application as the Council considers:
 - a) The application to be repugnant to the Future Urban Zone (FUZ) objectives and policies;
 - b) Auckland Council does not have any dedicated funding or financing for infrastructure to facilitate the development, and applicant has not raised how this upgrade will be funded or financed in its application, nor has it provided any indication of its assessment of its contribution to the upgrades

Strategic Documents

- (4) The Whenuapai Structure Plan (WSP) indicates the site is in 'stage 1' of development, which is identified in the Future Urban Land Supply Strategy (FULSS) as being development ready between in the next 2 – 10 years (2018-2026). The FULSS informs the Council's infrastructure funding priorities and feeds directly into the Council's long-term plans, annual plans, and other strategic documents. The FULSS was refreshed by Council in July 2017.
- (5) Council is currently drafting Auckland's Future Development Strategy (as required by the National Policy Statement on Urban Development 2020 and the Local Government (Auckland Council) Act 2009) which will provide updated information on the timing and sequencing of all Future Urban Areas that align with key infrastructure requirements.
- (6) A contributions policy which reflects the infrastructure needed to urbanise the Whenuapai area has not yet been developed and will likely be behind the developer's timeframe for development. This policy will ensure that the cost of new infrastructure is fairly shared between developers and ratepayers on the basis of who causes the need for and who benefits from the investment. Allowing this proposed development to proceed ahead of an updated contributions policy will result in future wider network infrastructure upgrades required for this development to be borne by the ratepayer under the current policy setting.

This is assuming funding becomes available to deliver these upgrades.

- (7) Auckland Council are entering into a process to review the current DC charge for the Northwest. Until this work is completed, the future anticipated DC amount that reflects the urbanisation of the Northwest is unknown. However, recent examples such as Drury have shown that DC costs have gone from **\$22,500 per household unit equivalent** (DC charge is reflective of projects over the 10-year LTP period) to a proposed average charge in the 2022 Drury DC consultation is **\$83,000 per household unit equivalent** (this DC charge is still to be confirmed and includes transport, community facilities and parks projects required over a 30-year period). It should be noted that Auckland Council is experiencing a significant number of Private Plan Changes and Fast Track applications in the Northwest. Therefore, using the Drury example, the difference in DC costs per household unit equivalent under the current and proposed policies would be picked up by Auckland Rate Payers under the current policy framework. This provides an example of the potential significant financial impacts to Council in the Northwest should these developments proceed.

Auckland Unitary Plan (AUP OP) – Auckland Council FUZ Policy Position

- (8) *Reverse Sensitivity* - If this is to proceed, this application must take a strategic approach to all resource management matters as occurs in the Schedule 1 process of the RMA.
- (9) In the Council's view, the application is not consistent with the Objectives and Policies of the Regional Policy Statement ("RPS") and the FUZ. This includes two separate aspects of the FUZ being:
- a) The establishment of an urban activity in FUZ without the land being rezoned;
 - b) The activity being established with conflicting RMA frameworks (urban uses in a zone that does not manage urban development and land use) to ensure land use continues to be managed effectively and efficiently post this resource consent decision (if it is approved).
- (10) Regarding the first point raised under paragraph (9), it is considered that the application is inconsistent with the following, but not limited to, objectives and policies are relevant:

<i>RPS Objective B2.2.2(3)</i>	<i>Enable rezoning of future urban zoned land for urbanisation following structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines.</i>
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<i>RPS Objective B2.2.2(8)</i>	<i>Enable the use of land zoned future urban within the Rural Urban Boundary or other land zoned future urban for rural activities until urban zonings are applied, provided that the subdivision, use and development does not hinder or prevent the future urban use of the land.</i>
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<i>Objective H18.2(4)</i>	<i>Urbanisation on sites zoned Future Urban Zone is avoided until the sites have been rezoned for urban purposes.</i>
<i>Policy H18.3(1)</i>	<i>Provide for use and development which supports the policies of the Rural – Rural Production Zone unless that use and development is inconsistent with policies H18.3(2) to (6).</i>
<i>Policy H18.3(3)</i>	<i>Require subdivision, use and development to maintain and complement rural character and amenity.</i>
<i>Policy H18.3(4)</i>	<i>Avoid subdivision that will result in the fragmentation of land and compromise future urban development</i>
<i>Policy H18.3(6)</i>	<p><i>Avoid subdivision, use and development of land that may result in one or more of the following:</i></p> <ul style="list-style-type: none"> <i>(a) structures and buildings of a scale and form that will hinder or prevent future urban development;</i> <i>(b) compromise the efficient and effective operation of the local and wider transport network;</i> <i>(c) require significant upgrades, provisions or extension to the wastewater, water supply, or stormwater networks or other infrastructure;</i> <i>(d) inhibit the efficient provision of infrastructure;</i> <i>(e) give rise to reverse sensitivity effects when urban development occurs;</i> <i>(f) give rise to reverse sensitivity effects in relation to existing rural activities or infrastructure; or</i> <i>(g) undermine the form or nature of future urban development.</i>

(11) Regarding the RPS objectives and policies that are considered relevant, the site has been structure planned (Whenuapai Structure Plan 2016) and clearly meets the first part of policy B2.2.2(3) (structure plan) but not the second (plan change) .

(12) Regarding Objective H18.2(4), the application does not avoid the creation of urban land use activities. This will 'urbanise' the site. and fails to meet H18.2(4).

(13) Regarding the FUZ policies, Policy H18.3(1) provides FUZ for use and development which supports the policies of the Rural - Rural Production Zone, unless that use and development is inconsistent with policies H18.3(2) to (6). Policy H18.3(1) applies to rural activities, if they are inconsistent with the listed policies under H18.3(6). In this circumstance, the Council considers that the proposed activity is inconsistent with the some of the listed policies and is urban in nature. Therefore this application is inconsistent with Policy H18.3(1).

- (14) Policy H18.3(3) seeks for subdivision, use and development to maintain and complement rural character and amenities. As this application is an urban activity that proposes to provide infrastructure in its 'planned urban' state, and it does not meet Policy H18.3(3).
- (15) Policy H18.3(4) seeks to avoid subdivision that will result in fragmentation of land and compromise future urban development. The scale and size of the application could avoid fragmentation of the land. However, unless the development provides the infrastructure required to service the site; and the application provides a method to undertake effective and efficient land use management to avoid reverse sensitivity effects, the application fails to meet policy H18.3(4) in part.
- (16) Policy H18.6, the resource consent application is required to avoid subdivision, use and development unless it meets all sub-policies listed.
- a) In terms of 18.3(6)(b). the application does propose to provide some infrastructure to manage effects of the proposal. This development may not compromise the operation of the infrastructure and therefore may not be inconsistent with Policy H18.(3)(6)(b), however, this needs further assessment to clarify as discussed below, the Applicants Transport assessment sets out a lack of walking and cycling facilities to the site.
 - b) Policy H18.3(6)(c) of which seeks to avoid subdivision, use and development if significant infrastructure is required to facilitate the land use. As the Hobsonville Road (northern section) will be required to be at an urban standard, the Council considers Policy H18.3(6) is not met.
 - c) Policy H18.3(6)(d) is for development that will inhibit the efficient provision infrastructure. This policy may be met, of which is more relevant to the recently notified NoR for Hobsonville Road. The NoR process should manage this outcome.
 - d) Regarding Policies H18.3(6)(e)-(g), the Council does not consider the proposed resource consent has provided a framework that is effective of efficient for the future management of the land. Therefore, there is uncertainty on the land management, which leaves the Council uncertain about any potential compliance matters.
- (17) The process to urbanise land required by the AUP occurs in three distinct stages, being structure planning - followed by plan change(s) to rezone for urban purposes – followed by resource consent proposals for specific subdivision and land use development. The first stage (structure planning) is usually at a more generalised conceptual level and often shows indicative elements and preferred future development. The second stage of a plan change seeks to rezone land and is required to be supported by more in-depth analysis and refines the development concepts identified in the structure plan. The plan change stage requires the supporting comprehensive s.32 analysis. Finally, the applications for subdivision and development are site-specific and the most detailed with specific conditions of consent tailored to the proposal.
- (18) These three stages are complementary and build-on one another. Following through all three stages is particularly important to planning, designing and providing for infrastructure that is efficient, effective and integrated with urban development for the wider area. It is quite common for the in-depth analysis carried out at the plan change stage to result in significant changes and refinements to the structure plan (so therefore the structure plan guides development, but is not the definitive development framework).

- (19) In addition to infrastructure planning, the plan change stage is also important as it sets up the regulatory framework to manage the on-going use and development of the land. This includes (for example) the application of methods including zones, precincts, overlays, classes of activities, development standards, assessment criteria (including objectives and policies) and subdivision requirements.
- (20) An application proceeding on FUZ land could lead to future reverse sensitivity issues for future resource consent applications, as there will not be an appropriate regulatory framework (i.e., An urban residential zone or business zone) in place to manage those effects in the future.
- (21) If the activity is legally established through the FCTA, any future land use consents will be considered against the FUZ objectives and policies. The nature of the FUZ objectives and policies are to enable rural use of the land until a site has been through the plan change process. The FUZ is not an efficient and effective zone for these urban types of development until the site is re-zoned for urban purposes.
- (22) It should not be anticipated that the Council will initiate a plan change to urbanise this site, as the current Covid Recovery Budget means that this land is unlikely to become a priority for the Council.

Council Initiated - Plan Change 5 (PC 5 - Withdrawn)

- (23) Infrastructure Funding and Financing – one of the reasons for withdrawing PC5 was that there was no funding budgeted in the lifetime of the Auckland Unitary Plan (ten years) for the upgrading of the wider transport network to address the anticipated adverse effects from increased traffic generated by the development of land in the proposed plan change area. There remains no funding allocated for the upgrade of the wider transport network. Allowing the application to proceed could effectively “orphan” the development without suitable infrastructure, or result in an infrastructure provision being forced on the council, meaning that the currently unbudgeted costs of that infrastructure will fall on ratepayers (see comment regarding development contributions above).
- (24) The applicant will need to provide further information on how infrastructure upgrades (including those required for the wider network to manage cumulative effects) will be funded. Noting that Auckland Council does not have any dedicated funding for the PC5 area.
- (25) The applicant has not raised these upgrades in its application, nor has it provided any indication of its assessment of its contribution to those upgrades. Further, as outlined above the Council does not have the ability to fund such projects. It is also considered that this application should not cause the Council to have to re-allocate potential or actual infrastructure funding, which may be the result of approving this resource consent application.
- (26) The Schedule 1 RMA process is considered to be more suitable, as the nature of this application, and the effects on the surrounding landowners (that could be limited by the roading capacity) requires public notification and the ability of those other land owners to participate in a plan change process. This approach may also require a precinct to be applied to the site, requiring infrastructure upgrades prior to development, which is a

consistent approach with greenfield development in the Auckland Region (PC 48, PC 49, PC 69).

Transport Assessment

- (27) The Applicant has supported their proposal with a Transport Assessment by Traffic Engineering and Management LTD dated 27 February 2023. It is acknowledged that there is capacity in the current roading network, however the transport assessment has not identified the current state of the road nor the current level of service. The existing infrastructure is not considered to be of an urban standard (north part of Hobsonville Road), and upgrades should be provided prior to resource consent being granted. The Applicant's Transport Assessment acknowledges, for example, the lack of a public footpath on the northern section on Hobsonville Road. Specifically, the transport Report states:

"It is understood that PPC5 has been withdrawn, however future rezoning of the subject site and wider area can be anticipated with further urbanisation undertaken including continuous footpath on the northern side of Hobsonville Road and pedestrian crossing facilities across the road."

- (28) The transport assessment then identifies that the *"Footpath connection to the existing eastbound bus stop and pedestrian refuge crossing to the west of the site is considered a key provision for staff, residents and visitors to the proposed retirement village."*
- (29) The Council has concerns with these statements as it does not identify who will initiate a plan change, nor when the footpath will be constructed. Further, on the 23 March 2023 a Notice of Requirement (NoR) was notified for the *"Trig Road Corridor Upgrade (West Harbour): An upgrade of Trig Road to an urban arterial corridor. This includes the upgrade of the existing Hobsonville Road/Trig Road and Luckens Road/Trig Road intersections."* The application site is affected by this NoR.
- (30) The construction and timing for the Trig Road Corridor upgrade project has not been confirmed by the Supporting growth Alliance at this time. A lapse date of 10 years is being sought for the concurrent resource consent application (lodged on the 19 December 2022), and a 15-year lapse date is being sought for the NoRs.
- (31) It is considered that the widening and construction of this section of Hobsonville Road to have a formed footpath on the northern section is required to support a well-function urban environment. The Council does not consider that there is certainty that this will occur within the timeframe outlined in the application (2023 – 2027) and therefore does not consider this site to be development ready.

Information required (but not limited to):

- a) Include in the Assessment of Environmental Effects:
 - i. Auckland Councils Strategic Framework, including an assessment against the Whenuapai Structure Plan, Auckland Plan 2050, Future Urban Land Supply
 - ii. An assessment of required infrastructure, to an urban standard, to be provided in facilitate this development.

- b) An assessment against all relevant parts of Auckland Unitary Plan's Regional Policy Statement, noting that an assessment only against '*Chapter B2 urban Growth and form*' is not sufficient for a strategic decision.
- c) Consultation with the direct neighbors of 82 Hobsonville Road.
- d) Economic assessment, that includes:
 - i. Analysis in the context of the COVID-19 Recovery (Fast-track Consenting) Act 2020;
 - ii. Enabled residential capacity of the AUP OP
 - iii. Outlining the likely location where future residents will access key amenities and work opportunities.
- e) Integrated Transport Assessment:
 - i. That includes information on Public Transport services, including future upgrades and current level of service;
 - ii. Infrastructure upgrades required to facilitate the development including any network upgrades that may be required for the wider area.
 - iii. An assessment against Regional Policy Statement objectives and policies
 - iv. An assessment against the objectives and policies of the National Policy Statement on Urban Development.
- f) Set of draft conditions for staging development until key infrastructure projects are delivered.
- g) Information on what infrastructure will be funded and built by the applicant and how all remaining infrastructure will be funded that is not being funded by the applicant, noting that Auckland Council does not have any allocated funding for the Whenuapai FUZ area.

- (32) If this application is approved for processing, the non-infrastructure economic and social benefits identified in the application should not be counted as contributing to the current shortfall of funding for infrastructure projects in the region. For certainty on this matter, the Applicant should fund the infrastructure required in full and not anticipate any funding from the Council.

Asset Owner / Specialist Response

From: Ameya Bhiwapurkar, Development Engineer, Watercare Services Ltd.

Date: 14/04/2023

Overall Summary:

Airey Consultants Ltd has been engaged to carry out an engineering infrastructure assessment for the proposed development at 82 Hobsonville Road, West Harbour. The proposed development involves the construction of a retirement village.

Proposal

Wastewater

A private low-pressure wastewater system will be installed within site to limit the additional flow to the existing downstream network. All the on-site pump units, control systems, 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 of approximately 300m will be constructed along Hobsonville Road and Westpoint Drive to connect to the existing manhole on Westpoint Drive.

Water supply

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.

Watercare's comments on the proposal

Wastewater

The development is within the Future Urban Zone area, and therefore we have no commitment to service it at this stage.

The developer has three options for the proposed development:

Option A: To propose a gravity connection to the existing Wastewater (WW) network in Westpoint Drive

Based on COP theoretical PWWF, the development will be 18 l/s, therefore, requiring an upgrade of the local downstream network where capacity is exceeded.

Option B: To propose Low-Pressure System (LPS system) within site directed to the new gravity connection to the existing WW network at Westpoint Drive

LPS is not preferred by Watercare when a gravity connection can be feasible. The LPS system must have a **prior agreement** from the Watercare to proceed. Additionally, the LPS system will be a private network in this development maintained by the client/developer discharging the wastewater into the new public WW gravity network along Hobsonville Road and Westpoint Drive.

Option C: Proposing a gravity WW network to the new Northern Interceptor Stage 2

This proposal is subject to the completion of Northern Interceptor Stage 2, which is due in late 2025. Once completed, the developer can propose an 800m network connecting to the Northern Interceptor Stage 2.



Figure 1: Options proposed for the development at 82 Hobsonville Rd

The capacity constraints in the wastewater network will need to be mitigated by the developer through public network extensions or upgrades, depending on the agreed solution with Watercare as part of the resource consent process at that time.

Water supply

The existing 150mm Watermain has insufficient capacity to cater to the proposed development. Firefighting requirements were not identified at this stage, as the details of the Sprinkler and hydrant are yet to be explained. The existing 150mm Watermain needs to be upgraded to 200mm ID as below:



Figure 2: Proposed Watermain to be upgraded

Asset Owner / Specialist Response

From: Hillary Johnston – Consultant Stormwater Specialist, Growth & Development, Healthy Waters

Date: 14th April 2023

Overall Summary:

Kings Height Group Limited have submitted a Fast-Track application for the development of a retirement village including 354 retirement style units including hospital level care and associated communal facilities including basement carparking. The development site is 4.0486ha and is located at 82 Hobsonville Road, to the north of existing established residential development within the West Harbour neighbourhood.

The assessment herein presents comments from the perspective of Healthy Waters as an asset owner, as well as from the perspective of a regulatory stormwater specialist.

The following application documents have been reviewed as part of this assessment:

- *Fast Track Infrastructure Report to Support a Resource Consent Application for a Proposed Retirement Village for Queen's Homes Ltd at 82 Hobsonville Road, West Harbour* prepared by Airey Consultants dated 20.02.2023
- *Preliminary ecological assessment* prepared by Boffa Miskell Limited dated

27.03.2023 The proposal has been discussed with the following additional specialists:

- Danny Curtis – Principal, Catchment Planning, Healthy Waters

Authorisation

The site is within the Future Urban Zone under the Auckland Unitary Plan. Healthy Waters Department holds a network discharge consent which authorises the discharge of stormwater runoff from existing and future proposed public stormwater networks within urban zoned land. As the development is within the Future Urban Zone, authorisation for the discharge of stormwater under the Region Wide Discharge Consent cannot be sought.

Adjacent *Business Light Industry Zone* land to the east of the development site is subject to an adopted Stormwater Management Plan which is not yet shown on Council's GeoMaps being the Waiarohia Catchment Management Plan.

Although the infrastructure report includes comments in respect of the requirements of Schedule 4 of the Region Wide Network Discharge Consent, a private diversion and discharge consent is required under Chapter E8 of the Auckland Unitary Plan. The

planning assessment in support of the application has identified consent is likely required under Chapter E8 as a Discretionary Activity.

Granting of the EPA Fast-Track consent does not guarantee that public assets can and/or will be vested to Auckland Council Healthy Waters. Any proposed public stormwater infrastructure will need to meet the requirements of the Stormwater Code of Practice, and any other design guidance relevant to stormwater infrastructure and intended asset owner.

Water Quality

The proposed development will result in increased impervious area, increases in runoff flowrates, and increase in contaminant loading. Section 6.2 of the infrastructure report states that treatment is not required as there is no creation of High Contaminant Generating Areas. This is in reference to the high contaminant generating area provisions of Chapter E9 of the Auckland Unitary Plan, which are specific targeted provisions for land uses that meet the definition of being high contaminant generating. However, the provisions of Chapter E8 (and related consents, such as Healthy Waters Region Wide Network Discharge Consent) together with the overarching objectives and policies outlined through Chapter E1 set a broader framework for water quality, with expectations beyond just the high contaminant generating land uses. This framework includes directive policies E1.3(2)(a) (*to maintain or enhance water quality, flows, stream channels and their margins and other freshwater values...*) and E1.3(8)(b)/(e) (*minimising the generation and discharge of contaminants... and providing for the management of gross stormwater pollutants...*).

Treatment of impervious surfaces could be provided as a by-product of the SMAF hydrology mitigation devices and catchpit filters. The design of such devices has been proposed to be finalised at the Building Consent stage of development and it is unclear whether stormwater management conceptually proposed will provide the necessary stormwater management or will be able to be implemented. It is recommended that gross pollutant traps are implemented in waste storage areas within the development. Intended ownership or operation and maintenance responsibility of future stormwater quality management devices has not been clarified.

Hydrology Mitigation

The site is within the Future Urban Zone and is therefore not subject to a Stormwater Management Area – Flow (SMAF) overlay. Urban zoned land adjacent to the site within the Waiarohia Catchment Management Plan area is subject to a SMAF-1 requirements. Stormwater runoff from the proposed development will discharge to the same stream receiving environment as development within the Waiarohia Catchment Management Plan area. The infrastructure report outlines that it is proposed to achieve SMAF-1 hydrology mitigation of runoff from the development. It is proposed that each building includes dual function retention and detention tanks and that runoff from the road areas is discharged to raingardens which will provide detention and possibly retention. The

devices shall be designed in accordance with GD01, a condition in this regard is recommended.

Although hydrology mitigation is proposed, given the proximity to the stream receiving environment, achieving SMAF 'retention' outcomes through the discharge of stormwater to ground or through reuse should be considered a priority in the development. This would likely have hydrological benefits in terms of maintaining pre-development conditions with a delayed runoff response, further water quality enhancement, temperature benefits, and promote groundwater interflow. A condition in this regard is recommended

Wetlands

The ecological assessment provided in support of the Fast-Track application details that no wetlands which meet the definition of a 'natural wetland' under the NES-F(2020) have been identified within the site. The provisions of the NES-F are applicable to activities within a 100 metre radius of an identified 'natural wetland'. It is recommended that the ecological assessment is peer reviewed by an ecology specialist. Given the proximity to overland flow paths and the stream receiving environment, and the general topography of the area surrounding the stream which dissects the site is surprising that wetlands have not been identified. A more detailed analysis of the environment within 100 metres of the site and proposed development in respect of wetland identification may need to be undertaken.

Erosion Mitigation

The proposed development and increased impervious area will result in increased flow rates at the outfall locations. Erosion protection should be implemented at the outfall locations that is sensitive to the stream receiving environment. 'Green outfalls' should be considered where possible. The

detailed design of erosion protection will be developed in future and it is recommended that an ecological specialist provides input to the design. A condition in this regard is recommended

Natural Hazards

A central portion of the development site and the environment downstream are subject to the 1% AEP floodplain. The existing floodplain within the site is constrained to the incised stream gully. There are no habitable buildings between the site and the Upper Harbour Motorway that are at risk of flooding within the 1% AEP event. GeoMaps indicates that the overland flow path and floodplain downstream remains constrained to the stream channel.

The infrastructure report outlines that flow is likely throttled by the constructed stormwater channel under the motorway. The effects of the development on this motorway culvert are unclear and should be assessed further. The infrastructure report concludes 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. Appropriate freeboard levels shall be achieved within the development site in accordance with the Stormwater Code of Practice. No further mitigation of existing flood hazards has been proposed.

It is unclear whether upstream Future Urban Zoned catchments and contributing areas (80 Hobsonville Road) will be considered during the design of proposed stormwater networks or management of flood hazards within the development site. The design of the stormwater network within the site and conveyance of the existing overland flow path through the site should accommodate for any upstream Future Urban Zoned catchment and contributing areas.

Asset Owner / Specialist Response

From: *Lea van Heerden, Senior Parks Planner, Auckland Council*

Date: 14 April 2023

Overall Summary:

Upon reviewing the Hobsonville Road Retirement Village proposal, our high-level view is that the project is generally **not** acceptable from a Parks Planning perspective.

Retirement villages do not require neighbourhood parks as often they are secured and do not provide public access within them. The land is kept private, and Council does not seek to acquire land from private developers. As evident within this proposal, open space and communal areas are provided internally as part of the development.

However, the subject site is located within the Future Urban Zone and is subject to the Whenuapai Structure Plan (WSP) and an internal Council Plan Change 5, which was later withdrawn. Upon reviewing the open space provision against the structure plan, all open space infrastructure requirements demonstrate a need for a neighbourhood park towards the northern portion of the subject site, to meet the recreational needs of future and surrounding communities.

The applicant is proposing a 20m wide corridor formed around a permanent stream at the centre of the Site that will form part of a wider landscaped setting of open spaces and walkways through the Site¹. The applicant is proposing enhancement planting that will improve the ecological values and habitat for native fauna.

Further in the applicants details they specify that the stream will be planted a minimum of 10m of riparian vegetation on either side after the earthworks.²

Based on the effects assessment, the applicant concludes that the street design together with the open space layout will respond positively to the streetscape character, amenity and visual effects. However, under Part VII, p14. the applicant confirms that all roads will be private and separate pedestrian access will allow for safe connectivity in the site. What the applicant fails to demonstrate, and in reference to making use of the proposed green corridor, is whether these separate pedestrian accessways will be available to the wider public and defers from assessing the impact the retirement village will have on the wider open space network. It is also not clear whether the walkways will sit outside the 10m riparian planting areas.

The Upper Waitemata Greenway plan proposes to connect Hobsonville Road to the Upper Waitemata running along the new reserve that adjoins the Waiarohia Stream and crossing the motorway to another new reserve located at 161 Brigham Creek Road. This link is demonstrated as an important link, but it isn't planned to go through

this Site. However, it would naturally connect into the site's riparian reserve around the proposed stream corridor. The relevance of having this connection emphasises the location of the future neighbourhood park.

The required park can be moved to the north-west as shown circled in red on the GIS screenshot below.

¹ 156.01 Application, p3.

² 156.01 Application, Part VII, p12.

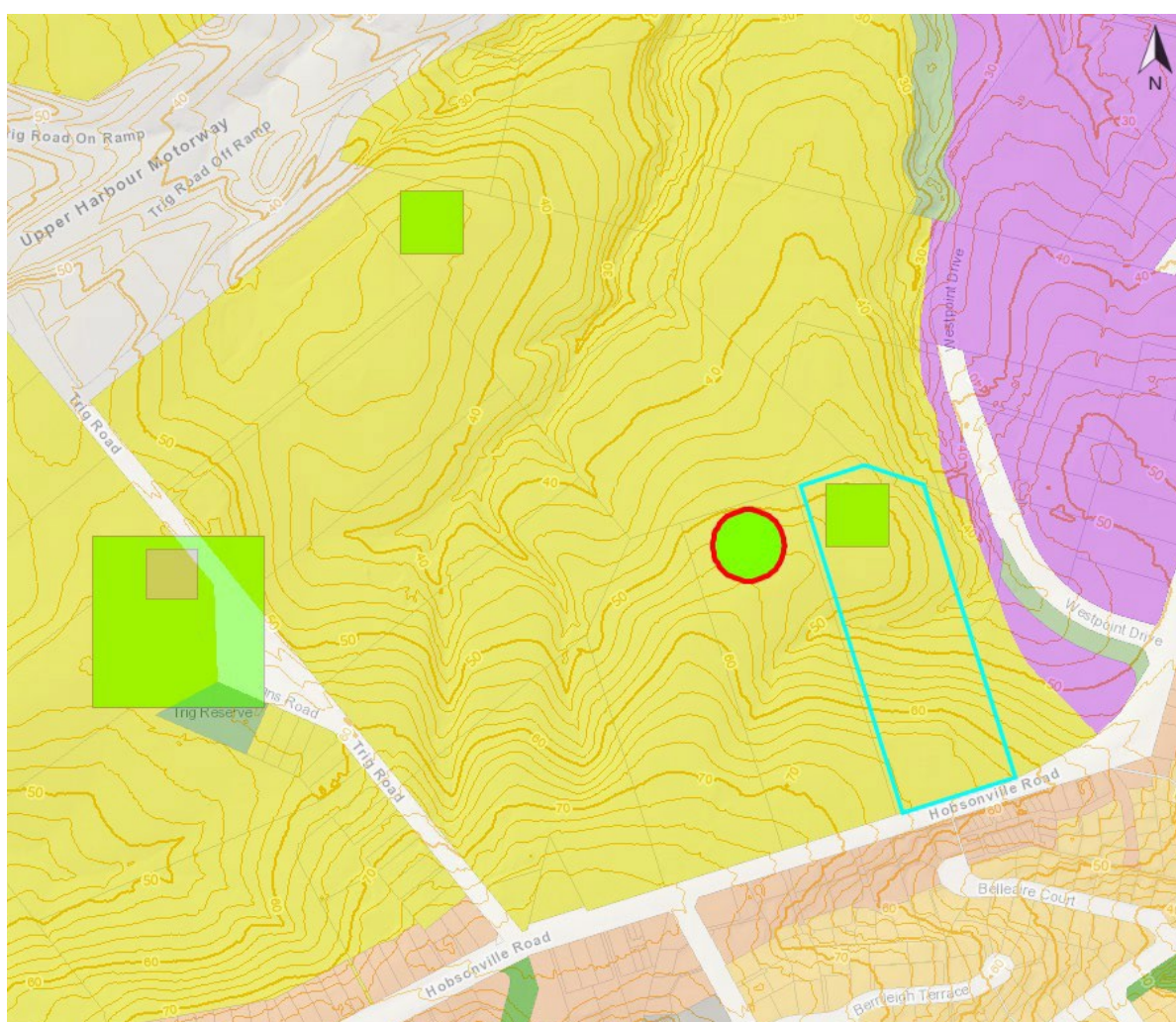


Figure 1 Locations of required open spaces based on the open space provision policy demonstrated as green squares.

While the applicant has emphasised their development to meet the Structure plan and the National Policy Statement for Urban Development objectives and outcome to utilised recreational routes and connections between open spaces and the coast where practicable through utilising stream networks, both the structure plan and the NPSUD also requires the provision of quality open spaces, a network of high-quality open spaces and recreational areas to meet the growing amenity and recreational needs of Whenuapai

communities that is acceptable by the requiring authority. The applicant has not successfully demonstrated this.

In conclusion, we have the following concerns that would warrant the project or any part of it to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA:

1. Demonstrate a new location for a proposed neighbourhood park against the open space provision policy and provide an open space, access and amenity effects assessment to determine there will not be a gap within the wider open space network.
2. Demonstrate what mechanisms will be used to enable public access through the development as not to limit quality accessibility to active and passive recreation of a future park. The proposed road network is very insular and shows no connection to a future road/road network to the east. It does not seem appropriate and it is recommended the

applicant demonstrate an east-west public through-road or mechanism to enable public accessibility. That will enable connection through the site from the Waiarohia Stream corridor – east to west – to help connect to a future neighbourhood park to the north-west of the subject site.

Asset Owner / Specialist Response

From: *Liam Burkhardt, Senior Planner, Auckland Transport*

Date: 11 April 2023

Overall Summary:

The Project proposes to construct a retirement village on a 4-hectare site at 82 Hobsonville Road, West Harbour, Auckland. The retirement village will include approximately 354 residential units, including approximately 42 single storey villas, approximately 267 independent-living apartments in six buildings between four and six storeys in height with basement car parking, and 45 care units in one building of three storeys in height with basement car parking.

Under the Auckland Unitary Plan (Operative in Part) (AUP), the site is currently zoned Future Urban Zone (FUZ). H18.2 Objective 1 anticipates that FUZ land will achieve the objectives of the Rural Production Zone, until such time that the land has been re-zoned for urban purposes (H18.2(1)). Furthermore, H18.3 Policy 4 directs that development within the FUZ should prevent the establishment of more than one dwelling on a site. In this instance, the Project is contrary to both H18.2 Objective 1 and H18.3 Policy 4, given that approximately 353 residential units are proposed for the site, which Auckland Transport considers to be an urban activity.

Auckland Council's Future Urban Land Supply Strategy (FULSS) provides for the sequencing and timing of urban development within the FUZ. This is critical to ensure that urban development is integrated with the necessary investments in transport infrastructure and/or services. The Regional Policy Statement of the AUP also places emphasis on the need for the re-zoning of FUZ land to be integrated with the provision of infrastructure (refer to B2.2.2(7)).

Auckland Transport acknowledges that while the FULSS identifies the site as "development ready" in 2018-2022, the funding of necessary transport infrastructure and services needed to enable growth has not been confirmed. In particular, the Supporting Growth programme (SGA) has only recently notified an alteration to designation 1437 of the AUP to route protect the future upgrade and widening of Hobsonville Road between Oreill Avenue and Memorial Park Lane, which includes the frontage of the subject site. While the alteration to designation 1437 route protects the future upgrade and widening of Hobsonville Road, there is no funding confirmed for its construction in the Regional Land Transport Plan 2021-2031 (RLTP). This is of concern to Auckland Transport, given that the Project is not integrated with the Hobsonville Road upgrade.

For the reasons above, Auckland Transport considers that it is not appropriate for the Project to proceed through the fast-track process. Auckland Transport considers that it is more appropriate for the Project to proceed either as a private plan change request or through the standard consenting process.

The Preliminary Transport Assessment by Team Traffic, dated 27 February 2023, provides some initial comments related to matters, such as parking and traffic generation. However, if the Project is accepted for fast-track consenting, a full Integrated Transport Assessment (ITA) should also be provided.

The main objective of an ITA is to ensure that the potential adverse transport effects of a development proposal are well considered and addressed with particular consideration of accessibility to and from the development as well as safety and efficiency effects.

Auckland Transport requests the following matters form part of an ITA:

- Whether the Project meets the relevant objectives and policies of the AUP as they relate to transport;*
- An assessment of potential adverse safety effects on the surrounding transport network and how these effects will be avoided, remedied or mitigated;*
- An assessment of potential adverse effects on the efficient operation of the surrounding transport network and how these effects will be avoided, remedied or mitigated;*
- An assessment of bicycle parking requirements for the residential lots;*
- Whether there are any proposed roads to vest and whether these meet the relevant transport standards of Chapter 3 in the Auckland Code of Practice for Land Development and Subdivision;*
- The effects of any proposed vehicle access points on Hobsonville Road, noting that Hobsonville Road is identified as an arterial road in the planning maps of the AUP;*
- Discussion of SGA's notified alteration to designation 1437 and whether the Project will conflict with or prevent the future upgrade and widening of Hobsonville Road. Ideally the NoR boundary should be shown on relevant plans;*
- An assessment of effects for any other reason for consent under Chapter E26 Infrastructure and Chapter E27 Transport of the AUP;*
- A Draft Construction Traffic Management Plan (CTMP) covering an assessment of effects on construction traffic (including measures to maintain safe and efficient operation for all road users), the construction period and associated earthworks;*
- An assessment of the likely impacts of earthworks and construction activity and heavy vehicle movements on road pavements in the vicinity of the site.*

Local Board Response

From: Anna Atkinson, Local Board Chairperson, Upper Harbour Local Board

Date: 11 April 2023

Overall Summary:

The following are Upper Harbour Local Board comments on the Hobsonville Road Retirement Village Development under the COVID-19 Recovery (Fast-track Consenting) Act 2020 ("FCTA"), requested by the Resource Consents Department of Auckland Council.

Specific Question One.

Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?

The Local Board oppose this fast-track application. We recommend this fast-track consent is declined and request that the application go through the existing Resource Management Act process.

We believe that the Fast Track consenting process is too rushed to enable appropriate consideration of many aspects of the development.

- A. We have concerns about this development and the need for supporting infrastructure and the need to avoid any potential adverse effects on the environment. All these issues are best identified through a full RMA process rather than fast track.
- B. We have concerns that there is no immediate funding solution to respond to the cumulative effects of increased traffic on the wider northwestern transport system.
- C. We have concerns around Hobsonville Road and future transport plans including "Supporting Growth" and the use of the Climate Action Targeted Rate to create a cyclelane on Hobsonville Road. We consider that a full RMA process is better for ensuring that any decisions made are fully aware of future plans for Hobsonville Road.
- D. We are concerned about the impacts on the stream running through the property both during and post construction. We would want to ensure what any impacts on the stream give effect to the NPS Freshwater Management eg it prioritises first, the health and wellbeing of water bodies and freshwater ecosystems.
- E. We express concern that this development may result in the removal of mature trees as the adopted Urban Ngahere 10 year action plan shows that Whenuapai currently has less than 10% tree cover, whereas the goal for each local board area is 30%.
- F. We are concerned about the impact of six storey apartment blocks, we think that assessing the impacts of this is best dealt with through a standard RMA process.

- G. We are concerned about the flood plain and overland flow paths.
- H. We would like to see more detail on the esplanade reserves. How wide are the esplanade reserves to be created and vested and will there be public access to the reserves. Will any other public land be created?
- I. We have financial concerns:
 - a. This development could have a financial implication for the local board. The council most likely does not have enough information to accurately assign a fair proportion of future costs to the proposed development.
 - b. Full costs of the infrastructure for the wider network are unlikely to be determined at this time and are likely to take some time to be calculated. The shortfall in funding of the infrastructure costs is not provided for in the Long-Term Plan 2021-2031. Therefore, the council is unable to recover the costs of future infrastructure via either the Development Contributions Policy or by having another funding mechanism in place. Should the development go ahead without these matters being resolved it will result in future wider network infrastructure upgrades required for this development to be borne by the ratepayer under the current policy setting. This is assuming funding becomes available to deliver these upgrades.
- J. We are concerned that while there is no footpath on that side of the road, there are currently no funded plans to put one in. Thus, all the residents would most likely drive which would further exacerbate congestion and CO2.

Specific question 2. Not applicable to the Local Board.

Specific question 3. The project does not provide for a neighbourhood park on site as intended by the Whenuapai Structure Plan (WSP). Provide any comments on this and on alignment with the WSP generally.

- A. This proposal will add even more pressure on an area already underserved for play and recreation spaces. The Upper Harbour Strategic Play Provision Assessment 2018 states in the Whenuapai section "As more of the Future Urban Areas are developed, community playspaces with provision for informal recreation, fitness and teen play should be included. More neighbourhood play spaces focused on younger age groups, for new families in the area, should also be provided for." The local board regularly hears from Whenuapai residents on the lack of playspaces and open spaces available. We realise that a neighbourhood park is not necessary in a retirement village (although some of our other villages have playgrounds close to them that are well used by residents with visitors). The local board would request that if there wasn't a neighbourhood park in this location, then there needs to be another one in a close location to make up for it, as residents in this area don't really have enough. We haven't had enough time to discuss this in depth with the divisions of council, hence we request that this goes through the full RMA process as it's vital that playspaces are planned and implemented.

The local board consider that plan changes for Future Urban areas in Whenuapai should be halted until a more detailed strategic plan for the area can be done. The strategic plan should consider in particular the waterways, wetlands, connectivity, planting and parks and ensure

they are managed together to connect people and nature across the city. This will provide resilience and mitigate climate change impact.

Ward Councillor Response

From: *Councillor John Watson, Albany Ward*

Date: 18 April 2023

Thank you Hailey and agree with the 'red flags' signalled by the council's policy and parks planners and by Watercare.

Kind regards

John Watson

Councillor, Albany Ward

Independent Māori Statutory Board Response

From: *Miriana Knox, Principal Advisor Environment Outcomes*

Date: 12 April 2023

Kia ora Hailey

The applicant hasn't undertaken any iwi engagement to date, nor have they referenced any iwi planning documents. While I note that they intend to collaborate with iwi, there is no information to show what their approach.

As per my previous advice, the Ministry must determine a clear view from iwi on this application prior to any further progress.

Ngā mihi nui,

Miriana

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Auckland Transport
Contact person (if follow-up is required)	Matthew Richards, Manager Development Planning
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Hobsonville Road Retirement Village Project
General comment	<p>Thank you for the opportunity to provide comments on the referral of the Hobsonville Road Retirement Village Project (the Project) for consideration under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (Covid 19 Recovery Act).</p> <p>Auckland Transport requests that, should the project be accepted for fast-track consenting, the requirement for an Integrated Transport Assessment (ITA) which includes analysis addressing the matters set out below is formally stated in the referral order to accompany any resource consent application for the Project lodged with the Environmental Protection Authority. Auckland Transport would also request the referral order specifically identifies Auckland Transport as a party which the Expert Consenting Panel must invite comments from.</p>
Other considerations	<p>The Project proposes to construct a retirement village on a 4-hectare site at 82 Hobsonville Road, West Harbour, Auckland. The retirement village will include approximately 354 residential units, including approximately 42 single storey villas, approximately 267 independent-living apartments in six buildings between four and six storeys in height with basement car parking, and 45 care units in one building of three storeys in height with basement car parking.</p> <p>Under the Auckland Unitary Plan (Operative in Part) (AUP), the site is currently zoned Future Urban Zone (FUZ). H18.2 Objective 1 anticipates that FUZ land will achieve the objectives of the Rural Production Zone, until such time that the land has been re-zoned for urban purposes (H18.2(1)). Furthermore, H18.3 Policy 4 directs that development within the FUZ should prevent the establishment of more than one dwelling on a site. In this instance, the Project is contrary to both H18.2 Objective 1 and H18.3 Policy 4, given that approximately 353 residential units are proposed for the site, which Auckland Transport considers to be an urban activity.</p> <p>Auckland Council's Future Urban Land Supply Strategy (FULSS) provides for the sequencing and timing of urban development within the FUZ. This is critical to ensure that urban development is integrated with the necessary investments in transport infrastructure and/or services. The Regional Policy Statement of the AUP also places emphasis on the need for the re-zoning of FUZ land to be integrated with the provision of infrastructure (refer to B2.2.2(7)).</p> <p>Auckland Transport acknowledges that while the FULSS identifies the site as "development ready" in 2018-2022, the funding of necessary transport infrastructure and services needed to enable growth has not been confirmed. In particular, the Supporting Growth programme (SGA) has only recently notified an alteration to designation 1437 of the AUP to route protect the future upgrade and</p>

	<p>widening of Hobsonville Road between Oreill Avenue and Memorial Park Lane, which includes the frontage of the subject site. While the alteration to designation 1437 route protects the future upgrade and widening of Hobsonville Road, there is no funding confirmed for its construction in the Regional Land Transport Plan 2021-2031 (RLTP). This is of concern to Auckland Transport, given that the Project is not integrated with the Hobsonville Road upgrade.</p> <p>For the reasons above, Auckland Transport considers that it is not appropriate for the Project to proceed through the fast-track process. Auckland Transport considers that it is more appropriate for the Project to proceed either as a private plan change request or through the standard consenting process.</p> <p>The Preliminary Transport Assessment by Team Traffic, dated 27 February 2023, provides some initial comments related to matters, such as parking and traffic generation. However, if the Project is accepted for fast-track consenting, a full Integrated Transport Assessment (ITA) should also be provided.</p> <p>The main objective of an ITA is to ensure that the potential adverse transport effects of a development proposal are well considered and addressed with particular consideration of accessibility to and from the development as well as safety and efficiency effects.</p> <p>Auckland Transport requests the following matters form part of an ITA:</p> <ul style="list-style-type: none"> • Whether the Project meets the relevant objectives and policies of the AUP as they relate to transport; • An assessment of potential adverse safety effects on the surrounding transport network and how these effects will be avoided, remedied or mitigated; • An assessment of potential adverse effects on the efficient operation of the surrounding transport network and how these effects will be avoided, remedied or mitigated; • An assessment of bicycle parking requirements for the residential lots; • Whether there are any proposed roads to vest and whether these meet the relevant transport standards of Chapter 3 in the Auckland Code of Practice for Land Development and Subdivision; • The effects of any proposed vehicle access points on Hobsonville Road, noting that Hobsonville Road is identified as an arterial road in the planning maps of the AUP; • Discussion of SGA's notified alteration to designation 1437 and whether the Project will conflict with or prevent the future upgrade and widening of Hobsonville Road. Ideally the NoR boundary should be shown on relevant plans; • An assessment of effects for any other reason for consent under Chapter E26 Infrastructure and Chapter E27 Transport of the AUP; • A Draft Construction Traffic Management Plan (CTMP) covering an assessment of effects on construction traffic (including measures to maintain safe and efficient operation for all road users), the construction period and associated earthworks; • An assessment of the likely impacts of earthworks and construction activity and heavy vehicle movements on road pavements in the vicinity of the site. <p>Given the need to review any potential adverse effects on the transport network, Auckland Transport requests that any referral order for this project requires the Expert Consenting Panel to include Auckland Transport as a person who is to be invited to comment on the Project.</p>
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Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	New Zealand Defence Force
Contact person (if follow-up is required)	Mr Mark Brunton
	Head of Defence Estate and Infrastructure, New Zealand Defence Force
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Hobsonville Road Retirement Village Development
General comment	<p>The applicant has not engaged with the New Zealand Defence Force (NZDF) on the Hobsonville Road Retirement Village Development proposal.</p> <p>The application for the proposal states (incorrectly) that “<i>development of the land would not give rise to any matters of particular interest to government ministries or departments</i>”. However, the proposal is of particular interest to the NZDF and the Minister of Defence for the reasons outlined below.</p> <p>The proposal site is located within Minister of Defence designation 4311 (Whenuapai Airfield Approach and Departure Path Protection) included in the Auckland Unitary Plan – Operative in Part (AUP). Designation 4311 sets obstacle height restrictions through Obstacle Limitation Surfaces (OLS) which protect flight operations undertaken at Royal New Zealand Air Force (RNZAF) Base Auckland. Designation 4311 provides that the OLS cannot be breached without prior written approval from the NZDF. The proposal includes buildings of heights that appear to breach the OLS by approximately 20 metres. Based on information provided in the application, the NZDF would not approve such a breach. For that reason, the proposal cannot proceed as currently proposed, regardless of whether or not it is referred to an Expert Consenting Panel under the FTCA.</p> <p>The application contains some inaccuracies. It incorrectly describes the NZDF’s position in regard to managing reverse sensitivity effects. It is not the NZDF’s position that reverse sensitivity effects are primarily managed through requirements for acoustic insulation. Rather, the NZDF’s position is that that no-complaints covenants are the most effective, least-cost method to manage reverse sensitivity effects to protect RNZAF Base Auckland.</p> <p>In addition, while the application states that the applicant offers conditions to acoustically insulate all buildings within the 57dB contour that are to be used for activities sensitive to aircraft noise, the proposal site is not within the 57dB , so such conditions would be redundant.</p> <p>For the reasons above, the NZDF’s position is that the proposal should not be referred to an Expert Consenting Panel.</p>

	The Minister of Defence has also provided comments, which complement the NZDF's comments above.
Other considerations	As above.
[Insert specific requests for comment]	Click or tap here to insert responses to any specific matters the Minister is seeking your views on.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Waka Kotahi
Contact person (if follow-up is required)	Sonya McCall – Waka Kotahi, Team Lead, Environmental Planning
	environmentalplanning@nzta.govt.nz
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Hobsonville Road Retirement village Development
General comment	<p>This site proposes to develop 82 Hobsonville Road, West Harbour into approximately 354 retirement style units and associated facilities.</p> <p>The development of this future urban zoned area would normally require a structure plan and publicly notified plan change process prior to being released for urban development. Allowing the proposed development of this site without a broader strategic exercise that considers adverse effects, implementation of required infrastructure and mitigation measures is likely to result in piecemeal development and adverse effects on the transport network.</p>
Other considerations	<p>The proposal does not consider the accessibility needs of the residents or provide any multi modal connections to the wider community in terms of walking, cycling or public transport resulting in an isolated private vehicle dependent community.</p> <p>It is noted that a Notice of Requirement has been lodged on the road frontage of this development for route protection to enable future upgrades, widening and provision of active mode facilities on Hobsonville Road, however this has not yet been taken account of in the proposed design. Additionally, the proposal is reliant on the successful consenting and implementation of Hobsonville Road upgrade to provide required multi modal facilities without any confirmed timeframes for implementation.</p> <p>An integrated approach to understanding land use and infrastructure, including the transport network, is critical to ensuring a quality, accessible development. There is insufficient information and provision of required transport infrastructure to support recommending this project to the Fast-track process and referral of the</p>

	project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020 is not supported.
[Insert specific requests for comment]	Given the need to review any potential adverse effects on the transport network Waka Kotahi requests that any referral order for this project requires the Expert Consenting Panel to include Waka Kotahi as a person who is invited to comment on the project.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Watercare Services Ltd.
Contact person (if follow-up is required)	Shane Lawton, Head of Developer Services, s 9(2)(a)
	Mark Iszard, Head of Major Developments, s 9(2)(a)
	Ameya Bhiwapurkar, Development Engineer, s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Hobsonville Road Retirement Village
General comment	<p>Overall Summary:</p> <p>Airey Consultants Ltd has been engaged to carry out an engineering infrastructure assessment for the proposed development at 82 Hobsonville Road, West Harbour. The proposed development involves the construction of a retirement village.</p> <p>Proposal</p> <p>Wastewater</p> <p>A private low-pressure wastewater system will be installed within site to limit the additional flow to the existing downstream network. All the on-site pump units, control systems, 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 of approximately 300m will be constructed along Hobsonville Road and Westpoint Drive to connect to the existing manhole on Westpoint Drive.</p> <p>Water supply</p> <p>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.</p>

Watercare's comments on the proposal**Wastewater**

The development is within the Future Urban Zone area, and therefore we have no commitment to service it at this stage.

The developer has three options for the proposed development:

Option A: To propose a gravity connection to the existing Wastewater (WW) network in Westpoint Drive

Based on COP theoretical PWWF, the development will be 18 l/s, therefore, requiring an upgrade of the local downstream network where capacity is exceeded.

Option B: To propose Low-Pressure System (LPS system) within site directed to the new gravity connection to the existing WW network at Westpoint Drive

LPS is not preferred by Watercare when a gravity connection can be feasible. The LPS system must have a prior agreement from the Watercare to proceed. Additionally, the LPS system will be a private network in this development maintained by the client/developer discharging the wastewater into the new public WW gravity network along Hobsonville Road and Westpoint Drive.

Option C: Proposing a gravity WW network to the new Northern Interceptor Stage 2

This proposal is subject to the completion of Northern Interceptor Stage 2, which is due in late 2025. Once completed, the developer can propose an 800m network connecting to the Northern Interceptor Stage 2.




Figure 1: Options proposed for the development at 82 Hobsonville Rd

The capacity constraints in the wastewater network will need to be mitigated by the developer through public network extensions or upgrades, depending on the agreed solution with Watercare as part of the resource consent process at that time.

Water supply

The existing 150mm Watermain has insufficient capacity to cater to the proposed development. Firefighting requirements were not identified at this stage, as the details of the Sprinkler and hydrant are yet to be explained. The existing 150mm Watermain needs to be upgraded to 200mm ID as below:

	 <p>Figure 2: Proposed Watermain to be upgraded</p>
Other considerations	
[Insert specific requests for comment]	

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.