

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

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

|                                           |                                  |
|-------------------------------------------|----------------------------------|
| Local authority providing comment         | Auckland Council                 |
| Contact person (if follow-up is required) | Tony Bullard s 9(2)(a)           |
|                                           | Click or tap here to enter text. |
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## Comment form

Please use the table below to comment on the application.

|                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project name                         | Project Name: Whenuapai Green<br>Address: 98-102 Totara Rd, Whenuapai<br>Applicant: Neil Construction Ltd and Maraetai Land Development Ltd                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| General comment – potential benefits | Will add additional urban residential capacity to the Auckland region and provides an opportunity for new recreation open space where there is an identified demand for a neighbourhood park.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| General comment – significant issues | The proposal is currently zoned Future Urban Zone (FUZ) and lies within an area where a plan change is not planned until 2028 – 2032. The proposal is contrary to the Auckland Unitary Plan including the FUZ zone provisions and the Regional Policy Statement.<br><br>There are severe capacity restraints on the transport and wastewater network which will serve this area. Further details on this are contained in Auckland Transport and Watercare's comments below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Is Fast-track appropriate?           | No because: <ul style="list-style-type: none"> <li>The land is currently zoned Future Urban Zone which does not provide for the proposed development. While a structure plan has been developed, there is currently no plan change in place for this development and it is not identified to be done until Stage 2 (2028-2032) of the Future Urban Land Supply Strategy 2017 (see comments from Plans and Places below).</li> <li>Public transport infrastructure is not in place to service this development and is not planned until approximately 2028-2032. There are significant issues associated with the funding of such which is out of step with the Regional Land Transport Plan (see comments from Auckland Transport below)</li> <li>There is no capacity in the public wastewater network until a new pump station is installed in Brigham Creek Rd. The timing of this is uncertain and cannot be confirmed until Watercare has obtained resource</li> </ul> |

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|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                  | consent, landowners approvals and engaged a contractor. See comments from Watercare below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Environmental compliance history</b>          | <p>The following companies have been reviewed for previous compliance history:</p> <p><i>Neil Construction Limited</i></p> <p>There are 6 abatement notices issued by Auckland Council in 2019 and 2020 to Neil Construction Limited. All of these notices are associated with Auckland Council's 'Small Sites' project, where the Proactive Compliance team issue notices due to inadequate sediment and erosion controls on dwelling construction sites. Following discussion with the Proactive Compliance Project Lead, they have confirmed that there are no outstanding or on-going compliance concerns with Neil Construction Limited.</p> <p>There are no other significant outstanding compliance concerns for the abovementioned party that we are aware of.</p> <p><i>Maraetai Land Development Limited.</i></p> <p>There are no enforcement actions listed against Maraetai Land Development Ltd.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Reports and assessments normally required</b> | <ul style="list-style-type: none"> <li>• An AEE assessing the effects of the proposal against the rules, standards, matters, policies and objectives of the AUP.</li> <li>• Building and infrastructure plans</li> <li>• Survey plans</li> <li>• Urban design assessment</li> <li>• Geotechnical report including infiltration tests for hydrology mitigation (see comments from Healthy Waters) and details on soil remediation works and any future development requirements or restrictions.</li> <li>• Stormwater infrastructure report designed in accordance with the draft Stormwater Plan (SMP) and Water Sensitive Design – see Healthy Waters and Auckland Transport comments.</li> <li>• Natural Hazards Risk assessment (flooding and overland flow paths) including any upgrades to culverts (see Healthy Waters comments) or other mitigation that may be required</li> <li>• An integrated traffic assessment. Further details are in Auckland Transport's comments below.</li> <li>• Water and wastewater infrastructure and capacity report including engineering plans, capacity assessment, fire/water supply-demand, wastewater flow. Further details are in Watercare's comments below.</li> <li>• Road designs including landscaped berms, pedestrian access and cycle lanes. Further details are in Parks and Auckland Transport's comments below).</li> <li>• An assessment of construction related effects including traffic, noise and vibration and a construction management plan</li> <li>• Landscape and visual assessment</li> <li>• Landscape and planting plans for the streets, reserves, stormwater ponds, accessway and streams – see Parks comments below.</li> <li>• Acoustic report outlining acoustic treatment for all future dwellings affected by aircraft noise along with any other mitigation required to manage effects to or from the Airforce Defence Base.</li> <li>• Communal facilities plan if applicable including an assessment of effects from this.</li> </ul> |

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|---------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                             | <ul style="list-style-type: none"> <li>Records of iwi consultation and cultural value assessments from all mana whenua groups associated with this site (as listed below).</li> <li>Earthworks, cut and fill, and erosion/sediment management plans.</li> <li>A lighting plan of roads, footpaths, accessways and parking areas.</li> <li>Details on the management and ownership structure of any common assets.</li> <li>A contaminated land detailed site investigation.</li> <li>Archaeological assessment</li> <li>Ecology assessment</li> <li>Arborist assessment</li> <li>Details on any stream restoration works / riparian corridors and works to be undertaken in them including planting and widths.</li> <li>An esplanade reserve assessment</li> <li>The provision of a recreation reserve in accordance with the Auckland Council Open Space Provision Policy – see comments form Parks below.</li> <li>A crime prevention through environmental design (CPTED) assessment of any proposed parks, reserves and access (pedestrian and cycle) to them.</li> </ul> |
| <b>Iwi and iwi authorities</b>                                                              | Ngāti Whātua o Kaipara, Te Rūnanga o Ngāti Whātua, Te Ākitai Waiohūa, Ngāti Paoa, Te Kawerau Ā Maki, Ngāti Whātua Ōrākei, Ngāti Manuhiri, Ngāti Te Ata, Ngāti Maru                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Relationship agreements under the RMA</b>                                                | NA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Insert responses to other specific requests in the Minister's letter (if applicable)</b> | Questions 1 to 4 are answered above. In addition, please note the comments from Plans and Places below in relation to question 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Other considerations</b>                                                                 | Click or tap here to insert any other responses you consider relevant for the Minister to be aware of.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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.

## Auckland Transport Response

**From:** Tessa Craig, Major Developments Interface Lead, Auckland Transport

**Date:** Thursday 9th December 2021

### Overall Summary:

Thank you for the opportunity to provide comment on the referral of Whenuapai Green for consideration under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (**Covid 19 Recovery Act**).

Auckland Transport does not support the Project being accepted for fast-track consenting.

The site is Future Urban zoned land under the Auckland Unitary Plan (Operative in Part) (AUP(OP)). The AUP(OP) states that Future Urban zoned land should not be developed for urban purposes until it has been through a structure planning and plan change process (refer Policy B2.2.2(3), Objective H18.2(1) of AUP(OP)). The land is included within the Council's Whenuapai Structure Plan, but no plan change is currently confirmed. (In 2017, Auckland Council notified Plan Change 5 proposing to live zone part of the Whenuapai structure plan area – a number of matters including the funding and financing of infrastructure and aircraft engine noise testing are still to be resolved, with the Hearing Panel acknowledging that the issues with this particular plan change are complex).

It is considered more appropriate for the Project to proceed through existing Resource Management Act private plan change and resource consent processes, rather than the Covid 19 Recovery Act. The development will not help achieve the purpose of the Covid 19 Recovery Act given a well-functioning environment will not result due to the misalignment between the timing to provide the minimum necessary infrastructure and services ahead of the first units being occupied. The project does not align with the Auckland Unitary Plan (Operative in Part) (AUP(OP)), or the National Policy Statement on Urban Development 2020 (**NPS UD**).

The Auckland Plan, as the spatial plan for Auckland as per the Local Government (Auckland Council) Amendment Act 2010, and the Council's Future Urban Land Supply Strategy (FULSS) provide the Development Strategy for Auckland, including the sequencing and timing for when future urban areas will be ready for development to commence which requires necessary bulk infrastructure to be in place and relevant zoning. They help to inform wider network infrastructure asset planning and funding priorities and, in turn, enables development capacity to be identified in a coordinated and cost-efficient way.

Any misalignment between the timing of infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is "development ready". The FULSS identifies this area as expected to be development ready in 2028-2032.

The proposed development is a Non-Complying Activity in the AUP(OP). Two of the objectives of the Future Urban zone in the AUP(OP) are 'Future urban development is not compromised by premature subdivision, use or development'; and 'Urbanisation on sites zoned Future Urban Zone is avoided until the sites have been rezoned for urban purposes' (H18.2. (3) and (4)). Policies of the Future Urban zone require subdivision to maintain and complement rural character and amenity, avoid fragmentation

compromising future urban development; and avoid subdivision, use and development which will compromise the efficient and effective operation of the local and wider transport network.

The Supporting Growth Alliance (SGA), a partnership of Auckland Transport and Waka Kotahi and with key stakeholders Auckland Council and KiwiRail, has been commissioned to identify preferred transport networks and necessary projects required for future growth areas such as in the North West, and secure route protection for strategic network elements. Strategic transport network infrastructure is needed to service the Whenuapai growth area as identified in FULSS and by SGA. This work has identified that the initial indicative cost allowance estimates for construction costs (not including consenting costs) for the abovementioned Plan Change 5 area are in the order of \$570 – 620 million. It is important to note that these costs are indicative only, based on assumed scope, judgement and simplified unit rates, rather than from design and quantity measurements.

There is insufficient funding identified in the Regional Land Transport Plan (RLTP) (10-year plan for Auckland's transport network for 2021-2031) to provide the required strategic network infrastructure needed to support such urbanisation in this location. Any consideration and prioritisation for funding to be set aside for such works is unlikely until at least 2031 (no works are currently identified in the RLTP). The Project should not go ahead at this time without infrastructure funding and delivery being addressed.

As is mentioned further below, an Integrated Transport Assessment will need to be provided as part of the application material. This will identify the infrastructure required to meet the network demands of the Project and how the Applicant will provide these. The Applicant will also need to fund a proportional share of strategic transport infrastructure required to service growth at Whenuapai (which will include land outside of their ownership). The mechanism for funding a proportional share is not in place/agreed yet and there is no delivery agreement with developers.

The funding and financing of infrastructure needed to enable growth has not been addressed and so the necessary bulk infrastructure is not in place, nor is there any confirmation of timing for the provision of such. Development occurring ahead of appropriate infrastructure will lead to a car dominated development, contributing to carbon emissions, and poor land use outcomes, and the potential for network safety issues.

Allowing the site to be developed ahead of the infrastructure required to support sustainable development will, therefore, not provide a well-functioning urban environment outcome as under Sections 19(d)(iii) & (vii) of the Covid 19 Recovery Act.

#### Transport Assessment

Auckland Transport requests that, should the Project be accepted for fast-track consenting, the requirement for an Integrated Transport Assessment (ITA) is formally stated in the referral order to accompany any resource consent application for the Project lodged with the Environmental Protection Authority.

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.

An ITA 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. An ITA (and application material) will also need to clearly identify how the required transport infrastructure is being provided to ensure certainty that the development will provide for its network demands.

Assessing the full range of transport modes and the utility provided by each mode is crucial in determining the forecasted transport effects, by mode, of this development. The most suitable way to determine an appropriate trip rate and modal split for the proposed development, and its proposed uses, is to undertake surveys of any similar occupied and operational developments such as within the general vicinity of the site, as the travel behaviours and mode choices would be reflective of such a development in the area, and the feasibility of any proposed modal splits for trips generated.

It is noted that the preliminary Transport Assessment provided with the proposal places unrealistic emphasis on the development being well located and accessible from a transport perspective, based on a future transport network which is still being planned, is not currently route protected, and is unfunded. Included in the conclusion of this assessment document is a statement that 'the proposed development will be well served by public transport, walking and cycling connections in the near future which are currently being planned by SGA and Waka Kotahi'. As emphasised above, there is no certainty about the funding and timing of these connections, and so will not align with the Applicant's development timeframe.

### Stormwater

Details of stormwater management have not been provided at this stage. Communal stormwater devices are the preferred approach and fewer, larger devices, for example, down one side of a road or at the end of a road. Pre-cast raingardens are not suitable for vesting due to the ongoing maintenance burden they pose. Details of the design of the stormwater system and devices for the management of both quantity and quality of the stormwater runoff, including overland flow paths should be provided.

Options for stormwater management should be documented in the proposed application, including how the Project's proposed method of managing stormwater would be the best option for this site and how it would align with the Water Sensitive Design principles as outlined in Auckland Council's GD04 document. In addition, the proposed solution must be justified as the most cost-effective, operable, and maintainable solution in the long term, with consideration to Whole of Lifecycle Costs. Consideration of alternatives is necessary to assess whether the design of the development is the most appropriate to meet the relevant principles of the AUP(OP), GD04, and Auckland Council's Code of Practice.

[Click or tap here to provide any information you consider relevant to the Minister's decision on whether to refer the project to an expert consenting panel.](#)

## Healthy Waters Response

**From:** Katja Huls, Principal Waterways Planning, Healthy Waters, Auckland Council

**Date:** 08/12/2021

### Overall Summary:

#### High level view of the proposal

The proposal is to develop rural land in the Future Urban Zone for residential purposes. A school may be provided by the Ministry of Education in the northern part of the site (2.8ha), but this has not been confirmed. If the school doesn't eventuate, residential development will take place instead. Please refer to the proposal description above.

The applicants own the land and have funding to carry out the development as proposed.

The ultimate receiving environment is the Upper Waitemata Harbour (NB this is a degraded receiving environment). Stormwater discharges will be conveyed via two streams, the Te Rawawaru/Waionoke Stream and the Ratara Stream. Flows from impervious surfaces will be discharged to dry ponds, rain gardens, or other treatment devices within the streets or drainage reserves prior to discharging to the stream. The attenuation is for hydrology mitigation (very small storm events), not flood attenuation (very large storm events)

Stormwater treatment and flow attenuation will occur primarily through new stormwater dry ponds within drainage reserves. Additional treatment will likely be via raingardens. These devices will be compliant with GD01. Ponds with permanent water are not favoured in this location due to the proximity of the airbase and the potential for bird strike.

All of the streams on the site will be retained and enhancement planting will occur within the "riparian corridors". The width of these is not clear.

The applicant is committed to working collaboratively with Te Kawerau ā Maki throughout the development phases of the project to finalise the stormwater management approach. Te Kawerau ā Maki expect that there may be cumulative effects on the streams from the stormwater discharges and propose that the developer installs a mixture of tree pits, vegetated swales, and proprietary devices for stormwater treatment. They understand that the applicant intends to undertake stream restoration works within the property footprint and employ a 100% native vegetation palate for all street planting/public spaces.

There will be some earthworks within the 1% AEP flood plain.

#### Impacts on assets

There is a culvert under Totara Road that will need to be upgraded to convey the flows without causing flooding. This development triggers the need for this upgrade to be undertaken by the developer.

Installing an additional culvert is the best option to mitigate the risk of inundation for the nearest dwelling to the culvert. The invert of the existing culvert is located at a narrow section of the stream therefore installing a new culvert at a slightly higher invert level is a constructible solution.

The best practical option is to install a 0.9m diameter culvert at an invert of 1.8mRL, which is 0.6m above the invert of the existing 2.3m diameter culvert. This additional culvert, together with the existing culvert, will provide sufficient freeboard to the nearest dwelling to meet current Auckland Council standards.

The implementation of the culvert upgrade can be aligned with the progressive development within the catchment. An assessment as to when the culvert upgrade would be required with respect to the percentage of imperviousness or area of impervious coverage within the catchment occurs has been undertaken and concludes that the Totara Road culvert will require upgrading once 109ha, or 63%, of impervious coverage is undertaken with the catchment.

#### Device design

Poorly designed devices can incur significant health and safety risk for operational staff, and significant operational cost. There is a risk that devices that are not approved by the future asset owner will not be vested, and that they need to be removed and/or reconstructed.

Stream restoration may require stream bank erosion mitigation to prevent bank collapse and sedimentation in the receiving environment. Sediment is a pollutant, particularly in the marine receiving environment. Poorly restored streams may not be vested.

#### Consistency with infrastructure plans and strategies

The development site is out of sequence with the [FILLS](#) which identifies the site in the first half decade two: 2028 – 2032.

The [Whenuapai Structure Plan](#) shows the site as medium density and expects developers to utilise [Water Sensitive Design](#) (WSD) and the existing stream network.

The Auckland Unitary Plan does not support development within the 1%AEP flood plain. It's unclear the extent to which development is intended within the flood plain, but there is a risk that climate resilience will be lost if this isn't managed.

The land covered by this application is currently zoned Future Urban in the Unitary Plan and is a non-complying activity. The stormwater management proposed is generally aligned with the requirements of Schedules 2 and 4 of the [Region-wide NDC](#).

The site is downstream of the [Whenuapai 2 SHA](#) area which has a draft [Stormwater Management Plan](#) (SMP). The applicant should develop in accordance with this SMP.

## Missing information

### **Geotechnical**

The geotechnical assessment does not include infiltration tests for hydrology mitigation. The entire assessment has been completed without development plans being available to the consultant.

The consultant has identified expansive soils, which may impact the feasibility of some of the proposed stormwater solutions. Expansive soils become unstable when water is infiltrated into them. This requires further assessment.

### **Stream restoration**

The width of the riparian corridors has not been identified. Narrow planting strips impose a high maintenance burden due to weed invasion. This matter needs to be confirmed to determine future operational cost and therefore suitability for vesting.

The future asset owner for the stream corridors has not been identified. Asset owner approval will be required to vest streams and drainage reserves.

## Plans and Places Response

**From:** Eryn Shields, Team Leader, Regional, North, West and Islands Planning

**Date:** 08 December 2021

### Overall Summary:

This application is located in the Future Urban Zone. The location is identified for rezoning in Stage 2, in the Future Urban Land Supply Strategy 2017. The application is not consistent with the Future Urban Land Supply Strategy 2017.

This means that overall the application is non complying. A non complying application of this nature, if granted, calls into question the integrity of the Auckland Unitary Plan.

The Council has progressed Proposed Plan Change 5 elsewhere in the Whenuapai Structure Plan area. This involved extensive technical research and bespoke provision contained in a precinct that addressed the adverse environment effects arising from the urbanisation of that land. This included bespoke provisions that manage the effects on the wider transport network, stormwater management, stormwater effects on the receiving environment (the Upper Waitemata Harbour), and effects arising from Whenuapai Airbase.

The matter of the funding of infrastructure is not addressed in this application, and the applicant reports that it has not consulted with Auckland Council, Auckland Transport or the Supporting Growth Alliance about these matters. Therefore the nature of infrastructure requirements for the wider transport network are not identified and not costed (refer Auckland Transport comments

## Parks Response

**From: Sean Stirling – Senior Parks**

**PlannerDate: 09/12/2021**

### Overall Summary:

#### Background information:

This response is prepared based on the information received as outlined in the email from Tony Bullard, Principal Specialist Planner, Resource Consents dated 06 December 2021.

The overall application has been identified to be a non-complying activity (because of the subdivision in the Future Urban Zone and the proposed density within the Future Urban Zone).

The proposal seeks to establish a residential development of approximately 453 residential lots, road reserves, drainage reserves and one area of recreation reserve. The proposal provides two options one of which provides for an alternative where a school is provided in place of 99 residential lots.

Due to Covid-19 level restrictions, a site visit has not been undertaken to date.

#### Positives of the application:

From the draft application drawings, and the associated specialist reports provided by the applicant it can be determined that:

- The proposal provides an opportunity to provide for recreational open space on the site where there is an identified demand for a neighbourhood park.

#### Key Issues from a Parks Planning Perspective

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

#### Parks Planning information, reports and assessment requirements:

- a) Landscape plans: Sufficiently detailed to properly assess the proposed assets in the streetscape, reserve to be vested, stormwater ponds, and accessways.

- b) Planting plans with a schedule of species: To understand the extent of mitigation provided.
- c) Assessment to demonstrate width of streams on the site.
- d) Scheme plan: demonstrating the size and location of roads, Drainage Reserve and land in lieu of reserve along with any areas of open space proposed to be retained in private ownership.

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

- Whether the width of streams on site meet the requirements under E38.7.3.2. so an assessment can be made whether they trigger the taking of esplanade reserve in accordance with s230 of the Resource Management Act and Rule E39.4.1(A5) of the Auckland unitary Plan (Operative in Part)
- Whether streetscape planting is appropriate. Council has significant experience in this area as an asset owner and promotes species which provide attractive streetscapes but species which are also suitable from a maintenance perspective and are practical in their chosen location e.g. will not hinder drivers sightlines or reduce usability of footpaths over time.
- Whether any aspects of the design would require the approval of the Local Board or Governing Body to accept any proposed assets
- Whether accessways to parks are suitable from a crime prevention through environmental design (CPTED) perspective. This includes assessing building orientation and fencing on properties adjoining parks and park accessways to ensure appropriate passive surveillance over these areas is provided. Accessway widths and gradients are also important for the safe movement of walkers and cyclists.
- Hard assets such as stormwater outfalls or retaining walls are designed and located where they do not reduce the amenity of the parks or impact future greenways.
- Whether privately owned, developed, and maintained open spaces and recreational facilities are proposed, and if so, whether these are accessible to the public, and will be appropriately managed and maintained with clear information such as sign posting to inform users of its private management and ownership. If privately owned and managed, an understanding of the mechanisms for this purpose will also be necessary. This is particularly important the application appears to propose riparian open spaces in the eastern most part of the site that is not identified on the master plans provided as public land, unlike the drainage reserves and neighbourhood park shown elsewhere.

### **Acquisition of land**

Council can confirm that there is a provision requirement for a neighbourhood park of 3000 – 4000m<sup>2</sup> in the general location of the recreation reserve shown on the applicant's master plan. The proposed recreation reserve is however not supportable in its current size and configuration as it is too linear in shape, and would need to be increased in size. It should be able to provide sufficient area to accommodate a play space, a flat unobstructed 30m x 30m kickaround area, and areas for socialising and respite in order to be consistent with the [Auckland Council Open Space Provision Policy](#)

In addition to the above, Healthy Waters would normally decide whether to accept the drainage reserves as assets, including the stormwater ponds. The Parks Provision team would also do an assessment of the acquisition of the proposed recreational reserve. A decision on whether to acquire the proposed neighbourhood park area as land in lieu of

reserve under the Local Government Act 2002 would be made by the relevant Local Board and Council's governing body.

### **Overall position of Parks Planning**

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

### **Conclusion**

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

## Watercare Response

**From:** Amir Karimi, Development Engineer, Watercare

**Date:** 10 December

**2021 Overall**

### **Summary:**

There were no engineering plans, capacity assessment, fire/water supply-demand, or information on wastewater flow provided as part of this application. Based on very limited data provided, Watercare has completed a very high-level assessment for the proposed development options below at 98-100 & 102 Totara Road, Whenuapai.

- a) Development of 453 residential lots, comprising 76 standalone dwellings, 32 duplex dwellings, and 345 terraced houses.
- b) Development of 354 residential lots and a school (2.7900ha)

Some capacity constraints have been identified in both water and wastewater network. The developer will need to address the constraints through public network extensions or upgrades, depending on the agreed solution at no cost to Watercare.

### **Wastewater:**

Watercare has plans in place to construct a new pump station in Brigham Creek Road. However, the timing is uncertain at the moment. The likely completed date is end of 2024 but this cannot be confirmed until Watercare has obtained resource consent and landowner approvals and has engaged the contractor. The provision of the wastewater connection relies on the pump station's commissioning as there is no capacity in the wastewater networks to service the proposed development until the Brigham Creek Pump Station (Slaughterhouse) comes into service.

Additionally, a new local pump station may be required to service the entire development site due to the topography. The pump station flow must be conveyed directly to the Brigham Creek Pump Station through building a new gravity line along Totara Road and Brigham Creek Road based on an agreed solution with Watercare.

### **Water Supply:**

It is expected the development can be supplied but will require additional infrastructure requirements to ensure capacity and resilience of the water supply network.

- The area is currently supplied predominately from the east along Brigham Creek Road 315mm PE WM, which is at capacity. There remains an outstanding restricted 150mm AC section (300mm) from the BSP to the eastern side of the motorway, which would require upgrading (size to be confirmed).
- The development will also trigger the need to improve resilience for the area once the number of properties exceeds 1,000 Dwelling Unit Equivalents (DUEs). A new watermain has already been installed along Fred Taylor Drive, and this would require commissioning to support planned and unplanned maintenance/resilience considerations along with capacity needs.
- To supply the development watermain extensions would need to occur along Totara Road with integration with the existing development to the south. This would include extension of the existing 315PE WM along the development frontage for further extensions north.

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|                                           |                                                                          |
|-------------------------------------------|--------------------------------------------------------------------------|
| Organisation providing comment            | Auckland Transport                                                       |
| Contact person (if follow-up is required) | Tessa Craig – Major Developments Interface Lead, Planning and Investment |
|                                           | s 9(2)(a) [REDACTED]                                                     |
|                                           | s 9(2)(a) [REDACTED]                                                     |

## Comment form

Please use the table below to comment on the application.

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| Project name    | Whenuapai Green (the Project)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| General comment | <p>Thank you for the opportunity to provide comment on the referral of Whenuapai Green for consideration under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (<b>Covid 19 Recovery Act</b>).</p> <p>Auckland Transport <u>does not support</u> the Project being accepted for fast-track consenting.</p> <p>The site is Future Urban zoned land under the Auckland Unitary Plan (Operative in Part) (AUP(OP)). The AUP(OP) states that Future Urban zoned land should not be developed for urban purposes until it has been through a structure planning and plan change process (refer Policy B2.2.2(3), Objective H18.2(1) of AUP(OP)). The land is included within the Council's Whenuapai Structure Plan, but no plan change is currently confirmed. (In 2017, Auckland Council notified Plan Change 5 proposing to live zone part of the Whenuapai structure plan area – a number of matters including the funding and financing of infrastructure and aircraft engine noise testing are still to be resolved, with the Hearing Panel acknowledging that the issues with this particular plan change are complex).</p> <p>It is considered more appropriate for the Project to proceed through existing Resource Management Act private plan change and resource consent processes, rather than the Covid 19 Recovery Act. The development will not help achieve the purpose of the Covid 19 Recovery Act given a well-functioning environment will not result due to the misalignment between the timing to provide the minimum necessary infrastructure and services ahead of the first units being occupied. The project does not align with the Auckland Unitary Plan (Operative in Part) (AUP(OP)), or the National Policy Statement on Urban Development 2020 (<b>NPS UD</b>).</p> <p>The Auckland Plan, as the spatial plan for Auckland as per the Local Government (Auckland Council) Amendment Act 2010, and the Council's Future Urban Land Supply Strategy (FULSS) provide the Development Strategy for Auckland, including the sequencing and timing for when future urban areas will be ready for development to commence which requires necessary bulk infrastructure to be in place and relevant zoning. They help to inform wider network infrastructure asset planning and funding priorities and, in turn, enables development capacity to be identified in a coordinated and cost-efficient way.</p> <p>Any misalignment between the timing of infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is "development ready". The FULSS identifies this area as expected to be development ready in 2028-2032.</p> <p>The proposed development is a Non-Complying Activity in the AUP(OP). Two of the objectives of the Future Urban zone in the AUP(OP) are 'Future urban development is not compromised by premature</p> |

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|                                    | <p><i>subdivision, use or development</i>’; and ‘Urbanisation on sites zoned Future Urban Zone is avoided until the sites have been rezoned for urban purposes’ (H18.2. (3) and (4)). Policies of the Future Urban zone require subdivision to maintain and complement rural character and amenity, avoid fragmentation compromising future urban development; and avoid subdivision, use and development which will compromise the efficient and effective operation of the local and wider transport network.</p> <p>The Supporting Growth Alliance (SGA), a partnership of Auckland Transport and Waka Kotahi and with key stakeholders Auckland Council and KiwiRail, has been commissioned to identify preferred transport networks and necessary projects required for future growth areas such as in the North West, and secure route protection for strategic network elements. Strategic transport network infrastructure is needed to service the Whenuapai growth area as identified in FULSS and by SGA. This work has identified that the initial indicative cost allowance estimates for construction costs (not including consenting costs) for the abovementioned Plan Change 5 area are in the order of \$570 – 620 million. It is important to note that these costs are indicative only, based on assumed scope, judgement and simplified unit rates, rather than from design and quantity measurements.</p> <p>There is insufficient funding identified in the Regional Land Transport Plan (RLTP) (10-year plan for Auckland’s transport network for 2021-2031) to provide the required strategic network infrastructure needed to support such urbanisation in this location. Any consideration and prioritisation for funding to be set aside for such works is unlikely until at least 2031 (no works are currently identified in the RLTP). The Project should not go ahead at this time without infrastructure funding and delivery being addressed.</p> <p>As is mentioned further below, an Integrated Transport Assessment will need to be provided as part of the application material. This will identify the infrastructure required to meet the network demands of the Project and how the Applicant will provide these. The Applicant will also need to fund a proportional share of strategic transport infrastructure required to service growth at Whenuapai (which will include land outside of their ownership). The mechanism for funding a proportional share is not in place/agreed yet and there is no delivery agreement with developers.</p> <p>The funding and financing of infrastructure needed to enable growth has not been addressed and so the necessary bulk infrastructure is not in place, nor is there any confirmation of timing for the provision of such. Development occurring ahead of appropriate infrastructure will lead to a car dominated development, contributing to carbon emissions, and poor land use outcomes, and the potential for network safety issues.</p> <p>Allowing the site to be developed ahead of the infrastructure required to support sustainable development will, therefore, not provide a well-functioning urban environment outcome as under Sections 19(d)(iii) &amp; (vii) of the Covid 19 Recovery Act.</p> |
| <p><b>Other considerations</b></p> | <p><u>Transport Assessment</u></p> <p>Auckland Transport requests that, should the Project be accepted for fast-track consenting, the requirement for an Integrated Transport Assessment (ITA) is formally stated in the referral order to accompany any resource consent application for the Project lodged with the Environmental Protection Authority.</p> <p>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.</p> <p>An ITA 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. An ITA (and application material) will also need to clearly identify how the required transport infrastructure is being provided to ensure certainty that the development will provide for its network demands.</p> <p>Assessing the full range of transport modes and the utility provided by each mode is crucial in determining the forecasted transport effects, by mode, of this development. The most suitable way to determine an appropriate trip rate and modal split for the proposed development, and its proposed uses, is to undertake surveys of any similar occupied and operational developments such as within the general vicinity of the site, as the travel behaviours and mode choices would be</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|                                               | <p>reflective of such a development in the area, and the feasibility of any proposed modal splits for trips generated.</p> <p>It is noted that the preliminary Transport Assessment provided with the proposal places unrealistic emphasis on the development being well located and accessible from a transport perspective, based on a future transport network which is still being planned, is not currently route protected, and is unfunded. Included in the conclusion of this assessment document is a statement that 'the proposed development will be well served by public transport, walking and cycling connections in the near future which are currently being planned by SGA and Waka Kotahi'. As emphasised above, there is no certainty about the funding and timing of these connections, and so will not align with the Applicant's development timeframe.</p> <p><u>Stormwater</u></p> <p>Details of stormwater management have not been provided at this stage. Communal stormwater devices are the preferred approach and fewer, larger devices, for example, down one side of a road or at the end of a road. Pre-cast raingardens are not suitable for vesting due to the ongoing maintenance burden they pose. Details of the design of the stormwater system and devices for the management of both quantity and quality of the stormwater runoff, including overland flow paths should be provided.</p> <p>Options for stormwater management should be documented in the proposed application, including how the Project's proposed method of managing stormwater would be the best option for this site and how it would align with the Water Sensitive Design principles as outlined in Auckland Council's GD04 document. In addition, the proposed solution must be justified as the most cost-effective, operable, and maintainable solution in the long term, with consideration to Whole of Lifecycle Costs. Consideration of alternatives is necessary to assess whether the design of the development is the most appropriate to meet the relevant principles of the AUP(OP), GD04, and Auckland Council's Code of Practice.</p> |
| <b>[Insert specific requests for comment]</b> | Click or tap here to insert responses to any specific matters the Minister is seeking your views on.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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

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

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

|                                           |                            |
|-------------------------------------------|----------------------------|
| Organisation providing comment            | Watercare Services Limited |
| Contact person (if follow-up is required) | Amir Karimi- S 9(2)(a)     |
|                                           | Ilze Gotelli- S 9(2)(a)    |
|                                           | Shane Lawton- S 9(2)(a)    |

## Comment form

Please use the table below to comment on the application.

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| Project name         | Whenuapai Green                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| General comment      | <p>There were no engineering plans, capacity assessment, fire/water supply-demand, or information on wastewater flow provided as part of this application. Based on very limited data provided, Watercare has completed a very high-level assessment for the proposed development options below at 98-100 &amp; 102 Totara Road, Whenuapai.</p> <ul style="list-style-type: none"> <li>a) Development of 453 residential lots, comprising 76 standalone dwellings, 32 duplex dwellings, and 345 terraced houses.</li> <li>b) Development of 354 residential lots and a school (2.7900ha)</li> </ul> <p>Some capacity constraints have been identified in both water and wastewater network. The developer will need to address the constraints through public network extensions or upgrades, depending on the agreed solution at no cost to Watercare.</p>                                                                                    |
| Other considerations | <p><b>Wastewater:</b></p> <p>Watercare has plans in place to construct a new pump station in Brigham Creek Road. However, the timing is uncertain at the moment. The likely completed date is end of 2024 but this cannot be confirmed until Watercare has obtained resource consent and landowner approvals and has engaged the contractor. The provision of the wastewater connection relies on the pump station's commissioning as there is no capacity in the wastewater networks to service the proposed development until the Brigham Creek Pump Station (Slaughterhouse) comes into service.</p> <p>Additionally, a new local pump station may be required to service the entire development site due to the topography. The pump station flow must be conveyed directly to the Brigham Creek Pump Station through building a new gravity line along Totara Road and Brigham Creek Road based on an agreed solution with Watercare.</p> |

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|                                               | <p><b>Water Supply:</b></p> <p>It is expected the development can be supplied but will require additional infrastructure requirements to ensure capacity and resilience of the water supply network.</p> <ul style="list-style-type: none"> <li>• The area is currently supplied predominately from the east along Brigham Creek Road 315mm PE WM, which is at capacity. There remains an outstanding restricted 150mm AC section (300mm) from the BSP to the eastern side of the motorway, which would require upgrading (size to be confirmed).</li> <li>• The development will also trigger the need to improve resilience for the area once the number of properties exceeds 1,000 Dwelling Unit Equivalents (DUEs). A new watermain has already been installed along Fred Taylor Drive, and this would require commissioning to support planned and unplanned maintenance/resilience considerations along with capacity needs.</li> <li>• To supply the development watermain extensions would need to occur along Totara Road with integration with the existing development to the south. This would include extension of the existing 315PE WM along the development frontage for further extensions north.</li> </ul> |
| <b>[Insert specific requests for comment]</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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.