



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

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

<b>Local authority providing comment</b>	Auckland Council
<b>Contact person (if follow-up is required)</b>	Masato Nakamura – Principal Project Lead, Premium Resource Consents
	Email: S 9(2)(a)
	Phone: S 9(2)(a)

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Upland Road Retirement Village
<b>General comment – potential benefits</b>	No Comment
<b>General comment – significant issues</b>	<p>Auckland Council has not identified any significant issues with the project.</p> <p>The below is noted:</p> <ul style="list-style-type: none"> <li>- In terms of stormwater and flooding, there is downstream flooding identified which future assessments needs to address.</li> <li>- With the level of information provided, it cannot be determined whether significant issues would be present in terms of transport matters. As per the below, an Integrated Transport Assessment is requested.</li> <li>- At a high level, there will be sufficient capacity for water supply. There are wastewater capacity constraints that will likely exacerbate the overspill currently experienced in the down stream network. The proposal will require upgrades to the downstream wastewater network.</li> </ul> <p>We foresee no issues in these matters being addressed by the Environmental Protection Authority, should the project be referred.</p> <p>Specific comments are compiled and attached to this response.</p>
<b>Is Fast-track appropriate?</b>	While there are issues identified at a high level, the Council does not oppose to the project being assessed and considered under the Covid 19 Recovery (Fast Track Consenting) Act 2020.
<b>Environmental compliance history</b>	The regulatory records for the applicants have been reviewed, and no environmental compliance history has been identified.
<b>Reports and assessments normally required</b>	<p>For an application of this nature the following information is typically required:</p> <ul style="list-style-type: none"> <li>- geotechnical report (incl detailed groundwater assessment)</li> <li>- Draft Construction Traffic Management Plan</li> <li>- Noise and Vibration Report</li> </ul>

	<ul style="list-style-type: none"> <li>- Infrastructure Report</li> <li>- Flood Risk Assessment</li> <li>- Draft Stormwater Management Plan</li> <li>- Integrated Transport Assessment</li> <li>- Landscape Visual Assessment</li> <li>- Urban Design Assessment</li> <li>- Preliminary and Detailed Site Investigation Report (PSI and DSI)</li> <li>- Landscape Plan</li> <li>- Arborist Report</li> <li>- Erosion Sediment Control Plan</li> </ul>
<b>Iwi and iwi authorities</b>	<p>Ngāi Tai ki Tāmaki</p> <p>Ngāti Maru</p> <p>Ngāti Pāoa</p> <p>Ngāti Pāoa</p> <p>Ngāti Tamaoho</p> <p>Ngāti Tamaterā</p> <p>Ngāti Te Ata</p> <p>Ngāti Whanaunga</p> <p>Ngāti Whātua o Kaipara</p> <p>Ngāti Whātua Ōrākei</p> <p>Te Ahiwaru – Waiohū</p> <p>Te Ākitai Waiohū</p> <p>Te Kawerau ā Maki</p> <p>Te Patukirikiri</p> <p>Te Rūnanga o Ngāti Whātua</p> <p>Waikato - Tainui</p>
<b>Relationship agreements under the RMA</b>	Not applicable
<b>Insert responses to other specific requests in the Minister's letter (if applicable)</b>	Not applicable
<b>Other considerations</b>	Comments from the Orakei Local Board is included in the responses provided and compiled.

## **Planning Comments**

**From:** *Masato Nakamura, Principal Project Lead, Premium Resource Consents*

**Date:** 12.01.2023

The assessment provided by the applicant relies on the up zoning as proposed under Plan Change 78. Whilst this may depend on timing, should the project be referred to the EPA, the project would most likely need to stand on its own merits assessed against the operative Residential – Mixed Housing Suburban Zone standards.

At present Plan Change 78 is open for further submissions until 20 January 2023. While there are no qualifying matters which apply to the subject site, the plan change is yet to be heard, and no decisions have been made by the Council. Noting this early stage in terms of the plan change process, Plan Change 78 and its provisions will have lesser weight in assessing the proposal.

The zone generally expects a built form that is two storeys in height with a recession plane of 2.5m+45 degrees. The proposal at three to four storeys across the development sits outside of these general expectations in the zone, and detailed visual and design assessments are required to be provided for the application.

However, these matters around the plan context and weighting of Plan Change 78 is a matter of detailed assessment once the application is referred, and I do not see this as being prohibiting to consider the project under the Covid-19 Recovery (Fast Track Consenting) Act 2020.

It is also noted here that the project at a high level has been reviewed by the Design Review Unit. It is noted that there are matters for further detailed consideration that were raised including amenity and intensity, pedestrian safety and amenity, site legibility, and the roof forms as viewed from Ventnor Road. This is also while acknowledging both the existing constraints within the subject site, as well as the positives and successful elements of the proposal.

## **Asset Owner / Specialist Response**

**From:** *Lakshmi Nair, Principal – Development, Healthy Waters*

**Date:** 10/01/2023

### **Overall Summary:**

*The proposed development will be considered as a Large Brownfield Development as per schedule 4 of the Regional Network Discharge Consent for stormwater discharge and diversion. Accordingly, a stormwater management plan will be required to demonstrate the stormwater management techniques that will be adopted to mitigate the effects of the development on the downstream stormwater properties and stormwater network.*

*This site is in Hobson Bay Stormwater Catchment. The following constraints will need to be addressed as part of the development application.*

#### *Flooding downstream*

*Auckland Council Geomaps show that there is considerable flooding within the properties and roads at the downstream end of the catchment before discharging into Hobson Bay. The Stormwater Management Plan shall provide calculations to confirm that the post-development peak flow rates are equal or lower than pre-development peak flow rates.*

#### *Overland flowpaths within the site*

*This site has a few overland flowpaths traversing through the site that will need protection and or diversion within the site*

#### *Water Quality*

*The development will be discharging to degraded coastal environment through the network, therefore treatment of all impervious areas by a water quality device designed in accordance with GD01/TP 10 for the relevant contaminants is required*

*Or*

- An alternative level of mitigation is determined through a SMP that:*
  - applies an Integrated Stormwater Management Approach (as per above);*
  - meets the NDC Objectives and Outcomes in Schedule 2; and*
  - is the BPO*

## Asset Owner / Specialist Response

**From:** Robbie Lee, Planner, Growth & Urban Planning Integration, Auckland Transport

**Date:** Wednesday 15th July 2022

### Overall Summary:

*Thank you for providing the opportunity to comment on the referral of 17 Upland Road, Remuera, Auckland, for consideration under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (FTCA). Auckland Transport does not currently have enough information to assess the effects of the Project.*

*The Project proposes the development of 17 (Lot 1 DP 86731) Upland Road in Remuera and construction of approximately 11 buildings.*

*Under the Auckland Unitary Plan (Operative in Part) (AUP), the site is currently zoned Residential – Mixed Housing Suburban.*

*Auckland Transport requests that, should the Project be accepted for fast-track consenting, the full application material include an Integrated Transport Assessment (ITA). The main objective of an ITA is to ensure that the transportation effects of a new development proposal are well considered that there is an emphasis on efficiency, safety, and accessibility to and from the development by all transport modes where practical; and that the adverse transport effects of the development have been effectively avoided, remedied, or mitigated.*

*The preparation of an ITA seeks to ensure that appropriate thought is given to the zoning or land use proposed so that integrated transport and land use outcomes occur. [Guidance](#) on producing an ITA is available, along with a draft template, to assist in preparing an ITA on the AT website. An Integrated Transport Assessment provides a more comprehensive assessment than a Traffic Impact Assessment (TIA), with an emphasis on considering the full range of transport modes. An ITA considers measures to reduce travel demand, how to utilise the existing network more efficiently, encouragement of other modes and then finally adding road capacity as a last resort.*

*The assessment should ensure that any potential adverse transport effects of the development have been effectively avoided, remedied, or mitigated. This is reinforced by the Regional Policy Statement (RPS) of the AUP. For instance, B3.3.2(5)(f) of the RPS requires activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure.*

### **The ITA should assess the following:**

- *How any potential adverse effects on user safety and operations will be avoided, remedied and/or mitigated; and whether the Project meets the relevant objectives and policies of the AUP as they relate to transport.*
- *An assessment of potential adverse effects on the efficient operation of the surrounding transport network and how these effects will be avoided, remedied, or mitigated. There should be particular emphasis on key intersections, including (but not limited to) Remuera Road and the intersection of Upland Rd/Ventnor Rd*
- *An assessment of potential adverse safety effects on the surrounding transport network and how these effects will be avoided, remedied or mitigated.*
- *An assessment on the likely impacts the development will have on accessibility to public transport and bus stops, including wayfinding*
- *pedestrian amenity and how any existing and proposed pedestrian infrastructure would meet user demand under the AUP(OP);*

- *loading/servicing details, including confirmation that refuse and loading vehicles will not reverse onto Upland Road at all times*
- *assessment of effects on Upland Road to confirm whether any mitigation is required (with particular focus on right turn movements into and out of the site);*
- *a Draft Construction Traffic Management Plan (CTMP) covering an assessment of effects on construction traffic (including measures to maintain safe and efficient operation for all road users), the construction period and associated earthworks;*
- *assessment of effects for any other reason for consent under Chapter H4 and Chapter E27 of the AUP(OP);*

*Given the need to review any potential adverse effects on the transport network, Auckland Transport requests that any referral order for this project requires the Expert Consenting Panel to include Auckland Transport as a person who is to be invited to comment on the project.*

### **Red Flag Checklist (For asset owners)**

*Guidance Note – Red Flag should be ticked where the criteria question is categorically answered in the affirmative. Amber should be ticked if the question is not categorically answered in the affirmative, but where there are one or two potential issues or uncertainties which mean Green cannot be confidently selected.*

*Green should be selected where it is clear that there are no issues with regard to the criteria question.*

## **Asset Owner / Specialist Response**

**From:** *James Shao, Senior Development Engineer, Watercare Services Limited*

**Date:** *13 January 2023*

### **Overall Summary:**

In general, the public water and wastewater network can provide the capacity to support this development. However, some separation and upgrading work along the downstream wastewater network will need to be investigated and planned to offload the capacity issues at branch 1.

### **Water Supply:**

The application information pack supplied does not contain any water usage demand assessment. Based on the high-level flow estimation, the existing 100mm watermain on Upland Road and Ventnor Road has sufficient available capacity to accommodate this development.

### **Wastewater network:**

The application information pack supplied does not contain any wastewater upstream or downstream catchment study.

We note that the developer has initiated discussions with Watercare and is prepared to address any capacity constraints either by way of upgrading the downstream network or by detaining wastewater flows within site, (refer to section 8.36, Proposed Retirement Village – 17 Upland Rd, 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, dated 25 November 2022).

Our high-level calculation on wastewater from this development shows that it is likely that the development will increase flow to the existing network by 1-2 L/s. This increase in flow may increase overflow spill in branch 1 in Dempsey Street. However, separation and upgrading are currently being planned/carried out.

The GIS shows the development will likely be connected to the 150mm diameter sewer in Upland Rd. This 150mm diameter sewer then increases to 300mm diameter, before connecting into the 225mm diameter at Ventnor Road. A survey is needed to confirm these pipe diameters and the gradients of the line sections affected.

There is a downstream 225mm diameter section connecting to branch 1 at Dempsey Street, and we know there are capacity issues at branch 1. However, branch 1 will be upgraded from 2025 (completion 2029) following the completion of separation work (currently ongoing, completion by 2025).



25 St Johns Road  
St Johns  
Auckland 1072  
20 December 2022

**FEEDBACK FROM THE ŌRĀKEI LOCAL BOARD  
ON A RESOURCE CONSENT APPLICATION 17 UPLAND ROAD – UPLAND  
ROAD RETIREMENT VILLAGE, AUCKLAND.**

**General Comments about Large Scale Development Applications**

1. Local Boards across the region are facing challenges with ensuring developers comply with the new generous provisions of the Unitary Plan. Some will naturally test the Unitary Plan interpretations to give them the best commercial outcome. The Unitary Plan sets out clear zoning and height regulations under section H4 (Mixed Housing Suburban) and H5 (Mixed Housing Urban). The challenge for commissioners, if appointed, and the Council is when infringements are allowed, for example, to exceed the stated regulated heights, a precedent is set for other developers to then use to justify their future projects and proposals to this level, and thereby further endorse the "contraventions".
2. The Ōrākei Local Board advocates strongly for the integrity of the Unitary Plan to remain and for the Council to ensure that serious infractions will not be permitted/approved. What is decided and approved now in terms of zoning, height, height in relation to boundary, and other aspects of the Plan will determine what can be accepted in future.
3. Overall, the Board is not opposed to new developments provided they fully comply with all standards in the Unitary Plan. But the Board is opposed to infringement of the Plan. The Unitary Plan enables far more generous development opportunity than the previous district plan. And therefore, the way applicants respond to the Plan and the way planners assess infringements of it must also change.
4. Following on-going concern within the community, the Ōrākei Local Board has advocated very strongly for the Council's planning department to process applications in a way to ensure the development provisions set out in the Unitary Plan are treated as intended, and not treated as flexible provisions or guidelines which can be exceeded
5. In this regard, the Ōrākei Local Board has requested greater evidential standards, particularly for any high-rise developments in residential areas. In December 2017 it resolved:
  - a) *That the Director of Regulatory Services be requested to ensure that planning officers processing planning consents irrespective of size and type of application, exercise their statutory powers to check all evidentiary information provided by applicants for planning consents, including requesting any further*

*information such as a theodolite report to ensure the following information is provided:*

- 1) Clear spot levels at crucial points around the relevant section i.e., on the boundary adjacent to the proposed building's edge, and around the proposed building's footprint.*
  - 2) Overall spot levels to give an accurate measure for any cut and fill that may take place.*
  - 3) Existing boundary lines in relation to existing fencing structures.*
  - 4) All existing structures and their floor levels and ridge line levels.*
  - 5) Clear measures from the boundary line to the proposed buildings on all sides and at the crucial points.*
- b) That a copy of resolution a) be circulated to all local boards.*

*OR/2017/244*

6. The Orakei Local Board has been consistent in addressing all applicants utilizing the COVID -19 Recovery- Fast Track Consenting Act 2020 – that the underlying principles of the Auckland Unitary Plan should not be compromised to provide haste to decision-making. There must still be robust analysis across each area of the development and compliance with the fundamental rules of construction as required by the AUP.
7. OLB are also cognisant of the NPS-UD which came into effect in August 2020 and was amended in May 2022. OLB has challenged the thresholds that have been permitted under the legislation and question whether the objectives of well-functioning urban environments and provision of sufficient development capacity will actually be achieved.

### **Background to this Application**

8. 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**").
9. 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.
10. 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.
11. The Project is for the construction and operation of an integrated residential development (as defined by the Auckland Unitary Plan) which will involve retirement village accommodation units and aged care beds and services.

12. 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
13. 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.



**Orakei Local Board responses to specific questions on the application Upland Road Retirement Village Project:**

14. Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?
  - i. We consider this project is more suited for RMA consenting process on a publicly notified basis enabling transparent access to process and the benefit of broader evidential insights to be received from the community.

- ii. We also consider it is philosophically wrong for an applicant to consider RMA notification process as a risk because of a risk that process may affect their unique financial position or holding costs and possible appellate risks. That would intimate that RMA process was designed to service indebted or highly leveraged development, or development focused on yield rather than on design and s7 RMA sustainability outcomes. We believe those 'holding cost' risks are reduced when the applicant engages with the community through a RMA-based process to deliver a design-led outcome rather than a yield-led one.
- iii. The RMA enables a greater diversity of evidence and input from which to make well-meaning decisions that fulfil the RMA key purposes, and with likely no less expert reporting than what might happen under the FTCA. The applicant appears to rely on FTCA pathway mostly to avoid this holding cost risk and ensure certainty of timing.
- iv. With regard to the purposes of the Covid-19 FTCA, the Board disagrees with the applicant's view (page 11-12 of its application) that commercial and residential construction intentions have fallen since February 2022.
- v. The Board observes there is existing certainty of employment and investment across New Zealand at present, record levels of low unemployment and an excess of demand over supply for building work to be done suggesting no prejudice to any developer or any construction worker from not being referred for a fast track.
- vi. The Board notes many similar large scale development proposals in Orakei are being successfully processed through the RMA pathway.
- vii. The Board also challenges the breadth of the applicant's view as to the social and cultural well-being of the development for future generations as a basis on which to consider this application for fast tracking.
- viii. Only 12-14% of all 75+ year olds choose retirement villages as their preferred residential option (based on annual data from Jones Lang Lasalle RV white paper). The predominant resident ethnicity is European.
- ix. The vast majority of residential offerings rely on older owner occupiers with considerable equity. As pointed out in the Retirement Commissioner's 2020 white paper (written by one of the local board members incidentally) there is a parallel reduction in the owner-occupation rates for home ownership, plus an increase in owner occupiers reaching 65 heavily indebted with mortgages – overall leading to a need for a refresh of the underlying investment model for future retirement village operations.

**15. What reports and assessments would normally be required by the Council for a project of this nature in this area?**

- i. While the intended use of the land is consistent with its historic use, there are a range of adverse effects that are apparent from the proposal. Reports, assessments,

(plus the benefit of public submission input ideally through a RMA notified process), should be obtained for the following:

- ii. Landscape and visual effects which include bulk/location dominance, shading, loss of privacy, and essentially the impact on local neighbourhood character.
  - a. The Board notes significant residential character in the surrounding neighbourhood and would further refer assessors to recent case law (Wallace and others – a case involving a Ventnor Road infill development).
  - b. Urban design reports on proposed architectural form and materials should also be obtained to ensure cohesion with the surrounding character.
- iii. Arborist and bio-diversity adverse effects on the broader environment not just the site itself. There is a substantial amount of mature vegetation that appears to be sacrificed in this proposal across this site. Mature vegetation is not readily replaceable. This site's vegetation helps serve the sustainability of already pressured biodiversity, wildlife. There are no apparent mitigation measures that can manage the loss of mature biodiversity.
- iv. Transport reports that accurately evaluate the impacts of on-site user/staff, service delivery movements and parking on the surrounding streets and arterial network, and ensure on-site parking realistically serves large numbers of visitor/ staff movements. Such reports will specifically analyse operational movements of site use.
- v. Infrastructure and network effects with regard to stormwater from both natural permeation and network connectivity. Infrastructure effects should also include assessment of noise effects. Large developments for rest home / retirement village purposes require industrialized levels of venting and other infrastructure often resulting in constant industrialized levels of noise in an otherwise tranquil residential neighbourhood.
- vi. Natural hazards, contamination, earthwork effects, and the construction movement effects from the project
- vii. OLB note in para 1.9 of the Application document (25 Nov 2022) – reference to significant investment in the local community of s 9(2)(b)(ii) during the construction and development phase. OLB would request the analysis report which substantiates the quantum.

**15. Do the applicants, or a company owned by the applicants, have any environmental regulatory compliance history in your region?**

Unaware

## Additional OLB observations and comments

16. The OLB note on the Application document dated 25 November 2022 that the MDRS will permit increasing the height standard to 11m (para 4.17). This is contravened by the reference in 4.2 – which states that eleven buildings could be approximately 17m in height.
17. The OLB note under para 4.25 that by processing through the fast-track process and the timing of the Expert Consenting Panel – then earthworks could be undertaken during the summer period of 2023/24. The purpose of the Covid fast track process should not be interpreted as a means to expediate faster construction timings.
18. The OLB note under para 5.3 that a meeting occurred between the Applicant and Auckland Council – on 2 December 2022. The Local Board are part of the Auckland Council, and it is unfortunate that the Orakei Local Board Planning and Consenting portfolio lead was not invited to participate and consult in a transparent consultative manner.
19. OLB note under para 5.6 that it is the Applicant's view *that no other parties are affected by the Project*. This assumption is too narrow - and key stakeholders need to be consulted – including neighbours surrounding the area and resident and business associations to name a few.
20. OLB note under para 8.3 that MHUZ is proposed to be applied to the Site by PC8 **except for the 11m building height standard**. Any breaches of the already generous height standard has a clear disregard for the height, bulk and design intentions originally provisioned under the Auckland Unitary Plan (AuP).
21. The OLB note the recent completion of 44 Ventnor Road comprising 13 terraced town houses. This construction involved a legal case *Wallace vs Auckland Council* and the need to be fully diligent and consultative in key principles outlined in the AUP.
22. In reference to para 13(iii) above – the transport plan and associated report are critical to determine the impact on key arterial routes being Ventnor Road and Upland Road. There is the aspect of overflow for vehicles of staff who in future may also need to park on the outer road system.
23. We note the point in 8.17 – of over 3000 truck trips to undertake the earthworks program.

## Summary

24. Over the past few years and currently - there have been several major developments where the Board has re-emphasized its views and principles with regards height, bulk and impact on the surrounding environment as listed below: -
  - Summerset Retirement Village – St Johns Road
  - Oceania Retirement Village – Waimarie Street
  - Ryman Village complex – Kohimarama Road
  - Mission Bay Shopping development – Patteson Ave/ Marau Crescent
  - Stonefields apartment building
  - Ellerslie Raceway – Hill Development
  - MetLife Care – St Vincent Avenue

25. The Ōrākei Local Board's view is that the Upland Road Retirement Village development must be considered with the cumulative development activity in the overall area and the consequent impact on our communities. This means our communities are receiving significant change to their built environment. There are several major developments, proposed and underway, in the Ōrākei Local Board's area. These include:

- 37 Upland Road (demolition of Sholto Smith heritage manor)
- Housing NZ and SHA developments in Orakei/Meadowbank
- Ōrākei Point – Ōrākei Village
- Kepa Road apartments
- Corran School – Remuera Road
- St Kentigerns Girls school complex – Shore Road (completed)
- Extension of section 4 Glen Innes/Tamaki Drive walkway/cycleway
- Shundi Development – Morrin Road

### **Conclusion:**

OLB are supportive of economic progress and the capability of developments to deliver additional housing (and retirement village) capacity. But throughout the design, planning and execution – each stage of the process must fully address the progressive impacts on the landscape, infrastructure, transportation routes and the overall impact of neighbouring communities.

OLB understand the merits of applying for construction and development under the Fast Track Consenting Act 2020 – but there has been over 6 years of intensive consenting processes and protocols which has assisted the Board ensuring that all aspects of the development will meet the community needs and aspirations of stakeholders.

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

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

Organisation providing comment	Te Whatu Ora Te Toka Tumai (previously Auckland District Health Board)
Contact person (if follow-up is required)	Dr Mike Shepherd

## Comment form

Please use the table below to comment on the application.

Project name	Upland Road Retirement Village, Remuera
General comment	The application is being made by an experienced aged care provider that already operates aged residential care facilities and a retirement village within Te Toka Tumai Auckland. This site is the old Caughey Preston Rest Home site and we would be very supportive of the land continuing to be used for aged care.
Other considerations	
[Insert specific requests for comment]	

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















