

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)	Katherine Dorofaeff, Principal Planner, Land Use Policy and Planning North / West
	s 9(2)(a)
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Tōtara Landing PJ-0000832
General comment	<p>Thank you for the opportunity to provide comments on the referral of the Tōtara Landing 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. A Stormwater Management Plan should also be required. Auckland Transport also requests that the referral order specifically identifies Auckland Transport as a party which the Expert Consenting Panel must invite comments from.</p>
Other considerations	<p>The site location is 101 and 105-107 Tōtara Road and 9 McKean Road, Whenuapai, Auckland. The Project proposes to subdivide the 14.6027ha site to accommodate 244 residential lots together with Jointly Owned Access Lots, public roads, pedestrian accessways and recreation, drainage, and esplanade reserves, neighbourhood park and enhanced wetland area to vest with Council. Of the proposed lots, 15 lots will undergo house design at the resource consent stage and the remaining 229 will be subdivided as vacant lots.</p> <p>Site layout and access locations are identified in the application, together with road cross-sections. The proposed layout includes new connections of new local roads to Tōtara Road, with the McKean / Tōtara Road intersection changed to allow left-turning entry only from Tōtara Road due to poor site distances. It is proposed to upgrade and rebuild the existing Tōtara and McKean Roads where adjacent the site to urban road Auckland Transport standards. McKean Road would be upgraded to have two traffic lanes, kerbs, and a pedestrian footpath. Tōtara Road would be upgraded to have two traffic lanes, a central flush median, kerbs, cycleway, and pedestrian footpaths. New public internal development roads are proposed to be 16m and 18m wide urban roads. The application also suggests that additional bus stops and a pedestrian crossing will be added as part of the Tōtara Road upgrade.</p> <p>Under the Auckland Unitary Plan (Operative in Part)(AUP) the sites are currently zoned Future Urban. The AUP states that Future Urban zoned land should not be developed for urban purposes until it has been through a structure planning and plan change process (refer Policy B2.2.2(3),</p>

Objective H18.2(1) of AUP. While a structure plan has been completed for Future Urban zoned land at Whenuapai, the land has not been rezoned for urban use. It is noted that the site was not part of the area of Whenuapai included in the Council's previously proposed Plan Change 5, which was withdrawn in June 2022 due to infrastructure funding concerns.

Due to the Future Urban zoning of the site, Auckland Transport considers it more appropriate for the Project to proceed through the private plan change process, rather than through the Covid Recovery Act.

If the Project is referred for processing under the Covid Recovery Act, then a comprehensive Integrated Transport Assessment should be provided. Some initial transport assessments have been provided by the applicant i.e:

- 101, 105-107 Totara Road Whenuapai Preliminary Transport Assessment
- Tōtara Landing Fast Track Consent - Further Assessment of Transport Matters

These assessments provide a preliminary assessment of the potential transport implications of the proposal. However, a more comprehensive ITA should 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 for all modes as well as safety and efficiency effects. The assessment should ensure that any potential adverse transport effects of the development have been effectively avoided, remedied or mitigated. Auckland Transport requests the following assessments and information form part of the ITA:

- Whether the Project meets the relevant objectives and policies of the AUP as they relate to transport, including integration of land use and transport;
- The potential adverse safety effects on the surrounding transport network and how these effects will be avoided, remedied or mitigated;
- The potential adverse effects on the efficient operation of the surrounding transport network and how these effects will be avoided, remedied or mitigated. There should be particular emphasis on key intersections;
- Clear identification of the mitigation required to address transport effects, who is responsible for providing it, and how it would be staged and sequenced with site development;
- Whether the Project provides for adequate future roading connections to adjacent sites - in particular to 3, 5 and 7 McKean Road and 99 Tōtara Road;
- The bicycle parking requirements for the residential lots;
- The appropriate location and provision of bus stops;
- The street design including the design philosophy for all new roads supporting the spatial allocation for each mode and outlining how the design appropriately and safely provides for all transport users;
- Whether proposed roads to vest meet the relevant transport standards of the Auckland Code of Practice for Land Development and Subdivision;
- The effects of any other reason for consent under Chapter E26 Infrastructure and Chapter E27 Transport of the AUP;
- A Draft Construction Traffic Management Plan (CTMP) including assessment of effects of construction traffic (including measures to maintain safe and efficient operation for all road users), the construction period and associated earthworks;
- The likely impacts of earthworks and construction activity and heavy vehicle movements on road pavements in the vicinity of the site.

Auckland Transport also notes an error in section 2.3 of the Tōtara Landing Fast Track Consent - Further Assessment of Transport Matters. The project referred to in this paragraph appears to be the Waka Kotahi New Zealand Transport Agency project, State Highway 16 Brigham Creek to Waimauku. This project is not been progressed as part of the Te Tupu Ngātahi Supporting Growth, but is a separate Waka Kotahi project.

There are some flood hazards on the site, and the applicant's infrastructure report indicates that 'Rebuilt McKean, Tōtara and new roads to act as overland flow paths to manage and control existing flood plain, prone and overland flow paths'. A Stormwater Management Plan should be provided, if the project is referred for processing under the Covid 19 Recovery Act.

[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

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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	Tōtara Landing Project
General comment – potential benefits	Will add additional housing supply and choice. Public road extension and upgrades are proposed as part of the proposal. A local park is added to the community and an extension of the esplanade reserve is also provided, which supports the implementation of the aspirational trail on the Upper Harbour Greenways Plan (2019).
General comment – significant issues	<p>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.</p> <p>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.</p> <p>The application is inconsistent with the Auckland Unitary Plan and not aligned with the outcomes in the Auckland Plan 2050 as well as the Auckland Plan Development Strategy and Future Urban Land Supply Strategy. (See the Policy planner's comments below).</p> <p>There is a risk that the vested assets Council may inherit are not consistent with the Council's standards or the community needs (see the Parks team's and the local board's comments).</p> <p>There may be also potential reverse sensitivity issues as there will not be an appropriate regulatory framework (i.e. an urban residential zone) in place to manage those effects.</p> <p>It is also unclear if an adequate width of the esplanade reserve is provided. It is unclear how the proposal will maintain and enhance the public open space qualities and recreation opportunities of the coastal environments. The applicant relies on the coastal walkway, however, no detailed design is provided to confirm its feasibility and practicality. It is also unclear if this walkway will be constructed by the applicant.</p> <p>The proposal includes discharging stormwater to a Significant Ecological Area – Marine. We do not consider that appropriate thought has been applied by the applicant on the potential impacts of the development on this environment (See Healthy Waters' response).</p>

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>In addition, further investigation is required for the Council to review the appropriateness of the proposed park and the esplanade reserve from an asset owner's point of view.</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 subject site sits in, should have comprehensive and coordinated planning carried out before they are urbanised.</p>
Environmental compliance history	<p>The following companies/stakeholders have been reviewed for previous compliance history:</p> <ul style="list-style-type: none"> • Neil Construction Limited • Maraetai Land Development Limited • Philip AINSWORTH • Jack Lee PORUS • Chiong Yong TIONG • Ik King TIONG • Emily Kheng Shyun CHUA • Phoo LOW • Chiong Hee TIONG <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 • Esplanade reserve assessment • Arboricultural assessment • Crime prevention through environmental design (CPTED) assessment • Cultural values assessment • Coastal hazard assessment

Iwi and iwi authorities	<p>Ngāti Manuhiri - Ngati Manuhiri Settlement Trust</p> <p>Ngāti Maru - Ngāti Maru Rūnanga Trust</p> <p>Ngāti Pāoa - Ngāti Paoa Iwi Trust</p> <p>Ngāti Pāoa - Ngāti Paoa Trust Board</p> <p>Ngāti Te Ata - Te Ara Rangatu o Te Iwi o Ngāti Te Ata Waiohū</p> <p>Ngāti Whātua o Kaipara - Ngā Maunga Whakahii o Kaipara Development Trust</p> <p>Ngāti Whātua Ōrākei - Ngāti Whātua Ōrākei Trust</p> <p>Te Ākitai Waiohū - Te Ākitai Waiohū Iwi Authority</p> <p>Te Kawerau ā Maki - Te Kawerau Iwi Settlement Trust</p> <p>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	<p>We consider a coastal hazards assessment and a survey plan noting the location of the Mean High-Water Spring are required to assess if an adequate width for an esplanade reserve and a walkway is provided. It is also unclear that who and when the walkway will be provided. We consider this needs to be designed (at minimum) at this stage, given its proximity to the coastal environment.</p> <p>We also consider that further investigation/assessment is required with regard to the existing activity, a water tanker supply from a bore, at 5 McKean Road and the potential effects (including any reverse sensitivity effects) from the proposal.</p>

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Local Board Response

From: Anna Atkinson - Local Board Chairperson

Date: 27 March 2023

Overall Summary:

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

Due to the Future Urban zoning of the site the Local Board oppose this application. We recommend decline for the following reasons:

- A. express serious concerns about out of sequence development and the need for supporting infrastructure and the need to avoid any potential adverse effects on the environment as the proposal is out of sequence with the Future Urban Land Supply Strategy 2017. This site is in 'stage 2' of development which is identified in the Future Urban Land Supply Strategy as being development ready between in the first half of Decade Two (2028-2032). The Future Urban Land Supply Strategy (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 Council's Future Urban Land Supply Strategy was refreshed in July 2017.
- B. express 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 financial concerns:
 - a. This development could have a financial implication for the local board. The applicant has proposed to fund infrastructure to mitigate the immediate local effects of the proposed development. The council 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 unable 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.
- D. note 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." We concur with the summary from

the parks specialist that it's important that council is able to assess any park assets prior to vesting as there have been many instances where parks to be vested are not of required standard.

- E. 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. express concern that the poor bus service experienced by local residents in Whenuapai and lack of cycle lanes would mean residents of the new development are more likely to drive. The 114 bus currently has only 4 buses between and including 7:06 am and 9:06 am and during the day the buses are hourly.
- G. Express concerns that in light of recent flooding events the stormwater and wastewater plans are reassessed. We are concerned about the flood plain and overland flow paths.
- H. The plan has footpath on only one side of Mclean Road. We consider that in a modern urban environment footpaths on both sides should be delivered
- I. Express concern around the use of earthworks to realign overland flow paths. This is not being done on a network wide approach.
- J. The local board notes and shares concerns raised by Auckland Transport, Watercare, Plans and Healthy Waters about this development in particular we note the following
 - a. This a greenfield development discharging to a Significant Ecological Area as defined in the AUP:OP. Healthy Waters do not consider that appropriate thought has been applied by the applicant on the potential impacts of the development on this environment.
 - b. The report is based solely on the proposed land use activity within the site boundary and fails to acknowledge the receiving environment. As such the proposed stormwater management for the development fails to meet the objectives of Chapter E1 of the Auckland Unitary Plan: Operative in Part (AUP:OP) for protecting and enhancing watercourses and coastal areas and using integrated stormwater management
 - c. We share concerns from Auckland Transport about capacity of the roading network within Whenuapai.
 - d. endorse Watercare's concerns that there is currently no way to service the development for stormwater and all costs must fall on the developer not council
 - e. express concern regarding the poor Poor water quality outcomes, at SEA and wetland as noted by Healthy Waters

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. To provide resilience and mitigate climate change impact.

Ward Councillor Response**From: John Watson - Councillor, Albany Ward****Date: 21 March 2023**

Hi Hailey

Like members of the Upper Harbour local board, Cr Wayne Walker and myself are concerned with the increasing number of applications for the Whenuapai area that are being processed under the fast track legislation that, as the name suggests, was destined solely to aid the covid-19 recovery.

We are particularly concerned with the cumulative effect of these applications which in this instance also include part of the Coastal Marine area. We believe it is now well and truly time to put these applications through the normal processes including the ability to publicly notify.

We are of the view that in the present circumstances the public scrutiny is not what it should be and that those with a legitimate interest in these applications are being cut out of the process. Given events of the last few months that is now even more inappropriate than was the case before. In these circumstances we do not support progression to a panel for consideration.

Asset Owner / Specialist Response

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

Date: 20 March 2023

Overall Summary:

- (1) The following is Plans and Places initial comments on the Tōtara Landing 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 potentially 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 it's preference is for this application to go through a Schedule 1 process of the Resource Management Act 1991 ("RMA") and then obtain consent through the AUP.
- (4) The Whenuapai Structure Plan (WSP) indicates the site is in 'stage 2' of development, which is identified in the Future Urban Land Supply Strategy as being development ready between in the first half of Decade Two (2028-2032). The Future Urban Land Supply Strategy (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 Council's Future Urban Land Supply Strategy was refreshed in July 2017.
- (5) 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 the cost of new infrastructure is fairly shared between developers and ratepayers on who causes the need for and who benefits from the investment. Allowing this 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.
- (6) If this is to proceed, this application must take a strategic approach to all resource management matters like the Schedule 1 process of the RMA.
- (7) An application proceeding on Future Urban Zoned (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) in place to manage those effects.
- (8) 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. There are concerns the FUZ is not an efficient and effective zone until the site is re-zoned.

- (9) It should not be anticipated that the Council will initiate an un-budget plan change, and with the current Covid Recovery Budget, it is unlikely to be come a priority for the Council.

- (10) In providing these comments, I have also reviewed the Assessment of Environmental Effects on the Whenuapai Green to assist the decision-maker. The Whenuapai Green FCTA is on Totara Road by the same applicant approximately 800 meters towards the Whenuapai Town Centre (South). We anticipate that Plans and Places will also be provided with the opportunity to comment on that application should that proceed. For clarity, the reason for this initial comment on Whenuapai Green is because the applicant has stated:

“The site is within close proximity to the proposed Whenuapai Green (Covid-19 Recovery (Fast-track Consenting) Referred Projects Order 2020 (Schedule 53)) development and will utilise infrastructure services proposed under this development. This is considered to be an efficient use of already planned infrastructure and will provide sufficient servicing for the proposed development, whilst minimising additional works that may otherwise have been required.”

- (11) Some of the information requested may not been provided for the Whenuapai Green application from Plans and Places, but will likely be raised in future comments when requested.

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
- 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) Economic assessment, that includes:
 - i. Analysis in the context of the COVID-19 Recovery (Fast-track Consenting) Act 2020;
 - ii. Outlining the likely location where future residents will access key amenities and work opportunities.
- d) 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
 - 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.

e) Set of draft conditions for staging development until key infrastructure projects are delivered.

f) 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.

(12) If this application is approved, the non-infrastructure economic and social benefits 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: *Katherine Dorofaeff, Principal Planner - Land Use Policy and Projects North/West, Auckland Transport*

Date: 21 March 2023

Response to Auckland Council specific questions:

Auckland Council has asked AT to:

- check the proposal's alignment with the NoR.
- provide estimated timelines for the relevant roads upgrades.
- undertake the capacity check.

AT's response to these specific questions is below:

The Project site is not directly affected by any of the NoR recently lodged by AT / Te Tupu Ngātahi Supporting Growth for the North West Local Network, or the North West Housing Infrastructure Fund (HIF) Trig Road Network.

North West HIF Trig Road project is to upgrade the southern section of Trig Road in Whenuapai between State Highway 18 and Hobsonville Road. This is a funded project with a lapse period of 15 years being sought in the NoR.

AT / Te Tupu Ngātahi Supporting Growth has also lodged NoR to route protect for the following transport projects referred to the applicant's transport assessment:

Trig Road (North), Māmari Road, Brigham Creek Road, Spedding Road, and Hobsonville Road. None of these projects are funded for implementation. With the exception of Hobsonville Road (which an alteration of an existing designation already given effect to) lapse dates of 15 years are sought.

The Project site has frontage to Tōtara Road and McKean Road. Auckland Transport does not currently propose to undertake any upgrades to these roads.

The applicant's transport consultant has provided some information about network capacity. This includes some reference to and reliance on modelling done for PC69 Spedding Block (approved with no appeals, but not yet operative) and the Whenuapai Business Park Fast Track (currently with the EPA). AT has not undertaken an expert review of the modelling information given the limited timeframe, and the potential need for external resources to do this. It is likely that further detail will be required from the applicant's transport consultant.

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229 will be subdivided as vacant lots.

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Tōtara Road, with the McKean / Tōtara Road intersection changed to allow left-turning entry only from Tōtara Road due to poor site distances. It is proposed to upgrade and rebuild the existing Totara and McKean Roads where adjacent the site to urban road standards. McKean Road would be upgraded to have two traffic lanes, kerbs, and a footpath (on the northern side). Totara Road would be widened and upgraded along the site frontage to have two traffic lanes, a central flush median, kerbs, and separated pedestrian and cycle facilities on the western side. New public internal development roads are proposed to be 16m and 18m wide urban roads. The application also suggests that additional bus stops and a pedestrian crossing will be added as part of the Tōtara Road upgrade.

Under the Auckland Unitary Plan (Operative in Part)(AUP) the sites are currently zoned Future Urban. The AUPOP states that Future Urban zoned land should not be developed for urban purposes until it has been through a structure planning and plan change process (refer Policy B2.2.2(3), Objective H18.2(1) of AUP(OP)). While a structure plan has been completed for FUZ zoned land at Whenuapai, the land has not been rezoned for urban use. It is noted that the site was not part of the area of Whenuapai included in the Council's previously proposed Plan Change 5, which was withdrawn in June 2022 due to infrastructure funding concerns.

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- The bicycle parking requirements for the residential lots;
- The appropriate location and provision of bus stops;
- The street design including the design philosophy for all new roads supporting the spatial allocation for each mode and outlining how the design appropriately and safely provides for all transport users;
- Whether proposed roads to vest meet the relevant transport standards of the Auckland Code of Practice for Land Development and Subdivision;
- The effects of any other reason for consent under Chapter E26 Infrastructure and Chapter E27 Transport of the AUP;
- A Draft Construction Traffic Management Plan (CTMP) including assessment of effects of construction traffic (including measures to maintain safe and efficient operation for all road users), the construction period and associated earthworks;
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Parks Asset Owner / Specialist Response

From: Rahman Bashir – Senior Parks Planner

Date: 20 March 2023

Overall Summary:

Positives of application

From the draft subdivision layout plans provided by the applicant it can be determined that:

- The proposed road layouts front the park boundaries ensuring a high degree of accessibility to public open spaces through the provision of park edge roads.
- The provision of a neighbourhood park has been assessed by Principal Acquisition specialist Maylene Barrett and addresses the size and location as appropriate and fits Auckland Council Provision policy.
- The extension of the esplanade reserve will further support the implementation of the aspirational trail on the 'Upper Harbour Greenways Plan' (2019) in enabling for ecological and recreational functions for the immediate and wider area.

Key Issues from a Parks Planning Perspective

The key issue from a Parks Planning perspective with the project going through the COVID-19 Recovery Act 2020 fast track consenting process is the potential for Auckland Council to inherit parks assets where they have not had the opportunity to assess and comment on prior to receiving them. There is a risk that the vested assets Council may inherit are not to the same standard or consistent with those assets which go through the normal resource consent and engineering plan approval process, resulting in a financial burden not anticipated.

Parks Planning information, reports and assessment requirements:

- a) Landscape plans: Sufficiently detailed to properly assess the amenity values from proposed roads to vest, this should include proposed vehicle crossings, berm widths, street trees with grass berms and any elements in the berm that may impact on the landscaping proposed. Landscaping demonstrate the requirements of the Urban Ngahere (Forest) Strategy.
- b) Landscaping Plan sufficiently detailed to assess any potential planting proposed on the esplanade and drainage reserve.
- c) A coastal hazards assessment and a current survey plan noting the location of MHWS to determine existing and proposed lot boundaries to assess the actual location and width for the taking of an esplanade reserve as required by Schedule 4(4) of the RMA.
- d) Proposed design of paths on the esplanade reserve, including width and gradients.
- e) Outlining of proposed fencing conditions of all sites that engaged with an open space boundary (esplanade, recreation, and drainage reserves).

This would provide Council with the means to determine factors such as:

- Whether the proposed width of the esplanade reserve to vest is appropriate for integration with the existing network and the envisaged implementation of the future greenway plan. It will also form an assessment of the appropriateness of the esplanade reserve width designated under s230 of the Resource Management Act and Rule E38.4.1(A8) of the Auckland Unitary Plan (Operative in Part).
- Whether streetscape planting is appropriate. Council has significant experience in this area as an asset owner and promotes species which provide attractive streetscapes including species which are also suitable from a maintenance perspective and are practical in their chosen location e.g. will not hinder drivers sight lines or reduce usability of footpaths over time. Landscaped garden beds on the road reserve are not supported due to its implication on safety, maintenance and restrictions on necessary services (i.e. refuse collection) within the neighbourhood.
- Whether any aspects of the design would require the approval of the Local Board or Governing Body to accept any proposed assets.
- Whether boundary interfaces with parks are suitable from a crime prevention through environmental design (CPTED) perspective. This includes assessing fencing on properties adjoining parks to ensure appropriate passive surveillance over these areas is provided.
- Hard assets such as stormwater outfalls or retaining walls are designed and located where they do not reduce the amenity and purpose of the parks or impact future greenways.

Acquisition of land

In addition to the above Healthy Waters would decide whether to accept the drainage reserves as assets, where, if to be the case, Parks will assess proposed landscaping on stormwater ponds which will be maintained by community facilities through a service level agreement.

Here the proposed (3.4HA) 3409m² recreation reserve would be classified as a neighbourhood park according to Auckland Council's Open Space Provision Policy. The assessment of the appropriateness of the park was undertaken by council provisions specialist in addressing its location, size and need is suitable. It is to note, as future asset owner, the neighbourhood park is more appropriate to vest as 'land in lieu of reserve' under the s138 of the Local Government Act (2002). The Community and Social Policy team would also do an assessment of the acquisition of the proposed recreational reserve.

At this stage the decision on whether to acquire the proposed neighbourhood park would need to be made by the relevant Local Board and Council's Governing Body.

Overall position of Parks Planning

Overall, it is considered that measures will need to be put in place under the COVID-19 Recovery Act 2020 fast track consenting process to ensure Council is able to provide sufficient input to decisions around the acquisition of land and the acceptance of vested assets. This is to ensure Auckland Council receives vested park and streetscape assets that are to the required standard and consistent with those that have gone through a normal resource consent process.

Conclusion

Should the EPA decide to allow the development to go through the Covid-19 Fast Track process, it is recommended that the proposal address all information requirements from a Parks perspective supplemented by a suitable assessment for the matters of concern. The applicant should also be made aware of any political decisions that are required for proposed vested assets which may impact on the delivery of the project.

Asset Owner / Specialist Response

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

Date: 21/03/2023

Overall Summary:

It is proposed to subdivide the site to accommodate **244 residential lots** together with Jointly Owned Access Lots ('JOAL'), public roads, pedestrian accessways and recreation, drainage, and esplanade reserves, neighbourhood park and enhanced wetland area to vest with Council. Of the proposed lots, 15 lots will undergo house design at the resource consent stage and the remaining 229 will be subdivided as vacant lots.

Wastewater

It is proposed to service the development via a public gravity network to the proposed Whenuapai Green Pumping Station, sized for this development and located at the end of McKean Road. The new public reticulated wastewater network will be designed to Watercare Standards and vested in Council. It is also proposed to remove and remediate all the existing septic systems on the development site.

Water

To supply the development, it is proposed to extend the proposed 315mm dia watermain installed as part of Whenuapai Green along Totara Road to the development's northern boundary. It is also proposed to replace the existing McKean Road watermain and install new reticulated watermains within the development site. All new water mains will be located within public road reserves, designed to Watercare Standards and vested in Council.

The external watermain upgrades is needed to provide further capacity to the existing 315mm watermain along Totara Road, being a pipe upgrade near the intersection of Brigham Creek and Hobsonville Road and on Fred Taylor Drive.

Watercare's response on proposal

Wastewater

This application provided insufficient information to confirm the capacity and serviceability of the proposed development. The proposed development's wastewater capacity relies on the delivery of Brigham Creek Pump Station (Slaughterhouse PS), which is proposed to be delivered in 2025-26. Until then, Watercare cannot service to this development. No information has been provided on the proposed staging and timing of the development and how this will be managed with the downstream constraints.

The wastewater plans did not mention any proposed local network locations within the property. Therefore, the proposed rising main discharge location and associated gravity network must be reconsidered.

Water

The proposed development will have enough capacity with the proposed upgrades. The developer must upgrade the existing Watermain network to at least 315ID pipes along Totara Road. Additionally, the developer needs to upgrade the network near the intersection of Brigham Creek, Hobsonville Road, and Fred Taylor Drive (as proposed in the plans). The proposed upgrades/extension must be executed by the developer complying with WSL standards at no cost to Watercare.

Asset Owner / Specialist Response

From: Sam Clare, Senior Healthy Waters Specialist, Healthy Waters, IES, Auckland Council

Date: 21/03/2023

Overall Summary:

This a greenfield development discharging to a Significant Ecological Area as defined in the AUP:OP. Healthy Waters do not consider that appropriate thought has been applied by the applicant on the potential impacts of the development on this environment.

From the information provided as part of this application the proposed stormwater management approach does not meet the requirements of the regionwide stormwater network discharge consent (NDC); although this development is in FUZ and so cannot be covered under council's NDC (even by way of an adopted SMP) Healthy Waters considers that NDC requirements for Greenfield development represent the appropriate and reliable approach. As such it is recommended that direction is provided to the applicant works with Healthy Waters to reach an appropriate outcome, including public infrastructure that will be vested to Council.

- General Comment

The applicant has provided an Infrastructure Report (**115.09_infrastructure_report**) with the application. The report is based solely on the proposed land use activity within the site boundary and fails to acknowledge the receiving environment. As such the proposed stormwater management for the development fails to meet the objectives of Chapter E1 of the Auckland Unitary Plan: Operative in Part (**AUP:OP**) for protecting and enhancing watercourses and coastal areas and using integrated stormwater management.

Although this is not currently a live zoned area of land, it is recommended that stormwater management should be in line with the regionwide stormwater Network Discharge Consent (**NDC**) as the development will see stormwater infrastructure vested to Auckland Council for ongoing operation and maintenance and will eventually form part of the legalised urban area.

Health Waters' regionwide NDC only authorises SW diversion/discharge in the urban area. Which for this is defined as areas with urban zones.

The NDC has a provision to adopt SMPs where the land is currently zoned FUZ – which is for the SMP to be prepared concurrently with a plan change to rezone the area to an urban zone; if not then the SMP cannot be adopted. For this Fast Track application the applicant is bypassing the plan change process for urbanisation, so the NDC cannot adopt the SMP and the SW diversion and discharge cannot be authorised by the NDC.

Therefore the applicant will need to apply for a diversion and discharge consent under E8 of the AUP as part of their fast track and, if the discharge is to a wetland, it will also trigger requirement for consent under the NES-F. But both would ultimately need to be transferred to HW to be the consent holder (undermining the point of the NDC). Although, in theory any E8 application should

follow the policy directions in E1 (which include the same high level outcomes as the NDC in terms of protecting streams and water quality, integrated SW management etc.), these are much less explicit than what are laid out in the NDC; enforceable outcomes may be commensurately less positive.

The NDC forms the basis of expectation for how Healthy Waters expects SW to be managed across our network. If the applicant intends to vest their assets in future then they should be expected to make sure, now, that HW accepts their proposal, i.e., by ensuring that their proposal meets the same requirements as for development covered by the NDC, even though their proposal cannot be authorised by it.

We note that the applicant has proposed the following stormwater management (extract from legend included on Drawing GN-494 included in the Infrastructure Report):

STORMWATER MANAGEMENT SUMMARY:

EXISTING STORMWATER INFRASTRUCTURE:
APART FROM EXISTING MINOR ROAD TABLE DRAINAGE ON McKEANS AND TORARA ROAD, THE DEVELOPMENT DOES NOT PROPOSE OR NEED TO UPGRADE ANY EXISTING STORMWATER INFRASTRUCTURE.

NEW STORMWATER INFRASTRUCTURE:
PUBLIC 10YR (10% AEP) PIPED STORMWATER INFRASTRUCTURE TO BE CONSTRUCTED IN THE DEVELOPMENT TO SERVICE ALLOTMENTS, NEW AND EXISTING ROADS.

100 YEAR OVERLAND FLOWS:
UNCHANGED EXISTING OVERLAND FLOW PATHS OR NEW AND EXISTING ROADS WILL ACT AS THE PRIMARY 100yr (1% AEP) OVERLAND FLOW PATHS IN THE DEVELOPMENT.

STORMWATER DISCHARGE AND CATCHMENTS:
SITES STORMWATER DISCHARGES TO TWO CATCHMENTS:

1. NORTH VIA AN EXISTING STREAM TO THE WAITEMATA HARBOUR RIVER ID 31282.
2. WEST DIRECTLY TO THE WAITEMATA HARBOUR RARAWARA CREEK.

WITH EACH CATCHMENTS NEEDING STORMWATER TO BE MANAGED FOR RETENTION AND DETENTION DIFFERENTLY, IN ACCORDANCE WITH AUP SMAF 1 REQUIREMENTS.

WHEN DISCHARGING TO 1. THE WAITEMATA HARBOUR RIVERID 31282:

VOLUME REDUCTION (5mm):
FROM LOTS WILL NEED TO BE MANAGED ON SITE
FROM ROADS WILL NEED TO BE MANAGED ON SITE

EXTENDED DETENTION VOLUME (APPROX 35mm):
FROM LOTS WILL NEED TO BE MANAGED ON SITE
FROM ROADS WILL NEED TO BE MANAGED ON SITE

100YR:
WILL NEED TO BE INVESTIGATED TO NOT IMPACT EXISTING DOWNSTREAM HABITABLE SPACES.

WHEN DISCHARGING TO 2. THE WAITEMATA HARBOUR RARAWARA CREEK:

VOLUME REDUCTION (5mm):
FROM LOTS WILL NEED TO BE MANAGED ON SITE
FROM ROADS WILL DISCHARGE DIRECT TO COAST

EXTENDED DETENTION VOLUME (APPROX 35mm):
FROM LOTS WILL DISCHARGE DIRECT TO COAST
FROM ROADS WILL DISCHARGE DIRECT TO COAST

100YR:
WILL NOT HAVE TO BE DETAINED, AS DISCHARGES DIRECT TO COAST

STORMWATER TREATMENT:
AS THE DEVELOPMENT IS RESIDENTIAL, THE ONLY AREA TREATMENT IS REQUIRED IS FOR TOTARA ROAD, BEING A HIGH USE ROAD (>5000 VEHICLES PER DAY)

The consideration of stormwater infrastructure for individual elements (i.e., treatment, retention, detention, 10% AEP and 1% AEP) of the network can lead to perverse outcomes and does not support an integrated stormwater management approach or provide protection to the receiving environment.

- Water Quality

Western Catchment discharges to an SEA (SEA-M2-57b) which is a low energy environment of the Upper Waitemata Harbour.

Northern Catchment will discharge to an existing wetland and then to the SEA in the Upper Waitemata Harbour via a permanent stream. Stormwater discharge to the wetland must be treated to protect and enhance, particularly as this is intended to be vested with Council.

Currently no treatment of the private lots, JOALS or public roads within the subdivision is proposed. This is not an appropriate stormwater management approach as it fails to acknowledge the quality of the receiving environment.

The current method of treatment presented in the Infrastructure Report is not considered to provide protection or enhancement of the receiving environment and is not appropriate to meet the objectives of the Unitary Plan.

- Hydrology Mitigation (SMAF)

Western Catchment discharges direct to the Coastal Marine Area (**CMA**) of the Upper Waitemata Harbour and is proposed to have 5mm Retention for lot areas to be provide at source. No other hydrology mitigation is to be provided.

Northern Catchment discharges to an existing wetland, to a short length of open watercourse and to the CMA. At-source SMAF1 retention and detention are proposed for the roads and lot areas.

Although no methods of providing the required mitigation are provided, the text presents at source management for roads and lot areas. At-source management for roads suggests that there will be public infrastructure located within the road reserve and as a result devices will need to meet the design criteria set out in the Auckland Transport Technical Design Guide, which could be difficult considering the proposed layout indicated on the Scheme Plan.

The applicant is proposing drainage catchment specific hydrology mitigation, which is considered appropriate considering the detail of information provided in the Infrastructure Report. It is noted that the western catchment proposes retention to be provided for the lot areas only, which indicates reuse tanks will be a requirement of development, although this is not mentioned in the Infrastructure Report.

- Flooding

Earthworks are proposed to realign overland flow paths, remove flood prone areas and remove existing floodplain storage within the site but there is no information provided in the Infrastructure Report related to flooding.

The applicant is required as part of the design of development to assess the impacts of removing the floodplain storage and passing this downstream. It is noted that buildings located on 97 Totara Road have been built close to the stream and may be impacted from unattenuated flows from the proposed development.

- Stormwater Infrastructure / Capacity

The only existing public stormwater infrastructure (not identified as such by the applicant) is the watercourse draining from upstream property, through the site, and discharging at the northern boundary of the proposed development. Healthy Waters is not able to assess the capacity of this watercourse. The applicant will be required to undertake a capacity assessment of this as part of design to ensure that there is capacity for any unattenuated flows from the development.

All other stormwater infrastructure will be constructed by the applicant as part of the development and should be capable of meeting relevant Network Utility Operator requirements.

Asset Owner / Specialist Response

From: Miriana Knox - Pouārahi - Principal Advisor Environmental Outcomes, Independent Māori Statutory Board

Date: 21/03/2023

Kia ora Hailey

Iwi consultation seems very light which is of concern, especially as this site is very close to the sea/estuary and is likely to be of interest to Te Kawerau a Maki.

Are these concerns able to be expressed to MfE and/or followed up by Council?

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	New Zealand Defence Force
Contact person (if follow-up is required)	Mr Mark Brunton, Head of Estate and Infrastructure, NZDF
	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	Totara Landing, Whenuapai
General comment	<p>The New Zealand Defence Force (NZDF) is a significant stakeholder in the Whenuapai area. The proposed Totara Landing development site is located immediately to the north west of the secondary runway (runway 08-26) for Royal New Zealand Air Force (RNZAF) Base Auckland.</p> <p>The proposed development site is in close proximity to an engine testing location on Taxiway J adjacent to runway 08-26 and is significantly affected by noise from engine testing, which is an essential part of aircraft maintenance.</p> <p>The NZDF wishes to highlight the national, regional and local significance and strategic importance of RNZAF Base Auckland, and to ensure that the proposed Totara Landing development does not adversely affect the NZDF's capability, operations and the ongoing viability of RNZAF Base Auckland.</p> <p>As one example of its strategic importance, RNZAF Base Auckland was used as an Emergency Coordination Centre, delivering around the clock outputs, during the National State of Emergency following Cyclone Gabrielle. It was also utilised as a staging post in another National State of Emergency following the Christchurch Earthquake in 2011.</p> <p>The Auckland Unitary Plan (Operative in Part) includes protection for RNZAF Base Auckland, including Minister of Defence designations 4310 (Whenuapai Airbase) and 4311 (Whenuapai Airfield Approach and Departure Path Protection), and strong policy direction for the protection of infrastructure.</p> <p>Key risks to Defence in relation to the Totara Landing proposal are:</p> <ul style="list-style-type: none"> a) reverse sensitivity arising from noise from Defence operations ; b) risks to flight operations and safety, including lighting and glare; c) bird strike risk; d) structure and obstacle heights; e) traffic impacts, particularly the ability for emergency services to access RNZAF Base Auckland; and f) stormwater/flooding effects impacting RNZAF Base Auckland. <p>Noise from engine testing on Taxiway J has been modelled by NZDF's expert acoustic consultant. The modelled engine testing noise contours represent an average noise exposure over a 7-day noisy week; peak noise levels experienced during individual engine tests will be significantly greater than the 7-day average.</p>

	<p>Acoustic insulation proposed by the applicant is intended to protect indoor environments, however, acoustic insulation does not on its own provide adequate protection against the risk of reverse sensitivity because it offers no protection to the outdoor environment. Rather, the NZDF's general position is that no-complaints covenants are the most effective and efficient method to mitigate the risk of reverse sensitivity.</p> <p>The NZDF's position generally is not to oppose development, but is rather that if development is to occur, it must proceed in a manner which does not adversely affect the NZDF's capability and operations, including in relation to the risk posed by reverse sensitivity. The NZDF routinely and consistently requests no-complaints covenants on new titles in developments in order to mitigate the risk of reverse sensitivity, and in most cases, considers that to be sufficient (along with measures to address other risks identified above).</p> <p>However, in this case, the NZDF's position is that the proposed development is incompatible with the high levels of noise from engine testing that are experienced within the development site. This position has previously been advised by the NZDF to Neil Construction Limited.</p> <p>In 2019 the Minister of Defence certified the activity of engine testing at RNZAF Base Auckland as exempt from the RMA for national security reasons, pursuant to section 4 (2) RMA. Notwithstanding the section 4 (2) RMA certification, there is a risk of material compromise to the operations of RNZAF Base Auckland from the Totara Landing development.</p> <p>Based on available information regarding the application, and in light of the proximity of the proposed development to a key aircraft engine testing location at RNZAF Base Auckland, the NZDF does not consider that the risk of reverse sensitivity can be effectively mitigated.</p> <p>There is a real risk that if the Totara Landing development proceeds as proposed, it will constrain Defence capability and the ability of RNZAF Base Auckland to operate due to the risk of complaints from new residents expecting levels of amenity which do not exist within the proposed development site. Ultimately the proposed development threatens RNZAF Base Auckland's ongoing viability. Accordingly, the NZDF considers the application should not be referred to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting Act) 2020.</p> <p>The Minister of Defence has also provided comments, which complement the NZDF's comments above.</p>
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
	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	Totara Landing, Whenuapai
General comment	The site is zoned for future urbanisation purposes (FUZ). To release this land for urban development, structure plan/s and a publicly notified plan change process is required. Without the assessment and implementation plan that underpins a plan change process, there is not enough information to support recommending this project to the Fast Track process.
Other considerations	<p>The subject site is zoned Future Urban Zone. The trigger for the release of this land for urban purposes is a via a structure plan followed by a publicly notified plan change.</p> <p>This project should not be referred to the fast-track process as it undermines both the structure plan and plan change process and would allow urban development to happen in a piecemeal manner, likely to result in an isolated car dependent community.</p> <p>The Preliminary Transport Assessment mentions many potential future public transport and walking and cycling improvements within the wider area. However, notes that these are not yet conceptualised and there is no certainty of timing for implementation.</p> <p>Waka Kotahi recommends that it is essential to have an integrated approach to the wider land use and transport network, with an implementation plan, prior to development to ensure a community that has inclusive accessibility with good access to public transport and active modes.</p>
[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	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	Totara Landing
General comment	<p>Overall Summary:</p> <p>It is proposed to subdivide the site to accommodate 244 residential lots together with Jointly Owned Access Lots ('JOAL'), public roads, pedestrian accessways and recreation, drainage, and esplanade reserves, neighbourhood park and enhanced wetland area to vest with Council. Of the proposed lots, 15 lots will undergo house design at the resource consent stage and the remaining 229 will be subdivided as vacant lots.</p> <p>Wastewater</p> <p>It is proposed to service the development via a public gravity network to the proposed Whenuapai Green Pumping Station, sized for this development and located at the end of McKean Road. The new public reticulated wastewater network will be designed to Watercare Standards and vested in Council. It is also proposed to remove and remediate all the existing septic systems on the development site.</p> <p>Water</p> <p>To supply the development, it is proposed to extend the proposed 315mm dia watermain installed as part of Whenuapai Green along Totara Road to the development's northern boundary. It is also proposed to replace the existing McKean Road watermain and install new reticulated watermains within the development site. All new water mains will be located within public road reserves, designed to Watercare Standards and vested in Council.</p> <p>The external watermain upgrades is needed to provide further capacity to the existing 315mm watermain along Totara Road, being a pipe upgrade near the intersection of Brigham Creek and Hobsonville Road and on Fred Taylor Drive.</p>

	<p>Watercare's response on proposal</p> <p>Wastewater</p> <p>This application provided insufficient information to confirm the capacity and serviceability of the proposed development. The proposed development's wastewater capacity relies on the delivery of Brigham Creek Pump Station (Slaughterhouse PS), which is proposed to be delivered in 2025-26. Until then, Watercare cannot service to this development. No information has been provided on the proposed staging and timing of the development and how this will be managed with the downstream constraints.</p> <p>The wastewater plans did not mention any proposed local network locations within the property. Therefore, the proposed rising main discharge location and associated gravity network must be reconsidered.</p> <p>Water</p> <p>The proposed development will have enough capacity with the proposed upgrades. The developer must upgrade the existing Watermain network to at least 315ID pipes along Totara Road. Additionally, the developer needs to upgrade the network near the intersection of Brigham Creek, Hobsonville Road, and Fred Taylor Drive (as proposed in the plans). The proposed upgrades/extension must be executed by the developer complying with WSL standards at no cost to Watercare.</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.