PROPOSED RETIREMENT VILLAGE

17 UPLAND ROAD, REMUERA

APPLICATION BY HND UPLAND LIMITED AND ST ANDREW'S VILLAGE TRUST INCORPORATED FOR REFERRAL TO EXPERT CONSENTING PANEL UNDER THE COVID-19 RECOVERY (FAST-TRACK CONSENTING) ACT 2020

25 NOVEMBER 2022

1. EXECUTIVE SUMMARY

1.1 This is an application for referral to an Expert Consenting Panel under the COVID-19 Recovery (Fast-Track Consenting) Act 2020 ("**FTCA**") for consent to redevelop the site at 17 Upland Road, Remuera ("**Site**").

1.2 HND Upland Limited ("**HND**") is a subsidiary of Z & F International Trading Limited, a private investment company which invests in land and property development projects, and which owns several high-profile landholdings. HND purchased the Site in 2021 and intends to develop an integrated residential development (retirement village and aged care accommodation) to provide housing and care options for elderly residents within Remuera.

1.3 St Andrew's Village Trust Incorporated ("**St Andrew's**") has been initially engaged by HND to advise and assist with concept planning, feasibility studies and relevant design work for the resource consent process. St Andrew's own and operate the St Andrew's Village, a large integrated retirement village and aged care development in Glendowie. St Andrew's has significant experience with the particular requirements of planning and developing retirement village accommodation, aged care and hospital level care facilities, and with the day-to-day operation and management of such facilities.

1.4 In relation to this application, HND and St Andrew's are jointly the "**Applicants**".

1.5 The Site is 3.173 hectares and is located in an area where a greater density of residential development is anticipated and can be accommodated. Sites of this size are rare in the existing urban areas of Auckland, and there are very few individual sites in Remuera which are suitable for development for a retirement village of the scale and intensity proposed.

1.6 The Site was formerly occupied by the Caughey Preston Rest Home Trust Board which opened in 1950, and which operated a maximum of 239 dementia, rest home and hospital beds. The Caughey Preston facility was closed in 2017. The activity occupied several large 2-3 storey buildings, including older brick-and-tile buildings in the south-eastern corner of the site and a contemporary 2-storey hospital building in the centre of the site which fronts Ventnor Road, together with various other detached and conjoined buildings. The existing buildings within the Site have been unoccupied and unused for five years. Due to the poor condition and the design of the buildings, they are no longer fit for purpose as aged care or accommodation facilities.

1.7 The Applicants propose to comprehensively redevelop the Site to construct and establish an integrated residential development ("**Project**"). More specifically, the Project involves the demolition and clearance of all existing buildings, and the construction and establishment of a new integrated retirement village and aged care facility comprising 11 buildings with 185 independent living units and 58 aged care rooms, common facilities and landscaped areas. Earthworks will be undertaken across the Site to enable building platforms and a suitable network of internal roads and pathways for the intended residents.

1.8 The Project is "shovel ready". HND is actively looking to commence with demolition works when a level of certainty is achieved with respect to the consenting of the Project, and civil and earthworks are anticipated to commence within approximately two to three months of receiving resource consent. The Project will then be constructed over an estimated period of 5-7 years. It is envisaged that initially all major demolition and earthworks will be completed followed by Stage 1 of the construction being Buildings A, B, C, D and E and the amenities building (Building F). Stage 2 will involve the construction of the balance of the buildings (Buildings G to K). HND has sufficient funding in terms of available equity and borrowing ability

to undertake the demolition, earthworks and Stage 1 construction. Funds released from Stage 1 will be used to fund Stage 2.

1.9 There will be significant investment in the local community of approximately s 9(2)(b)(ii) in direct investment during the construction and development phase, and an estimated economic impact (contribution) to the Auckland region of approximately $418 million. The local construction industry, and associated consultancy services, will benefit, with the Proposal resulting in an estimated 3,570 FTE years throughout the period of the construction works.[1]

1.10 Once constructed, it is anticipated that the retirement village and the ancillary facilities will generate approximately 98 full-time equivalent employees, including administration and management staff, carers, hospitality services, and maintenance staff.

1.11 The Proposal will replace the existing aged care buildings (which are of a poor condition and are not consistent with current standards) with contemporary, high quality retirement village accommodation and aged care buildings providing a variety of different accommodation typologies and care services, which will respond to local growth and housing demands. This will contribute to the release of existing housing stock back into the market as residents move into the village, which will help to relieve pressure on the housing market and free up other areas of land for further redevelopment and intensification, which will contribute to housing supply in the long term. The intensity of the proposed development within the Site will have other advantages in respect of facilitating further growth within the area with an increase in the overall competitiveness and efficiency of the land, and by ensuring infrastructure servicing to the Site is well-integrated and cost-effective.

1.12 The proportion of New Zealand's population over 75 is anticipated to grow rapidly over the next 50 years. Being an integrated residential development with 58 aged care beds/services, the Project would help to reduce the fiscal burden on the Government by supplementing the services provided by Te Whatu Ora - Health New Zealand (in terms of patient support and recovery), as well as providing care to residents of the independent living units. This will also contribute to meeting the needs of older people in terms of carer burden, that would otherwise often fall on the working aged population.

1.13 Sixteen relevant iwi authorities and seventeen treaty settlement entities have been identified as potentially having an interest in the Project. On 23 November 2022, the Applicants contacted each of the relevant iwi authorities to provide a description of the Project, the fast-track process, and inviting their involvement in the Project. To date, three responses have been received.

1.14 The Applicants have initiated consultation with Auckland Council ("**Council**"). Council has allocated resources to assist with the review of the Project and the subsequent resource consent application when feedback is sought. The Applicants have arranged a meeting with Auckland Council on 2 December 2022 to provide a detailed introduction to the Project and to continue to progress engagement with Council and relevant Council Controlled Organisations in parallel to this application.

1.15 The Applicants are communicating with a group of interested neighbours and have offered to consult with the group as the architectural design of the Project progresses towards the preparation of a full resource consent application.

1.16 The housing intensification that will be delivered by the Project will be an efficient use of the Site, which will have benefits in terms of the efficient provision and use of infrastructure, and

[1] An FTE Year is a full time equivalent role for one year.

the provision of on-site amenities and services which will reduce the demand for travel (and the subsequent generation of emissions). The Applicants intend to achieve a Homestar 7 rating which will involve considered design of energy-efficient buildings and services, and the careful management of demolition and construction to minimise waste.

1.17 There is no potential for the Project to have significant adverse environmental effects, and as outlined in section 8 below, adverse effects will be avoided, remedied or mitigated, and will be readily managed through conditions.

2. APPLICATION DETAILS

2.1 Applicants' details

Person or entity making the request:	HND Upland Limited and St Andrew's Village Trust Incorporated
Contact person:	Grant Seagar
Job title:	Project Director
Phone:	s 9(2)(a)
Email:	s 9(2)(a)
Postal address:	C/ Bentley & Co Limited, PO Box 4492, Shortland Street, Auckland 1140

Address for service (if different from above)

Organisation:	Bentley & Co Limited
Contact person:	Anthony Blomfield
Job title:	Planner
Phone:	s 9(2)(a)
Email:	s 9(2)(a)
Postal address:	PO Box 4492, Shortland Street, Auckland 1140

3. PROJECT LOCATION

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

☒ does not relate to the coastal marine area

☐ relates partly to the coastal marine area

☐ relates wholly to the coastal marine area.

Site location

3.2 17 Upland Road, Remuera, Auckland.

Below is a site plan that identifies the location and the land that is the subject of this application.

Figure 1 – Aerial photograph showing the location of the Site and surrounding environment (Source: Auckland Council Geomaps)

Legal description

3.3 Lot 1 Deposited Plan 86731

Copies of the above records of title can be provided on request.

Registered legal landowners

3.4 HND Upland Limited owns the relevant land.

4. PROJECT DETAILS

Project summary

Project name

4.1 Upland Road Retirement Village.

Project details

4.2 The Project is for the construction and operation of an integrated residential development (as defined by the Auckland Unitary Plan[2]) which will involve retirement village accommodation units and aged care beds and services. The village will comprise:

(a) approximately eleven buildings, each approximately up to 17m in height;

(b) approximately 185 one, two and three-bedroom Independent Living Units ("**ILU**").

(c) approximately 58 aged care beds;

(d) an amenity building with a range of amenities including lounges and dining areas, activities rooms, a health and wellness centre, a cinema, a gymnasium and associated outdoor amenity spaces;

(e) underground parking for approximately 220 spaces, together with approximately 50 uncovered parking spaces for visitors and staff, and internal access roads; and

(f) extensive site landscaping.

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

Figure 2 – Site Master Plan (Source: Ignite Architects)

4.3 In order to establish the Project, it will be necessary to:

(a) Undertake vegetation clearance within the Site.

(b) Undertake bulk earthworks to provide for suitable building platforms, basements, and retaining walls, to accommodate in-ground infrastructure, and to form the internal roading network.

(c) Install utility connections and undertake limited upgrades to existing public utilities within the Site, as described in this application.

(d) Erect site security fencing and hoardings as appropriate, including Project advertising and site identification.

4.4 The Site is held in one Record of Title, and no subdivision (or creation of unit titles) is proposed by the Project.

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

4.5 Having regard to the size of the Project and the scale of the proposed enabling earthworks, the construction of the Project will occur in stages. At this time, the composition and sequencing of each stage is not confirmed, however, the Project is likely to be staged in the following manner:

(a) Stage 1: All bulk earthworks and civil works across the whole site, together with the excavation of basement levels for Buildings A to F and the construction of Buildings A to F and corresponding roads.

(b) Stage 2: Excavation of the basement levels for Buildings G to K, and the construction of Buildings G to K and corresponding roads.

4.6 The staged construction of the retirement village may also mean that some temporary activities are required during the various phases. These may include:

(a) A show suite and a temporary sales office;

(b) Temporary advertising hoardings and signs; and

(c) A temporary operations office and other temporary construction buildings.

4.7 The Applicants anticipate, based on the industry experience of St Andrew's, that the timing of the staging of the construction of the buildings will be driven by the estimated demand for the living units.

Consent / approvals required

4.8 Relevant local authorities: Auckland Council ("**Council**").

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

☒ Land-use consent ☐ Subdivision consent ☐ Coastal permit

☐ Water permit ☒ Discharge permit ☐ Designation

☐ Alteration to designation

4.9 The Applicants seek all necessary consents for the Project. The Applicants consider the following resource consents are required:

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
Auckland Unitary Plan (OIP)	H4.4.1(A8)	Integrated Residential Development	Restricted Discretionary	Whole site
Auckland Unitary Plan (OIP)	H4.4.1(A34)	New buildings	Restricted Discretionary	All buildings
Auckland Unitary Plan (OIP)	C1.9(2)	The Proposal does not comply with the following Mixed Housing Suburban zone standards: - H4.6.4 Building height	Restricted Discretionary	All proposed buildings
Auckland Unitary Plan (OIP)	C1.9(2)	H4.6.5 Height in relation to boundary	Restricted Discretionary	Buildings A, C, D, G, H, K

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
Auckland Unitary Plan (OIP)	H4.4.1(A33)	New buildings which do not comply with H4.6.5 Height in relation to boundary but comply with H4.6.6 Alternative height in relation to boundary	Restricted discretionary	Buildings A and C
Auckland Unitary Plan (OIP)	E9.4.1(A6)	Development of a new or redevelopment of an existing high contaminant generating car park greater than 5000m^2.	Controlled	Whole site
Auckland Unitary Plan (OIP)	E11.4.1(A4)	Earthworks - Greater than 10,000m^2 up to 50,000m^2 where land has a slope less than 10 degrees outside the Sediment Control Protection Area.	Controlled	Whole site
Auckland Unitary Plan (OIP)	E12.4.1(A6)	Earthworks – Greater than 2,500m^2	Restricted Discretionary	Whole site
Auckland Unitary Plan (OIP)	E12.4.1(A10)	Earthworks – Greater than 2,500m^3	Restricted Discretionary	Whole site
Auckland Unitary Plan (OIP)	E23.4.2(A53)	Comprehensive development signage	Restricted Discretionary	Whole site
Auckland Unitary Plan (OIP)	E25.4.1(A2)	Noise and vibration during construction that exceeds the relevant standards of: - E25.6.27 for construction noise - E25.6.30 for construction vibration	Restricted Discretionary	Works proximate to the external boundaries of the Site
Auckland Unitary Plan (OIP)	E25.4.1(A2)	Noise arising from vehicle movements on Sunday morning which infringes Standard E25.6.2	Restricted Discretionary	Access from Upland Road
Auckland Unitary Plan (OIP)	E30.4.1(A7)	Discharges of contaminants into air, or into water, or onto or into land from the disturbance of soils	Discretionary	Whole site
Auckland Unitary Plan (OIP)	E40.4.1(A24)	The construction of the Project will exceed	Restricted Discretionary	Whole site

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
		the permitted 24 month period pursuant to E40.4.1(A20).		
Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011	Regulation 11(2)	The disturbance of soil which is not a permitted, controlled or restricted discretionary activity.	Discretionary	Whole site

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

Relevant zoning, overlays and other features

4.11 The Site is zoned Residential - Mixed Housing Suburban ("**MHS**") Zone under the Auckland Unitary Plan ("**AUP**"), as shown in Figure 3.

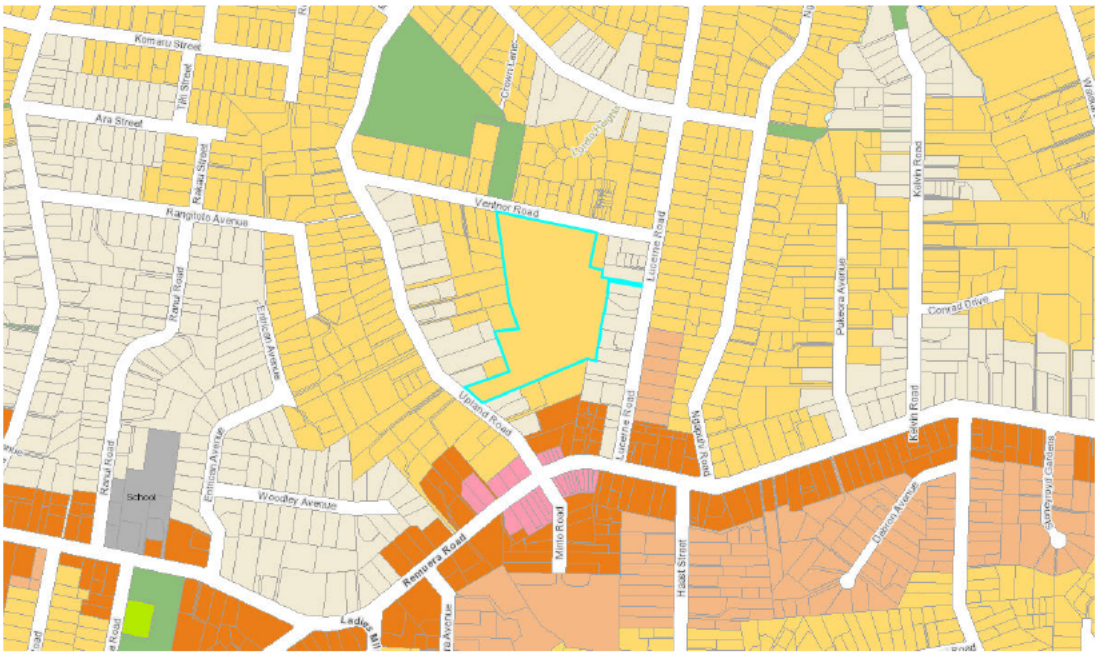

Figure 3 – Auckland Unitary Plan operative zoning

4.12 The MHS Zone is the most widespread residential zone in Auckland covering many established suburbs and some greenfield areas. The zone is applied to 'standard' residential sites occupied by one or two storey dwellings, as well as to large landholdings, including land that is vacant, and that which is occupied by substantially larger scaled built forms and intensive activities, including retirement village (integrated residential development) activities. The Site is an example of such a large landholding with a substantial scale and intensity of development.

4.13 The widespread nature of the zone encapsulates a variety of site sizes and building typologies, and in doing so, acknowledges the presence of (and ability of the zoning to accommodate) larger scale development, which is typically located on larger sites within the zone. These developments, together with the more 'standard' residential developments (and associated built form, which is generally two storey detached and attached housing in a variety of types and sizes) are provided for to facilitate housing choice, and currently form part of the overall zone characteristic.

4.14 In providing for intensification, the zone envisages a variety of forms of residential development (in addition to the prevalence of one or two storey, mainly standalone buildings which generally occur in the zone), particularly where:

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

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

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

4.15 To manage the effects of intensification, the zone requires resource consent as a restricted discretionary activity for Integrated Residential Developments (and for four or more dwellings per site) and for the buildings associated with such activities. The design and layout of development is required to be assessed through such a consent process to ensure a quality outcome for adjoining sites and the neighbourhood, as well as residents within the development site, to determine whether it:

(a) achieves/is in keeping with the planned suburban built character of the wider zone;

(b) achieves attractive and safe streets and public open spaces;

(c) manages the effects of development on neighbouring sites, including visual amenity, privacy and access to daylight and sunlight; and

(d) achieves high quality on-site living environments.

4.16 In terms of relevant overlays or notations, the following apply:

(a) most of the Site is located within a Natural Heritage: Regionally Significant Volcanic Viewshafts and Height Sensitive Areas overlay (Figure 4), which applies a height restriction from 20.5m to 34.5m above existing ground levels (and down to 18m at the Site frontage with Upland Road where there is no proposed development);

(b) the entire Site is subject to Airspace Restriction Designations - ID 1102, Protection of aeronautical functions - obstacle limitation surfaces, Auckland International Airport Ltd;[3] and

(c) the entire Site is subject to the Macroinvertebrate Community Index – Urban.[4]

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[3] The Designation does not affect the Project because no buildings are proposed that exceed the obstacle limitation surfaces.

[4] This 'control' relates to objectives and policies concerning the management of freshwater and sediment quality, the maintenance and improvement of the mauri of freshwater, the management of stormwater

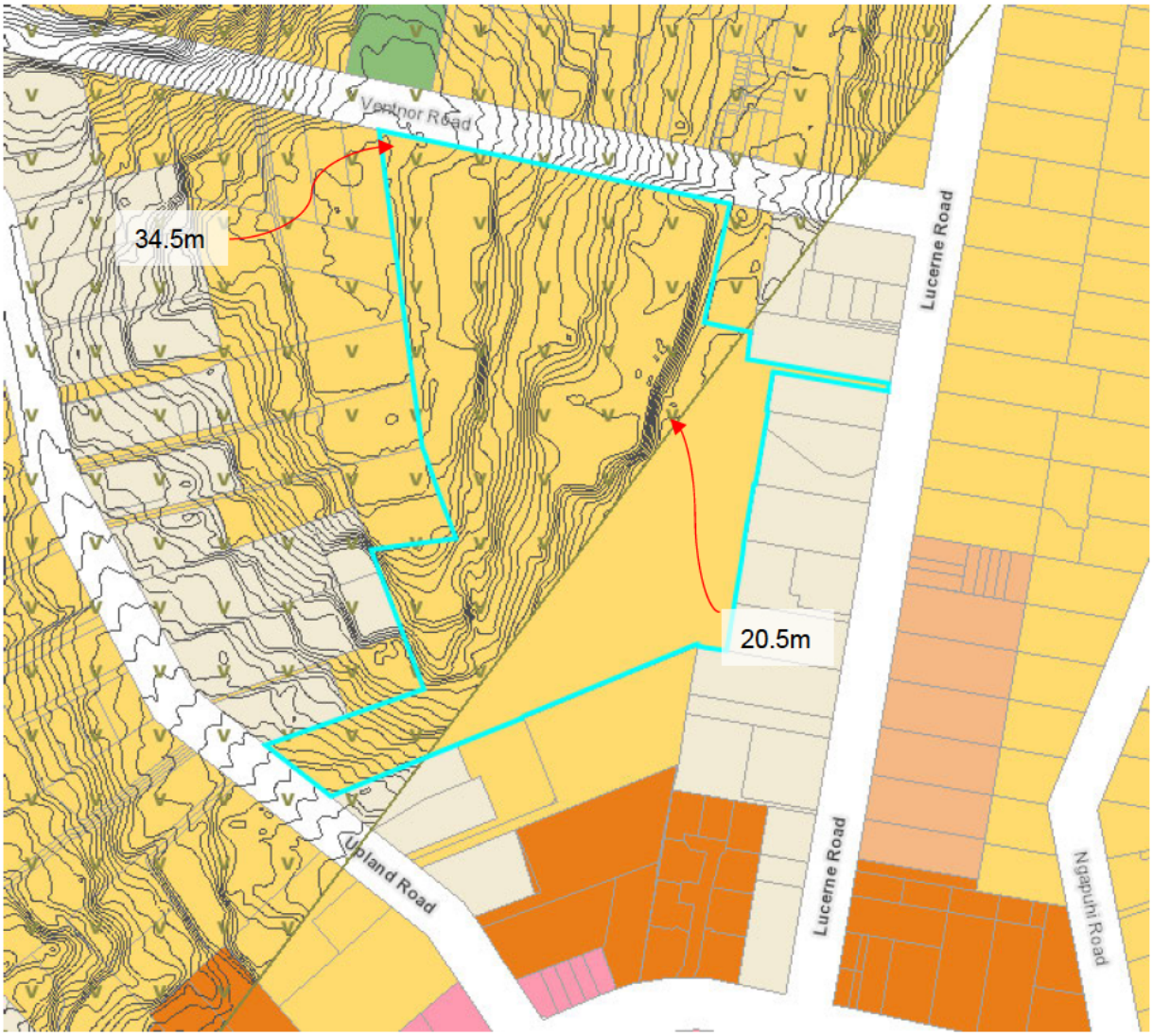

Figure 4 – Auckland Unitary Plan Volcanic Viewshaft Overlay

4.17 On 18 August 2022, Auckland Council notified Plan Change 78: Intensification ("**PC78**") to implement changes to the AUP to give effect to Policy 3 and 4 of the National Policy Statement on Urban Development 2020 ("**NPS-UD**"), and to incorporate the Medium Density Residential Standards ("**MDRS**") as required by the amendments to the Resource Management Act 1991, which were introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Compared with the current 'operative' planning framework, the changes that are proposed by PC78 include:

(a) Rezoning the Site to the Residential – Mixed Housing Urban ("**MHUZ**") Zone.

(b) Applying the MDRS which will involve:

(i) Increasing the height standard to 11m for occupiable building form, compared with the current standard of 8m.

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and wastewater networks to protect public health and safety, and to prevent or minimise adverse effects of contaminants on freshwater and coastal water quality. They do not introduce any particular standards to be complied with.

(ii) Increasing the 'height in relation to boundary' standard to 4m plus 60 degrees, compared with the current standard of 2.5m plus 45 degrees.

(iii) Reducing front yard standard from 3m to 1.5m.

(iv) Increasing the maximum building coverage standard from 40% to 50% of the net site area.

(v) Reducing the minimum landscaped area standard from 40% to 20% of the net site area.

4.18 The proposed zoning of the Site and the surrounding area, as proposed by PC78, is shown in Figure 5.

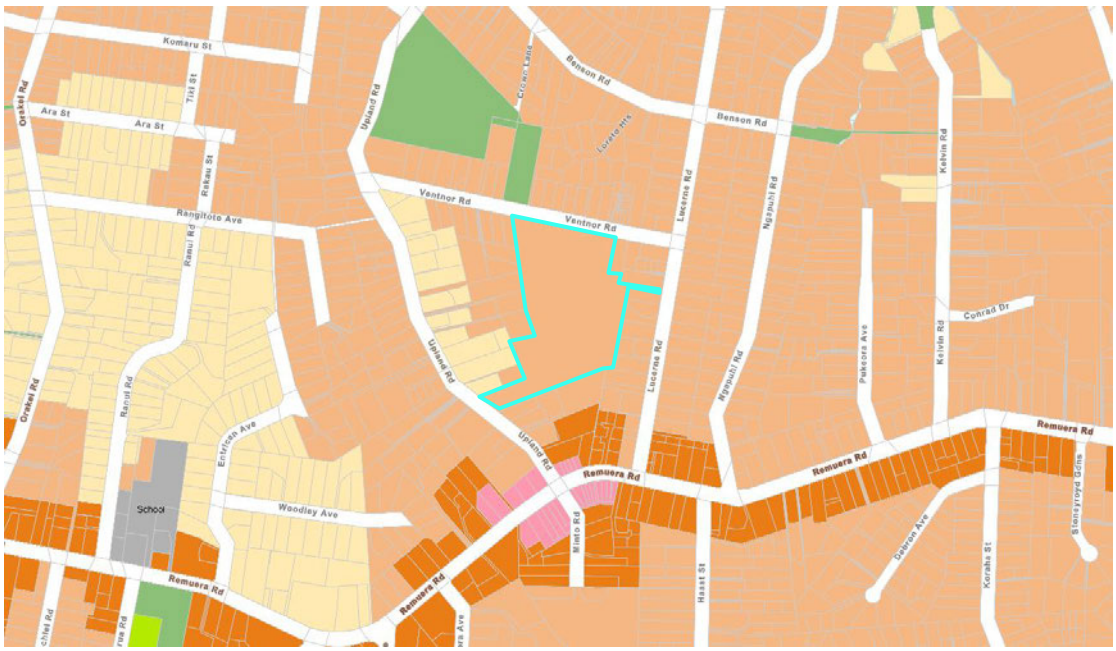

Figure 5 – Proposed zoning under the Plan Change 78 to the Auckland Unitary Plan

4.19 While the proposed rules under PC78 do not have immediate legal effect as they relate to the Project,[5] the policy and legislation referred to above requires that these changes are implemented. At the conclusion of the hearings process for PC78, it is therefore reasonable to expect that these standards will become operative and apply to the Site.

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

4.20 No application has been made by the Applicants to the Council in respect of the Project or for any other development within the Site.

Consents / designations by other parties

4.21 No resource consents or designations are required for the Project by anyone other than the Applicants.

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5 The provisions of PC78 only have legal effect where an activity is a permitted activity (i.e. up to three dwellings per site), and where a proposal complies with the proposed rules, and there are no qualifying matters that apply to the site or to the particular standard.

Other legal authorisations

4.22 No other legal authorisations are required for the Project.

Construction readiness

4.23 HND currently has sufficient funding (both in terms of available capital and borrowing ability) to complete Stage 1 of the Project. The completion and sale of units within Stage 1 will directly assist with funding to complete Stage 2.

4.24 The Applicants intend to commence construction within two to three months of receiving resource consent, to align with the 'earthworks season' (2023 to 2024).

Status		✓	**Expected Date**
Land Acquired	*All land has been acquired*	✓	**2021**
Business Case or Investment Case	*Initial feasibility study*	✓	February 2022
Procurement	*Award contract for preferred demolition contractor*	☐	July 2023
	Award contract for preferred civil works (earthworks) contractor	✓	October 2023
Design	*Architectural and civil preliminary designs completion*	☐	March 2023
	Detailed design completion	☐	September 2023
Designations/Consents	*Application for Resource Consent*	☐	March 2023
	Application for Building Consent	☐	September 2023

4.25 The Applicants intend to proceed with the Project as soon as possible, however there are a number of constraints that may have an impact on the timing of the Project, including:

(a) Contractors can undertake earthworks at any time of the year, but summer periods are preferable for earthworks. The fast-track process will enable earthworks to be undertaken during the summer period of 2023-2024, subject to the timing of a decision from an Expert Consenting Panel. It is unlikely that consent would be obtained under the RMA prior to the summer period of 2023-2024, and if there were appeals to the Environment Court, consent may not even be obtained in time for the summer period of 2024-2025.

(b) The availability of contractors. This may in turn affect the Applicant's ability to use locally sourced contractors for the Project.

(c) The availability and cost of materials. Record demand for construction materials and COVID-19 disruptions to supply chains have led to rapid increases in the costs of materials, and many materials have become unavailable. The sooner consent can be obtained for the Project, the sooner the Applicants can secure the relevant materials and provide certainty to its suppliers. Both the Applicant's costings for the Project and the pricing of contractor tenders will be affected by increases in material costs.

5. CONSULTATION

Government ministries and departments

5.1 The Applicants' experts engaged in a pre-application meeting with staff at the Ministry of the Environment on 22 November 2022, which involved providing a 'briefing' of the Project.

5.2 The Applicants have not consulted with any other Government ministries or departments.

Local authorities

5.3 The Applicants have commenced discussions with Auckland Council in preparing the application, and Council have allocated resources to engage with the Applicants during the design and consenting processes. A meeting has been arranged for 2 December 2022 for the Applicants to provide an introduction to the Project. The Applicants also intend to progress engagement with relevant Council Controlled Organisations regarding the Project, including Watercare and Auckland Transport. The Applicants will continue to progress engagement with Auckland Council, Watercare and Auckland Transport in parallel to this application.

Iwi

5.4 The Applicants sent letters to the relevant iwi authorities identified in section 6 below on 23 November 2022 to confirm any interest in the Project.

5.5 To date, responses have been received from Te Rūnanga o Ngāti Whātua and Te Whakakitenga o Waikato Incorporated, which confirm that they either defer their interest to other iwi authorities or have no interest in the Project. A response has also been received from Ngāti Paoa Iwi Trust stating that they hope to respond to our query soon. The Applicants will continue to progress engagement with iwi in parallel to this application.

Other persons / parties

5.6 It is the Applicants' view that no other parties are affected by the Project.

5.7 Several adjoining landowners have communicated (via a spokesperson) with the Applicants regarding their interest in the Project for the use and development of the Site, and in respect of day-to-day matters regarding the maintenance of the Site.

5.8 The Applicants have offered to meet (via the spokesperson) to discuss the Project during the development of the resource consent application.

5.9 The Applicants intend to meet with the District Health Board regarding the Project, including in relation to opportunities for the Project to support or supplement services provided by the District Health Board.

6. IWI AUTHORITIES AND TREATY SETTLEMENTS

6.1 The tables below outline the relevant iwi authorities and treaty settlement entities identified by the Applicant. Te Ngāti Ata are the only Treaty Settlement Entity which does not have a corresponding iwi authority entity. Te Ahiwaru Iwi Authority is the only iwi authority without a corresponding Treaty Settlement Entity (because there is no settlement for this iwi).

Iwi authorities

RELEVANT IWI AUTHORITY
Ngāi Tai ki Tāmaki Trust
Ngāti Maru Rūnanga Trust
Ngāti Paoa Iwi Trust
Ngāti Paoa Trust Board
Ngāti Tamaoho Trust
Ngāti Tamaterā Treaty Settlement Trust
Ngāti Whanaunga Incorporated Society
Ngā Maunga Whakahii o Kaipara Development Trust
Ngāti Whātua o Ōrākei Trust Board
Te Ākitai Waiohua Wakataua Inc
Te Kawerau Iwi Settlement Trust
Te Patukirikiri Iwi Trust
Te Rūnanga o Ngāti Whātua
Te Whakakitenga o Waikato Incorporated
Hauraki Māori Trust Board
Te Ahiwaru Iwi Authority

Treaty settlement entities

RELEVANT TREATY SETTLEMENT ENTITY
Ngāi Tai ki Tāmaki Trust
Ngāti Maru (Hauraki) Treaty Settlement Negotiators
Ngāti Paoa Iwi Trust
Ngāti Paoa Trust Board
Ngāti Tamaoho Settlement Trust
Ngāti Tamaterā Treaty Settlement Trust
Ngāti Te Ata

RELEVANT TREATY SETTLEMENT ENTITY
Ngāti Whanaunga Incorporated Society
Ngā Maunga Whakahii o Kaipara Development Trust
Te Ākitai Waiohua Settlement Trust
Te Kawerau Iwi Settlement Trust
Te Patukirikiri Iwi Trust
Te Rūnanga o Ngāti Whātua
Te Whakakitenga o Waikato Incorporated
Hako Tūpuna Trust
Ngāti Hako Treaty Settlement Negotiators
Ngāti Whātua o Ōrākei Trust Board

6.2 The Project does not involve land returned under a Treaty settlement.

7. MARINE AND COASTAL AREA (TAKUTAI MOANA) ACT 2011

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

8. ADVERSE EFFECTS

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

Summary

8.1 As set out in further detail below, the effects of the Project have been extensively assessed and can be appropriately managed. The Applicants are confident that all effects can be appropriately managed through the design and layout of the Project, and through conditions of consent concerning its construction and operation, and that, if referred, the input of parties through the FCTA process will be appropriate to enable the Expert Consenting Panel to make a fully informed decision on the Project.

8.2 The key effects of the Project are associated with:

(a) The bulk and location of the proposed buildings and their amenity effects in respect of dominance, overlooking, shading, loss of privacy, and the character of the neighbouring residentially zoned land;

(b) The temporary construction effects (noise, vibration, dust, ground stability, silt and sediment control, and construction traffic);

(c) The effects on the capacity of network utility infrastructure;

(d) The effects of the disturbance of potentially contaminated soils;

(e) The effects of natural hazards (flooding, overland flow) on the Proposal, and the effects of the Proposal relative to the risk of natural hazards to other land and people;

(f) The operational effects of the Proposal (noise, traffic); and

(g) Signage.

Bulk, Location and Visual Effects

8.3 The Project has been designed to generally comply with the relevant proposed bulk and location standards that will apply within the MHUZ that is proposed to be applied to the Site by PC78, except for the 11m building height standard. The Project will also comply with the standards for the MHSZ which currently applies to the Site, except for the 8m height and 2.5m plus 45 degree height in relation to boundary standards.

8.4 The design, layout and orientation of the proposed buildings and site wide landscaping have been carefully designed to respond to the topography of the Site in order to integrate the buildings within the existing landform, and to mitigate adverse effects on neighbouring properties arising from the height and proximity of the proposed built forms in respect of building bulk, dominance, shading, overlooking and loss of privacy.

8.5 Relative to the residential properties to the east, the proposed buildings are setback some 6m to 10m and will present as a series of 2 to 3 storey forms. The separation of the buildings from the boundary, and the façade/design elements and balcony arrangements will mitigate any effects with respect to visual dominance, overlooking, privacy and shading.

8.6 The properties to the south of the Site are well elevated relative to the level of the Site and the proposed finished levels of the buildings and are generally well buffered by vegetation that will not be affected by the Project. The proposed buildings will present their short ends to the southern boundary and the adjoining properties, and this, combined with the site levels, and the scale, setback (ranging from 7m to 17m) and design of the buildings, will avoid and mitigate any adverse effects of visual dominance, overlooking or shading to the properties to the south.

8.7 The proposed built forms proximate to the western boundary have been positioned to be generally well setback from the adjoining properties. The siting of the building at the north-western corner is well set back from the western Site boundary (by some 11m to 30m) and will be buffered by retained vegetation within the Site. In the south-western corner, the building proximate to the western boundary will be benched into the landform with a two-storey form (above a basement), and will be setback from the boundary by some 3.5m to 7m. The buildings are designed with setbacks and façade modulation to mitigate visual effects, and the retained and proposed landscaping will further assist to integrate the buildings into the environment.

8.8 The proposed buildings which will front Ventnor Road have been designed to respond to the existing and planned future character of the neighbourhood, through a combination of building heights, façade modulation, and setbacks. In particular, the three buildings which will front Ventnor Road will step in height with the Site contour, and the upper levels of the buildings are designed with a recessed penthouse and roof line. The combination of these design elements will present a two and three storey form to the streetscape.

8.9 The Project will not involve any development of the existing landscaped area at the Upland Road frontage of the Site, with this area proposed to be enhanced with further landscaping

and a play area for children. The contribution of this landscaped area to the Upland Road streetscape will be maintained and enhanced.

8.10 The Project has been assessed by Reset Urban from both an urban design and a landscape visual perspective.[6] In summary, these assessments find:

(a) Through a combination of setbacks, massing, scale, design and landscaping, the Project will positively respond to the future planned character for the neighbourhood, while respecting the amenity values of adjoining and surrounding properties.

(b) The Site will be well connected to the neighbourhood and will contribute to the safety of the streetscape by orientating buildings to the Ventnor Road frontage.

(c) The Project will contribute to the capacity and diversity of housing in the neighbourhood, will promote the efficient use of land, and will provide high quality accommodation with well-designed outdoor amenity.

(d) The Project will not result in built forms protruding into the scheduled Volcanic Viewshaft which is located above the Site and will therefore protect important public views of significant natural features.

(e) In terms of visual effects, the Project will have 'Low-Moderate' effects at worst relative to viewing audiences along Ventnor Road, owing mostly to the visual change that will result from the Project, while effects from other viewing locations will be 'Low' to 'Very Low'.

(f) The combination of the design of the built forms and the complimentary outdoor landscaping, which will assist to integrate the built forms to the landscape and to mitigate the effects of hard structures such as retaining walls, are such that the effects on landscape values and the landscape character will be 'Low'.

8.11 Arboricultural advice has been obtained to confirm that the Project will not result in any significant or long-term effects to the health or viability of any vegetation that is located within neighbouring properties.

Transportation Effects

Effects from the operation of the Proposal

8.12 The Project will be supported by at least one parking space per ILU and a suitable level of parking to accommodate staff and visitors. The Project will be serviced by suitable servicing, manoeuvring and loading areas. Bicycle parking will be provided at a suitable rate relative to the expected demands for bicycle use by staff, visitors and residents.

8.13 The Site will be accessed via one vehicle crossing from each frontage with Upland Road and Ventnor Road.

8.14 The assessment prepared by Flow Transportation Specialists[7] ("**Flow**") confirms that the Site has an excellent level of access to the road network and to public transport. Flow's assessment confirms that retirement village facilities are typically low generators of vehicle traffic, and that peak vehicle generation occurs outside of the standard peak hours, with the effects of both

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6 A copy of these assessments can be provided on request.

7 A copy of this assessment can be provided on request.

peak and daily traffic generation being readily accommodated by the surrounding transport network.

8.15 Overall, the operational transport effects of the Project will not adversely affect the capacity of the surrounding road network, and the internal design of the village road network and parking capacity is appropriate.

Effects during construction

8.16 During the earthworks and construction works phases, construction traffic to varying degrees will be present in the area.

8.17 The assessment prepared by Flow confirms truck and trailer vehicles can be accommodated within the Site, which will enable the efficient haulage of excavated material from the Site. On this basis, the assessment confirms that the Proposal will generate some 3,000 truck trips to undertake the full earthworks programme.

8.18 Flow's assessment confirms that the volume and nature of construction traffic can be safely accommodated by the existing road network, and that any effects of such traffic can be suitably managed by an appropriate Construction Traffic Management Plan that incorporates measures to manage the time of truck movements, routes, and any temporary changes to lane markings to safely accommodate truck movements during the construction works.

Earthworks

8.19 Earthworks are required to contour the Site to establish the future building platforms and basements, and the creation of internal roading, associated batters and retaining walls, and the installation of inground infrastructure. To facilitate roading and pathway gradients throughout the Site which are suitable for the needs of the future residents, the landform will generally grade up from the Ventnor Road frontage.

8.20 Earthworks effects will relate to their interim visual impact, noise and vibration, erosion and silt/sediment control, and dust management.

Visual Impact

8.21 The proposed earthworks have been designed to modify the landform to provide suitable gradients to facilitate movement of elderly residents throughout the village. In doing so, the proposed earthworks will involve a lowering of the site contour while generally following the existing landform which rises from north to south. The earthworks have been designed to bench the built forms into the sloping site, which will enable basements and lower portions of buildings to function as retaining walls and will allow for pedestrian movement through and around each building. This approach will maintain the appreciable landform of the Site to ensure effective integration with the surrounding urban form, while thoughtfully and carefully managing any perception of bulk.

8.22 Any temporary visual effects of the earthworks will be managed by standard construction management measures to ensure that worked land is not left exposed for extended periods of time. The Site will be progressively occupied by built form and landscaping or will be grassed or mulched if there is an unexpected delay in the construction programme.

Erosion and Sediment Control

8.23 MSC Consulting Group Limited ("**MSC**") have prepared an Infrastructure Report and a Land Management Plan[8] which addresses the earthworks effects and how they will be managed. Erosion and sediment controls will include specifically designed measures in accordance with the Auckland Council Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region Guideline Document 2016/005 (GD05). These measures will be designed to control sediment-laden runoff and prevent erosion of exposed ground within earthwork areas. The general principles and management measures to be adopted during the earthwork activities will be incorporated into an Erosion and Sediment Control Plan.

8.24 The sediment controls for the Project will involve the use of sediment retention ponds, decanting earth bunds, dirty and clean water diversion, stabilised entrances and wheel wash facilities, and silt fencing.

Contamination

8.25 A Detailed Site Investigation has been undertaken by WWLA[9] which confirms that the Site has been historically occupied by potential HAIL activities, which include uncertified fill, potential asbestos and lead in soils (due to the age of buildings and likely construction materials), potential underground fuel storage tanks, and electricity transformers. A range of soil samples have been collected and analysed, and it has been confirmed that the concentrations of contaminants within the Site exceed relevant background levels but are generally well below relevant human health and environmental thresholds. The Detailed Site Investigation concludes that standard earthworks management procedures are expected to be sufficient to manage the potential effects of contaminants in soil.

8.26 The potential for contaminants resulting from boilers, underground storage tanks and electrical transformers are proposed to be assessed following the demolition of the buildings, due to the practical constraints of undertaking testing with the buildings in place.

8.27 A Site Management Plan has been prepared by WWLA which sets out the measures and protocols that will be implemented to manage the potential for the disturbance of contaminants during earthworks. The Site Management Plan will be finalised following subsequent soil investigations after the buildings are demolished, and prior to the commencement of earthworks, to ensure that the appropriate measures are in place.

8.28 A Site Validation Report will be produced following the completion of earthworks, which will include disposal receipts, soil validation results, compliance correspondence and unexpected discoveries during works. With these measures proposed, there will be no offsite adverse effects generated.

Geotechnical and land stability effects

8.29 Initia Limited ("**Initia**") have prepared a Geotechnical Assessment Report for the Project,[10] which assesses the geotechnical characteristics of the Site, and provides an assessment of likely land stability and settlement effects as a result of the proposed excavations and retaining wall structures. In summary, Initia's assessment confirms:

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8 A copy of these reports can be provided on request.

9 A copy of this assessment can be provided on request.

10 A copy of this assessment can be provided on request.

(a) The underlying stratum of the Site is generally suitable for residential land use and the proposed built forms;

(b) The building foundations can be designed using standard typologies, including shallow foundations (flexible raft), soft piled hardfill raft, and hard piled foundations, relative to the specific ground conditions in different areas of the Site.

(c) The proposed retaining walls at the eastern and southern boundaries of the Site can be constructed with standard cantilevered timber pole walls, and the building basement walls which will serve as retaining walls can be constructed with reinforced concrete bored pile walls.

(d) The Site has a low to negligible risk of liquefaction effects, due to the nature of the underlying strata; and

(e) The extent of land settlement that will be caused by the proposed buildings and retaining walls has been modelled to be within acceptable limits relative to neighbouring buildings/structures (including swimming pools) and adjacent in-ground services.

Groundwater

8.30 The analysis prepared by Initia confirms that groundwater has been measured at depths between 1.5m and 6.6m below existing ground levels, and that the proposed finished levels of the building basements will not encounter the recorded groundwater levels. Accordingly, the Project will not result in effects on groundwater values, or in respect of the stability and condition of adjoining land and activities in respect of groundwater drawdown.

Ecological Significance and Ecological Values

8.31 As described above, there are no areas or features of notable ecological value within the Site.

8.32 To the extent that trees and vegetation outside of the Site contribute to ecological values, it has been assessed that the Project will be designed and managed to avoid significant or long-term effects on such vegetation.

Infrastructure Effects

8.33 The Infrastructure Report prepared by MSC has assessed the capacity of the existing infrastructure networks.[11]

Stormwater Infrastructure

8.34 The Infrastructure Report explains that the existing stormwater network has existing capacity constraints downstream of the Site. The Proposal will result in an overall reduction in the extent of impervious area within the Site by some 10% of the Site area (from 65% to 55%), and therefore the Proposal will substantially reduce the overall volume of stormwater flows to the stormwater network.

8.35 Stormwater treatment devices will be installed to treat runoff from the internal road and uncovered parking areas. The devices will comprise proprietary devices, which will be installed and managed in accordance with the manufacturer's specifications.

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[11] A copy of this assessment can be provided on request.

Wastewater Infrastructure

8.36 The Infrastructure Report identifies that a limited section of the existing wastewater network located within the road reserve downstream of the Site may require upgrading to accommodate the predicted flows from the Project. The Applicants have initiated discussions with Watercare Services Limited, the asset owner of the wastewater network, to determine the existing capacity of these limited pipe sections and the need to undertake upgrades. Should these discussions confirm that upgrades are necessary, MSC's assessment confirms that there are options readily available to address any capacity constraints either by way of upgrading the downstream network, or by detaining wastewater flows within the Site to manage the volume and flow rate of the discharge. As outlined above, the Applicants continue to progress engagement with Watercare in parallel to this application.

Water Infrastructure

8.37 The Infrastructure Report confirms that there are available water supply pipelines and fire hydrants within suitable distances of the Site, which will allow for ready servicing of the Project. Detailed investigations will be carried out to confirm the existing pressure available within the network. If there is inadequate pressure, a tank system and pressure boosters will be incorporated into the Project to ensure that there is adequate pressure for potable supply to the buildings and for firefighting purposes.

Flooding Effects

8.38 The north-western corner of the Site is identified on Auckland Council's GIS records as being affected by an overland flow path entering the Site from the west, and by a 'flood prone area'.

8.39 The overland flow path will be appropriately managed, such that the entry and exit points of the overland flow path will be maintained and there will be no impact on the capacity of the flow path, and no displacement of flood water.

8.40 The proposed finished occupiable levels of the buildings proximate to the overland flow path and flood prone area have been designed to be sufficiently higher than the modelled flood levels, and the design of the basements of the buildings have been designed to ensure that they will not be affected by floodwaters.

Archaeological and Tangata Whenua Effects

8.41 The Site is not recorded as containing any recorded or unrecorded archaeological deposits. It has been extensively modified by earthworks that have been undertaken during the ongoing development of the former activity.

8.42 Notwithstanding the above, it is appropriate that accidental discovery protocols (by way of conditions) apply in the event that archaeological features, artefacts or koiwi (human remains) are discovered.

Noise Effects

8.43 Noise and vibration effects relate to those associated with construction activity, and the subsequent day-to-day operation of the village.

8.44 The scale and methodology of the proposed construction works are common for the type of development relative to its context within a residential area. Relative to noise and vibration, the effects will mainly be associated with excavation, compacting, piling and retaining wall

construction, and concreting activities for foundations and the subsequent construction of structures.

8.45 An Acoustics Assessment has been prepared by Marshall Day Acoustics,[12] which confirms that construction noise levels from the use of standard machinery is generally expected to comply, except for short durations when machinery is required to operate in close proximity to the Site boundaries and adjoining receivers. Such exceedances are expected to be for a short duration, as works are completed and machinery is moved away from each receiver. With standard measures in place, including appropriate noise barriers, machinery selection, and other management procedures and protocols (including the implementation of a Construction Noise and Vibration Management Plan), the effects of construction noise will be appropriately managed relative to all surrounding receivers.

8.46 With regards to construction vibration, Marshall Day have confirmed that compaction activities associated with the formation of internal roads have the greatest potential for vibration effects. As these activities will occur at a significant distance from receivers, construction vibration will (with suitable management measures implemented) comply with relevant standards.

8.47 Operational noise from the activity occurring within the retirement village relates to that generated by mechanical equipment, the use of communal spaces (e.g. lounge areas and outdoor recreational activities), and the internal traffic movements associated with access to the parking and servicing areas. Being a residential activity, there are no inherently noisy activities.

8.48 All mechanical plant (that is anticipated to be required) can be designed, selected, positioned and shielded to control noise at any receiver to comply with the relevant standards, including by avoiding any outdoor plant directed towards external boundaries. The location of the parking and associated manoeuvring areas are sufficiently remote from neighbouring boundaries and/or screened to achieve compliance with the Unitary Plan standards. Marshall Day anticipates that with suitable management of the Upland Road access on Sunday mornings (before 9am), all traffic movements can be managed to ensure that noise is compliant with the standards.

8.49 Overall, noise effects can be managed and compliance with the AUP standards can be achieved through conditions of consent.

Signage Effects

8.50 The Project includes identification/naming signage to be erected at the front boundaries/entrances of the Site. The signs will be incorporated into new entrance gate structures and/or other landscaping features, and are considered to be appropriate with reference to the immediately surrounding residential environment.

8.51 During construction, the Site boundaries will be fenced with a combination of hoardings for security. Temporary signage may be incorporated within these hoardings towards the Site frontages. These signs are typical across Auckland for construction activities of this nature, and are proposed to contain graphics to communicate the nature of the village to be developed, and display/explain the types of accommodation available, as well as containing contact details for the sales manager. These signs will be in place during the construction of the village, and during that timeframe will be refreshed with imaging and information.

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12 A copy of this assessment can be provided on request.

8.52 The location and nature of these signs and the form of advertising, and identification for a large site is not uncommon, and when undertaken comprehensively (as proposed) can provide visual relief to the construction activity, as well as avoid a proliferation of uncontrolled contractor hoardings. The signs will be oriented to the road frontages and away from neighbouring properties. The signage will be legible and convey simple messages and images, and will not implicate traffic or pedestrian safety, or neighbouring residential amenity.

Greenhouse Gas Emissions

8.53 The scale and intensity of the Project has advantages over traditional lower density development in reducing greenhouse gas emissions, and the Site's location and accessibility to local services, amenities, and public transport infrastructure will be beneficial with regards to emissions from private vehicle use.

8.54 The Applicants intend that the design, construction and operation of the Project will achieve the current 'Homestar 7 Rating' from the New Zealand Green Building Council. St Andrew's have achieved such a rating for recent construction and development projects which are comparable to the buildings and activities proposed for the Project. A Homestar 7 Rating will necessitate the use of specified construction methods and materials to reduce wastage and environmental impacts, and specific energy efficient design and operational requirements which are intended to improve the overall quality of life of the residents while achieving reductions in greenhouse gas emissions.

8.55 As compared to traditional residential development, the village is inherently a lower generator of vehicle movements, minimising resultant emissions. There are also a range of amenities provided on-site that reduce the need for residents to travel.

8.56 The Project involves comprehensive landscaping throughout the Site (including specimen trees) which will be maintained by full time onsite gardeners. That new flora will have the effect of absorbing carbon (carbon sink) from the atmosphere.

9. NATIONAL POLICY STATEMENTS AND NATIONAL ENVIRONMENTAL STANDARDS

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

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

(a) NPS-UD.

(b) National Policy Statement for Freshwater Management ("**NPS-FM**").

(c) New Zealand Coastal Policy Statement ("**NZCPS**").

(d) National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ("**NES-CS**").

(e) National Environmental Standards for Freshwater ("**NES-F**").

NPS-UD

9.2 The NPS-UD came into effect on 20 August 2020 and was amended on 11 May 2022. The NPS-UD applies to planning decisions by any local authority that affect an urban environment. The NPS-UD directs decision makers to give effect to the objectives and policies of the NPS-UD, which recognise the national significance of:

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

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

9.3 The aim of the NPS-UD is to ensure that planning decisions enable the sufficient supply of housing that is needed to meet demand and improve the general affordability of housing around the country. Auckland is identified by the NPS-UD as being located within a Tier 1 high-growth urban environment.

9.4 Objectives 1, 2, 4, 6 and 8 of the NPS-UD are of particular relevance to the Project. These objectives direct that:

(a) New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future (Objective 1).

(b) Planning decisions improve housing affordability by supporting competitive land and development markets (Objective 2).

(c) New Zealand's urban environments and their amenity values develop and change over time in response to the diverse and changing needs of people, communities and future generations (Objective 4).

(d) Local authority decisions on urban development that affect urban environments are integrated with planning and funding for infrastructure, are strategic, and are responsive, particularly in relation to proposals that would supply significant development capacity (Objective 6); and

(e) New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the effects of climate change (Objective 8).

9.5 The corresponding relevant policies of the NPS-UD include:

> **Policy 1**: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:
>
> (a) have or enable a variety of homes that:
>
> (i) meet the needs, in terms of type, price, and location, of different households; and
>
> (ii) enable Māori to express their cultural traditions and norms; and
>
> (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

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

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

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

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

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

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

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

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

(a) The Project will utilise a site that is zoned for urban/residential development.

(b) The Project will replace old, not-fit-for-purpose aged care facilities with new, high quality living units and aged care facilities, which will contribute to the overall supply of housing in the district, thereby reducing pressure on the housing market, and will contribute to the creation of a well-functioning urban environment, which adds variety to the accommodation options for the elderly, within a thoughtfully designed village environment which is tailored to the safety and accessibility needs of the residents.

(c) The scale and form of the buildings proposed is appropriate in relation to the context of the site and the surrounding urban environment and is consistent with the outcomes required by the NPS-UD.

(d) The form and intensity of the Project is consistent with a well-functioning urban environment and will contribute to meeting the requirements of the NPS-UD to provide for, and realise, development capacity and the competitive land and housing markets.

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

9.8 As discussed above, Auckland Council have responded to the requirements of the NPS-UD by notifying PC78 which proposes to rezone the Site to a zone which enables greater intensification, and to introduce the MDRS. The Project is consistent with the intentions of PC78.

NPS-FM

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

9.10 The Site does not contain any freshwater streams or natural inland wetlands, and there are no such freshwater features within close proximity of the Site.

9.11 Insofar as the discharge of stormwater from the Site relates to downstream freshwater environments, the Project will substantially reduce the overall area of impervious surfaces within the Site and the resulting stormwater runoff to the network and will incorporate stormwater quality features to treat the runoff from parking and access areas, which in turn will improve the quality of stormwater discharged from the Site to the network.

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

NZCPS

9.13 The Site is inland from the coast, and the Project has no impact on the coastal environment given its location.

NESCS

9.14 The NESCS is relevant to the Project. A Detailed Site Investigation has been undertaken for the Site. The conclusion of that assessment is that a resource consent is required under the NES-CS as a discretionary activity. All proposed earthworks will be managed in accordance with an appropriate Site Management Plan, which will ensure that the effects of the works on human health are managed in accordance with the purpose of the NES-CS.

NES-F

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

10. PURPOSE OF THE ACT

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

10.1 As discussed in further detail below, the Project represents a significant investment in the local area through both the construction of the retirement village and its operation.

Economic benefits during construction

10.2 Construction has historically been a major driver for growth within New Zealand, directly employing about 292,800 people.[13]

10.3 Due to the effects of COVID-19, a number of projects have been delayed due to the periods of lockdown New Zealand underwent in response to the virus. The applications for government support during the lockdown periods for businesses show a significant number of construction businesses (86%) needed support in the form of wage subsidy or other support payments and the highest number of jobs of any sector.[14] Demand has been strong, with a record 49,773 new homes consented in the year ending February 2022.[15] Factors such as skill shortages and supply chain delays have affected the industry's ability to meet this demand, and are expected to remain in the long term, with the price of construction materials expected to continue to increase on an average of 11% through to the end of 2022.[16] COVID-19 continues to impact workforce availability (including construction-related and freight workers). While the re-opening of New Zealand's borders may help alleviate some workforce issues, the sector's workforce issues are ongoing and are likely to continue post the COVID-19 pandemic.[17]

10.4 Similarly, commercial and residential construction intentions have fallen significantly since February 2020. Longer term impacts are expected to be seen in the deferral of funding for private developments and capital projects in the corporate sector (e.g., for airlines, airports, tourism, retail and hospitality).

10.5 As a result, MBIE conclude that the construction sector will be reliant on a pipeline of fast-tracked consent activity, which will also work as a part of the economic recovery and rebuild following COVID-19. Whilst construction demand is predicted to continue to fall, fast-tracked construction activity (such as the Project) will work to offset these losses and fill the gap in terms of employment and construction activity where funding for private developments in heavily impacted sectors is deferred.

10.6 The Project has been assessed by Property Economics to represent an approximate s 9(2)(b)(ii) direct investment in the local area providing jobs and significant flow-on economic benefits to the Auckland region through the construction phase. This will provide jobs and significant flow-on economic benefits to the local community affected by the economic impacts of COVID-19.

10.7 There will be direct benefits for construction workers and project managers, architects, engineers and health and safety consulting service providers. There will also be associated financial and development contributions for the Auckland Council as part of the development.

10.8 Indirect benefits include supplies and services purchased by the appointed construction team, or by contractors engaged by the Applicants. These include the wholesale and retail building supplies, and legal, telecommunications, administrative and accounting services. Other professional services, such as real estate and conveyancing services, are expected to benefit as accommodation options are released into the market. Overall, it has been assessed by

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13 Building and Construction Sector Trends Biannual Snapshot: May 2022, page 2, MBIE.

14 Construction factsheet: October 2020, COVID-19 economic update, MBIE; A Better Way Forward – Building the Road to Recovery Together – Construction Sector COVID-19 Recovery Study, Deloitte, January 2021, at page 23.

15 Building and Construction Sector Trends Biannual Snapshot: May 2022, page 2, MBIE.

16 Building and Construction Sector Trends Biannual Snapshot: May 2022, page 5, MBIE.

17 Building and Construction Sector Trends Biannual Snapshot: May 2022, MBIE.

Property Economics that the Project will result in an overall impact on business activity within Auckland over the construction phase of some $418 million.

Economic benefits during operation

10.9 Based on the knowledge and experience of St Andrews, it is estimated that the Project will result in 98 Full-Time Equivalent ("**FTE**") roles for the operation of the retirement village, which will include staff roles for village management, administration, sales, maintenance and gardening, restaurant and ancillary services, and aged care support.

10.10 Around 65% of staff employed for the operation of retirement villages are caregivers and housekeepers. The village will also employ other qualified professionals such as registered nurses, a village manager, property managers and therapists. As set out in the New Zealand Aged Care Workforce Survey 2016, the aged care workforce is predominately made up of women aged 45 and above, which is consistent with the experience of St Andrew's.[18]

10.11 COVID-19 has had a disproportionate effect on women in the workforce, with women having fared worse than men across key labour market measures since COVID-19 began impacting New Zealand's labour market.[19] Nationally, the seasonally adjusted number of people in employment fell by 31,000 between the March and September 2020 quarters, with over two thirds (22,000) being women. This is reflected in the widespread job losses experienced in sectors that predominately employ women. One sector that has shown this trend is tourism, with job losses in roles such as accommodation, cafes and restaurants.[20]

10.12 The Project operations include many wider roles in staffing the resident amenities which will provide opportunities for those in the hospitality sector. The Project therefore presents employment opportunities for people that are likely to have been affected by COVID-19.

10.13 The provision of healthcare through the Project would be efficient due to factors such as:

(a) Earlier identification of health problems as residents are regularly assessed.

(b) Reduced emergency or unnecessary call outs with assessments accessible on Site.

(c) Centralised location for healthcare and social welfare services.

(d) Lower healthcare costs (hospital stays), and more efficient care with multiple people visited by healthcare professionals in the same location.

10.14 The Project would also be cost effective in relation to Council and public services, as the provision of on-site amenities reduces pressure on these services within the local community. Further, capital expenditure and maintenance costs for infrastructure (such as drains and vehicle accessways) within the Site would be borne by the operator of the retirement village. Rates would also be charged on the retirement village as a whole. This reduces both administrative and capital costs for the Council.

10.15 Caring for vulnerable people such as parents, grandparents, family or friends can often place a financial, time and emotional burden on carers, especially when this is a full-time responsibility. This burden often falls on a working aged generation and many carers both need to and want to work but are unable to due to this responsibility. The retirement village

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18 New Zealand Aged Care Workforce Survey 2016, at 3.

19 COVID-19's impact on women and work, Stats NZ, 4 November 2020.

20 COVID-19's impact on women and work, Stats NZ, 4 November 2020.

would enable carers to return to the workforce which may ease the financial situation of the carer while contributing to the local economy. Financial pressures on many carers are likely to be exacerbated by the effects of COVID-19.

Flow on effects

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

(a) increased business for local firms and industries supplying goods and services to the retirement village during the construction phase and thereafter during the future village operation.

(b) salaries earned by local residents being spent on purchasing household goods and services, boosting the regional economy.

(c) increased housing both through the provision of new accommodation options in the retirement village and the release of usually large family homes which are released back on the market for more efficient use.

(d) "new money" coming into the area as a result of the retirement village, for example residents and staff relocating from outside the area, and spending by relatives and friends of the village residents who live outside the Remuera area;

(e) increased household incomes flowing through the local community; and

(f) possible increased visitor benefits.

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

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

(a) Elderly people are more vulnerable to fraud and other forms of "elder abuse", which can often be unnoticed or unreported to the wider community. A retirement village environment provides a sense of security as retirement village units are well protected and residents have support networks within the retirement village.

(b) The residents and staff within a retirement village are familiar with each other and will build rapport, which provides a sense of community and security to the residents. This is a key advantage of a retirement village model of accommodation, which enables elderly residents to have a strong sense of community, rather than being potentially isolated within their individual homes.

(c) The retirement village will provide communal outdoor and indoor areas which will enable residents and their visitors to socialise in a comfortable setting, as well as providing spaces within which social events and activities can be provided to encourage residents to be active and outgoing. The buildings and facilities are likely to be utilised by outside communities and organisations (such is the case with the facilities at the St Andrew's Village), which assists to integrate the village and its residents with the wider community.

(d) Other measures to provide a safer community are outdoor lighting, CCTV and well-lit pathways which are provided in accordance with of Crime Prevention Through Environmental Design standards.

(e) The Project is being designed with the intention of obtaining a 'Lifemark' rating, which relates to suitable safety and access for ageing people. Through thoughtful design, the village will provide an environment which is tailored to the specific needs of the residents which will enable them to feel safe and comfortable, and to provide for their social and cultural well-being.

10.18 For the working age generations, there would be increased employment opportunities and a decreased burden for the family and loved ones of the residents where they would otherwise be family carers, and this has emotional, financial and physical benefits. Due to the proposed location of the retirement village, local residents will also be able to stay within their local communities and remain connected with friends and family.

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

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

10.21 This Project provides an inclusive environment for older people that is designed so that people remain connected to their communities and have different living options to meet their needs as they change over time.[21] The housing options available will also be in close proximity to green spaces, support services, employment opportunities, shops, and social and cultural networks.[22] Having inclusive environments ensures effective integration with the wider community by providing spaces that encourage positive socio-cultural activity. The Project recognises that these spaces are critical for the wellbeing of residents and for community cohesion.[23]

10.22 The Project also strongly aligns with the Government Policy Statement on Housing and Urban Development by enabling further use for urban development in an area that is experiencing strong demand for retirement housing and quality aged care facilities, but lacks supply. The Project will enable more homes to be built, which will increase supply (and therefore contribute to housing affordability), ensure houses meet the needs of our ageing constituents, support housing solutions for older people in care, and plan for our ageing population.[24]

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21 Te Tari Kaumātua – Officer for Seniors: Age friendly Aotearoa New Zealand and Te Tari Kaumātua "Age Friendly Urban Places" at 13.

22 Te Tari Kaumātua – Officer for Seniors: Age friendly Aotearoa New Zealand and Te Tari Kaumātua "Age Friendly Urban Places" at 8, 11 and 17.

23 Te Tari Kaumātua – Officer for Seniors: Age friendly Aotearoa New Zealand and Te Tari Kaumātua "Age Friendly Urban Places" at 6.

24 Government Policy Statement on Housing and Urban Development (September 2021) at 31.

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

Comparison of FTCA and RMA processes

10.23 The FTCA process offers a number of advantages in terms of time over the standard RMA process. Public and limited notification is precluded under the FTCA. The Panel is only permitted to invite comments from specified persons and a short timeframe is provided for comment. In the case of the Project, it is the Applicants' view that few parties are affected by the Project and none in a more than minor way, based on the anticipated effects outlined above and how they will be managed. The process under the FTCA for providing comment at both the referral and Expert Consenting Panel stage is appropriate and adequate to address concerns that may be expressed about the Project.

10.24 Within the current operative planning framework (prior to the provisions of PC78 being made operative), there is a risk that the Project would be subject to either a limited or publicly notified process were an application to be progressed through the standard RMA process. The Applicants do not consider that this is an efficient use of time and resources, and would fail to recognise what will be appropriately contemplated under the planning framework that is expected to be implemented within the next 12 to 18 months.

10.25 Notification significantly increases delays and the likelihood of an Environment Court appeal. The two-stage RMA process would create a much longer consenting timeframe for the Project and the risk of delay from a subsequent Environment Court appeal would be likely avoided under the FTCA. Appropriately for the Project, appeals under the FTCA process are limited to points of law and are restricted to those who provided comments, the relevant local authorities, and persons who have an interest in the decision greater than that of the general public.

10.26 The experience of the Applicants' experts is that retirement village and large-scale development proposals that go through the Environment Court process (whether by appeal or direct referral) can take at least two years to obtain consent, and will often be consented largely without modification from the proposal represented in the application. The approximately six-month timeline under the FTCA reflects a significant saving by comparison. As outlined at section 4.24 above, the Applicants will be ready to commence works within two to three months of receiving consent. The FTCA process will provide greater certainty of the timing of consent than a standard RMA process once this progresses to an Environment Court appeal. This certainty enables the Applicants to ensure that the Project remains "shovel ready" in all respects, to progress the works quickly and avoid compounding delays.

10.27 Even if the Council were to determine to grant resource consent on a non-notified basis, the risk of a judicial challenge of such a decision is high, as evidenced by a recent judicial challenge to a non-notified resource consent for a terraced housing development within the same neighbourhood as the Site (which found the Council had erred in its approach in finding that there were no affected persons).[25] That decision has resulted in greater conservatism in Council consideration of resource consent applications for intensification, particularly within the MHSZ. After the resource consent was set aside and a new application was lodged, the Council again granted consent on a non-notified basis, for largely the same development as per the original consent. Even once consent had been granted, neighbours sought injunctive relief to prevent progression of the development until a further judicial review of the second

25 *Wallace v Auckland Council* [2021] NZHC 3095.

decision could be determined.[26] Given recent opposition to new development in the neighbourhood, there is a high likelihood that:

(a) Any decision to process a resource consent application would be challenged by way of judicial review, which would delay development.

(b) If the application were publicly notified, any substantive decision to grant consent by the Council would be appealed to the Environment Court.

10.28 As a result, use of the fast-track process is likely to result in a timing saving of at least two years. Practically, a delayed timeframe under the standard RMA process is likely to exacerbate delays and lead to significant impacts on how the Project can progress with haste, including:

(a) Seasonal constraints, including the ability to commence during summer of 2023-2024 during which time earthworks are better able to be managed and works are less affected by inclement weather, together with the ability to source local contractors and supplies, and the ability to source and plant landscaping at appropriate times of the year.

(b) Supply chain constraints, including the ongoing construction boom and unprecedented demand for labour and materials, coupled with ongoing global supply chain issues, together with inflationary patterns and the added construction costs that will result when commencing construction and purchasing materials one to two years later if delays through the RMA process occur which might affect the overall feasibility and design of the Project.

Whether the project may result in a public benefit

Employment / job creation

10.29 The Project represents an approximate s 9(2)(b)(ii) investment in the local area including providing jobs and significant flow-on economic benefits to the local community through the construction phase. This includes jobs in construction work as well as real estate operations.

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

(a) local firms and industries supplying goods and services to the retirement village during the construction phase and thereafter during the future village operation; and

(b) "new money" coming into the area with residents and staff relocating from outside the area, and spending by relatives and friends of the village residents who live outside the Remuera area.

10.31 Bulk earthworks and then civil infrastructure construction will start almost immediately after receiving resource consent, with the village construction as a whole being completed in stages over approximately a 5–7-year construction period.

10.32 It is anticipated that the design, development and construction processes will result in some 2,350 FTE years, and a further 1,220 FTE years of other employment (including indirect and induced employment in all business sectors). The employment generated by the Project will

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26 *Wallace v Auckland Council* [2022] NZHC 1299.

be staggered throughout the construction timeframe and will rise and peak during the most intensive construction periods. It is estimated by Property Economics that employment generated over the course of construction will be:

(a) 142 FTEs in 2023:

(b) 490 FTEs in 2024;

(c) 848 FTEs in 2025;

(d) 656 FTEs in 2026;

(e) 213 FTEs in 2027; and

(f) 213 FTEs in 2028.

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

10.34 More broadly, constructing a new retirement village generates hundreds of construction jobs and millions of dollars in GDP. This supports more jobs within supplier industries and in turn enables construction workers to spend their income in the regional economy.

10.35 Once the village is operational it is expected to directly create approximately 98 FTE local jobs in the village such as caregivers and housekeepers, as well as many more jobs indirectly through demand on local suppliers being used to provide goods and services required to operate the village. These positions are expected to be filled by workers living in the region given the 'on-site' nature of the services.

Housing supply

10.36 As outlined above, the construction of retirement village accommodation, such as those options provided for in the proposed village, would increase the capacity and range of accommodation options available to the elderly, would reduce land demand pressure and make further residential housing available as new village residents release their properties to the market, to be more efficiently used.

Contributing to well-functioning urban environments

10.37 The Project is to be located within a large site, which is currently zoned for suburban development and intensification PC78 (in response to the NPS-UD) reinforces this intended outcome, and forecasts a corresponding change to characteristics of the neighbourhood.

10.38 The Project is an appropriate and anticipated use of the land (reinforced by the restricted discretionary activity status that applies to the nature of the proposed activity under the AUP), and represents an efficient use of a large site in a manner which will contribute to an increase in the provision of housing capacity, intensity, variety and choice for the elderly, as well as the wider neighbourhood.

10.39 Such an activity and intensity of development will enhance and support the social and economic well-being of the community.

10.40 The scale of the Project, while being different to the prevailing built characteristic on neighbouring sites, has been carefully designed in respect of its relationship with neighbours, and the interface of the Site to adjoining properties and the wider context.

10.41 Set within the context of a spacious site, while of a greater scale than the prevailing one-two storey residential development in the locality, the proposed retirement village will integrate well with (and contribute to) the established urban neighbourhood and the future planned character.

10.42 The Project is considered to achieve a positive interface with the surrounding residential environment, maintaining the amenity of surrounding properties, and ensuring a private and secure environment for future village residents.

10.43 As part of the development of the Project, any required private infrastructure, and upgrades to public infrastructure, will be funded by the Applicants, including drains, roads, and other capital requirements within the village. At the same time, substantial development contributions will be generated to by the Project (s 9(2)(b)(ii)), for the construction of public infrastructure external to the village.

10.44 The Project will generate less daily traffic movements than the level of traffic generated by a 'standard' residential development, with such movements occurring outside of the peak commuter periods.

10.45 The arrangement of access, parking and servicing have been assessed as being appropriately designed and will meet the relevant standards of the Unitary Plan, and industry recognised best practice standards, with traffic outcomes that match the needs of the retirement village, and which can be readily sustained by the local transportation and roading environment, with access and connectivity for a range of travel modes, from cars to mobility scooters.

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

10.46 The proposed retirement village would contribute to improving housing infrastructure in the Remuera area, and through both construction and ongoing operations would increase employment outcomes and productivity.

10.47 The Project will also result in more than s 9(2)(b)(ii) in development contributions[27] for the Council (and other contributions will be generated to Watercare Services Limited) which will support local public growth infrastructure, public community reserves (including environmental initiatives) and employment from infrastructure and reserve projects.

10.48 The Site is currently occupied by a defunct and dilapidated aged care facility. The buildings within the Site are currently in poor condition and represent a risk to health and safety. Within the previous eight months, several break ins have occurred at the Site and various infrastructure and materials have been stolen, with some occurrences involving persons operating or switching off old transformer equipment which is a significant risk to safety. The longer the buildings are left to remain in poor condition, the worse this situation will become. The Project will replace all of the existing buildings and services, and all contaminated soils will be removed and remediated. The Project will significantly improve the condition of the Site, and the quality of urban development which will contribute to the enhancement of the neighbourhood character.

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[27] Calculated using the Auckland Council Development Contributions Policy 2022.

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

10.49 The Site does not contain any coastal, freshwater or other natural feature, and the Project will not affect air quality or indigenous biodiversity. The Project will involve significant and comprehensive landscaping which will include native tree species to contribute to the surrounding urban ecology.

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

10.50 The Project would use land and construction resources efficiently given the increased density of the development and would enable the optimisation of existing housing released into the market as residents move into the village, that is typically large enough to accommodate multiple people and families and/or enabling further intensification of those properties, instead of necessitating further lower density large dwellings to be constructed.

10.51 The Applicants intend to target achieving a Homestar 7 Rating for the Project, which will involve careful management of demolition and construction processes relative to the efficient use of resources and waste materials.

10.52 Efficiencies will be achieved by the Project due to the intensified and self-contained nature of the development that provides amenities onsite and reduces the need for residents to travel.

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

Promoting the protection of historic heritage

10.54 The Site is not identified as containing any recorded and unrecorded archaeological deposits. It has been extensively modified by development during the operation and expansion of the Caughey Preston Rest Home, and it is unlikely that any archaeological remains are contained within the previously developed areas of the Site.

10.55 To date, the Applicants have not received any feedback from iwi regarding historic cultural heritage of the Site.

10.56 Notwithstanding the above, for completeness, it is appropriate that accidental discovery protocols (by way of conditions) apply in the event that archaeological features, artefacts or koiwi (human remains) are discovered.

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

10.57 The Project would help to increase the social resilience of its residents in the event of a natural disaster by looking after the residents that are likely to otherwise be vulnerable if living on their own. For example, in relation to stormwater management and flooding risks, freeboard is provided in accordance with the NZ Building Code, owing to accessibility requirements for older residents. Further, if the home of a resident is destroyed by a disaster and it cannot be rebuilt on the original site or in reasonable vicinity, they will receive the full market value of

their home. The village will be serviced by emergency water and power generation on site to ensure resilience for its residents through natural hazard events.

Other public benefits

10.58 The proportion of New Zealand's population over 75 is anticipated to grow rapidly over the next 48 years, with an anticipated increase of more than 1 million (or 17% of the projected population). In addition, people over 75 are living longer which requires further housing and creates a greater need for age-specific services such dementia and palliative care. This project would help address those needs as there would be an Aged Care centre incorporated on site in conjunction with the Retirement Village apartments.

10.59 The residents of retirement village units are provided with 'wraparound' services and care while they remain able and independent. The provision of such services prolongs the health and abilities of residents and delays the need for entry into residential aged care, which in turn delays and alleviates the burden on the health system.

10.60 Aged care facilities provide a place where older people can receive care and rehabilitation after surgery or medical events before it is safe for them to return to their home. This is known as "interim or step down care" which is run in partnership with the local public hospital, and assists in freeing up hospital bed capacity, as well as providing a 'continuum of care' to the residents of the retirement village as their care needs change over time. There is growing demand for Integrated Villages which offer both independent retirement living options and residential aged care, and the Remuera area lacks supply for these types of villages, and aged care living more generally, particularly given the closure of the Caughey Preston facility previously at the Site, together with the recently announced closure of the Mercy Parklands site. Overall, approximately 1,000 aged care beds were lost in New Zealand in 2022[28]. The establishment of aged care beds will contribute to alleviating these issues being faced by the aged care sector. The overall design of the village, and the aged care building specifically, has been undertaken with the benefit of the experience of St Andrew's, to ensure that these facilities are designed in a manner that will meet the Ministry of Health certification requirements.

10.61 The Project would contribute to increasing the safety of its residents and reducing the wider crime rate by reducing the real and perceived risk of crime to its residents, using "Safety in Design" principles and reducing the risk of road accidents involving the elderly.

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

10.62 There is no potential for the Project to have significant adverse environmental effects. As outlined in section 8 above, adverse effects will be avoided, remedied or mitigated through both the design of the village and through conditions.

11. CLIMATE CHANGE AND NATURAL HAZARDS

11.1 Climate change effects such as an increase in extreme weather events including storms are being taken into account in the design and planned construction of the Project.

11.2 The Auckland Council GIS indicates that most of the Site is clear of any flooding risk except for the north-eastern corner of the Site, which is identified as being subject to a 'flood prone

[28] https://www.newshub.co.nz/home/new-zealand/2022/08/aged-care-in-crisis-as-sector-loses-1000-beds-in-six-months-due-to-staffing-issues.html

area'. The floor levels and layout of the nearest buildings have been specifically designed to avoid risks to the health and safety of residents, staff and visitors (and neighbouring properties).

11.3 Based on the recent experience of St Andrew's as part of the development of their landholding in Glendowie, it is intended that the design, construction and operation of the Project will achieve the current Homestar 7 Rating, which includes measures to manage the effects of climate change and of the contribution of development to greenhouse gases.

12. TRACK RECORD

12.1 Neither HND nor St Andrew's have had any environmental compliance issues.