

8 May 2024

Campana Land Owners Consortium
c/- David Clark, Planner, Saddleback

via email: david@saddleback.nz

Dear David

RE: Clause 23(1) Resource Management Act 1991 Further Information – Private Plan Change request by Campana Land Owners Consortium

Thank you for the private plan change request to rezone land at Campana Road, Puhinui. A plan change number will be allocated at formal notification stage. Please advise whether you wish to have a particular plan change title.

Further to this request under Clause 21 to Schedule 1 of the Resource Management Act 1991, the Council has now completed an assessment of the information supplied. As you would be aware, Clause 23(1) provides as follows:

23 Further information may be required

- (1) Where a local authority receives a request from any person under clause 21, it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand-
 - (a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of Schedule 4;
or
 - (b) the ways in which any adverse effects may be mitigated; or
 - (c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or
 - (d) the nature of any consultation undertaken or required to be undertaken—

if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

Pursuant to Clause 23(1) the Council requires further information to continue processing the private plan change request. Appendix 1 attached to this letter sets out further information required and reasons for the requested information. Please use the indexed Request for further Information (RFI) question number for your responses – that will make it easier to refer back to the relevant specialists in the Council team. Appendix 1 can be made available in Word if you wish.

Please note that this CI23 relates only to the further information considered necessary for a better understanding of the application. It should not be seen as a full indication of the issues that may be identified through the process.

If you have any queries please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Peter Reaburn'.

Peter Reaburn
Consultant Planner for Auckland Council

Campana Clause 23

Planning Matters (Council Specialist Peter Reaburn)

General

The RMA 1st Schedule Clause 23 Requests For Information (RFI) contained within all of the separate specialist sections are relevant to the ultimate overall planning assessment of this private plan change (PPC) request. Some particular areas covered by other specialists are also relevant to some of the planning RFIs listed below. In this respect it will be noted that a number of questions from the different specialist perspectives are the same or similar. A deliberate approach has been taken of not relying on one specialist to ask a question where that question is important also to another specialist. However the Applicant is invited to provide a combined response to these same or similar questions if it so desires, provided that any combined response references the question reference.

Sound Resource Management

Auckland Council, when considering whether to adopt, accept or (in particular) reject the plan change request under Clause 25 will carry out an assessment as to whether the PPC represents “sound resource management”. Of the potential issues that may be raised with the PPC it is considered there are three main areas that relate to whether proceeding with the PPC in its current form and / or at this time is appropriate, i.e. sound resource management.

The first area relates to provision of adequate infrastructure. The key concern here is transport infrastructure. In that respect the precinct description states:

Future Urban zones are proposed to defer development until appropriately planned and funded transportation infrastructure is available and further consideration has been given as to how the land would be developed to reflect these values.

It appears clear that appropriately planned and funded transportation infrastructure is not yet available to the degree that would allow a live (LIZ) zoning that would allow development to proceed in accordance with that live zoning.

There is accordingly a question as to whether this PPC is premature. The “right time” to proceed with a live zoning is important to considering the PPC, including against Policy I432.3 (10) (which refers to the timing and sequencing of integrated development). The sequencing of areas identified in Council’s Future Development Strategy (FDS) is also relevant, as canvassed more fully in the Clause 23 Strategic Planning specialist questions.

Also relevant here are the questions that have been asked, again in the Clause 23 Strategic Planning specialist questions and also in the Economics specialist questions, as to whether there is a pressing need for this land to be made available for business use, at least within the period envisaged by the FDS.

The second, associated, area is the constraints imposed by the proposed precinct provisions, and in particular the new I432.6.1(4). That provision significantly limits the range of activities that would be enabled in this sub-precinct. That raises issues of alignment with the sub-precinct provisions, including Objective I432.2 (1), which is:

(1) A range of business and airport related activities are provided for in the precinct to ensure the efficient use and development of the land resource, and recognition of the precinct's proximity to Auckland International Airport.

..and Policy I432.3 (1) which is:

(1) Manage development to require that activities in the Puhinui Precinct are those primarily associated with manufacturing, warehousing, transport, storage and distribution activities consistent with a Business - Light Industry Zone and airport related activities.

..and the (underlying) Light Industry H17.3. Policy (1) which is:

(1) Enable light industrial activities to locate in the zone.

Accordingly, there is a question as to whether the significantly limited provision made for activities in the PPC provisions is consistent with the expectations of the zone and precinct. An associated concern would be whether very limited development established under the proposed provisions may compromise opportunities for more efficient utilisation of the land in accordance with the wider range of activities envisaged by the LIZ at a later date. This, in turn, is relevant to the assessment of options and the possible better option of encouraging the continued use of the land for the current horticultural activities (under the current FUZ zoning) until such time that transport infrastructure is in place and introduction of an alternative live zoning becomes more appropriate.

The third area relates to the limited geographical extent involved in the PPC. The live-zoned and new sub-precinct C (and associated sub-precincts A and E) would be situated between (to the east and west of) land that would remain zoned FUZ.

This raises questions about how and even whether the PPC could adequately integrate with other land in this area that would potentially have the same zoning and be in the same sub-precinct (C). In that respect it is considered inappropriate for the proposed provisions to refer to a "Campana" name as that may well be inappropriate for a latter, wider, sub-precinct. That proposal alone indicates that there has been insufficient consideration given to wider integration – an issue also raised in the Clause 23 Strategic Planning specialist questions. While at a more detailed level, issues of transport network integration with the wider area and Puhinui Road are raised in the Clause 23 Transport, Urban Design, Landscape and Open Space specialist questions.

Information Request P1 – Sound Resource Management

In light of the matters raised above the Applicant is requested to provide a further assessment as to whether the PPC represents sound resource management.

Sub-Precinct E

Information Concern

The Applicant will be aware of previous planning for the Puhinui Precinct which included (up to the PAUP hearings) identification of the subject land within a sub-precinct C. A sub-precinct E was not considered to be necessary or proposed at that stage, so the introduction of that sub-precinct now is inconsistent with past planning. The expressed aim of that new sub-precinct is to provide for the convenience needs of the future local (mainly working) population. Activities that provide for those needs are already for in the LIZ and sub-precinct C provisions. There is accordingly a question as to whether a new sub-precinct E is required and, as also highlighted in the Clause 23 Strategic Planning and Economics specialist questions, whether sub-precinct E, particularly at its proposed scale, would enable development that goes beyond a local service function.

An associated concern is whether, taking a wider view of all current FUZ zoned land in this area, whether sub-precinct E is in the optimum location, even if it is required.

Information Request P2 – Sub-Precinct E

Please provide a further assessment of sub-precinct E to review whether it is required to serve the convenience needs of the local area, whether it could have a function beyond those local needs (and the implications of that) and whether, having regard to all of the local area currently zoned FUZ, the proposed location is the optimum location.

Sub-Precinct A

Information Concern

A number of concerns have been raised about the extent and content of sub-precinct A, notably within the Clause 23 Urban Design, Landscape, Archaeology and Open Space specialist questions. Those matters are not repeated here, other than to confirm they are also planning-related questions.

It will be noted that, in the current precinct provisions, there is a close alignment between sub-precinct A and sub-precinct B (the airport land). There is a question as to whether that is the correct sub-precinct to adopt here, or whether there is a more appropriate alternative such as indicative open space or perhaps a new sub-precinct. This is not raised as a fundamental issue at this stage, noting that (as per the Open Space specialist questions) there appear to be inconsistencies with the approach taken to the proposed extent of sub-precinct A compared to the existing mapped sub-precinct A. However, taking into account the other questions that have been raised, a further assessment and evaluation of other methods is considered justified, including what method is most appropriate to identify and manage the coastal margins with their

associated landscape, cultural and archaeological values, their potential for public access (to and along) and potential interface issues with adjoining industrial land.

Information Request P3 – Sub-Precinct A

Please provide an assessment and evaluation of methods (other than the proposed sub-precinct A) to identify and manage the coastal margins with their associated landscape, cultural and archaeological values, their potential for public access (to and along) and potential interface issues with adjoining industrial land.

Campana Structure Plan

Information Concern

A “Campana Structure Plan” is referred to in the amended PPC provisions, however it is not part of the provisions. It is therefore unclear, in the provisions, as to what that structure plan is or what part it plays in the management of the area. Reference to a Campana Structure Plan either needs to be deleted or made more transparent through provision of the structure plan and means by which the structure plan elements are to be taken into account in future development.

Information Request P4 – Campana Structure Plan

Please clarify the purpose and intent of the Campana Structure Plan in the proposed PPC provisions.

Consultation

Information Concern

The information given in relation to consultation is acknowledged. It would be appropriate for the Applicant to undertake further consultation following consideration of the matters raised in this Clause 23 and any amendments to the PPC following on from that. Parties of particular interest include mana whenua, Auckland Airport, Auckland Transport, NZTA / Waka Kotahi, other land owners of land in the FUZ zone and land owners of land in sub-precincts D and E.

Information Request P2 –Consultation

Please advise what further consultation has been carried out and, if no further consultation has been carried out, why the Applicant has considered that to be unnecessary.

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Strategic Planning Matters (Council Specialist Rosie Stoney)

Precinct Plan Integration

Information Concern

The application documents do not explain how development that will be enabled will integrate with the remaining land in the Puhinui (stage 2) future urban area. This matter is associated with the implications of bringing forward part of the Future Urban Zone (FUZ) area ahead of the rest. The Future Development Strategy (FDS) anticipates this area being rezoned from 2030+. A partial rezoning now via a private plan change will have implications on the rezoning and structure planning of the remaining future urban area.

Information Request SP1 - Precinct Plan Integration

Please explain how the plan change will or can integrate with other areas of FUZ and that future rezoning options are not being compromised.

Land use and transportation Integration

Information Concern

The S32 evaluation does not consider the integration of the PPC area with transport projects along the state highway 20B (SH20B) corridor, namely the 20Connect long term improvements and Airport to Botany rapid transit. The FDS identifies 20Connect as an infrastructure prerequisite for the Puhinui (stage 2) future urban area, which the PPC site is part of.

Information Request SP2 – Land use and transportation Integration

Please provide a further assessment in relation to the integration of the PPC area with transport projects along the state highway 20B (SH20B) corridor.

Timing for Development

Information Concern

The application has not provided timing for the urbanisation of the PPC area, including transition away from unmanned storage areas to more intensive light industry uses. This information is needed to understand the appropriateness of the development, the effects on the timing of growth on surrounding locations, as well as the integration of land use and the timing of planned transport infrastructure investment.

Information Request SP3 - Timing for Development

Please assess and provide information on the likely timing of transitioning away from unmanned storage areas to more intensive light industry uses.

Centres Hierarchy

Information Concern

In the Property Economics Assessment (Appendix L), the assessment does not articulate how the proposed retail centre fits within the hierarchy of centres. It is unclear how the hierarchy has been considered across the wider Manukau area and airport precinct and how this centre would integrate with the existing network. It is also important to understand whether the proposal is appropriately sized for its catchment or would otherwise disperse activity from other centres in the local area.

Information Request SP4 - Centres Hierarchy

Please provide a further assessment as to how the proposed sub-precinct E will integrate with other centres across the wider Manukau area and the airport precinct.

Future Development Strategy

Information Concern

The Future Development Strategy (FDS) is a relevant nonRMA document - it is a requirement of the NPS-UD, as well as satisfying requirements under the Local Government (Auckland Council) Act 2009.

The submitted planning report states that the FDS gives a vague and uncertain plan about when this land will be released. It further states the FUZ zoning of the PPC site provides little certainty regarding the timing of land release. It is not the role of the AUP to provide this information, rather it is the role of the FDS to provide information on the timing and sequencing of future urban land. The FDS provides clear sequencing of future urban land based around when future urban areas are expected to be development ready. The Puhinui (stage 2) future urban area has sequencing of 2030+, as noted in other areas of the application. Page 118 of the planning report states that the proposal is consistent with the FDS principles, however it does not acknowledge that the plan change is not aligned to the sequencing of the Puhinui (stage 2) future urban area which it is part of (FDS Principle 5(b): Prioritise areas for growth and investment). In addition, the submitted planning report states the proposal will contribute to a well-functioning urban environment but does not address the fact that the development will be out of sequence with the FDS and therefore ahead of the planned completion of the 20Connect transport pre-requisite which has determined the timing of the Puhinui (stage 2) future urban area. It is considered important to include a discussion of the FDS sequencing in the discussion on whether the PPC achieves a well-functioning urban environment.

Information Request SP5 - Future Development Strategy

Please provide a further assessment of the PPC's alignment with the FDS.

Options Analysis

Information Concern

The s32 'do nothing' option is that the AUP zoning remains unchanged. It is suggested that this should read that the AUP zoning of the land will remain unchanged until it is rezoned by a plan change (which would normally be expected to be in line with the timing set out in the FDS).

Information Request SP6 - Options Analysis

Please review the s32 'do nothing' option and its assessment so that it (more correctly) refers to the AUP zoning of the land will remaining unchanged until it is rezoned by a plan change.

Population Projections

Information Concern

The Property Economics assessment (Appendix L) presents population projections for the Auckland region, referenced as "Stats NZ and Property Economics" and includes framing comments which state the high projection is likely over the long term. The projections are significantly higher than the current Auckland region projection series¹. Auckland Council bases its strategic planning, including the FDS, on a custom projection series sourced from Stats NZ (ACMar23²) and adopts the medium growth scenario as the most likely. It is considered that the Property Economics Assessment should refer to the Auckland Council projections in their assessment.

Information Request SP7 - Population Projections

Please reassess the population projections, including having regard to the custom projection series sourced from Stats NZ (ACMar23³) and adopt the medium growth scenario as the most likely.

Business Land Supply / Well-Functioning Urban Environment

Information Concern

The Property Economics Assessment (Appendix L), on page 22, states "*As identified in HBA 2023, there are some areas of the region and some activities that are projected to have shortages of business land to meet the currently estimated future needs. This includes Manurewa, located just a 10-minute drive from the PPC site*". The reference given for this in the HBA 2023 is to Table 54 Page 190. The associated text indicates these are mostly small centres and business areas with a mix of neighbourhood centre, mixed-use and light industrial land zoning in different areas in Auckland. There are three entries with the name Manurewa listed in the table and the split of business activities is not articulated. Later, on page 30, the shortfall in business land in areas like Manurewa is brought up as a benefit of the PPC. It is considered that the application should be clear about the business data which is being referenced from the HBA, including table titles and the types of business activities.

The application states the "*the Plan Change aligns with, if not is supported by, many of the objectives and policies of the NPS-UD by proposing additional land supply for business growth in an existing industrial area that is close to an established and growing labour force (fully outlined in Appendix L)*". It is considered that the application has provided insufficient detail as to how the application is proposed to contribute to a well-functioning urban environment on a regional and local scale, particularly as it is out of sequence with

¹ Subnational population projections, characteristics, 2018(base)-2048 update

<https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE8617>

² See: <https://knowledgeauckland.org.nz/publications/auckland-council-population-projections-total-auckland-march-2023>

³ See: <https://knowledgeauckland.org.nz/publications/auckland-council-population-projections-total-auckland-march-2023>

the FDS. The assessments provided do not fully consider all future urban areas and the sequencing of business area capacity in the FDS. Whenuapai, which is sequenced from 2025+, is not included in the assessment. In failing to include this, the application has not considered the effects which may impact on the efficiency of serving growth in different locations across the wider region and the contribution to the supply of light industry capacity. It is considered that additional detail is needed in the Property Economics Assessment (Appendix L).

Information Request SP8 - Business Land Supply / Well-Functioning Urban Environment

Please provide further comment on business land supply / well-functioning urban environment matters as a response to the indicated current deficiencies outlined above.

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Transportation Matters (Council Specialist Andrew Temperley)

Note: Mr Temperley has liaised with Auckland Transport in relation to the following matters.

Long-term transport outcomes resulting from Business – Light Industry Zoning

Information Concern

The application materials do not provide significant detail in relation to future development activities within the individual sub-precincts making up the PPC.

The Business – Light Industry Zone chapter of the Unitary Plan sets out a number of activities that are permitted or are discretionary under the zoning, in Table H17.4.1, which could result in a range of potentially different and varied traffic generation scenarios. While typical activities for the zone, such as offices and warehousing may be expected to generate comparatively high numbers of trips during morning and evening peak hours, other permitted and discretionary activities for the zone, such as retail and healthcare activities, could have comparatively higher levels of trip generation during off-peak periods and weekends.

It is further noted that the zone permits building heights of up to 20 metres, which could for example permit an office building of up to 6 storeys in height.

There is little clarity currently as to the level of intensity of development which could be enabled by the plan change, and hence the levels of traffic generation and other transport related effects.

Further information is needed to understand potential long-term transport effects which could result from permitted development activities within the Business – Light Industry Zone, including traffic effects during both peak and off-peak hours, depending on particular development activities.

Information Request T1 - Long-term transport outcomes resulting from Business – Light Industry Zoning

Please clarify potential land-use scenarios associated with each of sub-precincts within the PPC area.

Staging of development activities and consequent traffic generation potential

Information Concern

The Transportation Assessment memo considers traffic generation potential associated with the consented SPCA facility and proposed storage activities, including the impact of this traffic generation on the performance of the intersection of Campana Road / Puhinui Road. However, it does not consider traffic generation potential and effects associated with the development of other sub-precinct areas within the Plan Change area, nor how the effects would be mitigated.

Further information is needed to understand the full potential transportation effects of the PPC when fully developed and inform appropriate transportation provisions and mitigation measures required (see item III below).

Auckland Transport (AT) have similarly confirmed their support for further information in relation to trip generation, as well as assumptions in relation to trip distribution. AT have also reaffirmed that Waka Kotahi Guidelines for assessing Plan Changes require modelling assessments for 10 years into the future, in addition to the existing scenario.

Information Request T2 - Staging of development activities and consequent traffic generation potential

Please provide information in relation to traffic generation potential of land-use activities within the whole PPC area and consequent transport effects on the adjoining network.

Triggers for Transport Improvements and Mitigation Measures

Information Concern

While the Transportation Assessment Memo refers to the upgrading of Campana Road and to future walking and cycling improvements, it does not provide full details, including appropriate phasings and trigger points for improvements.

Further information is needed to ensure that appropriate outcomes for the transport network can be delivered in alignment with the staged development of the PPC area

Information Request T3 - Triggers for Transport Improvements and Mitigation Measures

Please provide information on appropriate transportation infrastructure provisions and appropriate mitigation measures for the PPC development, in addition to identifying appropriate trigger points for improvements, including responsibilities for funding and delivery.

Operational and Safety Assessment of access to 457 Puhinui Road

Information Concern

While the Transportation Assessment Memo assesses the performance of the intersection of Puhinui Road / Campana Road, it does not consider the safety and operational performance of the separate intersection point to 457 Puhinui Road. It further does not confirm whether this intersection arrangement is expected to be subject to any changes or upgrades, in response to future development and / or any safety issues.

Further information is needed to fully understand the traffic and safety impact of the PPC on the adjoining road network. The existing access intersection to 457 Puhinui Road is noted to already be handling regular truck movements, whilst constrained by a ban on the outbound right-turn manoeuvre and few convenient opportunities for vehicles to undertake U-turning manoeuvres along Puhinui Road in the immediate vicinity.

Information Request T4 - Operational and Safety Assessment of access to 457 Puhinui Road

Please provide an assessment of the safety and operational performance of this intersection, which should take account of the future development potential of this site, in accordance with the above. If appropriate, the assessment should also confirm recommended improvements to address safety and / or operational issues.

Campana Road Upgrade

Information Concern

While the Transportation Assessment Memo refers to the upgrading of Campana Road, it does not provide further details, such as confirmation of cross-sectional standards. While the infrastructure report provides a proposed cross-section for Campana Road, it does not assess this according to Auckland Transport Code of Practice (ATCOP) requirements.

Further information is needed to ensure that the key route connecting the PPC site to the wider transport networks is fit for purpose.

Information Request T5 - Campana Road Upgrade

Please provide a cross-section design for Campana Road which complies with ATCOP Standards and clarification as how provisions for active mode users will integrate with adjoining networks at either end.

Campana Road Structure Plan

Information Concern

It is considered that the Campana Road Structure Plan would benefit from further detail and supporting assessments in relation to the areas specified in the information request below.

Information Request T6 – Campana Road Structure Plan

Please provide:

- **A plan showing strategic transport movements, which could be an elaboration of the information presented in the plan on page 4 of the Structure Plan, showing strategic transport connections between the PPC site and the wider network and indicative internal connections within the PPC sub-precinct areas, for vehicular traffic, active modes and public transport.**
- **Further assessment and clarification in relation to the indicated realigned access to 457 Puhinui Road, shown on the same plan.**
- **Further assessment and clarification in relation to the indicated ‘Public Walkway opportunity’ following the coastlines of the peninsulas making up the PPC area. While the identified routes appear to offer significant amenity value, it would be helpful to understand how these walkways would be expected to serve the PPC site at a functional level and integrate with other provisions for access by active mode users.**

Puhinui Precinct Plan Provisions

Information Concern

Through engagement with AT, a number of suggested additions and amendments to the Precinct provisions have been identified in order to ensure delivery of effective transport outcomes through the PPC.

Information Request T6 - Puhinui Precinct Plan Provisions

Please review and consider the following (note: while this may not be considered a specific information request the applicant is requested to consider these matters).

1. Amendment to requirement I432.9(5) to reference sub-precinct C.
2. A new provision under I432.6.1.2 to require the upgrade of Campana Road.
3. Provision I432.6.1.2 (1) to refer to 'any proposed upgrade' to the Campana Road / Puhinui Road intersection.
4. Clarification as to why the plan change area is proposed to be exempted from I432.6.1.2 (2) and (3).
5. Better clarity of the wording under standard I432.6.1.2(4) & (5).
6. Change of status of Activities A52 and A54 in Table I432.4.2, in relation to sub Precinct C, from N/A to NC.

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Economic Matters (Council Specialist Reviewer Derek Foy)

Industrial zoned land supply and capacity

Information Concern

The Property Economics assessment⁴ provides assessment of industrial zoned land supply and capacity,⁵ but has not in that assessment referred to all future urban areas, and has excluded Whenuapai, which is included as a business area anticipated to be available for development from 2025+ in the Future Development Strategy.

Information Request E1 - Industrial zoned land supply and capacity

Please amend the industrial zoned land supply and capacity assessment to include an assessment of all future urban areas and Whenuapai.

Population Projections

Information Concern

The Property Economics assessment presents Auckland Region population projections which are referenced as “Stats NZ and Property Economics”.⁶ Those projections are between 8% and 10% higher than the current Statistics NZ population projections for Auckland Region,⁷ and the Property Economics projections appear to be more similar to the previous Statistics NZ population projections which have since been updated. That update involved significant downwards revision of future growth expectations in the Auckland Region. Auckland Council bases its strategic planning (including NPS-UD HBA and Future Development Strategy) on a custom projection series⁸ sourced from Statistics NZ and adopts the medium growth scenario as the most likely. Please note that Council’s economics expert considers the Property Economics assessment should refer to the Auckland Council projections referenced in footnote 8.

Information Request E2 - Population Projections

Please review the basis for population projections for Auckland Region and provide further confirmation or revision of the assessment.

⁴ Appendix L Economics assessment (“Campana Rd Industrial Plan Change Economic Assessment”, Property Economics, February 2024)

⁵ In Economics assessment, table 1

⁶ Economics assessment, figure 3

⁷ Subnational population projections, characteristics, 2018(base)-2048 update
<https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE8617>

⁸ <https://knowledgeauckland.org.nz/publications/auckland-council-population-projections-total-auckland-march-2023/>

Sub-Precinct E

Information Concern

Property Economics states that “it is appropriate for the activities within Sub-Precinct E to ‘feed and water’ the localised market which would be similar in scale to other existing convenience centres. This primarily involves catering to Dairies, Drive-through Restaurants, and F&B establishments.”⁹

The Property Economics assessment identifies two comparator convenience retail nodes and uses those as a justification for the appropriate size of proposed Sub-Precinct E. Please note that Council’s economics expert considers the identification of the two comparator nodes (Cavendish Drive, and Great South Road next to PB Tech)¹⁰ is not a robust basis for establishing an appropriate size of the proposed Sub-Precinct E within the PPC Area. Both of those nodes are located on busy arterial roads, and on the edge of the large Manukau Metropolitan Centre zone, and adjacent to residential zones, and therefore are in quite different types of locations than Sub-Precinct E. Sub-Precinct E is located 400m from the nearest arterial road (Puhinui Road), over 2km from the nearest residential zone, and nearly 4.5km from the nearest centre that is larger than a Neighbourhood centre.

Council’s economics expert notes that these differences mean that Sub-Precinct E will play a much different role for its local (industrial) catchment than do the comparator centres for their mixed residential/industrial catchments, and for example there is likely to be much different viability of a large medical centre in Sub-Precinct E than in the two comparator centres. The statement that the Great South Road comparator centre “primarily serves local businesses” is considered to be speculative, and not a sound basis for assessing suitable size of a commercial node in Sub-Precinct E.

It is further noted that healthcare facilities, which make up a significant component of the comparator centres, are not proposed to be permitted activities in Sub-Precinct E.¹¹

In respect of the data relied on in the Economics assessment Council’s economics expert notes that, while the numbers do not appear to be critical to the conclusions reached, it would be helpful to have more specific references and explanations of any calculations or analysis relied on to arrive at the presented numbers. This point relates to numbers presented in tables 1 and 3 (and related discussion) which are only generally referenced to “Auckland Council” and “Auckland Council HBA 2023”.

Further to the above it is noted that the range of permitted activities¹² proposed is relatively broad, and similar to activities permitted in the Business – Local Centre Zone, including commercial services, offices up to 500m², any type of retail in tenancies of up to 450m², dairies, and artworks. The main types of activities permitted in Local Centres that would not be permitted in Sub-Precinct E are supermarkets, dwellings, community facilities, education, and healthcare facilities. From that comparison the range of activities permitted in Sub-Precinct E would be more than just the dairies and food and beverages establishments the Property Economics report identifies. If the proposed Sub-Precinct E is larger than what is required to service the local catchment with convenience retail, it may develop to play a different role to that envisaged in the application, or to have greater adverse (retail distribution) effects on other centres or be larger than required to play the role envisaged and therefore be under-utilised.

⁹ Economics assessment, page 29

¹⁰ Economics assessment, page 26

¹¹ Table I432.4.1 – Precinct-wide activities, in Appendix C

¹² As listed in Table I432.4.1 – Precinct-wide activities, in Appendix C

Information Request E3 - Sub-Precinct E

Please review the identification of the two comparator nodes (Cavendish Drive, and Great South Road next to PB Tech)¹³ as to whether they are a robust basis for establishing an appropriate size of the proposed Sub-Precinct E within the PPC Area.

Information Request E4 - Sub-Precinct E

Please provide specific references for the data relied on in the Economics assessment (numbers presented in tables 1 and 3 and related discussion).

Information Request E5 - Sub-Precinct E

Please provide additional detail on the appropriate size of Sub-Precinct E and the appropriate type and scale of activities proposed to enable assessment to be made as to the scale and significance of the effects on the environment of Sub-Precinct E.

Note

Council's economic expert asks the applicant to note that each of the above matters might change conclusions relating to the significance of effects assessed, for example, if population growth is slower than the assessment assumed, or if industrial land supply is greater than assessed, then the sufficiency of industrial land supply might be different from what was assessed.

¹³ Economics assessment, page 26

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Urban Design Matters (Council Specialist Reviewer Lisa Mein)

Sub-Precinct A

Information Concern

It is acknowledged that the inclusion and identification of sub-precinct A within the structure plan (SP) has the potential to be a great resource, both for the occupants of the future land uses and the wider area. However Council's urban design expert notes that, to be of value as open space for passive recreation this needs to be connected to the wider pedestrian network. It also needs to include the archaeological sites (possibly as open space as these are appropriately identified as no build areas within the SP).

Information Request UD 1 - Sub-Precinct A

Please demonstrate how sub-precinct A might function as open space, how it might link in with existing (and proposed) pedestrian /active transport connections beyond the site (in order to meet the objectives (1), (3) and (4) and policies (1), (3) and (4) within the Puhinui Precinct), and review the appropriate connections to an existing or potential wider network.

Movement Network

Information Concern

Typically, a SP would include a movement network layer, indicating how people access and move around the site via vehicle or foot. Council's urban design expert notes that, with the exception of the existing Campana Road, indicative access to 457 Puhinui Road and a public walkway opportunity, the SP is very light on movement detail.

Information Request UD 2 - Movement Network

Please provide additional information on what may be the key internal routes for various different transport modes.

Pūkaki Marae

Information Concern

The Precinct Plan includes plan 3 which depicts a viewshaft from Pūkaki Marae to Matukutūreia (McLaughlin's Mountain). This is an identified viewshaft, as it is the prominent extant maunga. As stated in the cultural assessment report, the whole Puhinui peninsula is of significance to Te Ākitai Waiohū. The cultural assessment report, including the diagrams within it, suggests that there are not specific areas of concern on the applicant's site. Council's urban design expert notes that the SP identifies the importance of views from Pūkaki Marae towards the site and shows an indicative view from the Marae towards the site but doesn't go as far as setting up actual "viewshafts" between the Marae and the site. It is considered that, in order to protect the outlook from the Marae, it would be appropriate for the applicant to work with Te Ākitai Waiohū to identify viewshafts/no build areas beyond those "indicated" on the SP and include within the SP and as an additional plan within the Precinct.

Information Request UD 3 - Pūkaki Marae

Please review and provide comment on the potential / appropriateness of identifying viewshafts/no build areas within the precinct plan and provisions.

Building Design within the Coastal Environment/Waokauri Creek

Information Concern

The new sub-precinct C expresses a desire for “*distinctive, flexible and environmentally responsible architecture and urban design*”, and the objectives and policies seek development that achieves a high standard of built form and amenity. However, the sub-precinct also allows for unmanned storage yard and industrial activities. The SP includes a requirement for landscaping for those buildings visible from Pūkaki Marae. However, while assessment criteria are included within the precinct for buildings over 50m², most of these relate to relationship to the street or neighbouring sites. Both the precinct and the LIZ are light on assessment criteria for buildings in the sensitive coastal environment around Waokauri Creek and its tributaries.

Information Request UD 4 - Building Design within the Coastal Environment/Waokauri Creek

Please consider inclusion of additional, bespoke assessment criteria for buildings in the locations identified.

Staging Plan

Information Concern

The potential for development within Sub-precinct E calls into question is the proposed staging of development of the plan change area, as this would be a logical starting point to create a focal point for the wider development area. Staging of development is referenced in the Puhinui Precinct with respect to infrastructure requirements in the wider locality and in the PPC documents in relation to sub-precinct C, but not sub-precinct E.

A staging plan would give some clarity as to how the applicant envisages the overall plan change area being developed. This would enable assessment of the plan change in its context and its likely future development.

Information Request UD 5 - Staging Plan

Please provide a draft staging plan.

Campana Clause 23

Landscape Matters (Council Specialist Reviewer Stephen Brown)

Landscape Effects (General)

Information Concern

The higher order strategies and provisions for this area (please see Attachment A) reflect a landscape and environment that is both very complex and subject to a wide range of pressures. These include:

1. Exposure to Pūkaki Marae and – potentially – the nearby urupa on the edge of Pūkaki Crater;
2. Exposure to Crater Hill / Nga Kapua Kohuora;
3. Interaction with Waokauri Creek;
4. The subject site's engagement with the aforementioned Mana Whenua Management Area;
5. The presence of archaeological sites around the periphery of the PPC site;
6. Exposure to Puhinui Road and its airport gateway – subject to the Puhinui Heritage Gateway requirements; and
7. The need for open space and pedestrian linkages in line with the Puhinui Precinct's Sub-precinct A requirements.

The PPC application incorporates:

- (a) An area of Sub-precinct A 'open space' that wraps around the western and northern margins of the site;
- (b) A strip of Vested Esplanade Reserve down the eastern side of the main body of the site – as distinct from its eastern 'finger';
- (c) Identified archaeological sites – again, around the periphery of the site
- (d) Five wetlands that are linked to Waokauri Creek; and
- (e) A 'public walkway opportunity' within the proposed Sub-precinct A, but not the Vested Esplanade Reserve.

Council's landscape expert notes that, even though Te Ākitai Waiohūa's Cultural Heritage Assessment is provided in support of the PPC application, there is no exploration of how the plan change might 'take on board' the values and sensitivities described in that report, or how future development across the subject site might be integrated with the cultural landscape already described. Having regard to the features existing on the site and in the area of the site (including those listed 1 – 7 above) it is considered that the potential landscape effects associated with light industrial development have not been adequately explored, nor the means of avoiding or mitigating them.

In order to address effects on the above features it is considered that a more comprehensive assessment is required on the degree to which proposed permitted development would affect key vantage points / areas and public perception of the wider cultural landscape around the Puhinui Peninsula, together with its ONFs and the natural character values of Waokauri Inlet – including in a cumulative fashion.

Information Request L1 - Landscape Effects (General)

Please provide a further evaluation of landscape effects with reference to the cultural values and sensitivities identified in Te Ākitai Waiohū's Cultural Heritage Assessment, together with the relevant landscape characteristics and values otherwise identified on the ground, and having regard to Chapters B4, B8 and D10 of the AUP.

Public Accessways / Walkways

Information Concern

There is no connection between the 'Public Walkway Opportunity' that follows the creek edge of roughly 60% of the main PPC site and that around the eastern 'finger'. As a result, these separate walkway opportunities are likely to become isolated dead-end trails.

The same 'Public Walkway Opportunities' pass through the identified Archaeological Sites, without making provision for access that avoids them, together with further damage to them.

There appears to be no provision made (in the structure plan or otherwise) for a public accessway along the Puhinui Heritage Gateway.

Information Request L2 - Public Accessways / Walkways

Please review or otherwise explain why Sub-precinct A, together with its 'Public Walkway Opportunity', is not shown as extending down the full eastern side of the main body of the Campana site to connect up with those of the eastern 'finger'.

Please review or otherwise explain why Sub-precinct A and the 'Public Walkway Opportunity' around the main area of the site does not make provision for public access past the identified archaeological sites so as to avoid potential damage to them in the future.

Please review or otherwise explain why the Structure Plan does not reflect the requirements outlined for the Puhinui Precinct in relation to the Puhinui Heritage Gateway, including its public accessway requirements.

Permitted Activities

Information Concern

The proposed amended version of Table I432.4.1 makes the Reclamation of intermittent and permanent streams not shown on Puhinui Precinct Plan 2, together with farming and the grazing of livestock, Permitted Activities within Sub-precinct A. Council's landscape expert notes that, although this is consistent with the provisions for the Puhinui Precinct in general, this status fails to recognise the particular sensitivities of the site and its Sub-precinct A (as outlined above and including the protection of archaeological sites) which would suggest that the Waokauri Creek margins require extensive weed management and native revegetation – not on-going farming and browsing by animals.

Information Request L3 – Permitted Activities

Please review or otherwise explain why proposed Sub-precinct A provisions accommodate farming and the grazing of animals as Permitted Activities.

Puhinui Heritage Gateway

Information Concern

There is no specific recognition of the Puhinui Heritage Gateway, and its 40m strip of land north of Puhinui Road. It is noted that the intentions of this heritage gateway embrace much more than just transport objectives. However the amended version of the proposed revised Puhinui Precinct provisions deletes Yard Control I432.6.3(4) addressing Puhinui Road, part of which reads as follows:

(i) Landscaping must be provided to a minimum depth of 10 metres from the edge of State Highway 20B (Puhinui Road) – New Zealand Transport Agency Designation 6717, including retention of existing mature trees and provision of native trees, shrubs and ground cover plants, hard landscaping, connections with pedestrian linkage and landscaped grass areas within and along the full extent of the yard.

The proposed replacement provision is:

The yard adjoining the edge of State Highway 20B (Puhinui Road) - New Zealand Transport Agency Designation 6717 as at 30 September 2013, or subsequent amended designation, shall be reduced to 10 metres if it is not required to accommodate any part of the public transport corridor specified in the notice of requirement.

Council's landscape expert notes that, without the yard described in the current provisions, it is most unlikely that landscape objectives of the heritage gateway project would be achieved. Nor would there be any public access to the 'public walkway opportunities' indicated closer to Waokauri Creek (unless such access is provided along the creek margins of adjoining properties, west and east of the subject site).

Information Request L4 – Puhinui Heritage Gateway

Please review the proposed provisions amendments identified above against the stated intentions for the Puhinui Heritage Gateway, and its 40m strip of land north of Puhinui Road.

Sub-precinct A

Information Concern

No specific intentions are identified for Sub-precinct A, despite the site's multiple sensitivities. In particular, consideration is required as to whether the margins of Waokauri Creek should be subject to weed removal and planting restoration / enhancement, which both improves waterway's ecological health and serves as a buffer between light industrial development on the subject site and Pūkaki Marae, Pūkaki Crater and Crater Hill / Nga Kapua Kohuora.

Information Request L5 – Sub-precinct A

Please reconsider whether site specific provisions should be added that more specifically address weed and pest management near Waokauri Creek, together with the restoration and enhancement of its margins, to achieve an appropriate level of integration with the cultural landscape and features identified around the Campana site.

Shelter Belt Planting / Buffering

Information Concern

In a related vein, the 20m height standard for light industrial development within the Puhinui Precinct potentially means that such restoration / enhancement planting may not provide an adequate buffer in its own right – especially in the early years following its implementation. This raises a question about whether such planting needs to be supplemented by faster growing ‘shelterbelt’ planting or similar to achieve the level of buffering just described and the integration of new development with the cultural landscape focused on Pūkaki Marae and Waokauri Creek.

Information Request L6 – Shelter Belt Planting / Buffering

Please reconsider whether site specific provisions should be added relating to additional screening / planting that extends beyond the creek margins.

Clause 23 Request - Attachment A: Higher Order Context Provisions (Prepared by Stephen Brown)

The Puhinui Precinct & Structure Plan:

The Introductory section of the Puhinui Precinct (I432.) begins by stating as follows:

The primary purpose of the Puhinui Precinct is to enable a transition from rural to urban development, while recognising the cultural, spiritual and historical values and relationships that Te Ākitai Waiohūa have with the land and sea in Puhinui as part of the Māori cultural landscape. The precinct also recognises the relationship which exists between Māori cultural landscape values and the management of natural and physical resources.

While setting out to accommodate light industrial and airport related activities, together with some large lot residential development, the transition to these forms of development is to ensure that an “*integrated approach is taken to managing the adverse effects on the Māori cultural landscape*” which is described as extending across the entire precinct. Addressing the issue of a ‘Puhinui southern gateway connection’, the introduction goes on to state that:

Puhinui Road (State Highway 20B) provides a direct transport linkage between Auckland International Airport and the South-Western Motorway which forms the eastern boundary of the precinct. Puhinui Road is recognised not only as a transport corridor, being a main entry and exit point for tourists and visitors to the country and an important freight route, but also for its importance as a cultural heritage gateway.

The precinct identifies the ‘Puhinui Heritage Gateway’, which includes the State Highway 20B designation, a 40m strip on the southern side of the designation, and 40m strip on the northern side of the designation. The entire route runs the length from the State Highway 20 interchange through to the Auckland International Airport.

The route is intended to provide for possible transport requirements, including dedicated bus and rail corridors, and to integrate with the surrounding business areas that develop and public open space areas in the precinct. The route will promote important physical, ecological, and visual connections between the northern and southern areas of the precinct, and for this reason needs to achieve a high level of legibility and cohesiveness in its elements. This is achieved through provisions which will contribute towards the creation of a distinctive gateway.

Addressing the ‘Mana Whenua Cultural Landscape’, the introduction also comments as follows:

Cultural values to be protected encompass the geological, the coastal, archaeological, and ecological features within the precinct. The Pūkaki Crater and lagoon (Te Pukakitapu o Poutukeka) is ancestral Maori land of particular spiritual value to tangata whenua, and ownership is held by the Pūkaki Maori Marae Committee. The Portage Road Reserve at the centre of Nga Kapua Kohuora (Crater Hill) is vested in Council as reserve land. Pūkaki Crater and Portage Road reserve are zoned Open Space – Conservation.

Related provisions include the following:

1432.2. Objectives (precinct-wide)

- (2) Mana Whenua cultural, spiritual and historical values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, waahi tapu, and other taonga, in the Puhinui Precinct are identified, recognised, protected, and enhanced.*
- (3) Subdivision, use and development is managed in an integrated manner to avoid where practicable, or otherwise remedy or mitigate, adverse effects on the natural coastal environment, and significant ecological areas within the Manukau Harbour, as well as its tributaries.*
- (5) Subdivision, use and development is designed and located to avoid, or otherwise remedy or mitigate, adverse effects on those landscape features identified as Outstanding Natural Features, and areas with high levels of sensitivity to landscape modification in the Māori cultural landscape, which contribute to the ecological, geological, cultural, spiritual and amenity values of the precinct.*
- (6) The location, scale and form of development is managed within the precinct to avoid, remedy or mitigate adverse effects on cultural, spiritual and landscape values and their relationship associated with the Māori cultural landscape, while recognising the operational requirements of Auckland International Airport.*
- (7) A southern gateway connection to Auckland International Airport is developed, that provides improved connectivity and accessibility for all transport modes, and recognises and provides for the cultural significance of the Puhinui Peninsula to Mana Whenua.*
- (12) Development demonstrates the integration of green networks (such as natural freshwater and coastal systems, and ecological corridors) with open space and pedestrian networks while providing for improved access and connectivity.*

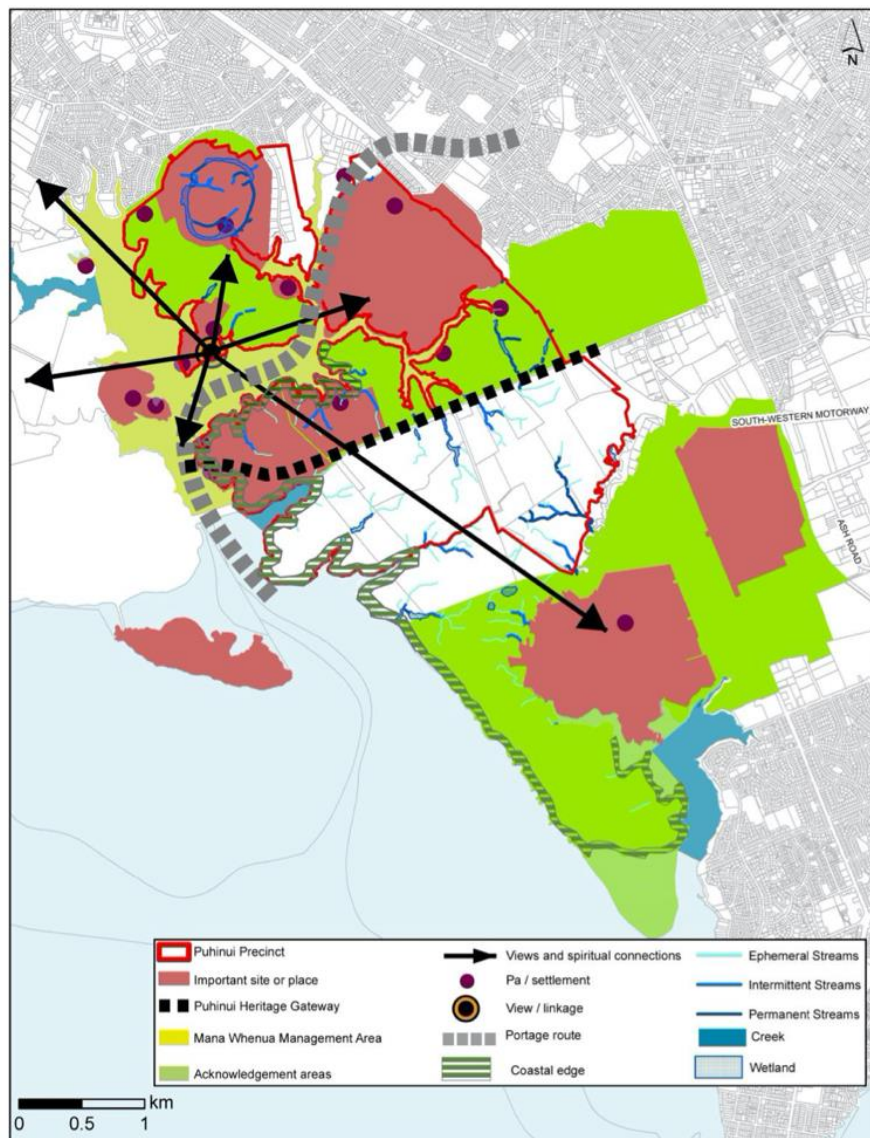
1432.3. Policies (precinct-wide)

- (2) Recognise, protect and enhance the cultural, spiritual and historical values and relationships associated with the Māori cultural landscape at Puhinui. These values include but are not limited to:*
 - (a) Pūkaki Marae and its connections within the Māori cultural landscape*
 - (b) important sites, places and areas, wāhi tapu and other taonga*
 - (c) views and connections between existing or historical cultural sites, places and areas*
 - (d) coastal edge and waterways*
 - (f) Mauri, particularly in relation to freshwater and coastal resources*
 - (g) historical physical connections through landscape including Portage routes*
- (3) Address potential adverse effects from subdivision, use or development on identified Māori cultural landscape values by:*
 - (a) avoiding urban development within the cultural landscape areas most sensitive to development (sub-precinct H);*
 - (b) encouraging development to reflect the whakapapa, ancestral names, history and stories of the area in reference to and use of the names of the various sites, places, areas, waahi tapu and other taonga of special significance and value to Mana Whenua;*
 - (c) protecting the visual integrity of the local viewshaft from Pūkaki Marae to Matukutūreia to maintain a visual linkage and connection with Ngā Matukurua;*
 - (d) requiring buildings to be set back from the coastal edge and identified intermittent and permanent streams and encouraging native landscaping within these areas;*

- (f) encouraging landowners to provide and enhance access for Mana Whenua to coastal areas and waterways of significance to Mana Whenua, particularly access to scheduled sites or features for karakia, monitoring, customary purposes and ahikā roa;*
- (g) incorporating mātauranga Māori and tikanga Māori in subdivision, use and development; and*
- (h) locating and designing development to take into account and reflect the relationship of the site within the context of the Māori cultural landscape at Puhinui.*
- (4) Require subdivision and development to be undertaken in a manner which protects and enhances the ecological, amenity and Mana Whenua values (including mauri) of the Pūkaki and Waokauri Creeks and identified permanent and intermittent streams within the Puhinui Precinct.*
- (5) Provide for appropriate public access to coastal areas and waterways and key public open space networks and pedestrian linkages.*
- (9) Require integrated and coordinated development of a southern gateway connection to Auckland International Airport, which recognises its significance as a cultural heritage route, having regard to the following matters:*
 - (a) appropriate location and design of development, infrastructure, and landscaping within and alongside Puhinui Road to support the gateway objectives, desired character and to provide visual amenity along this transport route;*
 - (b) integration of elements which reflect the cultural significance of the Puhinui area to Mana Whenua;*
 - (c) improvements in connectivity and accessibility to the gateway and the surrounding transport network in the precinct, for all modes of transport;*
 - (d) other operational requirements of the Auckland International Airport, existing designation, and future transport infrastructure requirements; and*
 - (e) the need to avoid, or otherwise remedy or mitigate any adverse impacts of infrastructure development, on Mana Whenua values, including the Mana Whenua Management precinct, and coastal margins which are receiving environments.*

The Precinct provisions directly applicable to Sub-precincts A and E are also applicable to the Campana PPC site, together with those of a proposed Sub-precinct C – which appears to largely mimic the provisions of Sub-precinct D (in the current Precinct Plan) albeit with a different location. Precinct Plan 1 also identifies those areas that have been identified in the Puhinui Structure Plan as having Māori cultural landscape values:

1432.10.1. Puhinui: Precinct plan 1 – Māori cultural landscape values



Of note, this plan shows the Campana PPC site in close proximity to Pūkaki Marae, directly abutting Waokauri Creek and its Mana Whenua Management Area, and opposite Crater Hill / Nga Kapua Kohuora (across the Creek from it). The viewshaft from Pūkaki Marae to Matukutureia /McLaughlins Mountain, on the other hand, lies well west of the subject properties, and would not be affected by development on them.

1.2 Pūkaki Marae:

Even so, Pūkaki Marae and its papakainga lies west to north-west of the PPC site, again across Waokauri Creek. Views from the Marae appear likely to embrace development at the western end of the site, but not its main body. However, the areas of significance to Te Ākitai Waiohū are not just confined to the existing marae and its near margins, with a sequence of paa and settlements having once ringed the area around the current marae, the Manukau Harbour, and both Pūkaki and Waokauri Creeks. This is reflected in the identification of a series of archaeological sites around the edge of the PPC site, together with the delineation

of the much broader Mana Whenua Management Area stretching from the mouth of Waokauri Creek near the airport to the edge of the PPC site (Precinct Plan 1).

1.3 Waokauri Creek:

The Mana Whenua Management Area shown on Puhinui Precinct Plan 1 embraces both Pūkaki and Waokauri Creeks, including all of the waterway that extends from near the Eastern Accessway bridge to Auckland International Airport up Waokauri Creek to the Mangere Gardens Cemetery and SH20. Although the Creek's margins are heavily vegetated, appearing to provide a sound foundation for ecological restoration and enhancement of the waterway, much of the vegetation cover found within those margins comprises exotic trees and weed species. Moreover, many of the macrocarpas and other trees lining the Creek are also nearing the end of their life. As a result, the current vegetation alone cannot be relied on to provide a high level of buffering between the Mana Whenua Management Area and future development on the PPC site.

1.4 Crater Hill & Pūkaki Crater:

As indicated above, Crater Hill / Nga Kapua Kohuora lies directly opposite the PPC site, across Waokauri Creek, with its southern slopes overlooking both the creek and Campana Road area. It is another site or place of importance for Te Ākitai Waiohūa that engages directly with the northern margins of the PPC site and that would be exposed to development within it. In addition, the ONF status of both Crater Hill / Nga Kapua Kohuora and Pūkaki Crater means that regard must be had to relevant provisions of AUP Chapters B4.2 and D10, which address the protection of the visual integrity of ONFs among other matters.

1.5 Puhinui Heritage Gateway:

The Puhinui Heritage Gateway, and its 40m strips of land both sides of Puhinui Road, was originally conceived of as a transport corridor that also provides a high level of amenity for those using this gateway to and from the international airport. In effect, the Heritage Gateway set out to both accommodate future transport links and to buffer them from the more utilitarian qualities of light industrial areas north and south of Puhinui Road. As part of this, the gateway corridor is supposed to reflect local cultural and natural heritage values, and to evolve into a distinctive and aesthetically pleasing gateway to the airport.

Campana Clause 23

Parks Matters (Council Specialist Reviewer Lea van Heerden)

Precinct Plan Consistency

Information Concern

It is noted that the proposed plan change does not follow the same pattern of open space development as seen in the surrounding environment. For example, the Puhinui Precinct (live-zoned part). currently identifies broad areas identified as Sub-Precinct A. The application proposes a Sub-Precinct A that follows a 20m margin from the coast.

Information Request OS1 – Precinct Plan Consistency

Please provide an explanation as to why a different approach has been adopted to the identification of open space than is apparent in other like areas of the precinct.

Open Space movement network

Information Concern

It appears that the structure and precinct plans are lacking a sensible movement network. For example, sub-precinct A is not shown as being connected both internally and to the wider pedestrian network to serve as a useful public open space. There appears to be no logical linkage between the Public Walkway Opportunity, which runs along the perimeter of the creek edge of the primary PPC site, and the area around the eastern finger. There is also no a public connection identified between Sub-precinct A and E, which would be important for the effective functioning of the proposed plan change and to ensure the accessibility of the public open space. There is accordingly a gap in understanding how sub-precinct A can function as open space and integrate with existing and proposed pedestrian and active transport connections beyond the site, and in that respect whether it meets the objectives and policies set out in the Puhinui Precinct, specifically objectives (1), (3), and (4), and policies (1), (3), and (4).

Information Request OS2 – Open Space movement network

Please review the open space movement network gaps identified and (if they are to be maintained as proposed) provide an explanation as to why further connections are not considered necessary.

Permitted Activities

Information Concern

In the proposed amended version of Table I432.4.1 the reclamation of intermittent and permanent streams not shown in Puhinui Precinct Plan 2, along with farming and grazing of livestock, will be allowed as Permitted Activities within Sub-precinct A, which includes the esplanade. The concern is whether this would adequately recognise the sensitivity of the site including Sub-precinct A.

Information Request OS3 – Permitted Activities

Please review and provide an assessment as to whether allowing ongoing farming and browsing by animals will compromise open space values.

Archaeological Sites

Information Concern

The proposed open spaces intersect with archaeological sites. The Structure Plan maps demarcate archaeological site extents as 'no build areas', identifying these are subject to further review but it is unclear how the plan change will consider these sites and how access routes may impact them, as it may be considered public space. There is also a question as to whether these sites will be considered part of the open space, extending beyond the required 20-meter esplanade. If these areas are included as part of the open space clarification is required as to how they will be protected and managed appropriately. The Planning Report also indicates that there is only some understanding of the extent of these areas, and the applicant has proposed provisions to investigate them only after the plan change is approved.

Information Request OS4 – Archaeological Sites

Please clarify how it is intended the archaeological sites are proposed to be managed, including if they are to be identified or otherwise managed as open space.

Weed Management and Native Revegetation

Information Concern

It is noted that, at some stage, the Waokauri Creek margins will require extensive weed management and native revegetation. As these margins will likely become open space clarification is required as to how this will be managed. As part of the clarification required, it is noted that Auckland Airport has a programme in place to manage local biodiversity which includes creating suitable bird environments in low-risk areas around the airport. With respect to weed management and revegetation, it is unclear whether the applicant has considered the impact that revegetation and weed management may have on bird migration in Precinct A.

Information Request OS5 – Weed Management and Native Revegetation

Please clarify how weed management and native revegetation should be managed in areas that are or are likely to become open space.

Campana Clause 23

Archaeology Matters (Council Specialist Reviewer Rebecca Ramsay)

Site Investigations

Information Concern

The Planning Report states that *“provisions have been included that require further intrusive investigations within the vicinity of heritage features identified during the cultural heritage site assessment. Where there is potential for adverse effects on a heritage feature, works must be completed in accordance with an Archaeological Management Plan prepared in consultation with Te Akitai Waiohū”*.¹⁴ The report further states that *“the findings of the investigation will help to ensure that the historic heritage sites are protected and managed appropriately, including what forms of development or subdivision can take place”*.

The absence of this information is considered to be a fundamental gap and should be provided as part of the proposed plan change application. This information is required to make a full and informed assessment of the scale and intensity of effects on historic heritage matters. Further, additional investigations can be used to refine the extent of and understanding of the archaeological evidence along the coastal margins of the plan change area, the evaluations of heritage values provided in Appendix – G: Archaeological Assessment and any subsequent recommendations to manage historic heritage places and values. This information will also be of use to Mana Whenua when making their assessment of the application.

Information Request A1- Site Investigations

Please, once complete, provide the findings of the proposed further intrusive investigations of and within the vicinity of the heritage features identified in the archaeological assessment and Structure Plan maps and a review of the proposals to identify / protect these features.

Site Information

Information Concern

The archaeological assessment states that test pitting was undertaken across the project area, however locations and results of these investigations are not provided.¹⁵ This information is necessary to assist in the assessment of the application, and actual or potential effects on historic heritage values.

Information Request A2 – Site Information

Please provide further information regarding the test pitting locations and results.

Information Concern

An area of potential 19th century historic artefacts and refuse was located at 485 Puhinui Road. The exact location and further research on the origin of the material or potential for further sub-surface archaeological remains is not provided in the assessment.

¹⁴ Planning Report: Request for a Private Plan Change to the Auckland Unitary Plan (Operative in Part). Prepared by Saddleback for Campana Landowners Consortium. Page 54, 57 and 93-95.

¹⁵ Appendix G – Archaeological Assessment page 10.

Information Request A3 – Site Information

Please provide information on the exact location and further research on the origin of the material or potential for further sub-surface archaeological remains at 485 Puhinui Road.

Information Concern

A previously unrecorded archaeological site (midden deposit) was located during the specialist site visit held on 23 April 2024.¹⁶

Information Request A4 – Additional Site

Please provide an assessment and update the structure plan maps as appropriate to account for this site and associated heritage values. This should include analysis of further archaeological potential along the coastal margins (proposed sub-precinct A), particularly where vegetation has limited surface visibility and survey access.

Information Concern

The Structure Plan maps demarcate archaeological site extents as ‘no build areas’, with the caveat these are subject to further review.¹⁷ The source of this information is not provided, with extents assumed to be taken from the 2013 survey results by CFG Heritage for the Puhinui Master Plan¹⁸ and provided in corresponding archaeological site records held in ArchSite. Further, 2023 field survey results appear inconsistent with the 2013 reporting and recent specialist site visit held on 23 April 2024. Notably, a previously unrecorded midden was recorded in April and archaeological evidence of R11/2855 was observed, which was unable to be relocated in the 2023 field survey.

Information Request A5 – Site Information

Please update the archaeological assessment and structure plan maps accordingly to provide clarity on the above matters.

AUP Chapter D17 and RPS B5

Information Concern

Section 5 of the archaeological assessment provides an “assessment of values us[ing] the criteria in Chapter D17 of the AUP and follows the Auckland Council Methodology for Evaluating Historic Heritage Significance”.¹⁹

¹⁶ Coordinates NZTM 1762312.94, 5904411.03.

¹⁷ Structure Plan Drawing Numbers 250, 260 and 270.

¹⁸ Campbell, M., Harris, J., McCaffrey, C. and Gedson, G. 2013. Puhinui Master Plan: archaeological heritage assessment. Unpublished report to Auckland Council.

- 2013. Puhinui Master Plan: archaeological heritage assessment – Background Report. Unpublished report to Auckland Council.
- 2013. Puhinui Master Plan: archaeological heritage assessment – Desktop Study. Unpublished report to Auckland Council.
- 2013. Puhinui Master Plan: archaeological heritage assessment – Summary Report. Unpublished report to Auckland Council.

¹⁹ Appendix G – Archaeological Assessment page 14-17.

Overall, it is considered that the assessment of the significance for archaeological sites lacks detail and is incomplete. Primarily, wording used throughout the assessment is inconsistent with the objectives and policies of the AUP B5 historic heritage regional policy statement (**RPS**) and methodology and guidance document. It is unclear whether the values assigned as 'high' are equitable to the considerable or outstanding thresholds set in the RPS. Additionally, further information is required to support the evaluation statements and articulate the heritage values of each place.

Two sites not relocated during the 2023 field survey (R11/2285²⁰ and 1112) have also been evaluated against the RPS criteria. While the proactive nature to assessing heritage values is appreciated, particularly in such a sensitive landscape, a current understanding of the physical integrity of a place is required to make an informed assessment of overall significance.

Further, there is no assessed value under the Mana Whenua criterion. While it is acknowledged that it is not the role of the archaeologist to determine the significance of archaeological sites and other heritage places to Mana Whenua, this criterion does need to be assessed as part of the plan change as required under the B5 Historic heritage RPS provisions.²¹ A Cultural Heritage Assessment has been provided by Te Ākitai Waiohū²², who appear to hold the view that the archaeological sites within the proposed plan change area are of at least considerable significance and thus potentially meet the significance criteria in B5.2. The significance to Mana Whenua must be considered when defining the physical extent of a significant historic heritage place.²³

The 2013 Puhinui Master Plan: Archaeological Heritage Assessment prepared by CFG Heritage for Auckland Council, recommends a series of archaeological sites for scheduling along the banks of Waokauri Creek, including R11/1111 and R11/2855.²⁴

Information Request A6 – AUP Chapter D17 and RPS B5

Please update the assessment to take into account the matters raised above and provide commentary under the B5 Historic heritage RPS provisions.

Site Scheduling

Information Concern

Historic heritage places meet the criteria for inclusion in Schedule 14.1 Schedule of Historic Heritage if they have considerable or outstanding value in relation to one or more of the evaluation criteria in AUP RPS Policy B5.2.2 (1) and have considerable or outstanding overall significance to the locality or greater geographic area.

If the site/place/s or area should be considered for scheduling as part of the plan change, the proposed plan change provisions should be amended so that they are consistent with the objectives and policies in B5 (RPS Historic Heritage and Special Character).

²⁰ Note: this site was relocated during the specialist site visit undertaken on 23 April 2024.

²¹ AUP, B5.2.2 (1)(C)

²² Appendix N - Cultural Heritage Assessment and Cultural Maps. Te Ākitai Waiohū Cultural Heritage Assessment for Puhinui Peninsula.

²³ AUP, B5.2.2. Policies

²⁴ Page 14-15 and 29-30 – Appendix A

Information Request A7 – Site Scheduling

Please confirm whether the archaeological places recorded warrant scheduling in the AUP under Schedule 14.1. Schedule of Historic Heritage.

Precinct Plan and Plan Provisions

Information Concern

The Archaeological Assessment does not include an assessment of the proposed precinct provisions where they relate to historic heritage matters - specifically, those provisions in relation to Sub-Precinct A to manage areas of cultural and archaeological sensitivity..²⁵

Mapped archaeological extents shown as 'no build areas' extend across two proposed sub-precincts, A and C. To give effect to the objectives and policies of the Puhinui Precinct, these sites should be managed consistency and ideally within an open space zone to ensure ongoing recognition, protection and enhancement.

Further, it is unclear how Sub-Precinct A is to be managed and should be addressed within the plan change application. It is considered critical that on-going management within this area accounts for, and prioritises the archaeological and cultural sensitivities to avoid any adverse cumulative effects.

Structure plan maps also show areas of 'public walkway opportunities' intersecting with identified archaeological sites (no build areas) and within archaeologically sensitive areas. However, there is no assessment or corresponding provisions regarding walkway connections which consider and avoid site damage through associated land disturbance activities or increased visitor impacts..

The structure plan sets out standards for works within archaeological sites, include planting activities. However, these standards do not consider wider vegetation management including pest plant removal and weed control that might be required for ecological enhancement within the coastal margins of proposed sub-precinct A. There is a risk these activities may damage or expose known or presently unrecorded archaeological evidence. The proposed plan change provisions should be updated to consider these additional effects.

The structure plan standards for archaeological sites should also be amended to ensure that Auckland Council Heritage Unit and Heritage New Zealand Pouhere Taonga are also included in any approval for investigations or works affecting archaeological sites.

Information Request A8 – Precinct Plan and Plan Provisions

Please update the archaeological assessment with any additional recommendations to strengthen provisions, including a review of the extent of and provisions within Sub-precinct A, and update the precinct provisions to integrate the structure plan standards where they relate to development works within identified archaeological sites.

²⁵ Planning Report – Part 4, Appendix C – I432 Puhinui Precinct Edits, Appendix D – Campana Road Structure Plan.

Campana Clause 23

Ecology Matters (Council Specialist Reviewer Carl Ackroyd)

Statutory Documents

Information Concern

The Application Documentation has not assessed the proposal against the provisions of section B7 of the Auckland Unitary Plan (AUP) Regional Policy Statement (RPS) or the provisions of the National Policy Statement for Freshwater Management (NPS:FM), or the National Policy Statement for Indigenous Biodiversity (NPS:IB).

Information Request Ec1 – Statutory Documents Reviews

Please provide an assessment against AUP RPS section B7, the NPS:FM and the NPS:IB.

Indigenous fauna

Information Concern

The effects on indigenous fauna have been stated as low despite no formal surveys being undertaken to determine if indigenous fauna are present or not. The conclusion relating to fauna effects has been based off desktop and habitat assessments alone. Relying on desktop surveys and nearby records only infers what species may be present on site. Concluding effects based on this alone is speculative. Specific fauna assessments are required to determine which species are present to better inform the effects, mitigation measures and certainty the provisions of the precinct will give effect to the NPS:IB.

Information Request Ec2 - Indigenous fauna

Please provide a fauna assessment based on a specific survey of the site.

Indigenous vegetation

Information Concern

The structure plan appears to be inconsistent with the vegetation types present on site. The areas identified as 'orchard planting' also contain indigenous planting which the ecological assessment classifies as amenity plantings. The ecological value of the vegetation in these areas has collectively been classified as low. Despite these indigenous trees being small clusters or rows of trees there may be value in identifying and retaining them due to the ecological function that larger trees provide to the wider landscape. It should accordingly be confirmed what larger indigenous trees of value should be retained (where practicable) or relocated to other areas on site.

Information Request Ec3 - Indigenous vegetation

Please provide an arboricultural assessment identifying and confirming the value of individual / groups of trees.

Wetland buffers

Information Concern

There is no assessment on the adequacy of the proposed 10m riparian yard for wetlands. The AUP E15 Vegetation management and biodiversity standards applies a 20m protected vegetation setback from wetlands.

While there is mention of planting riparian yards to 10m and the coastal protection yards to 20m, there is no mention of planting the wetland buffers. The yard enhancements should be more prescriptive than simply stating planting. A link to AUP:OP Appendix 16 Guideline for native revegetation plantings of the should also be specified.

Information Request Ec4 - Wetland buffers

Please provide an assessment of the appropriateness of providing for a smaller wetland yard (buffer) setback than what is anticipated in the existing AUP standards.

Information Request Ec5 - Wetland buffers

Please provide further detail of what species are appropriate for enhancing wetland buffers, referencing (as appropriate) the AUP:OP Appendix 16 Guideline.

Campana Clause 23

Stormwater Matters (Council Specialist Reviewer Gemma Chuah)

Stream erosion – watercourse 14 & 33

Information Concern

SMP section 6.5.1 notes that the majority of the site discharges to the coast and no hydrology mitigation is required. However a portion of the site will discharge to “Watercourse 14” and 33 – that matter needs to be assessed. This should consider the state of the stream and the vulnerability of the stream to erosion. Mitigation could consider inclusion of instream measures or of flow mitigation depending which is more appropriate for the stream in this location.

Information Request SW1 - watercourse 14 & 33

Please provide information on the potential effects of changes in stormwater runoff flows to the streams and discuss any mitigation needed to protect the streams from erosion.

Stormwater mitigation - Campana Road

Information Concern

Swales have not been a preferred asset in the road corridor by AT on other projects and without the asset owner in principle approval this may not be a viable option to provide the required mitigation.

Information Request SW2 - Stormwater mitigation - Campana Road

Please confirm that the proposed swale has been discussed with Auckland Transport as the future asset owner of this device.

Stormwater network and flood management - Information

Information Concern

Further information is required in respect of the Stormwater network and flood management measures required to support future development.

Information Request SW3 - Stormwater network and flood management

Please:

- **provide a plan to show indicative layout of the proposed public stormwater network.**
- **provide a plan to show post earthworks overland flow paths and areas that will have ponding of water with a flow rate of over 2m³/s.**
- **provide the indicative number and location of private and public coastal/stream outfalls intended to serve the proposed plan change area.**

Stormwater quality treatment

Information Concern

Section 6.4.1 of the Stormwater Management Plan proposes excluding roofs from needing water quality treatment if constructed from inert materials. However Table 6.5.3 states an expectation for the provision of bioretention or proprietary devices. The SMP has outlined that stormwater quality treatment and containment/removal of potential accidental spill of contamination will be addressed by each future lot. Further details are required of potential measures that may be implemented to address stormwater quality for future development. This should be based on an assessment of the likely site size and development type to be established, i.e. on what basis measures on the current water quality strategy is made.

Information Request SW4 – Stormwater quality treatment

Please:

- **clarify and confirm what/if mitigation is proposed for roofs within the Plan Change area.**
- **provide clarification whether the proposed approach is feasible for all developable land with consideration of landform of the area, whether there will be some area that no treatment will be provided, and the risks involved of discharging contaminants to the receiving environment.**
- **provide indicative quantities of raingardens, proprietary devices, swales and tree pit required to serve the future developable land, and comment whether alternative solutions have been considered.**

Piping of streams

Information Concern

For adequate assessment, further details are required of the intermittent stream intended to be piped as part of the planned development.

Information Request SW5 - Piping of streams

Please provide further detail of the intermittent stream intended to be piped as part of the planned development.

Campana Clause 23

Groundwater Matters (Council Specialist Reviewer Marija Jukic)

Potential Groundwater Extraction

Information Concern

Chapter 8.0 of the submitted Infrastructure Report indicates that the proposed development will be serviced by a new public water network extension, consistent with the intended upgrades identified within Watercare's scheme. No information has been provided as to whether the applicant has considered an alternative water supply should there be delays to the planned upgrades by Watercare for the area. If it is considered that groundwater abstraction may be an option, high level assessments of potential water use requirements and information on the availabilities of groundwater from the underlying aquifers is required.

Information Request GW1 - Potential Groundwater Extraction

Please confirm that no need is envisaged for an alternative or back-up water supply plan, in the event that there are delays to the intended Watercare upgrades.

Campana Clause 23

Coastal hazard matters (Council Specialist Reviewers Kala Sivaguru and Tola Omidiji)

Coastal Hazards Assessment and Map

Information Concern

The Applicant has not provided a site-specific coastal erosion hazard assessment to assess the potential coastal hazard for the future development over 100 years within the area proposed for a Plan Change.

The Proposed Plan Change area is within a coastal erosion hazard area (CEHA) as per the AUP definition. The site triggers part (b)(i)) of the CEHA definition (as below from Chapter J of the AUP).

(b) at an elevation less than 7m above mean high water springs if the activity is within:

- (i) Inner Harbours and Inner Hauraki Gulf: 40m of mean high water springs;
or
- (ii) Open west, outer and Mid Hauraki Gulf: 50m of mean high water springs;
or

MHWS sits at a contour level of about 2m in the Auckland council GIS maps.

The site is also within the Coastal Inundation 1 per cent AEP plus 1m Control in the AUP.

Policy 24 of the New Zealand Coastal Policy Statement (NZCPS) requires that coastal hazard assessments for development are based on a 100 year projection. This 100 year projection needs to consider the effects of climate change on coastal erosion and instability over that time frame.

The RMA, and Policy 25 of the NZCPS require avoiding increased risk of development in area affected by coastal hazard areas over at least the next 100 years.

AUP Policy E36.3 requires identification of land that may be subject to natural hazards, taking into account the likely effects of climate change including coastal erosion, coastal inundation and land instability.

Auckland Council has undertaken a regional assessment of the area susceptible to coastal instability and erosion (ASCIE) in the Auckland Council Technical Report 2020/021 'Predicting Auckland's Exposure to Coastal Instability and Erosion'. The regional scale scenarios for the Proposed Plan Change site are given in Figure 1c below.

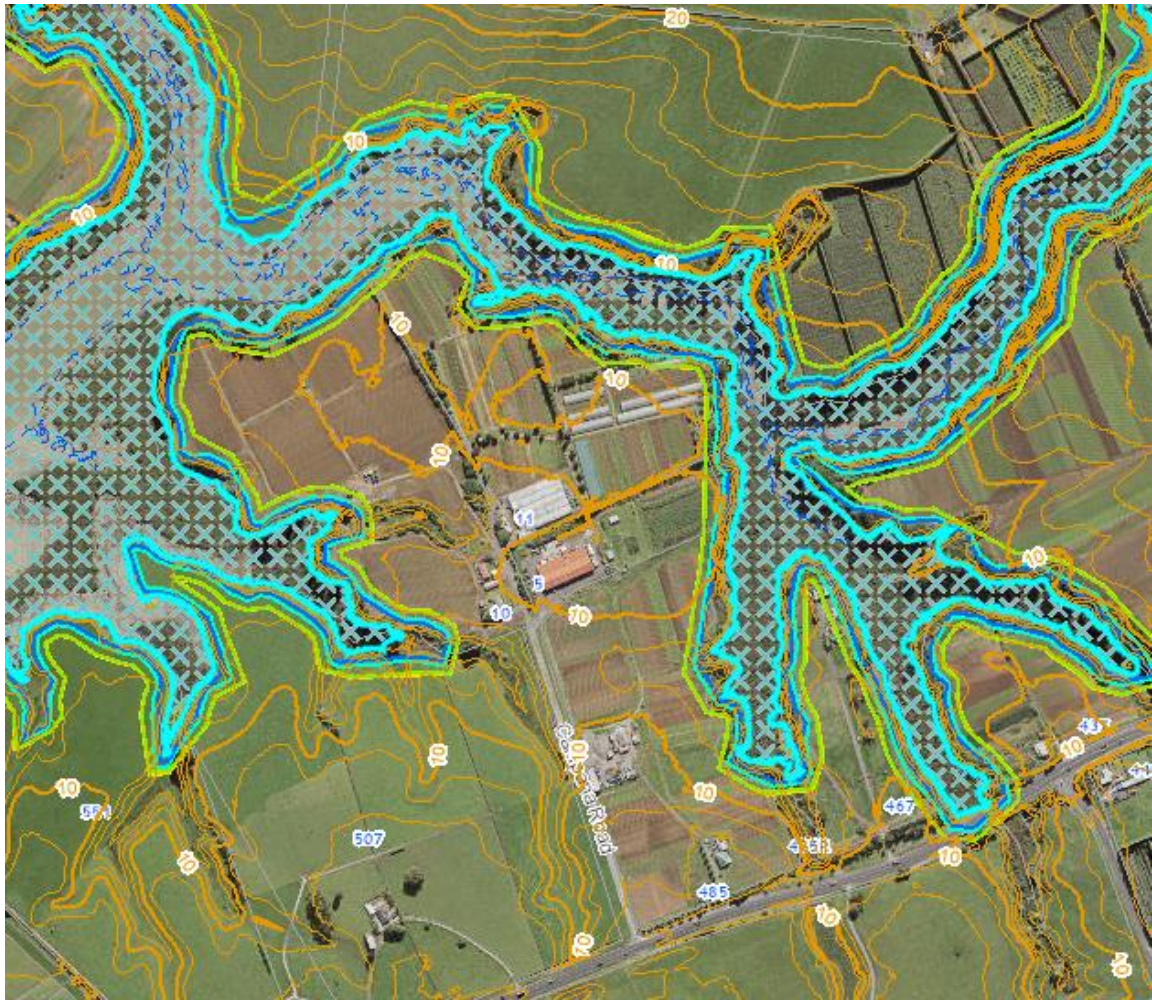


Figure 1c: Shows the indicative line of MHWs in the thick blue dashed line. The green line (immediate to yellow line) shows the extent of the area susceptible to coastal erosion and instability to 2130 under the RCP 8.5 scenario.

As the site is within CEHA, this would trigger consent for buildings/structures under Chapter E36 and under Chapter E38 for subdivision in the AUP. Under s106 of the RMA relevant matters to the proposal are the AUP provisions that establish the coastal erosion hazard area (CEHA) and the Council's Areas Susceptible to Coastal Instability and Erosion (ASCIE).

Information Request CH1 - Coastal Hazards Assessment and Map

Please provide the following:

1. A site specific CEHA report over 100 years with detailed calculation and values for parameters used in the conceptual formula to calculate the 100-year ASCIE (in accordance with the guidance and guidelines provided in the link). Sea level projections from the MfE 2024 ([Coastal hazards and climate change guidance | Ministry for the Environment](https://searise.takiwa.co/map/6245144372b819001837b900/embed)) including vertical land movement (VLM: <https://searise.takiwa.co/map/6245144372b819001837b900/embed>.) and the Auckland's Council's regional assessment document (<https://knowledgeauckland.org.nz/publications/coastal-hazard-assessment-in-the-auckland-region/>) should be used in the 100-year ASCIE calculation. All these details should be included/attached in the report.

2. A map (or maps) to indicate the proposed Plan Change in relation to the 100-year site specific ASCIE and demonstrate that future development will be outside the 100-year ASCIE. If the development is inside the 100-year planning horizon, mitigation options should be provided.

Clause 23 Response Memo

Attention:	
Peter Reaburn	Consultant Planner (Auckland Council)

17 September 2024

Dear Peter

In response to your request for further information under Clause 23 of the RMA dated 8 May 2024 I have prepared the following response. Note that I have personally addressed those matters raised by yourself (P1-P5) and Ms Stoney insofar as they relate to my area of expertise (SP1-SP3, SP5, SP6). I have left the other matters to be addressed directly by the relevant subject matter expert unless otherwise specified:

- Requests T1-T4 have been addressed by Don McKenzie of Don McKenzie Consulting. I have personally addressed T5 below.
- Requests E1-E6 and SP4, SP7 & SP8 have been addressed by Tim Heath of Property Economics.
- Requests UD1-UD5 and OS1-OS5 have been addressed by Bruce Weir of Saddleback Planning.
- Requests L1-L6 are being addressed by Rob Pryor of LA4 and this response will be provided subsequent to securing access to Pukaki Marae and Crater Hill (critical viewpoints from a landscape and visual perspective).
- Requests A1-A7 have been addressed by Lucy Arrell and Matthew Campbell of CFG Heritage in an updated archaeological assessment.
- Requests Ec2-Ec5 have been addressed by Angela Tinsel of Viridis. We have reserved response to Ec1 until the landscape and visual assessment is complete.
- Requests SW1-SW5 and GW1 have been addressed by Ryan Wylie of Maven.
- Request CH1 has been responded to by Sasha Eremin of Babbage Consultants.



Updates to the Plan Change Proposal

It bears mentioning that there has been significant progress in development of the precinct provisions and the structure plan:

- Sub-precinct A within the structure plan area has been replaced by a bespoke sub-precinct C1 which is functionally a coastal yard that will:
 - Protect identified archaeological sites and ecological features.
 - Ensure that the potential for a future coastal pathway is protected.
 - Provide a landscape buffer/amenity area for the future employees of light industrial development across sub-precinct C.
- Sub-precinct E (north) has been shifted to sit adjacent to Puhinui Road/SH20B in order to provide a higher amenity interface with the heritage corridor and provide wider benefit to the Puhinui Precinct and users of the SH20B corridor.
- The structure plan has been modified to identify:
 - Archaeological areas.
 - Future indicative connections to land to the west.
 - An indicative northern extension to Campana Road.
 - An access strategy for the eastern “finger” not reliant on a bridge solution or direct access to SH20B.
- The structure plan has also been consolidated within the precinct chapter itself and the structure plan provisions have been replaced by an earthworks consent trigger, an archaeological management plan standard and a stormwater treatment standard.



Attachments

For ease of distribution and reference I have asked the subject matter experts to provide their responses in memos and reports attached to this response.

- Attachment A – Updated Precinct Provisions (including an updated Structure Plan)
- Attachment B – Traffic Response
- Attachment C – Economics Response
- Attachment D - Urban Design and Open Space Response
- Attachment E – Updated Archaeology Assessment
- Attachment F -Ecology Response
- Attachment G – Stormwater and Groundwater Response
- Attachment H – Coastal Hazard Assessment
- Attachment I – Sound Resource Management Response (prepared by James Gardner-Hopkins)



Planning Matters

Information Request P1 – Sound Resource Management

In light of the matters raised above the Applicant is requested to provide a further assessment as to whether the PPC represents sound resource management.

While I appreciate the general concerns raised surrounding the timing of the plan change, and have addressed these concerns thoroughly against SP1-SP8 below, an assessment under Clause 25(4)(c) is as you know grounds for rejection of a plan change request. In light of the above, and having received expert advice on the matter from our strategic advisor, I would like to very carefully consider the scope of an assessment under Clause 25(4)(c). In the first instance it may be useful to determine what is meant by “sound resource management practice”. While there is no statutory definition the High Court has provided some direction¹:

[95] It would be unhelpful for me, in the context of this appeal, to embark on some definition of what are clearly very broad words. I agree with Judge Newhook the words “sound resource management practice” should, if they are to be given any coherent meaning, be tied to the Act’s purpose and principles. I agree too with the Court’s observation that the words should be limited to only a coarse scale merits assessment, and that a private plan change which does not accord with the Act’s purposes and principles will not cross the threshold for acceptance or adoption.

[96] But whether a procedural matter, such as timing, is caught by the words is problematic. There is inevitably a degree of overlap between practice, procedure, and substance, but the concepts are not identical.

[97] I accept that there is nothing about the appellant’s proposal which offends against sound resource management practice. The issue is whether the timing of the appellant’s request offends.

[98] In general terms I think it is drawing a long bow to hold that a timing issue (assuming a request’s timing is not frivolous or vexatious) will result in an otherwise unobjectionable proposal offending.

In my reading of the High Court’s decision, an assessment as to whether a proposal represents sound resource management practice comes down to two considerations:

¹ Malory Corporation Ltd v Rodney District Council [2010] NZRMA 392, at [85-98]



- a. A very coarse merits based assessment relying on consistency with the purpose and principles of the RMA; and,
- b. some limited consideration of the timing of the proposal.

In regard to point a, I shall consider the merits of the proposal against the purpose of the RMA, which I will take as read:

- We have been advised by the landowners that the site has almost completely passed out of potential for any profitable productive use dependent on its soils. The costs associated with market gardening have risen uncontrollably in recent years and land holdings of this size no longer make commercial sense. In order to make market gardening profitable, mechanization is necessary that is impractical at this scale.
- Given recent developments in Auckland Council's interpretation of Future Urban Zone (FUZ) provisions, keeping the site within the FUZ would limit the development of the site for anything other than a horticultural use.
- Thus, under the current zoning, the permissible activities make no commercial sense and the site will soon sit fallow (other than activities approved by resource consent that I would consider are characteristic of the Light Industrial Zone). Further, the site is a private landholding that would not otherwise provide public benefit should it sit fallow.
- Rezoning of the site as Light Industrial Zone (with infrastructure tags in the precinct provisions) will enable a sensible interim use (storage yards) until transport infrastructure is available and will enable a swift transition to a higher use once that infrastructure is built.

I think it is self-evident that enabling the development of a site for a sensible and pragmatic purpose is consistent with s5 in the context of a baseline scenario under which the site provides no private or community benefit.

In regard to point b, the concerns you have raised around timing, whether they hold general validity or not, are not considered relevant considerations in term of Clause 25(4)(c) in the context of a proposal that is otherwise consistent with the purpose and principles of the RMA. I think it would be difficult to describe the proposal as either frivolous or vexatious. Private interests looking for a reasonable use of their landholdings for a commercially viable purpose is quite the opposite of frivolous and the infrastructure tags in place mean the proposal is not vexatious to the general development of the surrounding area.

I have attached a separate letter from our strategic advisor James Gardner-Hopkins that also substantially addresses the concerns around "sound resource management practice".



Information Request P2 – Sub-Precinct E

Please provide a further assessment of sub-precinct E to review whether it is required to serve the convenience needs of the local area, whether it could have a function beyond those local needs (and the implications of that) and whether, having regard to all of the local area currently zoned FUZ, the proposed location is the optimum location.

It is now proposed to relocate sub-precinct E to be adjacent to Puhinui Road to provide wider benefit for commuters and general through traffic. This is considered a better option in the context of the wider area given that there will be demand for this kind of development along SH20B and it has not otherwise been provided in the wider Puhinui Precinct.

I believe that a commercial sub-precinct within the Heritage Gateway Corridor will better contribute to the amenity and heritage values of the corridor than standard light industrial activities.

Information Request P3 – Sub-Precinct A

Please provide an assessment and evaluation of methods (other than the proposed sub-precinct A) to identify and manage the coastal margins with their associated landscape, cultural and archaeological values, their potential for public access (to and along) and potential interface issues with adjoining industrial land.

It is my position that the updated precinct provisions including the new sub-precinct C1 are sufficient to address any effects on the values identified above. The project team have worked in close consultation with Te Akitai to ensure that:

- Known archaeological sites are protected with an appropriate overlay.
- Earthworks across the area require consent, and discretion has been given to archaeological and cultural landscape effects.
- Archaeological management plans are required for development.

Furthermore, the potential for public access is retained into the future via sub-precinct C1 and reserves can be vested with Council at the time of subdivision. I do not see any interface issues with adjoining industrial land, landscape buffers are commonly used between industrial activities and ecological areas such as riparian or coastal margins (see the Wiri Precinct of the AUP(OP)).

Information Request P4 – Campana Structure Plan

Please clarify the purpose and intent of the Campana Structure Plan in the proposed PPC provisions.



An updated structure plan has been provided that will be consolidated within the Puhinui Precinct document itself. The structure plan provides clarity about the future access strategy for the site once upgrades to SH20B are constructed and full light industrial development is enabled. Crucially, the structure plan demonstrates the access strategy for the eastern ‘finger’ of the site that cannot be directly accessed from Campana Road. The superseded “structure plan provisions” have been replaced by a suite of standards in the precinct chapter itself.

Information Request P5 –Consultation

Please advise what further consultation has been carried out and, if no further consultation has been carried out, why the Applicant has considered that to be unnecessary.

We continue to work with Te Akitai to develop the precinct provisions and the most recent iteration of the precinct provisions has been distributed to all identified stakeholders on 16/09/24. All correspondence will be forwarded to Council in due course.

Strategic Planning Matters

Information Request SP1 - Precinct Plan Integration

Please explain how the plan change will or can integrate with other areas of FUZ and that future rezoning options are not being compromised.

An updated structure plan has been provided demonstrating transport connections with other parts of the FUZ. The only other site that will need to be provided access off Campana Road is 507 Puhinui Road which has been provided with indicative access within the structure plan.

Given that all properties within the site itself can be accessed via a 20m road reserve, future development of these sites for light industrial uses will not be compromised. For avoidance of doubt, a northern extension to Campana Road with turning head has been marked up on the structure plan.

Note the recently approved roading cross sections in Mr McKenzie’s response. They clearly show that there is enough width within the Campana Road reserve to enable future development.

Information Request SP2 – Land use and transportation Integration

Please provide a further assessment in relation to the integration of the PPC area with transport projects along the state highway 20B (SH20B) corridor.

The transport project of note is the NoR for BRT along SH20B. Given:

- There is and will continue to be a controlled intersection between Campana Road and SH20B.
- The whole plan change area can be accessed via this intersection (as shown on the updated structure plan).



The plan change area will be fully integrated with the SH20B upgrades from a functional perspective without a need to add vehicle crossings onto the road corridor.

The supplied graphic information packet includes indicative cross sections for a 20m road corridor that demonstrate there is more than enough room to accommodate any road upgrades Auckland Transport may wish to introduce including pedestrian footpaths or cycleways.

Information Request SP3 - Timing for Development

Please assess and provide information on the likely timing of transitioning away from unmanned storage areas to more intensive light industry uses.

Discretion is reserved in the LIZ to consider transportation effects, as such transition away from storage yards to a higher use would be contingent on an assessment that transport effects can be addressed and mitigated. As such the transition would likely occur subsequent to the improvements to SH20B under the Airport to Botany BRT NoR and the widening of the bridge to the west. The FDS indicates that this infrastructure will become available 2030+.

Information Request SP5 - Future Development Strategy

Please provide a further assessment of the PPC's alignment with the FDS.

This will be provided in an updated planning report. In brief I consider there to be two limbs of the FDS that require consideration:

- The informing principles of the FDS being reduction of GHG emissions, adapting to climate change, making efficient infrastructure investments, protecting and restoring the natural environment and enabling sufficient business growth in the right pace and time.
- The sequencing for land release in the Puhinui Peninsula.

Regarding the first limb, the proposal almost perfectly aligns with the guiding principles of the FDS:

- The proposal addresses greenhouse gas emissions by:
 - Intensifying an existing urban area, if a storage yard is not established on the site in the near term it will have to be established elsewhere, further from the regional productivity hub in central Auckland. The same can be said for the light industrial activities that will be established once transport infrastructure is available (Principle 1(a)).
 - The proposal creates a framework for accessing the coastal margins of the site via indicative connections in the structure plan and the introduction of sub-precinct C1(Principle a(b)).



- The proposal will bring jobs and home closer together in the medium to long term by locating light industrial development in proximity to the residential neighbourhoods of Central and South Auckland (Principle 1(c)).
- The proposal will adapt the site to climate change risk by:
 - Avoiding built development within coastal hazard areas via sub-precinct C1 (validated with the provided Coastal Hazard Assessment) (Principle 2(a)).
 - Acknowledging the value of ecosystems services and using them as a basis for green infrastructure solutions (on-site freshwater values have been identified and protected for use in a future stormwater management strategy) (Principle 2(b)).
- The proposal will allow infrastructure providers to make better value investments by providing business land within the urban boundary (with all the attendant efficiency benefits) that would otherwise have to be provided in another location outside the urban boundary (costly and inefficient) (Principle 3). Note that the interim storage yard solution makes the best use of existing transport infrastructure for land that will otherwise likely sit fallow in accordance with Principle 3(b).
- The proposal will protect and restore the natural environment by:
 - Protecting the ecological and freshwater values on the site into the future via sub-precinct C1 noting that there are currently no statutory protections in place other than those that generally apply (Principle 4(a)).
 - Noting that the only mechanism left in place to connect the disparate ecological sites and values of the Puhinui Peninsula is a coastal yard, sub-precinct C1 is the only sub-precinct within the overall Puhinui Precinct that gives meaningful effect to consolidating and connecting these sites and values (Principle 4(b)).
- The proposal is considered to supply business land at the right place and time as the Airport Precinct and South Auckland are undoubtedly focus points of infrastructure and business investment in the Auckland Region. The proposal is therefore undoubtedly the right time and place for enabling growth given it will allow for the highest and best use of the site in the near term, and in the long term will enable efficient establishment of light industrial activities on the site as soon as infrastructure is available (Principle 5).

Regarding the second limb, given the 2030+ timeline given for development of FUZ in the Puhinui Peninsula, infrastructure planning and investment will begin happening very soon, and the plan change perfectly aligns with the FDS:



- Allow a reasonable use of the site in the near term that will not compromise growth or the Puhinui Peninsula generally.
- Allow for full development as soon as the necessary infrastructure is available, as envisioned by the FDS.

I would reiterate here that this is an uncontroversial approach already adopted across the rest of the peninsula, and the plan change merely corrects an anomalous parcel of FUZ land in an area that is otherwise zoned light industrial.

Information Request SP6 - Options Analysis

Please review the s32 'do nothing' option and its assessment so that it (more correctly) refers to the AUP zoning of the land will remaining unchanged until it is rezoned by a plan change.

The options assessment was undertaken on the basis of the “do nothing” option being the land remaining unchanged until upzoned by a future plan change. See the below extracts from the planning report:

*In achieving certainty in regard to the release of light industrial land, the do nothing approach provides no certainty **beyond those statements in the FDS that indicate a 2030+ timeline**, a vague and uncertain plan given the position of the site within the country's largest urban centre Planning Report. Relative to this, rezoning the site with or without additional precinct provisions provides certainty **in regard to timing of the upzoning**.*

*The do-nothing approach provides little certainty in regard to the environmental effects of any future light industrial development, **leaving the process of upzoning to a future plan change process** that may not meet the level of completeness of the proposal.*

Transportation Matters

Information Request T6 - Puhinui Precinct Plan Provisions

Please review and consider the following (note: while this may not be considered a specific information request the applicant is requested to consider these matters).

- 1. Amendment to requirement I432.9(5) to reference sub-precinct C.*
- 2. A new provision under I432.6.1.2 to require the upgrade of Campana Road.*
- 3. Provision I432.6.1.2 (1) to refer to 'any proposed upgrade' to the Campana Road / Puhinui Road intersection.*
- 4. Clarification as to why the plan change area is proposed to be exempted from I432.6.1.2 (2) and (3).*
- 5. Better clarity of the wording under standard I432.6.1.2(4) & (5).*



6. Change of status of Activities A52 and A54 in Table I432.4.2, in relation to sub Precinct C, from N/A to NC.

The following amendments have been made to the precinct provisions in response to the request:

- I432.9.2(5) already captures sub-precinct C and C1.
- There is already sufficient discretion to require road upgrades for any meaningful increase in development intensity across the plan change area.
- All reference to the plan change area has now been removed from I432.6.1.2(1). Traffic will now be managed under I432.6.1.2(4) & (5).
- Wording of the traffic standards has been changed.
- Activity status has been changed to NC.



Do not hesitate to contact us should you require any further clarification. We intend to use the original planning report as a living document which will be updated as the Clause 23 process is resolved and will discuss all of the developments within this document.

Kind regards,

Author

David Clark

Planner

Saddleback Planning Limited

Reviewer

Joe Gray

Principal Planner

Saddleback Planning Limited

Attachment A

I432. Puhinui Precinct

I432.1. Precinct Description

The primary purpose of the Puhinui Precinct is to enable a transition from rural to urban development, while recognising the cultural, spiritual and historical values and relationships that Te Ākitai Waiohū have with the land and sea in Puhinui as part of the Māori cultural landscape. The precinct also recognises the relationship which exists between Māori cultural landscape values and the management of natural and physical resources.

The precinct provides for predominately light industrial and airport related activities and some large lot residential development, using specific standards and assessment criteria to guide urban development. This is to ensure that development and subdivision is co-ordinated with the provision of transport infrastructure improvements, and does not adversely affect the performance of the road network across a range of criteria including reliability, safety and intersection performance; as well as ensure that an integrated approach is taken to managing the adverse effects on the Māori cultural landscape values. The cultural landscape applies to the entire precinct, in areas within and outside of the Rural Urban Boundary.

The Precinct includes the land area bounded by Waokauri Creek, State Highway 20B, Manukau Memorial Gardens Designation and sub-Precincts A and B. Development within this area has significant potential to adversely impact on the safe and efficient operation of State Highway 20B. It is also an area of identified cultural significance.

Future Urban zones are proposed to defer development until appropriately planned and funded transportation infrastructure is available and further consideration has been given as to how the land would be developed to reflect these values.

The provision for land extensive industrial activities is in alignment with the Regional Policy Statement and the Auckland Plan, although Puhinui is not identified as a greenfield area for investigation in the latter. However, the Auckland Plan supports further expansion of the Rural Urban Boundary in relation to the location of business land and recognises that some flexibility is needed to provide additional capacity where it is most required (e.g. southern Auckland).

Much of the land to the south of the Waokauri Creek (east of the Auckland International Airport and west of the South-Western motorway) is zoned Business - Light Industry, The inclusion of the land will create the potential for increased business and employment opportunities over time. A limited range of commercial activities will provide for some convenience retail and amenities. The Puhinui Precinct allows development where supported by infrastructure. In particular, development will be managed to ensure transport network improvements are coordinated with trip generation arising from development. This reflects the need for substantial transport infrastructure investment to support full development within the precinct.

The comprehensive and coordinated approach to development promoted in the precinct reflects its significant size and the strategic location of light industry zoned land in proximity to the intersection of two major transport corridors. The underlying Business - Light Industry Zone provisions are tailored to fit the desired outcomes for this area and address the constrained transport infrastructure to ensure potential effects on the transport network are avoided, remedied or mitigated. This approach acknowledges that significant transport upgrades will be required to support the level of development envisaged.

The precinct therefore encourages landowners of light industry zoned land in sub-precincts A to F to establish the spatial pattern of development and to address the integration of the sub-precincts, both

with each other and within the wider context. The provisions address issues such as built form, future street/pedestrian networks and layout of road connections with transport corridors, provision of activities, staging of development and the recognition of Māori cultural landscape values.

Puhinui southern gateway connection and transport infrastructure

Puhinui Road (State Highway 20B) provides a direct transport linkage between Auckland International Airport and the South-Western Motorway which forms the eastern boundary of the precinct. Puhinui Road is recognised not only as a transport corridor, being a main entry and exit point for tourists and visitors to the country and an important freight route, but for its importance as a cultural heritage gateway.

The precinct identifies the 'Puhinui Heritage Gateway, which includes the State Highway 20B designation, a 40m strip on the southern side of the designation, and 40m strip on the northern side of the designation. The entire route runs the length from the State Highway 20 interchange through to the Auckland International Airport.

The route is intended to provide for possible transport requirements, including dedicated bus and rail corridors, and to integrate with the surrounding business areas that develop and public open space areas in the precinct. The route will promote important physical, ecological, and visual connections between the northern and southern areas of the precinct, and for this reason needs to achieve a high level of legibility and cohesiveness in its elements. This is achieved through provisions which will contribute towards the creation of a distinctive gateway.

The existing road network, and in particular, State Highway 20B, is reaching capacity and has limited ability to cater for the additional traffic generation which will result from urbanisation of the precinct. Improvements to the roading network will need to be considered concurrently with urban development of the Puhinui Precinct to ensure the functionality of the road network (including the critical link to Auckland International Airport) is maintained.

Mana Whenua cultural landscape

The Puhinui peninsula reveals a complex but unique cultural ecosystem of inter-related settlements, travel routes, and fishing, gardening and food and resource gathering areas all closely associated with a series of prominent natural features and waterways that together form an integral part of the stories, genealogy, mythology and history of Te Ākitai Waiohū.

The Puhinui peninsula is notable for its continued occupation by Te Ākitai Waiohū since pre-European times due to its proximity and access to the coast (Manukau Harbour and its tributaries) for collecting kaimoana, fertile soils for food growing, and maunga for defence purposes. Puhinui is inextricably linked to the history, stories, whakapapa and mythology of Te Ākitai Waiohū. Te Ākitai Waiohū have a strong spiritual (Taha wairua) association with Puhinui which gives its people a sense of meaning and purpose.

Due to its proximity to the Manukau Harbour and its tributaries which weave through this area, the influence of the coast on the ecological, recreational, cultural and spiritual values and visual character is recognised in the Puhinui Precinct. The Puhinui Precinct is bisected by the Waokauri Creek, a Mana Whenua Management Precinct, which recognises the Māori reservation status of the Creek under the Te Ture Whenua Māori Act 1993, for the purpose of a landing place, and place of historic, spiritual and cultural significance for the use and benefit of the local hapu of Te Akitai and Te Ahiwaru o Wai-o-hua.

Cultural values to be protected encompass the geological, the coastal, archaeological, and ecological features within the precinct. The Pukaki Crater and lagoon (Te Pukakitapu o Poutukeka) is ancestral Māori land of particular spiritual value to tangata whenua, and ownership is held by the Pukaki Māori

Marae Committee. The Portage Road Reserve at the centre of Nga Kapua Kohuora (Crater Hill) is vested in Council as reserve land. Pukaki Crater and Portage Road reserve are zoned Open Space – Conservation.

Natural environment

The southern boundary of the precinct follows the Puhinui Stream, a Significant Ecological Area which connects to the Puhinui Creek in the upper reaches of the Manukau Harbour that is also a Significant Ecological Area. In recognition of these receiving environments, a Stormwater Management Area Flow overlay applies to address stormwater matters.

Designations and special purpose zones

The precinct is subject to several designations for various purposes. These include Puhinui Road which is designated for state highway purposes, and part of the Auckland International Airport designation which provides for a range of aeronautical operations.

Parts of the precinct are located within Auckland Airport's High Aircraft Noise and Moderate Aircraft Noise Areas, for which there are controls on the establishment of Activities Sensitive to Aircraft Noise. As a consequence the precinct has both business opportunities for land development related to the airport and other local industry, and constraints relating to activities sensitive to aircraft noise and building heights related to the approach paths.

The precinct contains the Manukau Memorial Gardens Special Purpose zone - Cemetery and the adjoining site which is a designated extension for cemetery purposes. Petroleum supply and water/wastewater supply designations overlay underground pipes that bisect the precinct.

The Puhinui precinct comprises of the following seven sub-precincts and zones:

- Sub-precinct A (Airport - Coastal) and Sub-precinct B (Airport - Core) – Business - Light Industry Zone and Coastal - Coastal Transition Zone
- **Sub-precinct C and Sub-precinct C1 – Business – Light Industry Zone and Open Space – Informal Recreation Zone**
- Sub-precinct D - Business - Light Industry Zone
- Sub-precinct E – Business - Light Industry Zone
- Sub-precinct F (Tidal Road) - Business - Light Industry Zone
- Sub-precinct G (Retreat Drive) – Residential - Large Lot Zone, Coastal - Coastal Transition Zone, Open Space – Informal Recreation Zone
- Sub-precinct H (Rural) – Rural Production Zone, Coastal Transition Zone, Open Space – Informal Recreation Zone

The precinct also comprises the following zones which sit outside of any sub-precinct: Open Space – Conservation Zone, Special Purpose – Māori Purpose Zone, Special Purpose – Quarry Zone, Strategic Transport Corridor Zone, Future Urban Zone and Special Purpose – Cemetery Zone.

The Puhinui precinct consists of overarching provisions that apply throughout the precinct, and specific provisions that apply to any number of sub-precincts, as specified in the plan.

Sub-precincts A & B (Business - Light Industry Zone and Coastal - Coastal Transition Zone south of Waokauri Creek)

Sub-precinct A adjoins the coastal environment and is proposed to be used for open space and passive recreation purposes. Sub-precinct B is at the interface of A and includes that land east of Pukaki Creek, south of Puhinui Road, that could be used for an airport remote parking area and a public transport interchange, as well as a small range of aeronautical and airport support activities. The land to the north of Puhinui Road is subject to Auckland International Airport's Designation.

Sub-precincts A and B also encompass sites and connections which are of cultural value to Mana Whenua and these are addressed in the provisions.

Sub-precinct C & C1 (Business – Light Industry Zone & Open Space – Informal Recreation Zone – Campana Road)

Sub-precinct C and C1 seek to create a high quality light industrial development with a strong sense of place for users and visitors. The use of distinctive, flexible and environmentally responsible architecture and urban design that maintains and enhances the existing topography and landscape where practicable, will appropriately enhance development. The Waioakauri creek and its tributaries that surround the sub-precinct are significant to Te Akitai Waiohoua. And Sub-precinct C1 is reserved for open space and passive recreation purposes to provide a buffer between light industrial development and the coastal margins.

Sub-precinct C is located on the northern side of Puhinui Road (SH20B) and is generally bound by Campana Road to the west and Sub-precinct C1 to the north and east. Sub-precinct C1 is located between Sub-precinct C and the margins of the Waioakauri creek.

Due to the constrained nature of existing transport infrastructure, development within Sub-precinct C is subject to a number of staging and infrastructure requirements designed to ensure a safe and efficient transport network. The sub-precinct allows for unmanned storage yard activities as a permitted activity, however further development must be supported by additional infrastructure.

Sub-precinct D (Business - Light Industry Zone south of ~~Waokauri Creek~~ Puhinui Road)

Sub-precinct D seeks to create a high quality, best practice, light industrial development with a strong sense of place for users and visitors. The use of distinctive, flexible and environmentally responsible architecture and urban design that maintains and enhances the existing topography and landscape where practicable, will appropriately enhance development.

Sub-precinct D is located to the east and west of Prices Road. The land to the east of Prices Road encompasses an area of approximately 150 hectares defined by the Puhinui southern gateway connection, State Highway 20 to the east, Puhinui Stream and its reserve to the south, and Puhinui Reserve to the west. The land features streams that flow into the Puhinui Stream and Waokauri Creek to the north.

The land to the west of Prices Road comprises a block of land about 48.4 hectares, the current physical address being 55 Prices Road. This land is proximate to Colin Dale Park, Puhinui Reserve and the Puhinui Stream.

Due to the constrained nature of existing transport infrastructure, development within the sub-precinct is subject to a number of staging and infrastructure requirements designed to ensure a safe and efficient transport network. The sub-precinct allows for development, where supported by infrastructure.

Sub-precinct E (Business - Light Industry Zone south of ~~Waokauri Creek~~ Puhinui Road)

Sub-precinct E provides for ~~two~~ **three** hectares of land **in two separate locations, sub-precinct E (south) and sub-precinct E (north),** for local convenience retail activities and amenities for the

precinct, to support the surrounding light industry areas and the needs of visitors and employees. The sub-precinct will respond to the existing topography and landscape, appropriately enhancing natural elements and facilitating pedestrian linkages where practicable.

The location of sub-precinct E (south) in the precinct plan is indicative only, and subject to the pattern of future development within sub-precinct D including the future roading layout. It is however anticipated to remain within the south-eastern corner of sub-precinct D. Sub-precinct E (north) is within the Campana Structure Plan area and will support light industry areas north of Puhinui Road. Development in sub-precinct E is also to occur in a manner which manages potential effects on transport infrastructure.

Sub-precinct F (Business - Light Industry Zone - Tidal Road)

Sub-precinct F clusters industrial development, providing for an additional 14.8 hectares of Business - Light Industry Zoned land along Tidal Road, the current physical address being 72 Tidal Road. Sub-precinct F partially includes and is adjacent to the Crater Hill Outstanding Natural Feature. The sub-precinct seeks to deliver a high quality industrial development that recognises the cultural landscape values and that maintains and enhances the existing landscape where practicable.

Sub-precinct G (Residential - Large Lot Zone, Coastal - Coastal Transition Zone, Open Space – Informal Recreation Zone - Retreat Drive)

Sub-precinct G provides for Large Lot residential development at Retreat Drive that recognises the cultural landscape values, and relationship to the Waokauri Creek and Pukaki Crater. The landscape will be maintained and enhanced where practicable.

The sub-precinct comprises approximately 21.8 hectares of land along Retreat Drive, and includes approximately 13.3 hectares of coastal land which presently accommodates market garden activities on the site at 39 Tussock Avenue, Mangere.

Given its proximity to the Waokauri Creek, some sites in the sub-precinct are subject to the underlying Coastal Transition zone.

Sub-precinct H (Rural)

Sub-precinct H provides for the continuation of rural production activities in the precinct, in proximity of those areas demarcated as Outstanding Natural Features and their associated reserves or historical physical extent (e.g. Special Purpose – Quarry zone). Sub-precinct H recognises the presence of elite soils in the vicinity of the Pukaki Crater. Land use activities provided for in sub-precinct H are a reflection of the cultural landscape values and the objective to maintain and enhance the existing landscape, including the coastal margins, where practicable.

A settlement established in the mid-1860s on the shore of Waokauri Creek remains today the location of the main pa of Te Ākitai Waiohū. This is supported by its zoning as a Special Purpose – Maori Purpose zone, and provides for papakainga housing, marae and other activities which support Maori social, cultural and economic development. Sub-precinct H is adjacent to the Special Purpose – Maori Purpose zone.

The coastal and ecological values are recognised in the sub-precinct to reflect the proximity of sub-precinct H to the Waokauri Creek. Some sites in the sub-precinct are subject to the underlying Coastal Transition zone plan provisions.

I432.2. Objectives (precinct-wide) [rcp/rp/dp]

- (1) A range of business and airport related activities are provided for in the precinct to ensure the efficient use and development of the land resource, and recognition of the precinct's proximity to Auckland International Airport.
- (2) Mana Whenua cultural, spiritual and historical values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, sites, waahi tapu, and other taonga, in the Puhinui Precinct are identified, recognised, protected, and enhanced.
- (3) Subdivision, use and development is managed in an integrated manner to avoid where practicable, or otherwise remedy or mitigate, adverse effects on the natural coastal environment, and significant ecological areas within the Manukau Harbour, as well as its tributaries.
- (4) Subdivision, use and development is managed to maintain or enhance water quality within the Puhinui freshwater catchment and receiving coastal environment, including the integration of Mana Whenua values, mauri, matauranga and tikanga associated with fresh water and coastal water resources.
- (5) Subdivision, use and development is designed and located to avoid, or otherwise remedy or mitigate, adverse effects on those landscape features identified as Outstanding Natural Features, and areas with high levels of sensitivity to landscape modification in the Māori cultural landscape, which contribute to the ecological, geological, cultural, spiritual and amenity values of the precinct.
- (6) The location, scale and form of development is managed within the precinct to avoid, remedy or mitigate adverse effects on cultural, spiritual and landscape values and their relationship associated with the Māori cultural landscape, while recognising the operational requirements of Auckland International Airport.
- (7) A southern gateway connection to Auckland International Airport is developed, that provides improved connectivity and accessibility for all transport modes, and recognises and provides for the cultural significance of the Puhinui Peninsula to Mana Whenua.
- (8) Subdivision and development of land is staged to ensure adequate transport infrastructure capacity is in place prior to land use development.
- (9) Subdivision and development establishes a transport network that provides for the safe and efficient movement of all travel modes.
- (10) The timing and sequencing of integrated development provides for the efficient and effective provision of all infrastructure including transport networks, stormwater, wastewater drainage networks, water, power, gas and telecommunication supply networks.
- (11) Subdivision and/or development within the precinct facilitates a transport network that:
 - (a) integrates with, and avoids adverse effects on the safety and efficiency of, the surrounding transport network, including any upgrades to the surrounding network; and
 - (b) facilitates transport choices by providing for pedestrians, cyclists, public transport facilities, and vehicles; and
 - (c) avoids where practicable, or otherwise remedies or mitigates adverse effects on the environment, including effects on Mana Whenua values.
- (12) Development demonstrates the integration of green networks (such as natural freshwater and coastal systems, and ecological corridors) with open space and pedestrian networks while providing for improved access and connectivity.

The overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above.

I432.3. Policies (precinct-wide) [rcp/rp/dp]

- (1) Manage development to require that activities in the Puhinui Precinct are those primarily associated with manufacturing, warehousing, transport, storage and distribution activities consistent with a Business - Light Industry Zone and airport related activities.
- (2) Recognise, protect and enhance the cultural, spiritual and historical values and relationships associated with the Māori cultural landscape at Puhinui. These values include but are not limited to:
 - (a) Pūkaki Marae and its connections within the Māori cultural landscape
 - (b) important sites, places and areas, wāhi tapu and other taonga
 - (c) views and connections between existing or historical cultural sites, places and areas
 - (d) coastal edge and waterways
 - (e) fresh water quality
 - (f) Mauri, particularly in relation to freshwater and coastal resources
 - (g) Historical physical connections through landscape including Portage routes
- (3) Address potential adverse effects from subdivision, use or development on identified Māori cultural landscape values by:
 - (a) avoiding urban development within the cultural landscape areas most sensitive to development (sub-precinct H);
 - (b) encouraging development to reflect the whakapapa, ancestral names, history and stories of the area in reference to and use of the names of the various sites, places, areas, waahi tapu and other taonga of special significance and value to Mana Whenua;
 - (c) protecting the visual integrity of the local viewshaft from Pūkaki Marae to Matukutureia to maintain a visual linkage and connection with Ngā Matukurua;
 - (d) requiring buildings to be set back from the coastal edge and identified intermittent and permanent streams and encouraging native landscaping within these areas;
 - (e) implementing an integrated stormwater management approach across the Puhinui precinct and incorporating mātauranga Māori alongside engineering methods, including retention and enhancement of intermittent and permanent streams and natural floodplains to provide natural attenuation and applying the SMAF Overlay to all sub-catchments draining to streams in addition to quality treatment;
 - (f) encouraging landowners to provide and enhance access for Mana Whenua to coastal areas and waterways of significance to Mana Whenua, particularly access to scheduled sites or features for karakia, monitoring, customary purposes and ahikā roa;
 - (g) incorporating mātauranga Māori and tikanga Māori in subdivision, use and development; and
 - (h) locating and designing development to take into account and reflect the relationship of the site within the context of the Māori cultural landscape at Puhinui.

- (4) Require subdivision and development to be undertaken in a manner which protects and enhances the ecological, amenity and Mana Whenua values (including mauri) of the Pūkaki and Waokauri Creeks and identified permanent and intermittent streams within the Puhinui Precinct.
- (5) Provide for appropriate public access to coastal areas and waterways and key public open space networks and pedestrian linkages.
- (6) Require the provision of transport infrastructure prior to undertaking development or subdivision.
- (7) Require all development to provide information on transport infrastructure on a network wide basis.
- (8) Require subdivision and/or development within the precinct to provide for a transport network that:
 - (a) Does not compromise the safe and efficient movement of pedestrians, cyclists, public transport and vehicles; and is
 - (b) Designed and constructed in accordance with the requirements of any relevant code of practice or engineering standards.
- (9) Require integrated and coordinated development of a southern gateway connection to Auckland International Airport, which recognises its significance as a cultural heritage route, having regard to the following matters:
 - (a) appropriate location and design of development, infrastructure, and landscaping within and alongside Puhinui Road to support the gateway objectives, desired character and to provide visual amenity along this transport route;
 - (b) integration of elements which reflect the cultural significance of the Puhinui area to Mana Whenua;
 - (c) improvements in connectivity and accessibility to the gateway and the surrounding transport network in the precinct, for all modes of transport;
 - (d) other operational requirements of the Auckland International Airport, existing designation, and future transport infrastructure requirements; and
 - (e) the need to avoid, or otherwise remedy or mitigate any adverse impacts of infrastructure development, on Mana Whenua values, including the Mana Whenua Management precinct, and coastal margins which are receiving environments.
- (10) Recognise and provide connections to Puhinui Reserve, Colin Dale Park and the wider open space network in land use development while ensuring adverse effects on the transport network are avoided.
- (11) Avoid, remedy or mitigate any significant adverse effects of subdivision and development, including reverse sensitivity effects, on the operation of Auckland International Airport.

The overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above with the exception of [H17.3.\(3\)](#) Business – Light Industry Zone policy 3.

Objectives and Policies (Sub-precincts A & B)

Objectives

- (1) Open space and passive recreation activities are provided for in sub-precinct A, appropriate to

the coastal environment it adjoins and the cultural significance of this location.

- (2) The efficient use and development of the land, operational facilities and airport related activities in Sub-precinct B, is enabled while achieving the other objectives of the Puhinui Precinct.
- (3) The cultural, spiritual and landscape values are reflected in the subdivision and development design of Sub-precincts A and B.
- (4) Development areas are of appropriate scale and design, considering the built layout, form and frontages visible from the Puhinui Gateway, Pukaki Marae, and public open spaces.

Policies

- (1) Enable the provision for open space and passive recreation activities appropriate to the coastal environment where Sub-precinct A adjoins and the cultural significance of this location.
- (2) Provide for activities related to the operation and development of the airport and business land within Sub-precinct B.
- (3) Avoid uses and development which would adversely affect airport operations or pose any risk to safety.
- (4) Encourage development of appropriate scale and design considering the built layout and form of buildings, car parking and access, and landscape elements visible from the Puhinui Gateway, Pukaki Marae, and public open spaces.

Objectives and Policies (Sub-precinct C & C1)

Objectives

- (1) Open space and recreation activities, including a future coastal walkway, are provided for in sub-precinct C1, appropriate to the coastal environment it adjoins and the cultural significance of this location.
- (2) Development areas in Sub-precinct C achieve high-quality design outcomes in scale and design of the built form and streetscape, including frontages visible from Puhinui Road and public open spaces.
- (3) The cultural heritage values of the Waiohauri Creek and Maori cultural landscape are maintained or enhanced.

Policies

- (1) Enable the provision for open space and passive recreation activities appropriate to the coastal environment where Sub-precinct C1 adjoins and the cultural significance of this location.
- (2) Avoid development that may compromise a future coastal walkway in Sub-precinct C1.
- (3) Encourage development that achieves a high standard of amenity in the built layout and form of buildings, car parking, access and landscape elements in publicly visible and accessible areas.
- (4) Avoid earthworks within protected archaeological sites and manage earthworks throughout the wider sub-precincts C & C1 to avoid, remedy or mitigate adverse effects on archaeological values and the Māori cultural landscape values.

- (5) Require stormwater mitigation and earthworks to be in accordance with best practice stormwater management and provide at source treatment for runoff.
- (6) Require development to avoid where practicable or minimise the impacts of land disturbance on cultural, heritage and ecological values while enabling light industrial activities.

Objectives and Policies (Sub-precinct D)

Objectives

- (1) Development areas achieve high-quality design outcomes in scale and design of the built form and streetscape, including frontages visible from the Puhinui Gateway, and public open spaces.

Policies

- (1) Development areas achieve high-quality design outcomes in scale and design of the built form and streetscape, including frontages visible from the Puhinui Gateway, and public open spaces.

Objectives and Policies (Sub-precinct E)

Objectives

- (1) Business activities that are ancillary to the Business - Light Industry Zone promote the efficient use and development of the land in the precinct for land use extensive activities.
- (2) Land use activities provide for the convenience shopping and service needs of businesses and employees in the precinct.

Policies

- (1) Limit land use activities in sub-precinct E to those activities required to provide the convenience shopping and service needs of businesses and employees in the precinct.

Objectives and Policies (Sub-precinct F)

Objectives

- (1) The location, scale and form of development within sub-precinct F avoids, or otherwise remedies or mitigates, adverse effects on neighbouring residential zones.
- (2) Development is located and designed in a manner which reflects the relationship of sub-precinct F within the context of the Puhinui Māori cultural landscape and the Crater Hill Outstanding Natural Feature.
- (3) Open space and connections to the coastal environment are provided for in sub-precinct F on the subdivision of land, appropriate to the coastal environment it adjoins.

Policies

- (1) Maintain the amenity values of neighbouring residential zones and the values of the Crater Hill Outstanding Natural Feature through appropriate location, scale and design of subdivision and development.
- (2) Enable the provision for open space and connections to the coastal environment that sub-precinct F adjoins upon the subdivision of land.

Objectives and Policies (Sub-precinct G) [rcp/dp]

Objectives

- (1) Development is located and designed in a manner which reflects the relationship of sub-precinct G within the context of the Puhinui Māori cultural landscape and the Pukaki Crater Outstanding Natural Feature.

Policies

- (1) Enable development that recognises the values of the Pukaki Crater Outstanding Natural Feature through appropriate design and location.

Objectives and Policies (Sub-precinct H) [rcp/dp]

Objectives [rcp/dp]

- (1) The productive capability of the land and soil resource is maintained and protected from inappropriate subdivision and development, in such a way that they retain their productive potential.
- (2) The rural character is maintained.
- (3) Development provides for coastal setbacks, planting and landscaping which protect and enhance the ecological, amenity and Mana Whenua values (including mauri) of the Waokauri Creek and its coastal margins adjoining sub- precinct H.
- (4) Development is located and designed in a manner which reflects the relationship of sub-precinct H within the context of the Puhinui Māori cultural landscape and the Pukaki Crater Outstanding Natural Feature.

Policies [rcp/dp]

- (1) Require buildings, structures and activities in sub-precinct H to not compromise the future productive potential of the land and soil resource.
- (2) Require development to be compatible with the prevailing low intensity and the small scale of building development in the sub-precinct.
- (3) Require coastal and riparian yard setbacks, planting and landscaping in sub- precinct H.
- (4) Avoid development that adversely affects the values of the Pukaki Crater Outstanding Natural Feature and Māori cultural landscape.

I432.4. Activity table

The provisions in any relevant overlays, Auckland-wide provisions and the underlying zone apply in this precinct unless otherwise specified below.

Table I432.4.1- specifies the activity status of land use and development activities pursuant to section 9(2) and section 9(3) of the Resource Management Act 1991, subdivision activities pursuant to section 11 of the Resource Management Act 1991 and activities in, on, under or over streams pursuant to section 13 of the Resource Management Act 1991.

A blank in Table I432.4.1 and I432.4.2 Activity table below means that the provisions of the overlays, zone or Auckland-wide apply.

Table I432.4.1 – Precinct-wide activities [rp/dp]

Activity		Activity status								
		Sub-precinct								
		A	B	D	E	F	G	H	<u>C</u>	<u>C1</u>
Reclamation										
(A1)	Reclamation of intermittent and permanent streams, as shown on Puhinui: Precinct plan 2 – Streams	NC	NC	NC	NC	NC	NC	NC	<u>NC</u>	<u>NC</u>
(A2)	Reclamation of intermittent and permanent streams not shown on Puhinui: Precinct plan 2 – Streams	P	P	P	P	P	P	P	<u>P</u>	<u>P</u>
Rural										
(A3)	Animal breeding or boarding	NC	P	P	P	P	NC	P	<u>P</u>	<u>NC</u>
(A4)	Farming, excluding the grazing of livestock on sites greater than 2,000m ² net site area	P	P	P	P	P	NC	P	<u>P</u>	<u>P</u>
(A5)	Grazing of livestock on sites greater than 2,000m ² net site area	P	P	P	P	P	P	P	<u>P</u>	<u>P</u>

Table I432.4.2 – Activities specific to sub-precincts A-F

Activity		Activity status								
		Sub-precinct								
		A	B	D	E	F	<u>C</u>	<u>C1</u>		
Airport activities										
(A6)	Any activity associated with the airport operation (not including aircraft operations, runways and the testing of in situ aircraft engines) including taxiways and other aircraft movement areas, aprons, terminals, maintenance and servicing facilities, catering facilities, freight facilities and quarantine facilities	NC	D							
(A7)	Rescue facilities, navigation and safety aids, monitoring activities and site investigation activities associated with the airport operation	P	P							
(A8)	Any activity associated with the needs of Airport passengers, visitors and employees, and Airport businesses, and not otherwise listed in this table	NC	D							

Development								
(A9)	Buildings and structures (including additions) no greater than 50m ² gross floor area	P	P	P	P	P	<u>P</u>	<u>P</u>
(A10)	Buildings and structures (including additions) greater than 50m ² gross floor area	NC	RD	RD	RD	RD	<u>RD</u>	<u>NC</u>
(A11)	Billboards	NC	RD	RD	NC	RD	<u>RD</u>	<u>NC</u>
(A12)	Buildings that do not comply with Standard I432.6.2 Building height	D	D	D	D	D	<u>D</u>	<u>D</u>
(A13)	Buildings that do not comply with Standard 0 Pūkaki Marae – Matukutureia viewshaft	NC	NC	NC	NC	NC	<u>NC</u>	<u>NC</u>
(A13a)	<u>Earthworks in the Campana Road Structure Plan Area</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>RD</u>	<u>NA</u>	<u>RD</u>	<u>RD</u>
Commerce								
(A14)	Bars and Taverns up to 120m ² GFA per Site	NC	NC	NC	P	P	<u>P</u>	<u>NC</u>
(A15)	Bars and Taverns exceeding 120m ² gross floor area per site	NC	NC	NC	P	NC	<u>NC</u>	<u>NC</u>
(A16)	Cafes up to 120m ² gross floor area per site	NC	NC	NC	P	P	<u>P</u>	<u>NC</u>
(A17)	Cafes exceeding 120m ² gross floor area per site	NC	NC	NC	P	NC	<u>NC</u>	<u>NC</u>
(A18)	Commercial services	NC	NC	D	P	D	<u>D</u>	<u>NC</u>
(A19)	Dairies up to 100m ² gross floor area per site	NC	NC	NC	P	P	<u>NC</u>	<u>NC</u>
(A20)	Drive-through restaurant	NC	NC	NC	RD	P	<u>NC</u>	<u>NC</u>
(A21)	Entertainment facilities	NC	NC	NC	D	D	<u>NC</u>	<u>NC</u>
(A22)	Garden centres	NC	NC	D	P	P	<u>D</u>	<u>NC</u>
(A23)	Marine retail	NC	NC	RD	RD	P	<u>RD</u>	<u>NC</u>
(A24)	Motor vehicle sales	NC	NC	RD	RD	P	<u>RD</u>	<u>NC</u>
(A25)	Offices up to 100m ² gross floor area per site	NC	NC	RD	P	RD	<u>RD</u>	<u>NC</u>
(A26)	Offices greater than 100m ² gross floor area per site, but not exceeding 500m ² gross floor area per site	NC	NC	NC	P	NC	<u>NC</u>	<u>NC</u>
(A27)	Offices greater than 500m ² gross floor area per site	NC	NC	NC	RD	NC	<u>NC</u>	<u>NC</u>
(A28)	Offices that are accessory to the primary activity on the site and: a. the office gross floor area does not exceed 30 per cent of all buildings on the site or b. the office gross floor area does not exceed 100m ²	NC	NC	P	P	P	<u>P</u>	<u>NC</u>
(A29)	Offices that are accessory to the primary activity on the site and the office gross floor area exceeds 30 per cent of all buildings on the site	NC	NC	D	D	RD	<u>D</u>	<u>NC</u>

(A30)	Restaurants up to 120m ² gross floor area per site	NC	NC	NC	P	P	<u>NC</u>	<u>NC</u>
(A31)	Restaurants exceeding 120m ² gross floor area per site	NC	NC	NC	P	NC	<u>NC</u>	<u>NC</u>
(A32)	Retail up to 450m ² gross floor area per tenancy	NC	NC	NC	P	NC	<u>NC</u>	<u>NC</u>
(A33)	Retail exceeding 450m ² per tenancy	NC	NC	NC	RD	NC	<u>NC</u>	<u>NC</u>
(A34)	Retail accessory to an industrial activity on the site, where the goods sold are manufactured on site and the retail gross floor area does not exceed 10 per cent of all buildings on the site	NC	NC	P	P	P	<u>P</u>	<u>NC</u>
(A35)	Service stations	NC	NC	NC	RD	P	<u>NC</u>	<u>NC</u>
(A36)	Show homes	NC	NC	NC	NC	P	<u>NC</u>	<u>NC</u>
(A37)	Trade suppliers	NC	NC	NC	D	P	<u>NC</u>	<u>NC</u>
Community								
(A38)	Artworks	RD	RD	RD	P	RD	<u>RD</u>	<u>RD</u>
(A39)	Care Centres	NC	NC	NC	D	D	<u>NC</u>	<u>NC</u>
(A40)	Community facilities	NC	NC	NC	D	D	<u>NC</u>	<u>NC</u>
(A41)	Urupa and interpretive structures and facilities which provide for information in relation to the mana whenua history of the area	P	RD	RD	RD	RD	<u>RD</u>	<u>P</u>
(A42)	Education facilities that are accessory to an industrial activity on the site	NC	NC	P	P	P	<u>P</u>	<u>NC</u>
(A43)	Education facilities not otherwise provided for	NC	NC	NC	RD	D	<u>NC</u>	<u>NC</u>
(A44)	Emergency services	NC	NC	P	D	P	<u>P</u>	<u>NC</u>
(A45)	Informal recreation and leisure	P	NC	NC	P	NC	<u>NC</u>	<u>P</u>
(A46)	Organised sport and recreation	D	NC	NC	RD	NC	<u>NC</u>	<u>D</u>
(A47)	Public amenities	P	NC	NC	P	NC	<u>NC</u>	<u>P</u>
(A48)	Tertiary education facilities that are accessory to an industrial activity on the	NC	NC	P	P	P	<u>P</u>	<u>NC</u>
(A49)	Tertiary education facilities not otherwise provided for	NC	NC	NC	D	D	<u>NC</u>	<u>NC</u>
Industry								
(A50)	Industrial activities	NC	NC	P	P	P	<u>P</u>	<u>NC</u>
Infrastructure								
(A51)	Development which complies with Standard I432.6.1 Transport	NA	NA	RD	RD	NA	<u>P</u>	<u>NA</u>
(A52)	Development which does not comply with Standard I432.6.1 Transport	NA	NA	NC	NC	NA	<u>NC</u>	<u>NA</u>
Subdivision								
(A53)	Subdivision which complies with Standard I432.6.1 Transport	NA	NA	RD	RD	NA	<u>NA</u>	<u>NA</u>
(A54)	Subdivision that does not comply with Standard I432.6.1 Transport	NA	NA	NC	NC	NA	<u>NA</u>	<u>NA</u>
Transport								
(A55)	Bus depots and public transport facilities	NC	RD	RD	RD	RD	<u>RD</u>	<u>NC</u>

(A56)	Parking (non-accessory), including park and rides	NC	RD	RD	RD	RD	<u>RD</u>	<u>NC</u>
Trees								
(A57)	The removal of the English Oak at 507 Puhinui Road	NA	D	NA	NA	NA	<u>NA</u>	<u>NA</u>

I432.5. Notification

- (1) Any application for resource consent for an activity listed in Table I432.4.1 or I432.4.2 Activity table above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (2) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in [Rule C1.13\(4\)](#).

I432.6. Standards

The overlay, Auckland-wide and underlying zone standards apply in this precinct in addition to the following standards:

All activities listed in I432.4.1 and I432.4.2 must comply with the following permitted activity standards.

I432.6.1. Transport

I432.6.1.1. Construction Traffic

- (1) For construction traffic purposes only, any development of land within sub- precinct D, sub-precinct C and sub-precinct E must provide the following roading infrastructure upgrades prior to construction works commencing on the site (noting that compliance with this rule does not remove the need to comply with Rule I432.6.1.2):
 - (a) A new or upgraded intersection on SH20B that prioritises through traffic movements and meets the relevant performance criteria for temporary traffic management during the construction period of these works as set out in the NZTA Code of Practice for Temporary Traffic Management.

I432.6.1.2. Road infrastructure

- (1) Prior to any activities (excluding construction) commencing within sub- precinct D and sub-precinct E (south), the following road infrastructure upgrades must be constructed and operational:
 - (a) a new double lane roundabout on SH20B that provides localised widening on the SH20B approaches to allow for two circulating traffic lanes. The roundabout should include a free eastbound through movement for SH20B traffic;
 - (b) an additional southbound right turn lane from Roscommon Road (north) into Vogler Drive;
 - (c) a new road connection between SH20B (Puhinui Road) and McLaughlins Road; and
 - (d) widening improvements on the Puhinui Road approach to the SH20/Puhinui Interchange.

- (2) Total traffic generated by any landuse entering and exiting sub-precinct D and sub-precinct E shall not cumulatively exceed 1,035 vehicles per hour (vph) (in any hour). A traffic assessment demonstrating compliance will be required.

Note: each entry or exit movement is equivalent to 1 vph.

- (3) Traffic from any land use within sub-precinct D and sub-precinct E **(south)** exceeding 1,035 vph in any hour, shall meet (a) to (c) below. Traffic assessments (undertaken by a suitably qualified and experienced traffic engineer demonstrating compliance with (a) to (c) below must be submitted with any resource consent application for development and must utilise traffic data no older than two years at the time that a resource consent application is lodged for the development proposal. For the purposes of Standard I432.6.1.2(3) the 'baseline scenario' is the operation of the road network at the time the first resource consent application is lodged for activities within sub-precinct D and sub-precinct E **(south)**.

- (a) State Highway Interchange Operational Criteria (Puhinui Interchange and Cavendish Interchange):

- (i) all-day: 95th percentile queues (not average queues) for each movement at intersections do not come within:

- 140m of motorway off ramp diverge point
- 140m of upstream intersection
- queues shall not extend beyond dedicated storage lanes or exceed the queue lengths for the baseline scenario, whichever is greater

- (ii) no individual traffic movement shall have a level of service (LOS) worse than LOS D, or have a degree of saturation higher than 95%. If the baseline scenario already operates at LOS E or F, then:

- degrees of saturation shall be no more than the baseline scenario; or
- delay shall not increase beyond the baseline scenario by more than 10%.

Note: Degree(s) of saturation is defined to be the proportion of actual traffic movements using the intersection to the theoretical maximum capacity of the intersection.

- (iii) The overall intersection LOS shall be no worse than LOS D.

- (b) Local Road Intersection Criteria

- (i) All-day: No individual traffic movement shall have a LOS worse than LOS E, or have a degree of saturation higher than 95%. If the baseline scenario already operates at LOS F, then:

- degrees of saturation shall be no more than the baseline scenario; or
- delay shall not increase beyond the baseline scenario by more than 10%.

- (ii) The overall intersection LOS shall be no worse than LOS D.

- (iii) 95th percentile queues (not average queues) shall not extend to be within 10m of an upstream intersection.
- (c) Reliability Criteria (Puhinui Road between SH20 Interchange (Inclusive) and Orrs Road):
- (i) during Peak Commuter Periods (Weekdays 7am to 9am, 1pm to 6pm): the average speed between Orrs Road and Puhinui Interchange (including the interchange) shall not decrease by more than 10% from the baseline scenario.
 - (ii) during Other Periods: the average speed between Orrs Road and Puhinui Interchange shall not reduce below 60km/hr (LOS E) or no worse than the baseline scenario at any time.
- (4) Storage and lock up activities within sub-precinct C or sub-precinct E (north) shall comply with the following:**
- (a) The storage and lock up facility shall be unmanned.**
 - (b) The total traffic movements from the Campana Road / Puhinui Road intersection (excluding movements associated with SPCA activities) shall not exceed a maximum of 50 movements per hour.**
 - (c) The total traffic movements from the existing access to 457 Puhinui Road shall not exceed a maximum of 5 movements per hour.**
- Any other activities shall comply with standard (5) below.**
- (5) Traffic from any land use within sub-precinct C or sub-precinct E (north) exceeding 4(b) or 4(c), shall meet (a) to (c) below. Traffic assessments (undertaken by a suitably qualified and experienced traffic engineer) demonstrating compliance with (a) to (c) below must be submitted with any resource consent application for development and must utilise traffic data no older than two years at the time that a resource consent application is lodged for the development proposal.**
- For the purposes of Standard I432.6.1.2(5) the 'baseline scenario' is the operation of the road network at the time the first resource consent application is lodged for activities within sub-precinct C or sub-precinct E (north).**
- (a) State Highway Interchange Operational Criteria (Puhinui Interchange and Cavendish Interchange):**
- (i) all-day: 95th percentile queues (not average queues) for each movement at intersections do not come within:**
 - 140m of motorway off ramp diverge point**
 - 140m of upstream intersection**
 - queues shall not extend beyond dedicated storage lanes or exceed the queue lengths for the baseline scenario, whichever is greater**

(ii) no individual traffic movement shall have a level of service (LOS) worse than LOS D, or have a degree of saturation higher than 95%. If the baseline scenario already operates at LOS E or F, then:

- degrees of saturation shall be no more than the baseline scenario; or
- delay shall not increase beyond the baseline scenario by more than 10%.

Note: Degree(s) of saturation is defined to be the proportion of actual traffic movements using the intersection to the theoretical maximum capacity of the intersection.

(iii) The overall intersection LOS shall be no worse than LOS D.

(b) Local Road Intersection Criteria

(i) All-day: No individual traffic movement shall have a LOS worse than LOS E, or have a degree of saturation higher than 95%. If the baseline scenario already operates at LOS F, then:

- degrees of saturation shall be no more than the baseline scenario; or
- delay shall not increase beyond the baseline scenario by more than 10%.

(ii) The overall intersection LOS shall be no worse than LOS D.

(iii) 95th percentile queues (not average queues) shall not extend to be within 10m of an upstream intersection.

(c) Reliability Criteria (Puhinui Road between SH20 Interchange (Inclusive) and Orrs Road):

(i) during Peak Commuter Periods (Weekdays 7am to 9am, 1pm to 6pm): the average speed between Orrs Road and Puhinui Interchange (including the interchange) shall not decrease by more than 10% from the baseline scenario.

(ii) during Other Periods: the average speed between Orrs Road and Puhinui Interchange shall not reduce below 60km/hr (LOS E) or no worse than the baseline scenario at any time.

I432.6.2. Building height

(1) Buildings must not exceed the heights as set out in Table 1 below:

Table 1:

Sub-Precinct	Maximum height (m)
Any building or structure located less than 40m from the edge of New Zealand Transport Agency Designation 6717 – State Highway 20B (Puhinui Road) as at 30 September 2013.	10m or the maximum height limit determined in accordance with the Auckland International Airport Limited Designation 1102: Specification for Obstacle Limitation Surfaces, whichever is the lesser

Note: "height" is to be measured using the rolling height method.

I432.6.3. Yards [rcp/dp]

- (1) Any building or structure must not project beyond the following minimum yard requirements set out in Table 2 below:

Table 2:

	Sub-precinct								
Yard	A	B	D	E	F	G	H	<u>C</u>	<u>C1</u>
Sites adjoining edge of State Highway 20B (Puhinui Road) - New Zealand Transport Agency Designation 6717 (as at 30 September 2013)	40m	40m	40m	NA	NA	NA	NA	<u>40m</u>	<u>40m</u>
Riparian yard	10m from the edge of the permanent and intermittent streams	10m from the edge of the permanent and intermittent streams	20m from the edge of Puhinui stream and 10m from the edge of all other permanent and intermittent streams	20m from the edge of Puhinui stream and 10m from the edge of all other permanent and intermittent streams <u>and wetlands</u>	10m from the edge of the permanent and intermittent streams	10m from the edge of the permanent and intermittent streams	10m from the edge of the permanent and intermittent streams	<u>10m from the edge of the permanent and intermittent streams and wetlands</u>	<u>10m from the edge of the permanent and intermittent streams and wetlands</u>
Coastal protection yard	50m	NA	NA	<u>50m</u>	25m	25m	50m	<u>50m</u>	<u>50m</u>

- (2) Riparian yards must be planted with locally sourced indigenous species to a minimum depth of 10m from the edge of intermittent and permanent stream. Walkways and cycleways may be located within the riparian yard.
- (3) Coastal protection yards must be planted with locally sourced indigenous species to a minimum depth of 20 metres.
- (4) Puhinui Road yard:
 - (i) ~~Landscaping must be provided to a minimum depth of 10 metres from the edge of State Highway 20B (Puhinui Road) – New Zealand Transport Agency Designation 6717, including retention of existing mature trees and provision of native trees, shrubs and ground cover plants, hard landscaping, connections with pedestrian linkage and landscaped grass areas within and along the full extent of the yard.~~
 - (ii) ~~Should a notice of requirement not be received for the future public transport corridor by 1 January 2023 the yard adjoining the edge of State Highway 20 (Puhinui Road) – New Zealand Transport Agency Designation 6717 as at 30 September 2013, shall be reduced to 10 metres.~~

~~Where a notice of requirement is lodged for the future public transport corridor by 1 January 2023, The yard adjoining the edge of State Highway 20B (Puhinui Road) - New Zealand Transport Agency Designation 6717 as at 30 September 2013, or subsequent amended designation, shall be reduced to 10 metres if it is not required to accommodate any part of the public transport corridor specified in the notice of requirement.~~

I432.6.4. Landscaping

- (1) In sub-precincts **C-E**, landscaped areas which in total comprise at least 10 per cent of a site must be provided and may include planting required under Standards I432.6.3.2 - I432.6.3.4 Yards above.
- (2) With the exception of the Puhinui Road frontage, a landscape buffer of 2m in depth must be provided along the street frontage between the street and car parking, loading, or service areas which are visible from the street frontage. This rule excludes access points but otherwise applies to sites in:
 - (a) sub-precincts B-F
- (3) The required landscaping in Standard (2) above must comprise a mix of trees, shrubs or ground cover plants (including grass).
- (4) **Proposed buildings within sub-precinct C must, at the time of construction, be screened from Pukaki Marae and Crater Hill with landscape planting in accordance with a landscape concept prepared in consultation with mana whenua.**

I432.6.5. Pūkaki Marae –Matukutureia viewshaft

- (1) Buildings and structures must not penetrate the floor height of the local viewshaft identified on Precinct Plan 3 – Pūkaki Marae –Matukutureia viewshaft.

Note: The floor of the view shaft is determined in accordance with the survey

coordinates contained in Table 3 below, and “height” is to be measure using the rolling height method.

Table 3: Schedule of Coordinates

PT	Mt Eden circuit 2000		Height (AGL)	NZ Transverse Mercator 2000	
	Northing	Easting		Northing	Easting
IS1	787316.27	404106.31	9.01	5904259.71	1761093.45
IS2	787333.30	404183.63	9.25	5904275.30	1761171.07
3	785179.79	407301.46	54.20	5902064.32	1764248.53
4	785119.81	407259.67	54.05	5902005.13	1764205.64
5	785684.81	406505.35	43.02	5902584.03	1763461.89

I444.6.7. Archaeological Management Plan

(1) As part of the first stage of development within sub-precinct C, An Archaeological Management Plan must be prepared by an archaeologist, in consultation with mana whenua, council and Heritage New Zealand Pouhere Taonga.

I444.6.8. Stormwater treatment

(1) Earthworks within sub-precinct C & C1 must comply with the following:

(a) Sediment retention ponds must be a minimum of 3% of the contributing catchment area, regardless of the site slope and a decant earth bund and drop-out pit within the sediment retention pond catchment must be incorporated to reduce the sediment load.

(b) Silt control measures to be installed on-site before or during (as specified) earthworks commencement.

(c) The site must be progressively stabilised as areas of earthworks are completed.

(2) Built development and associated impervious surfaces in sub-precinct C must:

(a) Provide for water quality treatment via at-source stormwater devices for all contaminated impervious area.

(b) Provide 5mm retention for all roof area.

(c) Provide 5mm retention for the remaining impervious area where ground soakage is possible.

(d) Allow for only inert building materials.

I432.7. Assessment – controlled activities

There are no controlled activities in this precinct.

I432.8. Assessment – restricted discretionary activities

I432.8.1. Matters of discretion

The Council will restrict its discretion to all the following matters when assessing a restricted discretionary activity resource consent application, in addition to the matters specified for the relevant restricted discretionary activities in the overlay, Auckland-wide or zone provisions:

- (1) for buildings and structures over 50m², parking (non-accessory) including park and rides, bus depots and public transport facilities:
 - (a) the effects on site layout and configuration;
 - (b) the effects of design and external appearance of buildings;
 - (c) the effects of landscape design and treatment;
 - (d) the effects of design consistency within and between sub-precincts;
 - (e) the effects of coherent design for Puhinui Heritage Gateway and surrounds;
 - (f) the effects of land use and transport integration; and
 - (g) the effects on Māori Cultural Landscape values.
- (2) for road infrastructure:
 - (a) the effects of location and design of transport improvements;
 - (b) consultation with road controlling authorities;
 - (c) the effects on integration of a transport network;
 - (d) the effects on a safe and efficient operation of transport network;
 - (e) the effects of traffic generation;
 - (f) methods of demonstrating compliance;
 - (g) the effects of provision of facilities that encourage alternative modes of travel; and
 - (h) the effects on Māori Cultural Landscape values.
- (3) for marine retail, motor vehicle sales, retail greater than 450m² per tenancy and offices greater than 500m² gross floor area per site:
 - (a) the effects on intensity and scale;
 - (b) the effects of design of parking, access and servicing;
 - (c) the effects of functionality; and
 - (d) the effects of the displacement of industrial activities.
- (4) for artworks and interpretive structures and facilities which provide for information in relation to the mana whenua history of the area:
 - (a) the effects on landscape character and amenity values; and
 - (b) the effects on Māori Cultural Landscape values.
- (5) for Urupā:

- (a) effects on groundwater; and
 - (b) visual effects on neighbouring sites or open spaces used for recreation.
- (6) for yards and landscaping:
- (a) the effects of scale and design of buildings;
 - (b) the effects of integration of development with neighbouring areas;
 - (c) integrated transport network;
 - (d) the effects of the nature, type, area and dimensions of landscaping provided, including any earthworks proposed as a component of the landscaping;
 - (e) the effects on ecological, amenity and Māori cultural landscape values of the coastal environment and margins of the Waokauri and Pukaki creeks;
 - (f) the effects on provision of landscaping and enhancement of significant heritage or outstanding natural features of the Maori cultural landscape;
 - (g) effects on Mana Whenua and Māori cultural landscape values;
- (7) for subdivision:
- (a) the effects on infrastructure;
 - (b) refer to matters I432.8.1(1) - I432.8.1(5); and
 - (c) effects on Maori cultural landscape values.
- (8) for dwellings:
- (a) effects of design and external appearance of buildings
 - (b) effects on Maori cultural landscape values
- (9) for earthworks in the Campana Road Structure Plan area:**
- (a) effects on archaeological values**
 - (b) effects on Maori cultural landscape values.**

I432.8.2. Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlay, Auckland wide or zone provisions:

- (1) for buildings and structures over 50m², parking (non-accessory) including park and rides, bus depots and public transport facilities:
 - (a) the extent to which site layout and configuration:
 - (i) enables provision of setback and a high quality relationship to street;
 - (ii) enables good passive surveillance of the street and contributes to streetscape amenity;

- (iii) is compatible with the site development of adjoining sites and the streetscape;
 - (iv) enables the building to align with the street, to create a clear spatial system along the street where streets are curved, aligns with that curve, or alternatively is stepped in plan in relation to the curve;
 - (v) enables buildings on corner sites to be designed to respond to the site's prominence in the roading network and the adjoining road intersection;
 - (vi) car parking areas are designed and located to ensure an attractive site layout, particularly when viewed from the road or public open spaces;
- (b) The extent to which design and external appearance of buildings:
- (i) modulates the mass of large buildings, including any large facades, or includes transitional elements or use of contrast, including colour and material, to reduce apparent scale
 - (ii) avoids monotonous built form when viewed from public open space and public places (including the coastal marine area) through variation in building footprints, height and form;
 - (iii) avoids blank facades or walls along street frontages, or adjacent to and visible from other public spaces;
 - (iv) is sympathetic to existing built development and the wider natural, cultural and built heritage and landscape values of the area;
 - (v) frames and defines edges to roads, parks and stormwater reserves, and to emphasise key intersections;
 - (vi) service areas, loading docks and car parks are separated from and not facing the front yard;
 - (vii) site levels, building scale, development intensity, building form, colour and texture are used to reduce the apparent height and size of large buildings when viewed from the Puhinui Heritage Gateway or public open spaces;
 - (viii) front activities (i.e. the more active office, showroom or similar activities) are located fronting adjacent streets and reserves; and conversely 'back' activities (i.e. warehouse, distribution, industrial, storage) are in less visible locations;
 - (ix) materials and colours of buildings (including buildings on adjoining sites) are consistent;
 - (x) any security fencing are integrated with planting and buildings so as to avoid any adverse visual effect on adjacent roads, parks and stormwater management areas; and
 - (xi) low glare, high cut-off exterior lighting are used, and integrated with the building and landscape designs.
- (c) the extent to which landscape design and planting:

- (i) is used to frame and define edges to roads, parks and stormwater reserves, and to emphasise key intersections;
 - (ii) achieves continuity to enhance the streetscape and character of the locality;
 - (iii) is of a similar scale as the proposed development, to provide adequate visual softening of large buildings and to screen car parking, loading and storage areas;
 - (iv) is integrated with the type, quality, character and standard of landscape design developed for the relevant sub-precinct;
 - (v) is consistent along the Puhinui Heritage Gateway;
 - (vi) retains existing trees and shelterbelts that may enhance the amenity of buildings, structures and works;
 - (vii) enhances the amenity of buildings, structures and works;
 - (viii) is capable of attaining a similar scale to proposed buildings, and relates appropriately to existing trees and shelterbelts on and immediately adjacent to the site;
 - (ix) provides a continuity of planting along road frontages wherever possible using species existing in the area;
 - (x) is placed so that it does not obstruct views of landscape or landmark features;
 - (xi) complements development in adjoining sub-precincts, contributes in a significant manner to the visual amenities of the site, and streetscape, and promotes a distinctiveness or sense of place appropriate for the wider precinct;
 - (xii) is designed to create visual interest, and contribute to the amenities of the area;
 - (xiii) extends the landscape and streetscape design elements of the Puhinui Heritage Gateway within and across road and other reserves and required yards (from building face to building face);
 - (xiv) incorporates standard elements (street trees, other planting, lighting, furnishings, directional signs); and planting of a naturally occurring, irregular form along and parallel to the Puhinui Heritage Gateway, contrasted with more geometric planting perpendicular to that route;
 - (xv) defines front boundaries by using locally sourced volcanic stone walls, hedges or linear planting; and
 - (xvi) uses specimen trees capable of attaining sufficient height to frame and define the edges of roads, parks and stormwater reserves, and to emphasise key road intersections.
- (d) Design consistency within and between sub-precincts:

- (i) The extent to which buildings, structures and parking are designed having regard to the context of adjoining sub-precincts and other surrounding land, natural features, buildings and structures.
- (e) Coherent design for the Puhinui Heritage Gateway and surrounds:
- (i) The extent to which buildings, structures and parking promote a coherent design for the Puhinui Heritage Gateway route and adjoining land by:
 - ensuring a coherent spatial structure formed by the relationship of buildings to the street and to one another;
 - minimising the number of vehicle entrances onto the street;
 - aligning buildings to the street;
 - locating the office component of a development at the front (street) part of the development;
 - using consistent materials on buildings;
 - using consistent planting, paving, lighting and fencing;
 - ensuring existing trees and shelter belts are retained where they may contribute to maintaining amenity values;
 - providing trees along road berms and within front yards which are capable of reaching a similar scale as nearby buildings;
 - avoiding security fencing being closer to the front boundary of the site than the buildings on the site; and
 - enhancing the natural character of open space.
 - (ii) the extent to which Pou, art, sculpture or other public amenity features located on land adjoining the Puhinui Heritage Gateway are of an appropriate design to represent the Māori and European history of the area and promote a distinctiveness or sense of place appropriate for the wider heritage area.

Note: pou, art, sculpture and other public amenity features should generally be located only in open space areas or on sites that will attract tourists.

- (f) for land use and transport integration:
- (i) whether sufficient roads are provided to create a connected roading pattern that avoids the need for rear sites;
 - (ii) whether roads are designed to a consistent, high-quality standard;
 - (iii) whether sufficient cycleway and walkway linkages and facilities are provided, and are designed to contribute to the employment, visitor and recreational user attractiveness of the heritage area;
 - (iv) whether the street and site layout avoids adverse effects on the safety and efficiency of the adjacent road network;

- (v) the extent to which the safe and efficient operation of the State Highway and road network (including Prices Road) is compromised; and
- (vi) whether there are opportunities to reduce or remove access points to the State Highway network.

(g) Māori cultural landscape values:

- (i) the extent to which adverse effects on the Māori cultural landscape values identified in Precinct Plan 1 - Māori cultural landscape values and association of Mana Whenua with land and water are avoided, remedied or mitigated;
- (ii) the ability to incorporate mātauranga Māori and tikanga Māori, recognising and providing for the outcomes articulated by Mana Whenua;
- (iii) whether consideration of practicable alternative methods, locations or designs that would avoid or mitigate the impact on the identified Māori cultural landscape values;
- (iv) the extent to which buildings, structures and works provide for the relationship of Mana Whenua with the Māori cultural landscape including through:
 - the incorporation of building design elements, art works, naming and historical information to reflect the values and relationship mana whenua have with the Puhinui area;
 - locating and orientating buildings and works to reference and respect the Māori cultural landscape values identified in Precinct Plan 1 - Māori cultural landscape values;
 - native landscaping, vegetation and design including removal and replanting;
 - minimising landform modification where practicable and respecting the Māori cultural landscape values identified in Precinct Plan 1 - Māori cultural landscape values; and
 - maintenance of views and connections to and between important sites, places and areas, waahi tapu and other taonga.
- (v) whether sub-precinct B is developed in such a way as to provide an outlook from the Pūkaki Marae dominated by landscaped open space rather than buildings, carparks and vehicle accessways.

(2) for road infrastructure

The assessment criteria within I432.8.2(1)(g) - Maori cultural landscape values above also applies to road infrastructure.

(a) standard I432.6.1.2(1) and I432.6.1.2(2) Road Infrastructure:

- (i) the extent of consultation with the relevant Road Controlling Authorities (including NZTA, Auckland Transport and Auckland Airport) in relation to the overall design of the road infrastructure;
- (ii) the extent to which the proposal supports an integrated transport network including well-connected internal roads and connections to adjacent sites and sub-precincts. Whether particular attention is given to any connection with SH20B (Puhinui Road) to ensure the safe and efficient operation of the adjoining state highway network is not adversely impacted;
- (iii) the extent to which the transport network, including roads, pedestrian and cycling connections, is designed and constructed in a manner that is consistent with the requirements of any relevant code of practice or engineering standards;
- (iv) whether the location of development will adversely affect the ability to provide public transport based networks in the precinct;
- (v) the extent to which the development achieves the overall objectives of the precinct;
- (vi) the extent to which the street and site layout avoids adverse effects on the safety and efficiency of the adjacent road network; and
- (vii) whether there are opportunities to reduce or remove access points to the State highway network.

(b) standard I432.6.1.2(2) and I432.6.1.2(3) Road Infrastructure:

- (i) whether traffic generated by the development will adversely affect the safe and efficient operation of the road network;
- (ii) whether compliance with Standard I432.6.1.2(2) and I432.6.1.2(3) is demonstrated by:
 - an assessment of the traffic generation of the proposal including all modes of transport that would support the land uses proposed;
 - an assessment of the performance of the local network as a result of the development showing compliance with performance criteria in Standard I432.6.1.2(2) and I432.6.1.2(3); and
 - a location policy that ensures specified development takes place in locations that, where relevant, supports sustainable transport mode share.
- (iii) whether there are opportunities to reduce or remove access points to the State highway network as part of the development of new road infrastructure.

(3) for marine retail, motor vehicle sales, retail greater than 450m² per tenancy and offices greater than 500m² gross floor area per site:

(a) intensity and scale:

- (i) whether the intensity and scale of the land use activity, in particular, the number of people involved and traffic generated by the activity (including vehicle noise and lights), is compatible with the planning outcomes identified in the Unitary Plan for the surrounding area.

(b) for design of parking, access and servicing:

- (i) the extent to which at grade parking will be softened with landscaping, including tree planting;
- (ii) whether vehicle ramps are visible from the street, however, where necessary they should be minimal in length and integrated into the design of the building;
- (iii) whether vehicle crossings and access ways are designed to reduce vehicle speed, be visually attractive and clearly signal to both vehicles and pedestrians the presence of a crossing or access way;

- (iv) whether a safe and convenient pedestrian environment with a good standard of amenity is created within the site which:

- provides direct and well defined routes;
- links car parking areas to building access points; and
- incorporates pedestrian linkages to adjacent sites, streets and public open spaces, (where appropriate).

- (v) whether pedestrian access between parking areas, building entrances/lobbies and the street provides universal access for people of all ages and physical abilities and provide a high level of pedestrian safety;

- (vi) the extent to which for commercial activities, suitable provision is made for on-site rubbish storage and sorting of recyclable materials that:

- is a sufficient size to accommodate the rubbish generated by the proposed activity;
- is accessible for rubbish collection. Kerbside collection is generally not appropriate; and
- is preferably located within the building or where it is not within the building, it is located in an area not visible from the street or public open spaces.

- (vii) the extent to which, where appropriate, a waste management plan is provided either at the time of lodgement or by way of a consent condition and:

- include details of the vehicles to be used for rubbish collection to ensure any rubbish truck can satisfactorily enter and exit the site; and

- provide clear management policies to cater for different waste management requirements of the commercial tenancy and residential apartments.

(c) functionality:

- (i) whether the features of the proposal that are necessary to meet the functional requirements of the activity are considered.

(d) displacement of industrial activities:

- (i) whether offices and/or retail development discourage or displace permitted activities in the Business - Light Industry Zone;
- (ii) whether the scale and design of offices and/or retail development are likely to attract further similar or supporting activities; and
- (iii) the extent to which the proposal integrates with existing activities on-site and supports light industrial activities in the surrounding area.

(4) for artworks and interpretive structures and facilities which provide for information in relation to the mana whenua history of the area:

(a) landscape character and amenity values:

- (i) whether the design and location of buildings and structures, and site landscaping should avoid, remedy or mitigate any adverse visual effects on the landscape character and amenity values of the area. The following aspects are particularly relevant:

building bulk;

- glare or reflections off exterior cladding;
- landform modification needed for building platforms;
- screening from neighbouring sites;
- views of the buildings from any public road or open space used for recreation, including any beach, coastal marine area, coastline, or regional park; and
- related signage.

(b) Māori Cultural Landscape values:

- (i) The assessment criteria within I432.8.2(1)(g) above also applies to artworks and interpretive structures and facilities.

(5) for urupā

(a) effects on groundwater:

- (i) whether an urupā would cause leachate emergence or contamination to groundwater; and

(b) visual effects on neighbouring sites or open spaces used for recreation:

- (i) [intentionally blank]

- (ii) the extent to which there are measures to mitigate visual effects on neighbouring sites or open sites used for recreation.

(6) for yards and landscaping

- (a) whether the proposed yard reduction, and the scale and design of the buildings and structures, adversely affect the amenity values and visual character of the precinct and adjacent sites;
- (b) the extent to which landscaping requirements met the yard reduction;
- (c) whether the yard reduction will have an adverse effect on:
 - (i) site access;
 - (ii) providing services to the site;
 - (iii) any adverse effects on stormwater disposal; and
 - (iv) the ability to mitigate any adverse effects of stormwater on the water quality of receiving environments.
- (d) whether the reduction of the Puhinui Road yard will compromise the future development of a rapid transit corridor;
- (e) whether the size and species of planting in riparian and coastal yards contributes to the enhancement of cultural and ecological values, including ecosourcing, ecological corridors and linkages with existing vegetation and/or habitats;
- (f) the extent to which a planting and maintenance plan provides for:
 - (i) the eradication of all invasive plant pests from the planting site both at the time of planting and on an ongoing basis;
 - (ii) animal pest control; and
 - (iii) ongoing maintenance of the planting, including the replacement of plants that do not survive.
- (g) the extent to which development within the riparian and coastal yards will protect and enhance cultural and ecological values, and recognise and provide for the outcomes articulated by Mana Whenua;
- (h) consideration of practical mechanisms to maintain or enhance the ability for Mana Whenua to access and use riparian and coastal yards for karakia, monitoring, customary purposes and ahikā roa;
- (i) the extent to which the location and design of development within coastal yards protects and enhances the Mana Whenua values associated with any archaeological sites of interest or significance to Mana Whenua identified in the Significant Historic Heritage Places Overlay; and
- (j) Consideration of any potential adverse effects of planting on the operations of the Auckland International Airport.

(7) for subdivision:

- (a) infrastructure:

(i) assessment criteria I432.8.2(1) - I432.8.2(5)

(b) Māori cultural landscape values:

- (i) the extent to which adverse effects on the Māori cultural landscape values identified in Precinct Plan 1 - Māori cultural landscape values and association of Mana Whenua with land and water are avoided, remedied or mitigated;
- (ii) ability to incorporate mātauranga Māori and tikanga Māori, recognising and providing for the outcomes articulated by Mana Whenua; and
- (iii) consideration of practicable alternative methods, locations or designs that would avoid or mitigate the impact on the identified Māori cultural landscape values.

(c) stormwater management:

- (i) the extent to which, stormwater management reserves are developed as a connected system with pedestrian access and other landscaping to, create green corridors to enhance ecology of the area and providing a visual connection of green networks to the surrounding open spaces and coastal areas;
- (ii) the extent to which the stormwater management approach incorporates mātauranga Māori and tikanga Māori;
- (iii) the extent to which infiltration can be achieved to minimise impacts of frequent flows on stream health on sites by:
 - setting aside 10% of the site or identifying a specific design to provide for on-site stormwater management as a pervious reserve, or multiple areas up to 10%;
 - ensuring the pervious reserve is located at the down gradient part of each site after earthworks and is the connection point to the piped stormwater network;
 - ensuring the pervious reserve is protected from compaction during earthworks, or ripped to maximise infiltration capacity if compaction cannot be avoided; and
 - ensuring that sufficient space is provided in the site layout and road design to accommodate stormwater management devices.

(d) the extent to which the creation of bird habitat in stormwater management areas will increase the risk of bird strike to aircraft; and

(e) the extent to which any stormwater outfalls entering a stream from a piped network is set back from natural channels to minimise erosion, and the extent to which it is practicable to use a vegetated conveyance swale within the floodplain to provide energy dissipation and additional interception prior to runoff entering a stream.

(8) for dwellings

- (a) whether the scale, form, design, height and colour of the dwelling is sympathetic to the surrounding environment; and
 - (b) whether the dwelling provides for the relationship of Mana Whenua with the Maori cultural landscape through:
 - (i) native landscaping, vegetation and design;
 - (ii) minimising landform modification where practicable and respecting the Maori cultural landscape values identified on Puhinui: Precinct plan 1 - Maori cultural landscape values; and
 - (iii) maintenance of views and connections to and between important sites, places and areas, waahi tapu and other taonga.
- (9) **Earthworks in the Campana Road Structure Plan area:**
- (a) **The extent to which adverse effects on archaeological values are avoided remedied or mitigated with an appropriate archaeological management methodology.**
 - (b) **Māori cultural landscape values:**
 - (i) **the extent to which adverse effects on the Māori cultural landscape values related to discovery of archaeological material are avoided, remedied or mitigated;**
 - (ii) **the ability to incorporate mātauranga Māori and tikanga Māori, recognising and providing for the outcomes articulated by Mana Whenua;**
 - (iii) **whether consideration has been given to practicable alternative methods, locations or designs that would avoid or mitigate the impact on the identified Māori cultural landscape values;**
 - (iv) **the extent to which the location and extent of earthworks provide for the relationship of Mana Whenua with the Māori cultural landscape including through:**
 - **the incorporation of building design elements, art works, naming and historical information to reflect the values and relationship mana whenua have with the Puhinui area;**
 - **native landscaping, vegetation and design including removal and replanting; and**
 - **minimising landform modification where practicable and respecting the Māori cultural landscape values identified in Precinct Plan 1 - Māori cultural landscape values.**

I432.9. Special information requirements

An application, where appropriate must be accompanied by:

I432.9.1. Buildings and structures over 50m2

- (1) Where a site has frontage to Puhinui Road, a perspective sketch or photomontage must be prepared showing the proposed scale and form of buildings when viewed from Puhinui Road (SH 20B); and
- (2) Planting and landscaping plan:
 - (a) a landscape plan must be submitted showing proposed planting of the site. The landscape plan must include sufficient information to meet the relevant assessment criteria including the following:
 - (i) a schedule of plant species;
 - (ii) planting specifications including the number, size and location of individual trees and shrubs;
 - (iii) planting management plan, including weed management;
 - (iv) the location and design of public amenity features; and
 - (v) retention and enhancement of native vegetation, existing significant trees and natural features and recognition of the plant species once found within the site

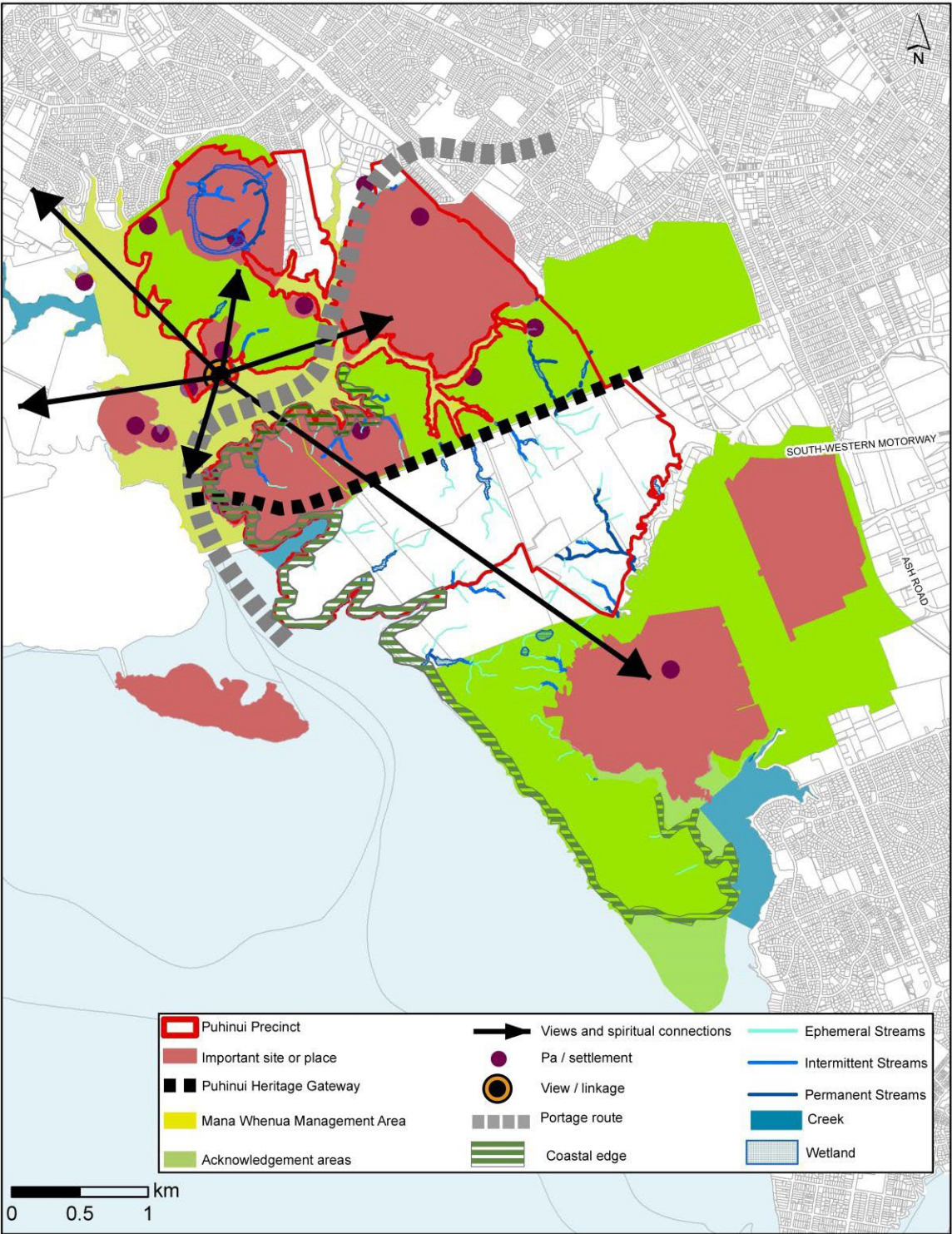
I432.9.2. Development or subdivision of land within sub-precincts A-G

- (1) A plan showing the overall context of the land area relative to existing buildings, including any public open space, transport connections, and any approved buildings;
- (2) Where land re-contouring is proposed, a plan showing the relationship of site contours to existing and proposed streets, lanes, and any public open space;
- (3) A plan showing the location and layout of any proposed public open space including the general location of soft and hard landscaping areas, such as pocket parks, plazas and linking spaces that complement the existing public open space network, ecological linkages and any natural features to be retained or enhanced;
- (4) For all non-complying activities an integrated transport assessment, including evidence of consultation with the road controlling authority including New Zealand Transport Agency, Auckland Transport and Auckland International Airport Limited, and consideration of:
 - (a) all modes of transport that would support the land uses proposed;
 - (b) the possible location of and linkages to rapid transport networks;
 - (c) a location policy that ensures specific development takes place in locations that, where relevant, supports sustainable transport mode share;
 - (d) planning and development tools to facilitate sustainable transport;
 - (e) travel plans, as appropriate to encourage uptake of sustainable transport options by employees and visitors;
 - (f) car parking standards with justification for the number of spaces proposed so land is used efficiently and effectively;

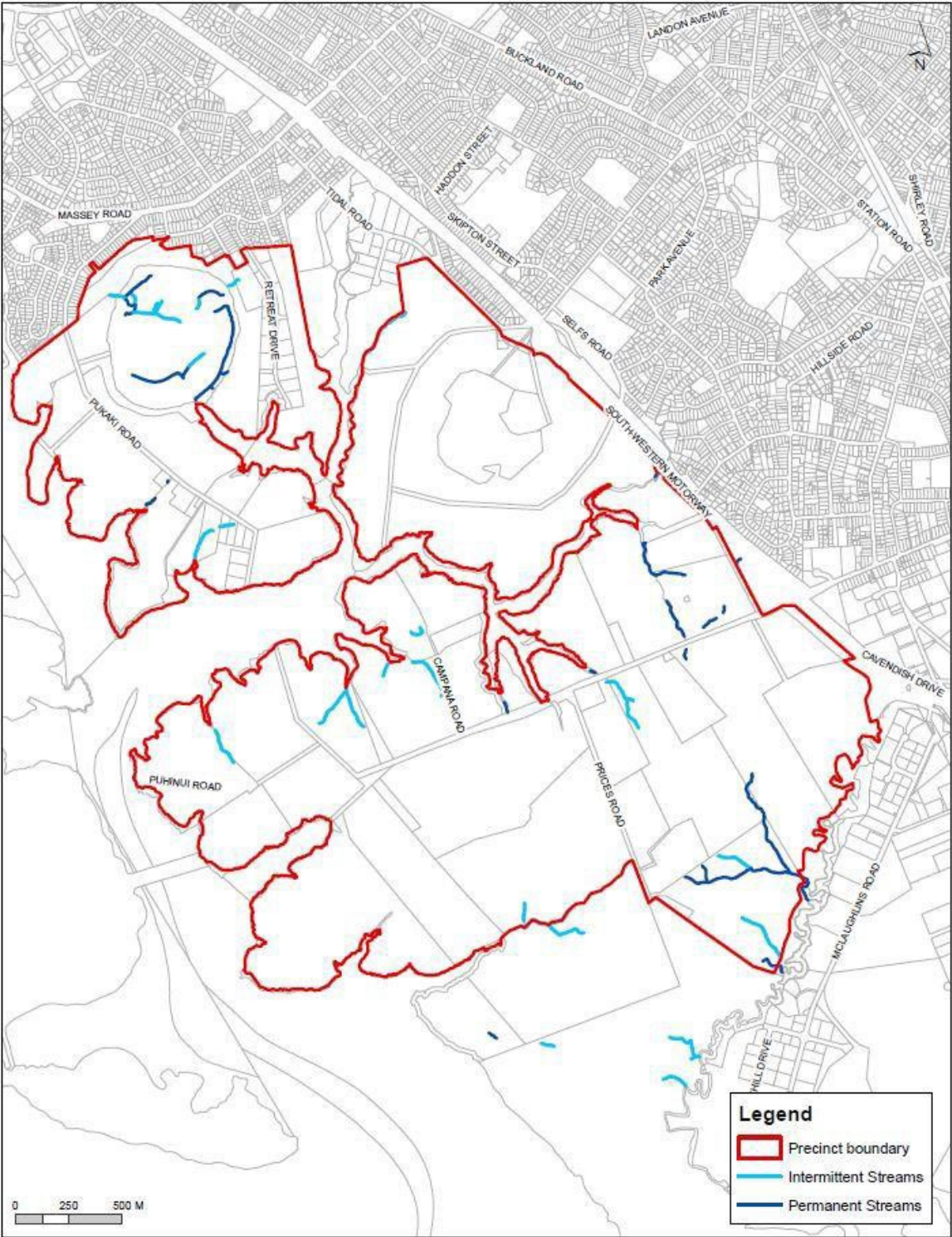
- (g) provision, where appropriate, to be made for cyclists, including cycle storage;
 - (h) any relevant funding matters;
 - (i) the safe and efficient operation of the State highway and road network (including Prices Road); and
 - (j) opportunities to reduce or remove access points to the State highway network.
- (5) For restricted discretionary activities, a traffic assessment shall be provided to address the predicted cumulative network performance in compliance with Standard I432.6.1 Transport by a suitably qualified and experienced traffic engineer using techniques accepted by the relevant road controlling authority. For development or subdivision within sub-precincts D or E the assessment must also contain a report outlining the results of:
- (a) A survey of total hourly traffic volumes entering and exiting the sub-precincts for completed development; and
 - (b) A review of total hourly traffic volumes entering and exiting the sub-precincts for consented development not yet constructed or operational.
- (6) The general location and design of streets and lanes, including the design of all main road linkages, and including cross sections where applicable;
- (7) The location and design of public transport and active mode infrastructure including walking and cycling network;
- (8) Identification of the location and function of main pedestrian and cycling routes to and within the sub-precincts, and their relationship to connections with SH20B (Puhinui Road) and transport nodes. This must include representative cross-sections showing the width of footpaths, cycle paths and traffic lanes;
- (9) The location of stormwater, wastewater and water supply infrastructure;
- (10) Areas to be developed for stormwater treatment and detention purposes consistent with the relevant network discharge consent;
- (11) Proposed staging of earthworks and building development and the means of managing any vacant land through the staging process;
- (12) The location, form of control, function and layout of road connections and corridor treatments, in particular those connecting with SH20B (Puhinui Road); and
- Note: All connections to SH20B (Puhinui Road) are required to be designed in accordance with the NZTA's requirements for physical works to State Highways.
- (13) Evidence of consultation with Kaitiaki contacts in respect of any potential wāhi tapu.

I432.10. Precinct plans

I432.10.1 Puhinui: Precinct plan 1 - Māori cultural landscape values



I432.10.2 Puhunui: Precinct plan 2 – Streams



I432.10.3. Puhinui: Precinct plan 3 – Pūkaki Marae – Matukutureia viewshaft



35°52'18" (73.10)

DIAGRAM ONLY
NOT TO SCALE

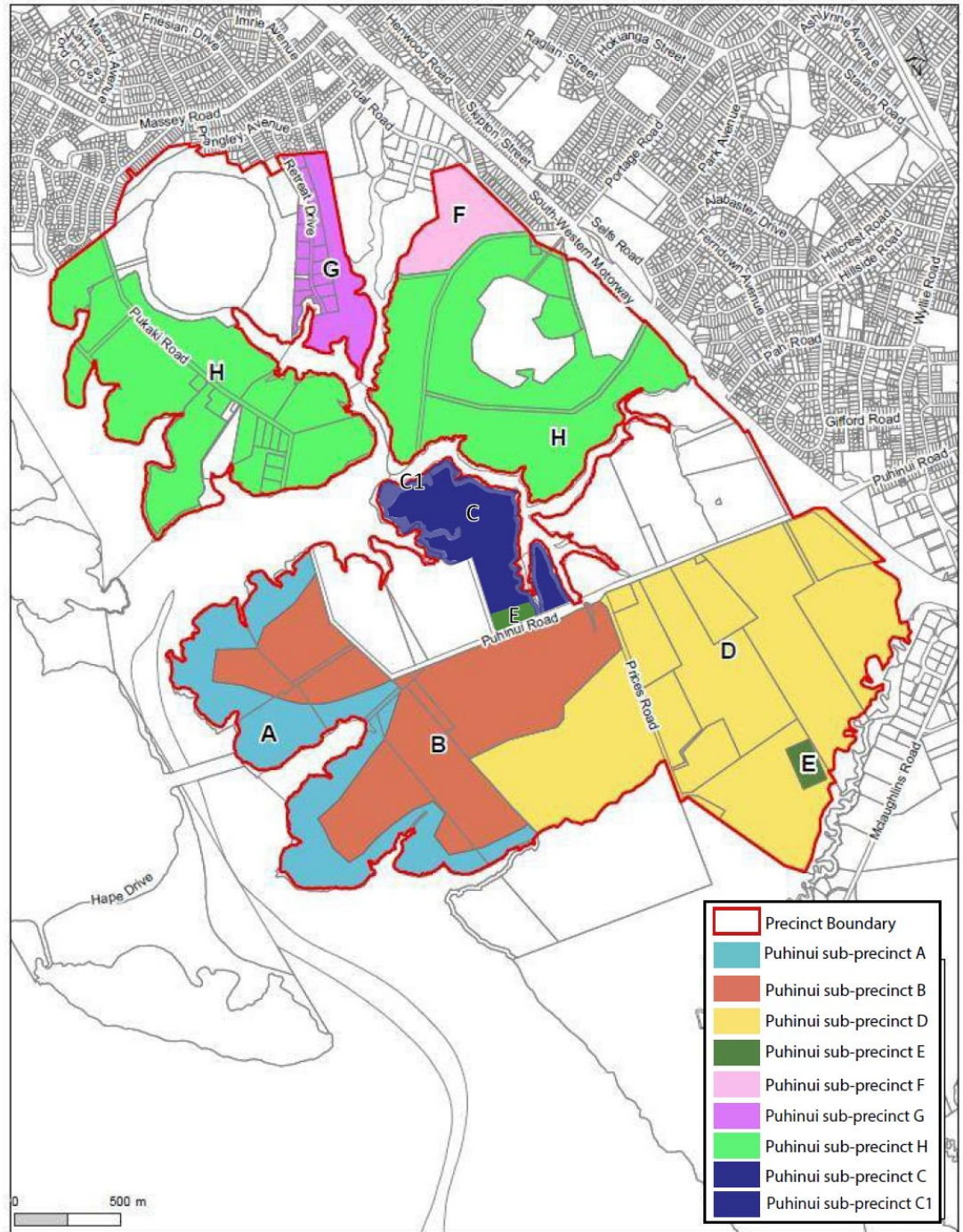
SCHEDULE OF COORDINATES

Pt No	DATUM 2000 MT EDEN CIRCUIT		New Zealand Transverse Meractor 2000		HEIGHT NEW ZEALAND VERTICAL DATUM 2016
	NORTHING	EASTING	NORTHING	EASTING	
IS1	787316.27	404106.31	5904259.71	1761093.45	9.01
IS2	787333.30	404183.63	5904275.30	1761171.07	9.25
3	785179.79	407301.46	5902064.32	1764248.53	54.20
4	785119.81	407259.67	5902005.13	1764205.64	54.05
5	785684.81	406505.35	5902584.03	1763461.89	43.02

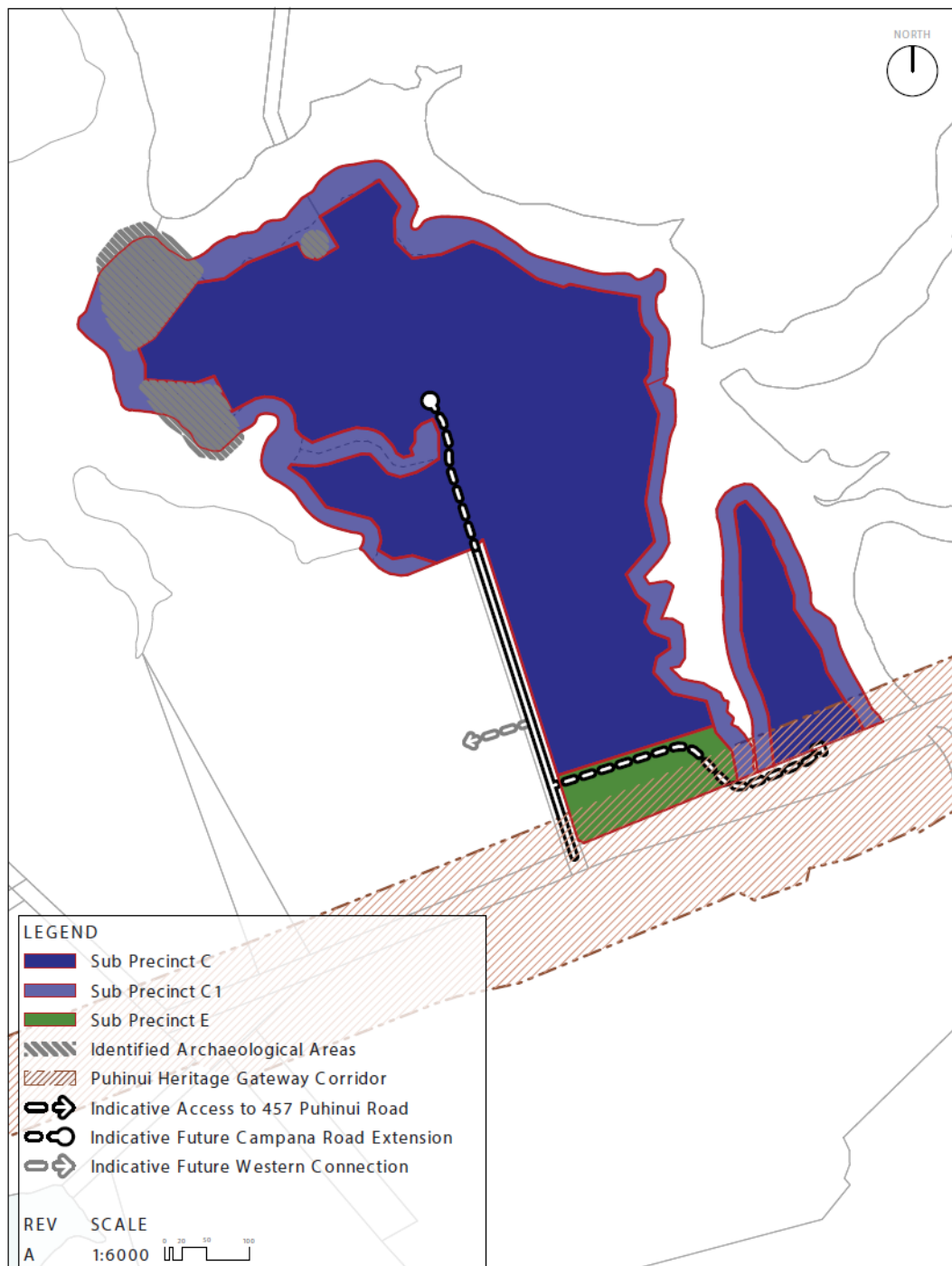
NOTES

- LEVELS ARE IN TERMS OF NEW ZEALAND VERTICAL DATUM 2016
ORIGIN OF LEVELS
PUKAKI MARAE - 8 170 80 56547 RL 11.11
PRICES ROAD - 5 164 50 56547 RL 16.98.
- POINTS IS1 AND IS2 ARE 1.75m ABOVE IRON SPIKES BURIED IN THE GROUND ON THE RESERVE SIDE OF THE FENCE. POINT 5 IS THE RL OF A TREE LINE ALONG THE EXTENSION OF PRICES ROAD INTO RESERVE/PARK.
- THE GRADIENT OF THE SIGHT LINE HAS BEEN DETERMINED USING THE HEIGHTS FROM IS1, IS2 TO 5.
- BEARINGS SHOWN ARE IN TERMS OF GEODETIC 2000 MT EDEN

I432.10.5. Puhinui: Precinct plan 5 – sub-precincts



I432.10.5. Puhinui: Precinct plan 6 – Campana Road Structure Plan



Attachment B

12 September 2024

Campana Landowners Consortium
c/o Capstone Projects Ltd
349b Manukau Road
Epsom
Auckland

Attention: Tom Anderson
Issued via email: tom@capstoneprojects.co.nz

Dear Tom

**Proposed Private Plan Change – Campana Road
Clause 23 Request for Further Information Response (Transport)**

Following our recent instruction, Don McKenzie Consulting Ltd is pleased to provide the following responses to the Council's Request for Further Information issued under Clause 23 of the Resource Management Act ("Clause 23 RFI") in relation to the proposed Campana Road Plan Change ("Plan Change") in advance of it being notified by Council. The responses build on discussions held with the Council's representatives Peter Reaburn (planning) and Andrew Temperley (transport) on 31 July 2024.

It is understood that additional responses to some (non-transportation) matters raised in the Council's Clause 23 RFI are being provided by other members of the Applicant team and will be reported on separately. .

1. Land use and transportation Integration

Information Concern

The S32 evaluation does not consider the integration of the PPC area with transport projects along the state highway 20B (SH20B) corridor, namely the 20Connect long term improvements and Airport to Botany rapid transit. The FDS identifies 20Connect as an infrastructure prerequisite for the Puhinui (stage 2) future urban area, which the PPC site is part of.

Information Request SP2 – Land use and transportation Integration

Please provide a further assessment in relation to the integration of the PPC area with transport projects along the state highway 20B (SH20B) corridor.

Response:

The Plan Change focusses on the development of yard-based storage being considered within the context of the current transport environment focussed on the SH20B Puhinui corridor. As discussed at the meeting with Council on 31 July (and as will be discussed in the next section of this response) the 50vph threshold is intended to ensure that any more substantial traffic and other mode generation associated with more intense development will be assessed via resource consent and associated traffic assessments at the time when such development is advanced including alignment and consistency with these wider strategic projects and processes.

The Plan Change's 50vph permitted traffic movement "ceiling" is considered to be generally consistent with the broad expectation of the 20Connect/Airport-Botany Busway over the next several years, with any future development potential beyond what is currently provided for within the Plan Change area assessed accordingly as required by future consent processes.

2. Staging of development activities and consequent traffic generation potential

Information Concern

The Transportation Assessment memo considers traffic generation potential associated with the consented SPCA facility and proposed storage activities, including the impact of this traffic generation on the performance of the intersection of Campana Road / Puhinui Road. However, it does not consider traffic generation potential and effects associated with the development of other sub-precinct areas within the Plan Change area, nor how the effects would be mitigated.

Further information is needed to understand the full potential transportation effects of the PPC when fully developed and inform appropriate transportation provisions and mitigation measures required (see item III below).

Auckland Transport (AT) have similarly confirmed their support for further information in relation to trip generation, as well as assumptions in relation to trip distribution. AT have also reaffirmed that Waka Kotahi Guidelines for assessing Plan Changes require modelling assessments for 10 years into the future, in addition to the existing scenario.

Information Request T2 - Staging of development activities and consequent traffic generation potential

Please provide information in relation to traffic generation potential of land-use activities within the whole PPC area and consequent transport effects on the adjoining network.

Response:

The discussions with Council representatives on 31 July identified that the potential for future land-use activities to be established within the Plan Change area should be framed around a more strategic, broader framework rather than being considered as a detailed "future baseline" or similar. Other members of the Applicant team will provide greater information on the most feasible and realistic light industrial land-uses/activities that could be considered within the Campana Road location.

From a transportation and traffic generation point of view, and as was set out in the Transportation Assessment accompanying the Plan Change application the "generic light industrial" activities occupying could generate traffic movements as follows:

In terms of the future traffic generating potential of the Consortium land (inclusive of the SPCA land) the following calculations are made:

- The total Consortium landholding (including SPCA) involves approximately 30.7 hectares of useable land;
- An allowance of 30% of the developable land for road reserves/accesses/drainage, and a 40% site coverage for buildings or useable storage facilities;
- Adopting 70% of the net developable land (60,172 sqm) to provide for warehousing/storage at a typical trip generation rate of 0.5 vph per 100 sqm;
- The remaining 30% (25,788 sqm) to provide for permitted ancillary office activities in support of the light industry/warehousing at a peak period generation rate of 1vph per 100sqm;
- Application of the above factors results in peak hour two-way flows of up to approximately 560vph (bothways) to and from the Consortium's land associated with such generic light industry and ancillary office activities.

More detailed evaluation of the Puhinui/Campana intersection would be undertaken once specific activities are known (and consent sought when/if these activities are planned), however at this stage (and on the basis of the above commentary regarding what development will be facilitated and enabled by the Plan Change), it is expected that the generic form of infrastructure response to cater for the light industrial activity would typically involve:

- Widening of Campana Road to an "urban collector" form of roading carriageway involving one lane in each direction, formed footpaths (or shared paths) on each side of the road, plus suitably dimensioned roadside shoulders and berms.
- Potential widening of the Campana Road approach to the Puhinui Road intersection to enable separation of left and right turning movements out of Campana Road.

The current legal road width of Campana Road at approximately 20m is generally sufficient to enable the widening of the carriageway to the "collector" standard incorporating footpaths and other associated design elements. The widening at the intersection with Puhinui Road may involve additional land requirements from the properties making up the Applicant's landholding to achieve the additional turning width.

In this regard it is considered (from a transportation engineering point of view) that there is suitable resilience and flexibility within the current Plan Change landholdings and legal road width of Campana Road to respond to future potential light industrial land use scenarios beyond the permitted traffic generation ceiling (of 50vph) proposed within the Plan Change.

3. Triggers for Transport Improvements and Mitigation Measures

Information Concern

While the Transportation Assessment Memo refers to the upgrading of Campana Road and to future walking and cycling improvements, it does not provide full details, including appropriate phasings and trigger points for improvements.

Further information is needed to ensure that appropriate outcomes for the transport network can be delivered in alignment with the staged development of the PPC area

Information Request T3 - Triggers for Transport Improvements and Mitigation Measures

Please provide information on appropriate transportation infrastructure provisions and appropriate mitigation measures for the PPC development, in addition to identifying

appropriate trigger points for improvements, including responsibilities for funding and delivery.

Response:

The above high-level assessment has shown that under a future hypothetical development scenario delivering a generalised light industrial development form could require upgrading of the general form set out under the response to Information Request T2 to provide for up to approximately 16.5ha of development area (or an equivalent of 65,800 sqm GFA). The specific triggers (prior to or at this level of development) for the delivery of the infrastructure discussed would be considered and derived through the subsequent consenting processes beyond what is proposed by the current Plan Change.

The responsibilities for funding and delivery of such upgrading is expected to be given consideration at a later time when any improvements are being planned. Standard approaches to the funding of such improvements would be expected to follow the normal processes including consideration of the proportional contribution of such improvements towards mitigation of external effects associated with the landuse proposed, and the additional wider benefit such improvements might deliver for the wider community.

4. Operational and Safety Assessment of access to 457 Puhinui Road

Information Concern

While the Transportation Assessment Memo assesses the performance of the intersection of Puhinui Road / Campana Road, it does not consider the safety and operational performance of the separate intersection point to 457 Puhinui Road. It further does not confirm whether this intersection arrangement is expected to be subject to any changes or upgrades, in response to future development and / or any safety issues.

Further information is needed to fully understand the traffic and safety impact of the PPC on the adjoining road network. The existing access intersection to 457 Puhinui Road is noted to already be handling regular truck movements, whilst constrained by a ban on the outbound right-turn manoeuvre and few convenient opportunities for vehicles to undertake U-turning manoeuvres along Puhinui Road in the immediate vicinity.

Information Request T4 - Operational and Safety Assessment of access to 457 Puhinui Road

Please provide an assessment of the safety and operational performance of this intersection, which should take account of the future development potential of this site, in accordance with the above. If appropriate, the assessment should also confirm recommended improvements to address safety and / or operational issues.

Response:

The Applicant has considered a potential form of alternative transport access to this part of the Plan Change area. The updated structure plan supporting the Plan Change application shows an indicative realignment and positioning of the existing "service lane" that extends (within legal road reserve) across the Puhinui Road frontage of the SPCA property between Campana Road and the 457 Puhinui Road property. It is indicatively shown extending further north through the SPCA property and connecting to Campana Road a minimum of 30m north of the existing Campana / Puhinui intersection (satisfying the relevant AUP Chapter E27 access location standards).

5. Campana Road Upgrade

Information Concern

While the Transportation Assessment Memo refers to the upgrading of Campana Road, it does not provide further details, such as confirmation of cross-sectional standards. While the infrastructure report provides a proposed cross-section for Campana Road, it does not assess this according to Auckland Transport Code of Practice (ATCOP) requirements.

Further information is needed to ensure that the key route connecting the PPC site to the wider transport networks is fit for purpose.

Information Request T5 - Campana Road Upgrade

Please provide a cross-section design for Campana Road which complies with ATCOP Standards and clarification as how provisions for active mode users will integrate with adjoining networks at either end.

Response:

The relevant ATCOP (Auckland Transport Code of Practice) and Transport Design Manual (TDM) standards will be referenced within future resource consents. As discussed under Information Request T2 above, there is sufficient legal road reserve width to deliver an appropriate design standard of urban industrial collector road comprising of for example, an 11m width two-way carriageway). In terms of active modes, the 20m road reserve width is suitable to accommodate footpath or other active mode provision as may be appropriate in the future. Any potential additional width requirements to provide for greater design requirements per ATCOP or other design standards can be achieved from land held by the Plan Change applicants.

An indicative cross-section of Campana Road is provided as an Attachment to this response.

6. Campana Road Structure Plan

Information Concern

It is considered that the Campana Road Structure Plan would benefit from further detail and supporting assessments in relation to the areas specified in the information request below.

Information Request T6 – Campana Road Structure Plan

Please provide:

- A plan showing strategic transport movements, which could be an elaboration of the information presented in the plan on page 4 of the Structure Plan, showing strategic transport connections between the PPC site and the wider network and indicative internal connections within the PPC sub-precinct areas, for vehicular traffic, active modes and public transport.***
- Further assessment and clarification in relation to the indicated realigned access to 457 Puhinui Road, shown on the same plan.***
- Further assessment and clarification in relation to the indicated 'Public Walkway opportunity' following the coastlines of the peninsulas making up the PPC area. While the identified routes appear to offer significant amenity value, it would be helpful to understand how these walkways would be expected to serve the PPC site at a functional level and integrate with other provisions for access by active mode users.***

Response:

An updated Structure Plan has been prepared by other members of the Applicant's advisory teams and is attached to this response as **Attachment B**. From a transportation point of view and in response to the initial two bullet points of the Council's request above, the updated Structure Plan shows:

- The indicative extension of the Campana Road alignment to the north towards and connecting with each of the land parcels in the northern sector of the Structure Plan area;
- An indicative alignment of the accessway serving the 457 Puhinui Road property and its indicative connection to Campana Road (via the SPCA land) located a minimum of 30m north of the Puhinui Road intersection;
- A potential indicative connection (Future Western Connection) from the western side of Campana Road (and north of the accessway to 457 Puhinui Road) towards non-Plan Change land on this western side of Campana Road.

Beyond this more strategic-level and structural transport indication shown in the attached updated Structure Plan, any more detailed or specific accessway, driveway or vehicle access development is considered premature and of limited relevance to the overall consideration of the transportation implications of the Private Plan Change. Due to the nature of the current landholdings within the Plan Change area there could be any number of arrangements of future development potentially including a single comprehensive operational development requiring only a single point of entry, or alternatively several development parcels potentially subdivided from the current land-holdings or amalgamating current parcels. On this basis, any more detailed or fine-grained indication of access provision would be theoretical at best.

The indication of a connection to the land to the west of Campana Road reflects the potential for Campana Road to cater for such movements, and the potential (at least in concept) for this to extend further west to connect with Orr's Road. However, existing topographical challenges in this area indicate that a roading connection in this area would not be readily or easily provided.

Response to the third RFI bullet point (relating to the Public Walkway Opportunity) is responded to by the Applicant's planning consultant.

I would be happy to discuss or expand on any of the details of the above as required. Please don't hesitate to contact via the below.

Yours sincerely



Don McKenzie | **Director**
Don McKenzie Consulting Ltd

E: don@dmconsulting.co.nz

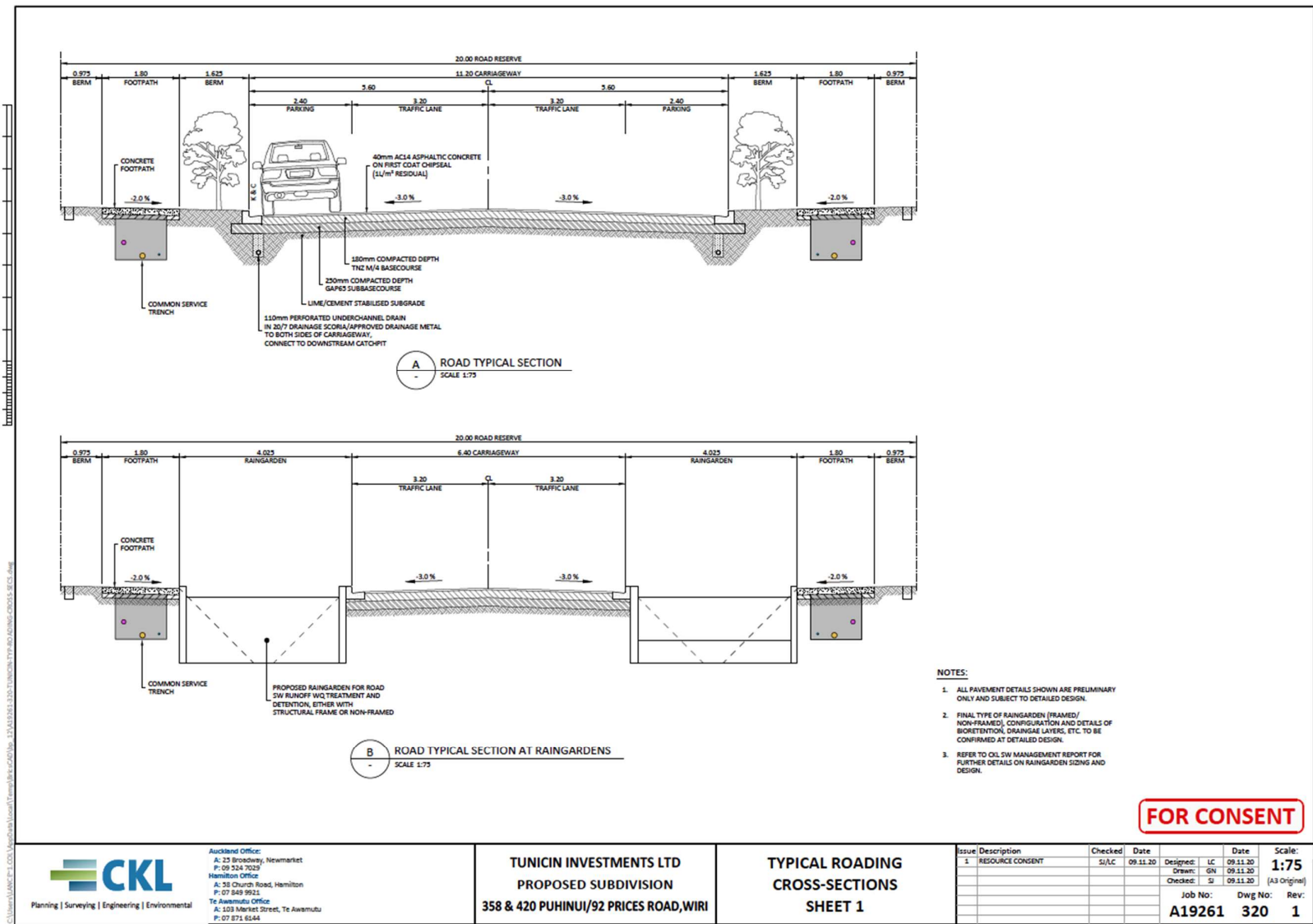
W: www.dmconsulting.co.nz

M: 021 656 191

Attachment A – Indicative Cross-Section

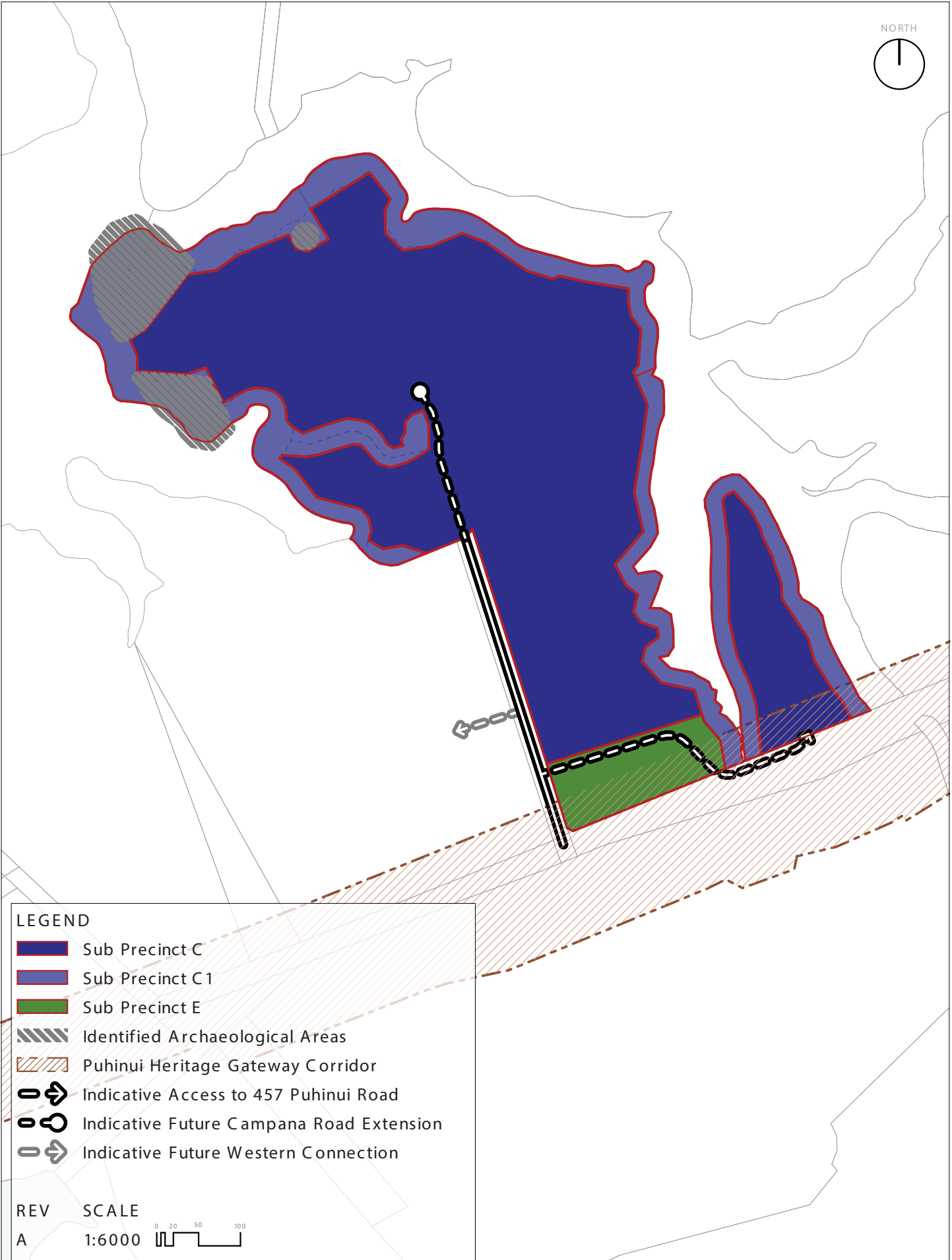
Attachment B – Campana Road Structure Plan (Rev. A)

ATTACHMENT A – Indicative Cross-Section (Campana Road)



ATTACHMENT B – Campana Road Structure Plan (Rev. A)

Campana Road Structure Plan



Attachment C

PROPERTY **E**CONOMICS



CAMPANA ROAD PPC

RFI ECONOMIC RESPONSE

MEMORANDUM

Client: Campana Landowners' Consortium

Project No: 52290

Date: August 2024

15 August 2024

DIGITALLYDELIVERED

ECONOMIC MEMORANDUM

To: Joe Gray

Principal Planner

Saddleback

Email: joe@saddleback.nz

RE: ECONOMIC RESPONSES TO AUCKLAND COUNCIL'S RFI ON CAMPANA ROAD PPC

INTRODUCTION

Property Economics has been engaged by Saddleback on behalf of Campana Landowners' Consortium (the Applicant) to provide responses to Auckland Council's Clause 23 Request for Information (RFI), relating to the proposed rezoning of 31.5ha of land on Campana Road, from Future Urban Zone (FUZ) to Business – Light Industry Zone (LIZ), under the Auckland Unitary Plan Operative in Part (AUP(OIP)).

For ease of reference, this memo provides the economic requests raised by Council's Economic Specialist – Derek Foy, with the relevant responses, analysis and commentaries from Property Economics (PE) following in *blue italics*.

ECONOMIC RESPONSES

#E1. Industrial Zoned land Supply and Capacity

Request: Please amend the industrial zoned land supply and capacity assessment to include an assessment of all future urban areas and Whenuapai.

PE Response:

Table 1 (on the next page), which includes a more detailed explanation of the data sources, includes the potential industrial land designated in the 2016 Whenuapai Structure Plan. This Structure Plan earmarked an additional 300ha of business land for the broader Auckland market.

It is important to acknowledge that the Planning, Environment, and Parks Committee is now initiating an update of the 2016 Whenuapai Structure Plan. This update will identify any development constraints in the area and outline the necessary infrastructure, including funding mechanisms and incorporation into future budgets and long-term plans.

Currently, the updated amount of industrial land to be designated in this area remains uncertain. Thus, the 300ha of greenfield industrial land identified in the 2016 Whenuapai Structure Plan should not be considered the definitive amount that will be available in the future. It is also unclear how much of this land, along with other future growth areas, will become available in the short, medium, and long terms.

Due to the lack of funding within the AUP(OIP)'s 10-year budget for upgrading the broader transport networks, which are needed to address the anticipated traffic increase from the development in Plan Change 5 – Whenuapai Plan Change, the Council has withdrawn the plan to live-zone approximately 360ha of Future Urban zoned land in Whenuapai.

Given the significant uncertainties regarding the timing and capacity to fund the necessary infrastructure to develop these greenfield industrial areas, it can be expected that the future availability of serviced, development-ready, and vacant industrial land will be considerably less than indicated in Table 1.

Importantly, including this Whenuapai greenfield industrial land does not alter the economic position outlined in our Economic Assessment, which has identified sufficient industrial land capacity in Auckland for the next 30 years.

As highlighted in our Economic Assessment, industrial land sufficiency is not the primary consideration in this instance. The anticipated sufficiency does not inherently undermine the economic viability of potential new industrial developments, depending on their locational efficiency and contribution to fostering a well-functioning urban environment.

Based on our economic assessment of historical employment trends in Auckland's industrial market, the locational characteristics of the PPC site, and the high-level economic costs and benefits associated with the proposed development, it can be concluded that the Campana Road PPC is strategically positioned to accommodate the shifting employment structure and evolving business activities within the economy. This would generate net economic benefits for the local market, businesses, and communities.

TABLE 1: AUCKLAND INDUSTRIAL LAND CAPACITY (HA)

	HEAVY		LIGHT		TOTAL	
	Area (ha)	Capacity (ha)	Area (ha)	Capacity (ha)	Area (ha)	Capacity (ha)
AUP(OIP) Provisions	1,846	545	4,472	1,736	6,319	2,281
Vacant Land		85		467		552
Vacant Potential Land		460		1,269		1,729
Structure Plan	191	107	1,419	834	1,610	941
Drury-Opāheke	56	24	276	126	332	150
Pukekohe-Paerata	0	0	224	95	224	95
Silverdale West Dairy Flat	98	56	502	293	600	349
Warkworth	37	27	27	20	64	47
Whenuapai	0	0	390	300	390	300
TOTAL (excl. Vacant Potential Land)	2,037	192	5,891	1,301	7,929	1,493
TOTAL (incl. Vacant Potential Land)	2,037	652	5,891	2,570	7,929	3,222

Source: Auckland Council HBA 2023 and relevant Council Structure Plans.

Notes: Industrial zoned land areas are estimated by Property Economics using QGIS¹ with AUP(OIP) zoning GIS layers. Capacity numbers under the AUP(OIP) provisions are based on Table 40 of the HBA 2023 on Page 143.

Greenfield industrial land areas are measured by Property Economics in QGIS based on the future industrial zones identified in the corresponding Structure Plans, including:

- *Drury-Opāheke Structure Plan (August 2019): Table 1 identifies 150ha of net developable industrial/business land.*
- *Pukekohe-Paerata Structure Plan (August 2019): Section 3.3.2 identifies 95ha of land to be zoned for Light Industry.*
- *Silverdale West Dairy Flat Industrial Area Structure Plan (April 2020): Section 4.2 identifies 293ha for Light Industry and 56 hectares for Heavy Industry.*
- *Warkworth Structure Plan (June 2019): Section 3.5.1 anticipates a yield of around 65ha of industrial land (gross). This has been translated into net developable land areas based on a 35% - 40% infrastructure assumption.*
- *Whenuapai Structure Plan (September 2016): Section 7.4.1 identifies a future supply of over 300ha of business land to meet future industrial demand.*

#E2. Population Projections

Request: Please review the basis for population projections for Auckland Region and provide further confirmation or revision of the assessment.

PE Response:

Figure 1 on the next page compares the customised Medium growth scenario adopted by the Council in March 2023 with the Stats NZ estimates and projections for the Auckland Region. Note that Property Economics has extended the Stats NZ forecast out to 2053 to provide a 30-year (long term) projection period based on the Stats NZ projections trends.

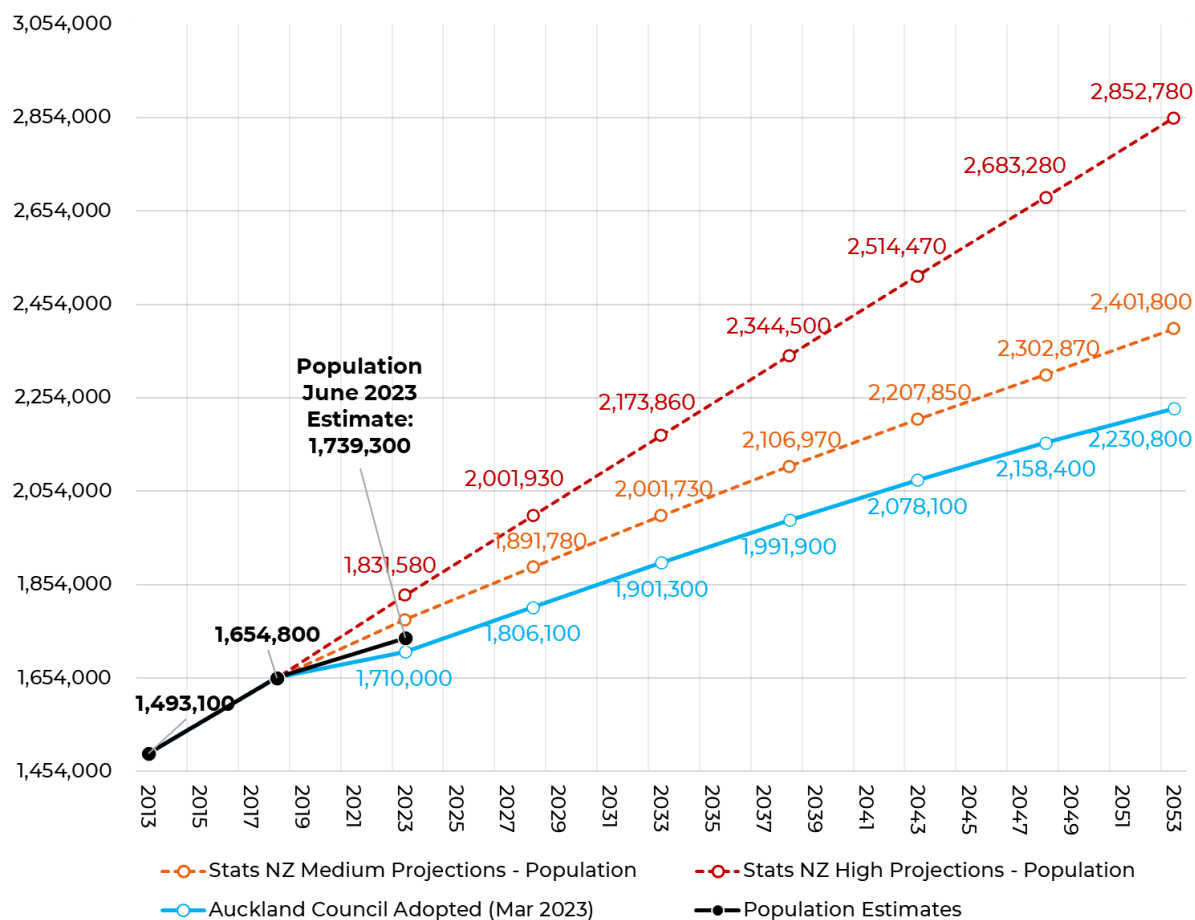
Figure 1 indicates that Auckland's current (2023) population has slightly exceeded the Council's adopted Medium projection series by approximately 1.7%.

Under this adopted Medium growth scenario, Auckland's population is projected to reach around 2,230,800 people by 2053, representing a 28.3% growth rate over the next 30 years.

Note that Section 4 of our Economic Assessment aims to provide context for the anticipated regional market growth over the next 30 years based on Stats NZ projections. The projections in this section do not serve as the basis for the industrial land sufficiency assessment presented in Section 7.

The HBA 2023, reviewed in Section 7 of our Economic Assessment, incorporates this customised growth scenario. Therefore, the Council's adopted Medium projection does not impact the economic analysis provided in our Economic Assessment, nor does it alter our economic position.

¹ Quantum Geographic Information System

FIGURE 1: AUCKLAND POPULATION ESTIMATES AND PROJECTIONS


Source: Auckland Council, Stats NZ, Property Economics

#E3. Sub-Precinct E

Request: Please review the identification of the two comparator nodes (Cavendish Drive, and Great South Road next to PB Tech) as to whether they are a robust basis for establishing an appropriate size of the proposed Sub-Precinct E within the PPC Area.

PE Response:

Property Economics understands that the Applicant has now revised their application to relocate Sub-Precinct E. The proposed new location is at the intersection of Campana Road and SH20B, covering approximately 1ha (see Pink Areas in Appendix 2).

When evaluating the most appropriate (economic) location for Sub-Precinct E, putting commercial activity at the intersection of Campana Road and SH20B would generate increased economic and social benefits (relative to the internalised location to the north along Campana Road). These include:

- Exposure to significantly more traffic from Puhinui Road. This increases the market opportunity significantly with a higher chance of drawing in spend from passing traffic.

- *Better accessibility to the local catchment (workers) and passing traffic (additional market). Accessibility is crucial to better service a market, particularly for convenience store types the Sub-Precinct E centre will rely on.*
- *Increased profile. The high traffic volumes on SH20B (relative to Puhinui Road), which connects to the airport, makes this location highly visible. This kind of exposure has the potential to attract more retailers such as fast-food operators who 'feed off' high traffic volumes, profile and a high level of accessibility. An internalised location will miss this market opportunity altogether.*
- *The Puhinui Road location also extends the hours of operation and move into the after hours economy with airport traffic having busy period in early morning and evening. This provides an opportunity to have extended hours of operation relative to the Campana Road site where that opportunity wouldn't exist.*
- *Better service workers and businesses on the south side of Puhinui Road. More accessible - leads to better economic performance of stores.*

Overall, based on our experience of assessing centres all across the country for over 20 years, economically a centre located on the corner of Puhinui and Campana Roads would perform significantly better and sustain a larger GFA footprint than the current Campana Road location.

The new Precinct E location would improve the development outcomes by enhancing its ability to meet the convenience needs of businesses, the community, and passing traffic more effectively, leading to a more sustainable and successful centre.

To estimate the likely employment base and consequent demand for convenience retail and commercial services, Property Economics uses the existing employment base within the LIZ area bounded by the railway line, Puhinui Road, and SH20. It is assumed that a similar employment density will be accommodated within the PPC site and surrounding FUZ areas, which comprise the localised catchment of Sub-Precinct E.

Based on this localised catchment of approximately 284ha and considering the likely land-extensive activities (around 18 employees per ha), Property Economics estimates that the future 'at capacity' employment base of the localised catchment would be around 5,200 people.

The future 'at capacity' employment of 5,200 people could generate approximately \$82m in total annual retail spend. Assuming an appropriate convenience spend ratio, the generated convenience retail spend is estimated to be around \$12m per year. This could support about 2,000sqm of convenience retail GFA and another 2,000sqm of non-retail commercial services GFA within the Sub-Precinct E.

Based on a 40% Floor-to-Land Ratio (FAR), the total sustainable convenience centre GFA of 4,000sqm can be translated into a net land requirement of around 1ha. This 1ha does include land required for roads, urban parks, civic spaces, reserves, public transport, etc.

Importantly, this 1ha does not include the likely convenience retail spend generated by airport and state highway drive-by traffic, which would further increase Sub-Precinct E's sustainable centre provision.

Given the above high-level analysis, Property Economics considers that the revised location and size of Sub-Precinct E are appropriate and can be expected to generate significant convenience and economic benefits for businesses, communities, and passing traffic.

#E4. Sub-Precinct E

Request: Please provide specific references for the data relied on in the Economics Assessment (numbers presented in tables 1 and 3 and related discussion).

PE Response:

An updated version of Table 1, including a detailed explanation of the specific data sources, is already shown in our response to #E1. Therefore, Table 1 is not replicated here.

Table 3 from our Economic Assessment is replicated on the next page. Note that the figures in this table are based on the HBA 2023 and are not estimates or forecasts from Property Economics.

Since the HBA 2023 has incorporated the Council's custom Medium growth scenario into the assessment, the numbers provided in Table 3 remain up-to-date and appropriate. Again, the inclusion of this custom Medium scenario in the Section 4 ("Economic Market Growth") does not change the numbers in Table 3 or alter our economic position.

As requested, a more detailed illustration of the data sources is provided in the notes under Table 3.

TABLE 3: AUCKLAND REGION INDUSTRIAL FLOORSPEACE CAPACITY SUFFICIENCY (2023)

	Short Term	Medium Term	Long Term
Additional industrial employment growth (MECs)	8,330	17,910	46,130
Additional industrial floorspace demand (000sqm)+ NPS-UD margin	570	1,103	2,445
Plan-enabled industrial floorspace capacity under AUP(OIP) (000sqm)*	79,657		
Estimated infrastructure constraints ratio	70%	32%	13%
Land suitability ratio	95%		
Unconstrained & suitable industrial floorspace capacity (000sqm)	22,702	51,458	65,836
Estimated Industrial floorspace sufficiency (000sqm)	+22,132	+50,355	+63,391

Source: Auckland Council.

Notes: Both "Additional industrial employment growth" and "Additional industrial floorspace demand" in the table are sourced from Tables 51-53 on pages 183-187 of the HBA 2023. Property Economics has applied the required NPS-UD demand buffers to these floorspace demand figures.

To calculate the "Plan-enabled industrial floorspace capacity under AUP(OIP)", Property Economics used the overall net additional plan-enabled business floorspace capacity of 120,930,000sqm for the wider region, as

shown in Table 57 on page 196 of the HBA 2023 and considered the industrial capacity ratio of 66%. This 66% assumption is based on the share of light and heavy industrial plan-enabled capacity in all business land capacity in the region, i.e., 242,947,000sqm out of 368,827,000sqm, both found in Table 42 on page 145 of the HBA 2023.

The "Estimated infrastructure constraints ratio" and the "Land suitability ratio" are the ratios used in the HBA 2023, such as those in Table 57 on page 196. Based on these ratios, the "Unconstrained & suitable industrial land floorspace capacity" can be calculated.

#E5. Sub-Precinct E

Request: Please provide additional detail on the appropriate size of Sub-Precinct E and the appropriate type and scale of activities proposed to enable assessment to be made as to the scale and significance of the effects on the environment of Sub-Precinct E.

PE Response:

Response to #E3 in this memo has justified the appropriate size of Sub-Precinct E at a high-level.

Regarding the appropriate activities within this Sub-Precinct, our Economic Assessment concluded that it is suitable for the activities within Sub-Precinct E to serve the local market, similar in scale to other existing convenience centres. This primarily includes catering to dairies, drive-through restaurants, and F&B establishments. The recommended status for other activities should align with the existing provisions for LIZ under the AUP(OIP) framework (Page 29).

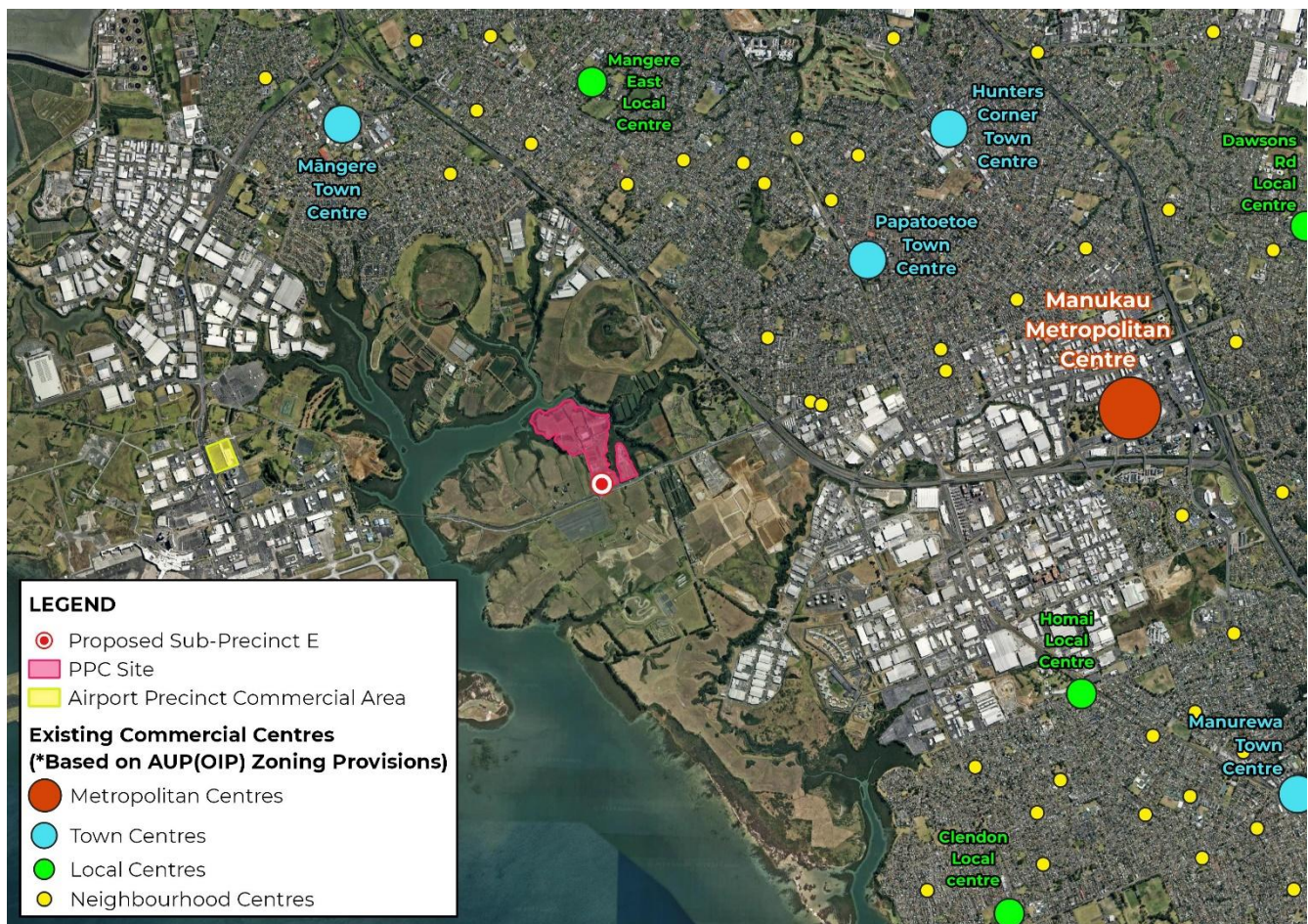
SP4 - Centres Hierarchy

Request: Please provide a further assessment as to how the proposed sub-precinct E will integrate with other centres across the wider Manukau area and the airport precinct.

PE Response:

The following figure provides an extension of Figure 6 in our Economic Assessment, which identifies the existing centre network in the wider Manukau area. A summary of these existing centres' size (land area) is provided in the table below.

Given the existing commercial centre network in the wider Manukau area and the absence of retail offerings in the Puhinui Road local industrial area, there is a noticeable gap in the supply of convenience retail and commercial services offerings in the local area. Without the proposed retail and amenity offerings within the PPC site, the future workforce along Puhinui Road would have to travel a longer period of time / distance to these existing centres for their convenience needs.

FIGURE 2: EXISTING COMMERCIAL CENTRE NETWORK


Source: Auckland Council, Google Maps, LINZ, Property Economics

The following table provides an overview of the zoned land area / commercial land extent of the existing commercial centres. This assists in understanding the relative size of the proposed Sub-Precinct E to the commercial centres and the likely position that it will be in within the wider centre hierarchy. This summary table shows that the average size of “Local Centres” in the surrounding areas is around 2.4ha, with Homai Local Centre being the smallest commercial centre. This average centre size is significantly larger than the proposed Sub-precinct E, being around 1ha.

The significantly smaller size of the proposed Sub-Precinct E relative to the existing commercial centres in the wider area and the extensive industrial / future industrial environment it surrounds both suggest that the economic catchment or market it services will be substantially smaller than that of the main commercial centres in the wider area.

Note that the PPC is not seeking to change the zoning of the Sub-Precinct E site. As such, it will not add to the existing centre land provisions in the area. In essence, Sub-Precinct E will primarily service the Puhinui local industrial area as well as some of the airport / state highway passing traffic. Given its proposed size, Property Economic considers that Sub-Precinct E is likely to form a larger “neighbourhood centre”, which is not of scale to compete with other higher-order commercial centre within the centre hierarchy of the wider area.

In addition to these zoned commercial centres, the existing commercial area within the Auckland Airport Precinct near John Goulter Drive spans approximately 5ha, making it significantly larger than the proposed size of Sub-Precinct E. This commercial area is primarily anchored by a Woolworths supermarket, a The Warehouse department store, and a Chemist Warehouse, mainly serving airport visitors and businesses within the wider Airport Precinct. Similar to other commercial centres across the wider Manukau area, this airport commercial area is unlikely to be negatively affected by activities within Sub-Precinct E.

TABLE 2: EXISTING COMMERCIAL CENTRE / AREA SIZE OVERVIEW

	Land Area (ha)
Manukau Metropolitan Centre	62.3
Māngere Town Centre	12.7
Hunters Corner Town Centre	17.2
Papatoetoe Town Centre	10.8
Manurewa Town Centre	25.1
Favona Local Centre	2.3
Māngere East Local Centre	3.7
Homai Local Centre	0.5
Dawsons Rd Local Centre	3.0
Airport Precinct Commercial Area	5.1

Source: Auckland Council, QGIS, Property Economics

SP8 Business Land Supply / Well-Functioning Urban Environment

Request: Please provide further comment on business land supply / well-functioning urban environment matters as a response to the indicated current deficiencies outlined above.

PE Response:

Property Economics understands that according to the FDS there is a delay in development timing of the Puhinui Stage 2 FUZ area, with infrastructure prerequisite (i.e., 20Connect) pushing the expected commencement to post-2030. However, in Property Economics' view, this should not be considered as an absolute restriction of any development within the Puhinui Stage 2 FUZ area.

In fact, on Page 46, the FDS, also states that:

“Applying prerequisites will vary from area to area..... In some cases, it will be appropriate for rezoning to occur and development to commence prior to or while the infrastructure prerequisite is in the process of being built and established”; and

“There may therefore be cases where the timing and development of areas could be brought forward. This will however need to be considered on a case-by-case basis. While this creates a ‘pathway’ for development that wishes to proceed earlier, the council will only consider this where there is not a significant impact on

the council's financial position and broader well-functioning urban environment outcomes can be met".

In Property Economics' view, the above FDS context directs that providing capacity that will contribute to a well-functioning urban environment is more important (subject to some provisos) than inflexibly adhering to the identified development sequences.

In the FDS, the infrastructure prerequisite of the Puhinui Stage 2 FUZ is the 20Connect Project (SH20B). Property Economics is aware that even though the "long term improvements" of the wider 20Connect project will continue during the post-2025 period, the recent completion of improvements to SH20B has largely improved access and safety of the local area.

According to Waka Kotahi², these key earlier improvements include:

- A safe place for people to walk and ride bikes*
- Safety improvements including central median barrier protection, improved lighting and a reduced speed*
- Improved pavement, drainage and stormwater treatment*
- Two improved intersections at Campana Road and Manukau Memorial Gardens.*

In Property Economics' view, the lead times for the provision of new business land typically range from 5 to 10 years. These times are influenced by several key factors, including regulatory approval processes, availability of construction materials, labour market conditions, infrastructure development, and financial considerations. Considering these factors, bringing forward the PPC is appropriate to leverage the existing and new infrastructure investments in the area.

To complement the economic analysis, the following assessment provides a high-level overview of whether the PPC will make a positive contribution to a well-functioning urban environment, i.e., satisfying the NPS-UD Policy 1. For brevity, the detailed criteria for a "well-functioning urban environment" under Policy 1 are not presented here and can be found in Appendix 1 of this memo.

Specifically, the policies 1(b), 1(c) and 1(d) of the NPS-UD are the most economically relevant to the PPC. As Property Economics understands, the PPC will offer a verity of sites / buildings, catering to different tenancy sizes. This development is situated in a locale characterised by distinct locational characteristics and views, setting it apart from the industrial land to the south of Puhinui Road. This aligns with Policy 1(b) of the NPS-UD.

Additionally, the Structure Plan of the PPC includes the establishment of a Sub-Precinct E (a commercial precinct) and local reserve spaces. These land uses align harmoniously with the NPS-UD, particularly addressing Policy 1(c), ensuring good accessibility for all people between housing (existing residential areas in the local area), jobs (newly provided employment opportunities within the PPC site), community services, natural spaces, and open spaces, including by way of public or active transport.

² <https://www.nzta.govt.nz/projects/southwest-gateway/>

Essentially, the designation of the PPC site as a Future Urban Area means that developing the site earmarked for urban (industrial) use would not negatively affect the current or future industrial areas. Given that the FDS identified development timeframe of post-2030, the adverse impact of the PPC, if any, on the existing industrial areas would not cause any additional inefficiencies in the timeline for the development of industrial area from 2030 and onwards.

This means that the potential impact of the PPC, if any, on the uptake and growth potential of the existing industrial areas, would be temporal.

If you have any queries, please give me a call.

Kind Regards



Tim Heath

M: 021 557713

PO: Box 315596, Silverdale 0944, AUCKLAND

E: tim@propertyeconomics.co.nz

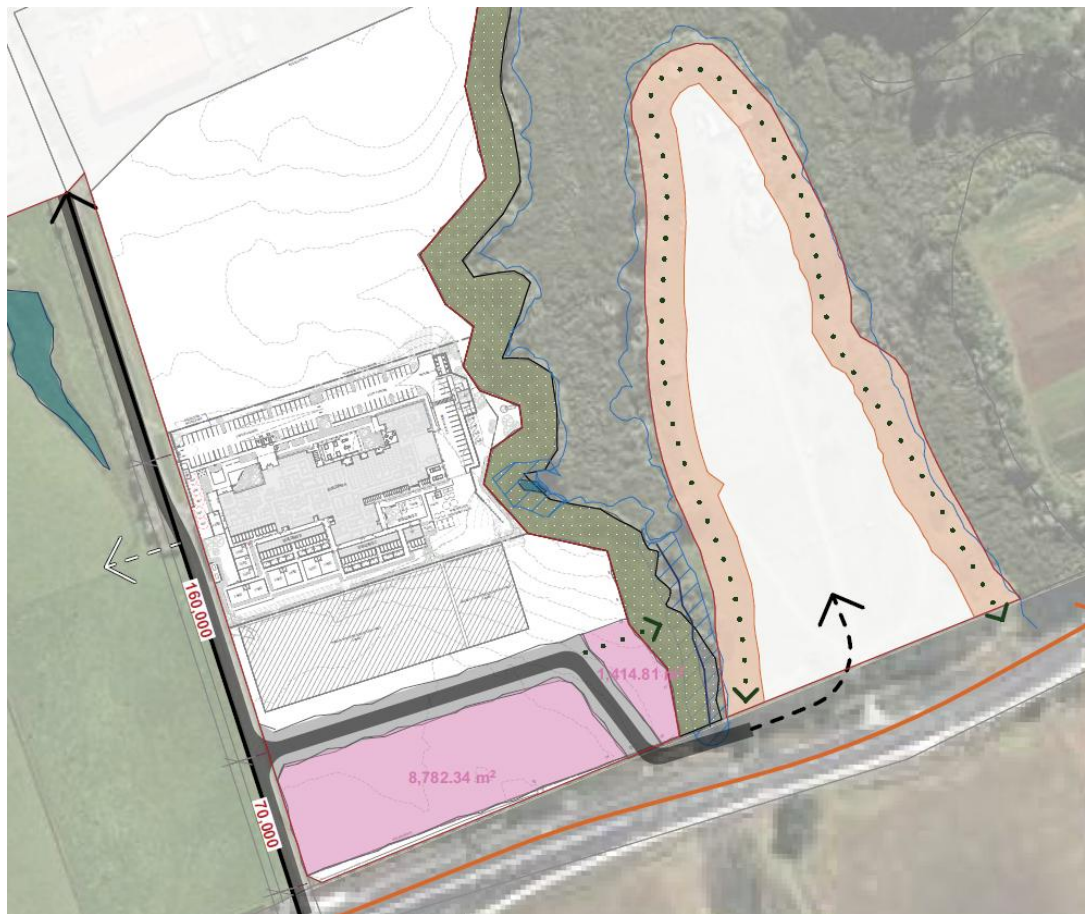
www.propertyeconomics.co.nz

APPENDIX 1. NPS-UD POLICY 1

Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) Enable Māori to express their cultural traditions and norms; and**
- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size;*
- (c) and have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;*
- (d) and support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;*
- (e) and support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change.*

APPENDIX 2. REVISED SUB-PRECINCT E PLAN



NOTE: THE SCALE AND DIMENSIONS SHOWN ARE FOR INFORMATION ONLY.
ALL CONSULTANTS AND CONTRACTORS MUST VISIT ALL LANDS, DIMENSIONS,
LANDFILL, SITE MEASUREMENTS AND CONFORM BEFORE COUNCIL ENDORSEMENT.
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REV	ISSUE	DATE
/	Discussion Document	01/08/2024

TITLE
Sub-Precinct E
Sub-Precinct E Reconsideration

SCALE (A3) 1:2000 NORTH

PROJECT
Campana Road Plan Change

CLIENT
Campana Road Plan Change Parties

JOB NO. 2211-002 STATUS Discussion Document

Source: Saddleback

Attachment D

16 September 2024

Information Requests : Urban Design & Open Space

Campana Road Plan Change

To whom it may concern,

The following is a response to urban design and open space requests for further information related to the proposed Campana Road Plan Change to the Puhinui Precinct of the Auckland Unitary Plan (Operative in Part).

For clarity, Sub-Precinct A (Open Space and Informal Recreation Zone) within the plan change area has now been redefined as sub-precinct C1. This is located around the coastal edge to the Waokauri Creek (a tributary to the Pūkaki Creek).

I have appended a graphic information packet to provide visual support.

Information Request UD 1 - Sub-Precinct A

Please demonstrate how Sub-Precinct A might function as open space, how it might link in with existing (and proposed) pedestrian /active transport connections beyond the site (in order to meet the objectives (1), (3) and (4) and policies (1), (3) and (4) within the Puhinui Precinct), and review the appropriate connections to an existing or potential wider network.

In the first instance, the purpose of sub-precinct C1 is to provide a landscape buffer between proposed light industrial development and the coastal margins. Its open space/amenity value is an added benefit. In light of this, it might function as an open space/amenity area for the benefit of the employees of future development within the plan change area, directly accessible from this development.

The use of sub-precinct C1 for wider public benefit would be contingent on linking it to other amenity areas and creating an integrated network of open space. As shown in plan below existing amenity spaces within the surrounding area (such as Colin Dale Park/Puhinui Reserve (A) and Aerovista Place Reserve (B)) are not within the precinct and have no clear means of connection to the site in question and Crater Hill (C) is in private ownership and is not generally accessible to the public. While the airport has an existing coastal yard to the west, a contiguous coastal pathway through AIAL's landholdings (D) would only occur if AIAL land were subdivided and an esplanade strip established. The record has established that AIAL is not in the habit of subdividing land.

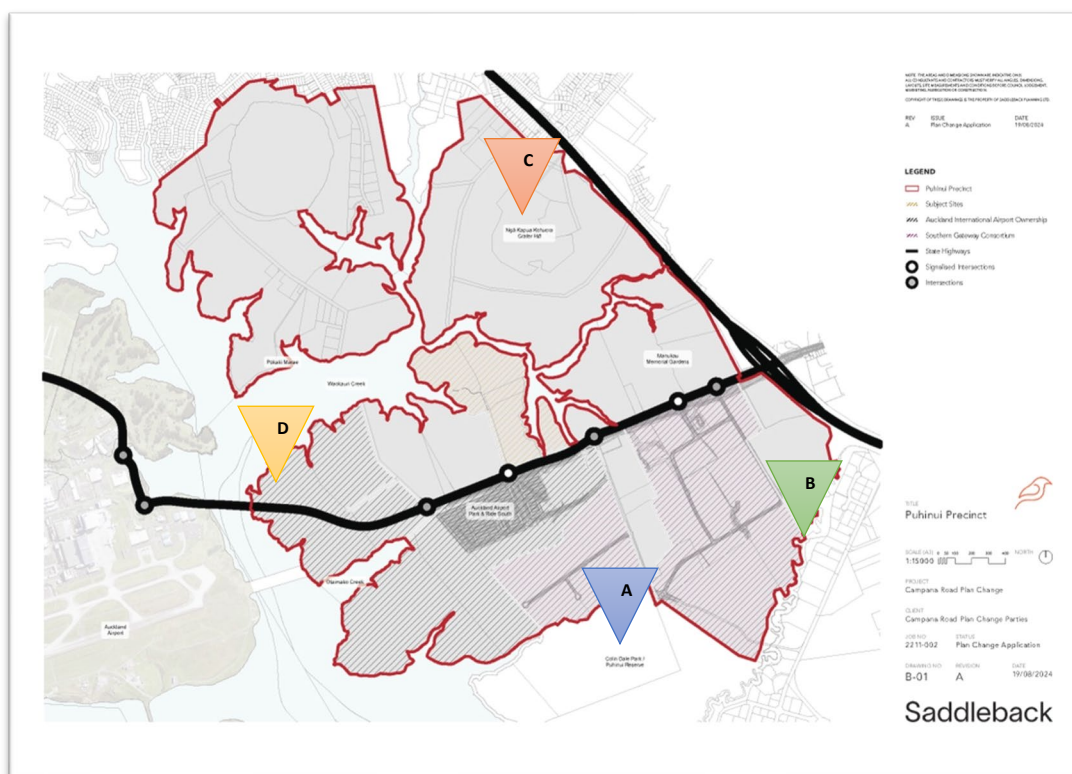


Figure 1: Puhinui Precinct (Sheet B-01) Labelled with Open Space Areas.

In light of the above, connecting the proposed open space to other amenity areas and making it generally accessible to the public will be heavily reliant on pathway linkages within road reserves.

The Campana Road Structure Plan and its indicative connections will ensure that there is a direct connection between the coastal margins of sub-precinct C1 and the existing and future active transport network running parallel to SH20B. As a result, safe public connection to the coastal edge of the Waokauri Creek tributary will be ensured via the proposed Campana Road Structure Plan and the indicative future connections which allow for direct access from the road reserve to sub-precinct C1, once the site is developed with light industrial activities.

Notwithstanding the above, should the airport and other landholders be amenable to creating a consolidated coastal connection along the creek in the future, sub-precinct C1 will be available to form part of this connection.

Information Request UD 2 - Movement Network

Please provide additional information on what may be the key internal routes for various different transport modes.

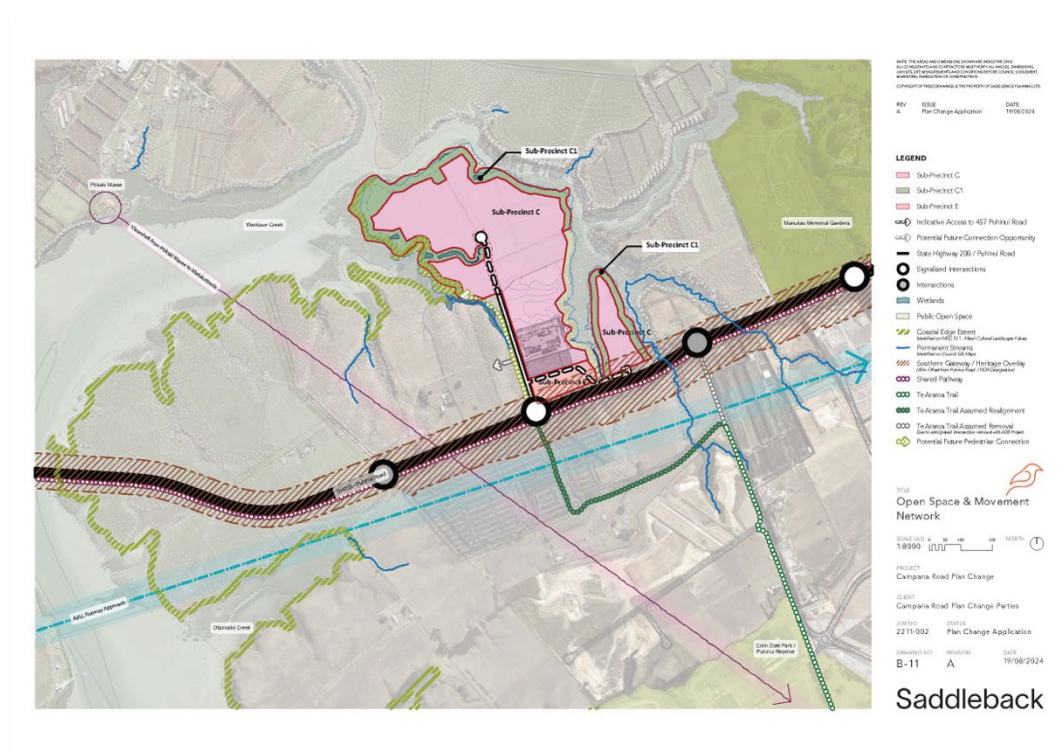
There is only one key vehicle route, that being Campana Road itself. Other vehicle routes are simply to provide internal block access. This includes the shorter slip-road east behind Precinct E to 457 Puhinui Road (within the existing SH20B road reserve). The road reserve of Campana Road is wide enough to accommodate a shared bicycle/pedestrian path should AT wish to provide this connection.



As detailed in the plan below (Sheet B-11), the important pedestrian linkages are:

- Those provided within the Campana Road corridor, and;
- Those which can be provided within the riparian margin in future.

The re-entrant gully/tributary to the Waokauri Creek to the west of Campana Road is particularly important to achieving a loop connection, however access is via the private land which is outside the scope of this Plan Change request. As an alternative, a loop connection can be achieved via the indicative northern extension of Campana Road.



Information Request UD 3 - Pūkaki Marae

Please review and provide comment on the potential / appropriateness of identifying viewshafts/no build areas within the precinct plan and provisions.

There is no specific viewshaft to, or over the plan change area in Council's guiding documents. I have visited the Marae site and the plan change area was not readily visible. Notwithstanding the above, a landscape assessment is currently being prepared by Rob Pryor of LA4 which will provide further clarity on this matter.

Information Request UD 4 - Building Design within the Coastal Environment/Waokauri Creek

Please consider inclusion of additional, bespoke assessment criteria for buildings in the locations identified.



Additional assessment criteria are not required. All buildings over 50m² have at least a Restricted Discretionary activity status and the Matters of Discretion (I432.8.1) provide sufficient leeway for Council planners to have a high degree of influence¹ of design outcomes, particularly with respect to Māori Cultural Landscape values. The Objectives (specifically (1) and (3)) and Policies for Sub-Precinct C1 (the coastal edge/ future riparian margin) provide a robust foundation to control built form within the coastal environment but without unduly constraining innovation and flair.

Notwithstanding my reasoning above, it would be drawing a very long bow, considering the policy framework in place, to predict that any but the smallest and most unobtrusive structures would be developed in sub-precinct C1.

Information Request UD 5 - Staging Plan
Please provide a draft staging plan.

No staging plan has been provided because:

- Light Industrial activity, particularly of the nature sought, requires large land holdings which largely align with existing land holdings; and
- Trunk infrastructure will be confined to the Campana Road Corridor which already exists.

Any change from either of these positions requires resources consent / subdivision and in which case phasing or staging of such works will be addressed.

Information Request OS1 – Precinct Plan Consistency
Please provide an explanation as to why a different approach has been adopted to the identification of open space than is apparent in other like areas of the precinct.

The Campana Plan Change Area (33.5 ha) occupies a very small part (4%) of the overall Puhinui Precinct (755 ha). Even within this, archaeological or culturally significant sites are relatively small, and as such would not typically be acknowledged at the overall precinct scale. Though, for completeness these have been shown within Sub-Precinct C1.

As detailed further below, the bounds of the Puhinui Precinct itself have some serious shortcomings by excluding major open space amenities areas (specifically Colin Dale Park, Puhinui Reserve and Aerovista Place Reserve) from what would typically be a logical, geographically-defined southern extent (i.e Puhinui Creek).

As a result, the approach employed for the Plan Change Area is similar to other Structure Plans employed on sites of similar scale.

¹ Pūkaki Creek became a Māori reservations under the Te Ture Whenua Māori Act 1993. This means Te Ākitai must have a direct and meaningful input into any proposal in the PCA coastal environment.



Information Request OS2 – Open Space movement network

Please review the open space movement network gaps identified and (if they are to be maintained as proposed) provide an explanation as to why further connections are not considered necessary.

As shown in Figure 2 - Open Space and Movement Networks, the Plan Change Area plays a relatively minor role in overall open space and recreational connectivity function– with most of the amenities of scale provided:

- North of the Waokauri Creek (being the Portage Road Reserve within Crater Hill), or
- Outside of the Puhinui Precinct to the south (being Colin Dale Park, Puhinui Reserve and Aerovista Place Reserve)

Connecting these disparate elements is principally a function of providing quality pedestrian and cycle path linkages east-west along SH20B and ultimately north/south along SH20 (linking to Aerovista Place Reserve) to avoid the costs associated with bridging Waokauri Creek. Therefore, the substantive responsibility of making an efficient and legible open space movement network function well lies with NZTA and Council. We have not been able to locate a cohesive open space strategy or plan for the Puhinui Precinct from either party.

In the Plan Change Area open space movement is provided by:

- Campana Road is the first instance, and then, in the longer term;
- Integrating coastal pathways to this.

Pedestrian access around the coastal edge, whilst highly desirable in the longer term, does not actually provide a significant open space benefit to the Precinct overall, but will provide amenity benefit once the land is redeveloped for higher, more urban intensive land use over time.

Information Request OS3 – Permitted Activities

Please review and provide an assessment as to whether allowing ongoing farming and browsing by animals will compromise open space values.

These provisions have been removed under sub-precinct C1.

Information Request OS4 – Archaeological Sites

Please clarify how it is intended the archaeological sites are proposed to be managed, including if they are to be identified or otherwise managed as open space.

Archaeological sites have been identified and stringent provision has been provided for their protection and management. This protection has now been extended throughout the plan change area via an earthworks consent trigger and related assessment criteria.

Information Request OS5 – Weed Management and Native Revegetation



Please clarify how weed management and native revegetation should be managed in areas that are or are likely to become open space.

There are adequate mechanisms in place including landscaping requirements at the time of development to ensure this is undertaken.

Author

A handwritten signature in black ink, appearing to read 'BW'.

Bruce Weir

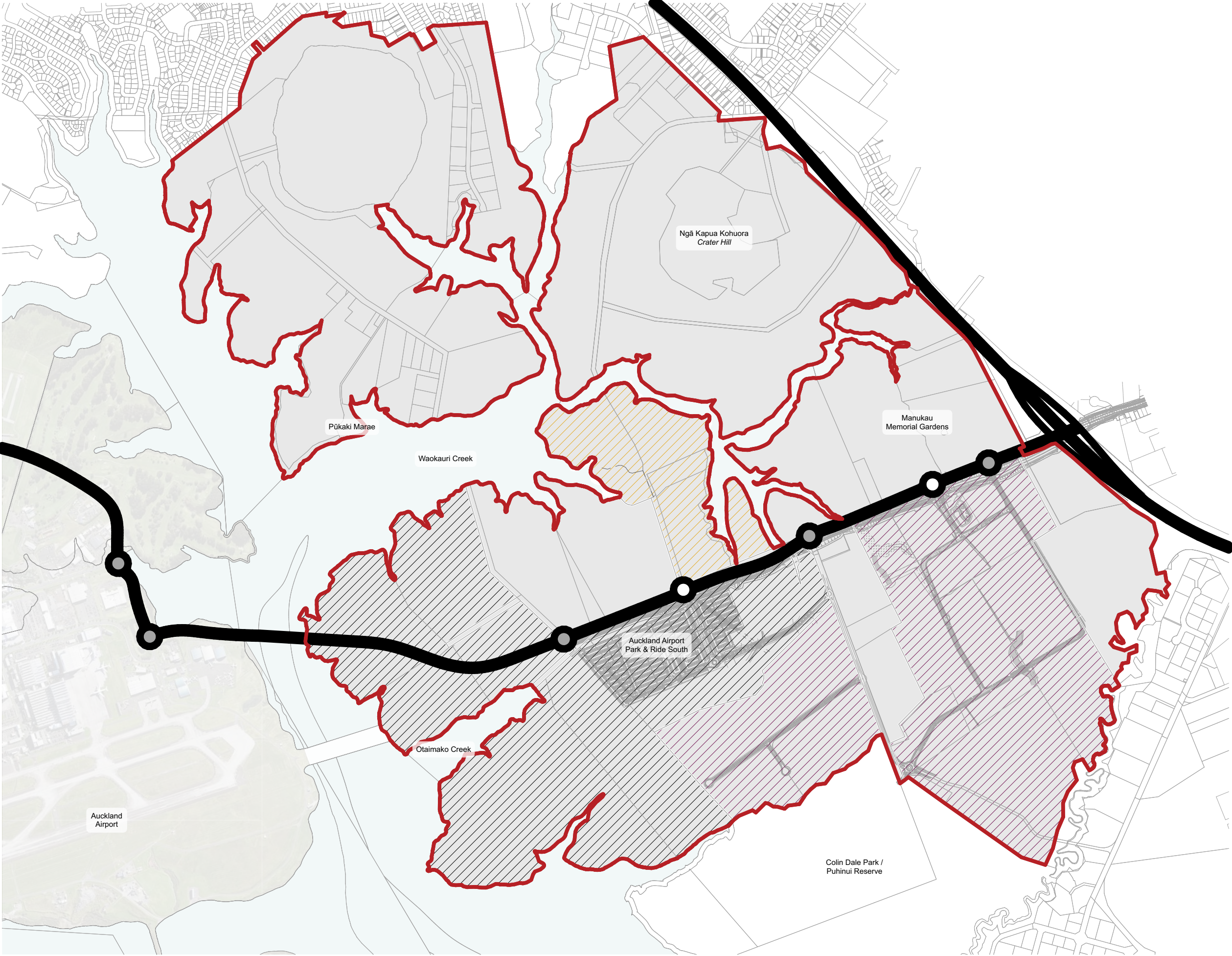
Principal Urban Designer
Saddleback

Reviewer

A handwritten signature in black ink, appearing to read 'JG'.

Joe Gray

Principal Planner
Saddleback



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REV	ISSUE	DATE
A	Plan Change Application	19/08/2024

LEGEND

- Puhinui Precinct
- Subject Sites
- Auckland International Airport Ownership
- Southern Gateway Consortium
- State Highways
- Signalised Intersections
- Intersections

TITLE
Puhinui Precinct



SCALE (A3) 0 50 100 200 300 400 NORTH
1:15000

PROJECT
Campana Road Plan Change

CLIENT
Campana Road Plan Change Parties

JOB NO
2211-002

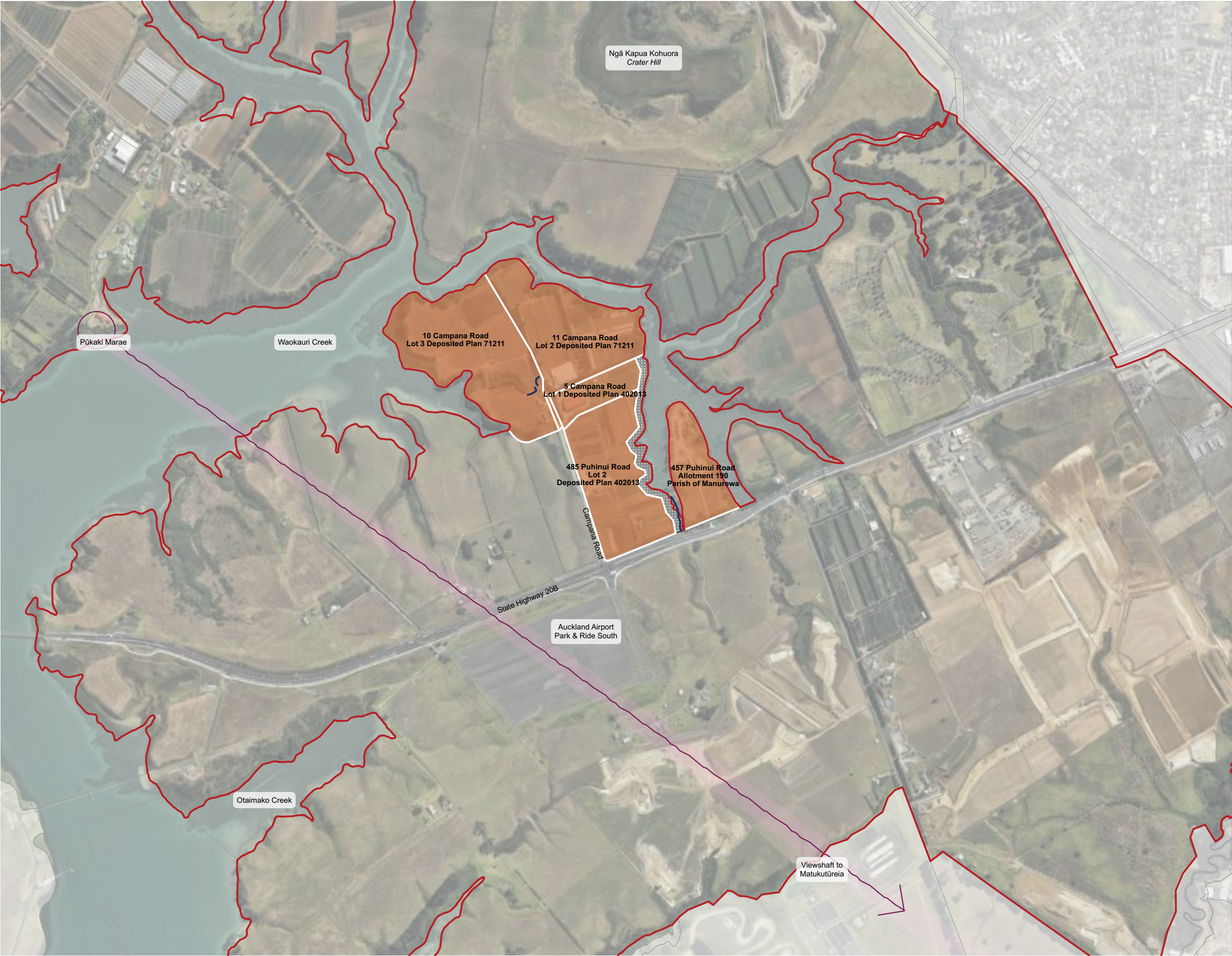
STATUS
Plan Change Application

DRAWING NO
B-01

REVISION
A

DATE
19/08/2024

Saddleback



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REV	ISSUE	DATE
A	Plan Change Application	19/08/2024

Subject sites to be rezoned from
H18 FUZ to H17B-LIZ

TITLE
Subject Sites

SCALE (A3) 0 50 100 200 300 400 NORTH
1:15,000

PROJECT
Campana Road Plan Change

CLIENT
Campana Road Plan Change Parties

JOB NO
2211-002

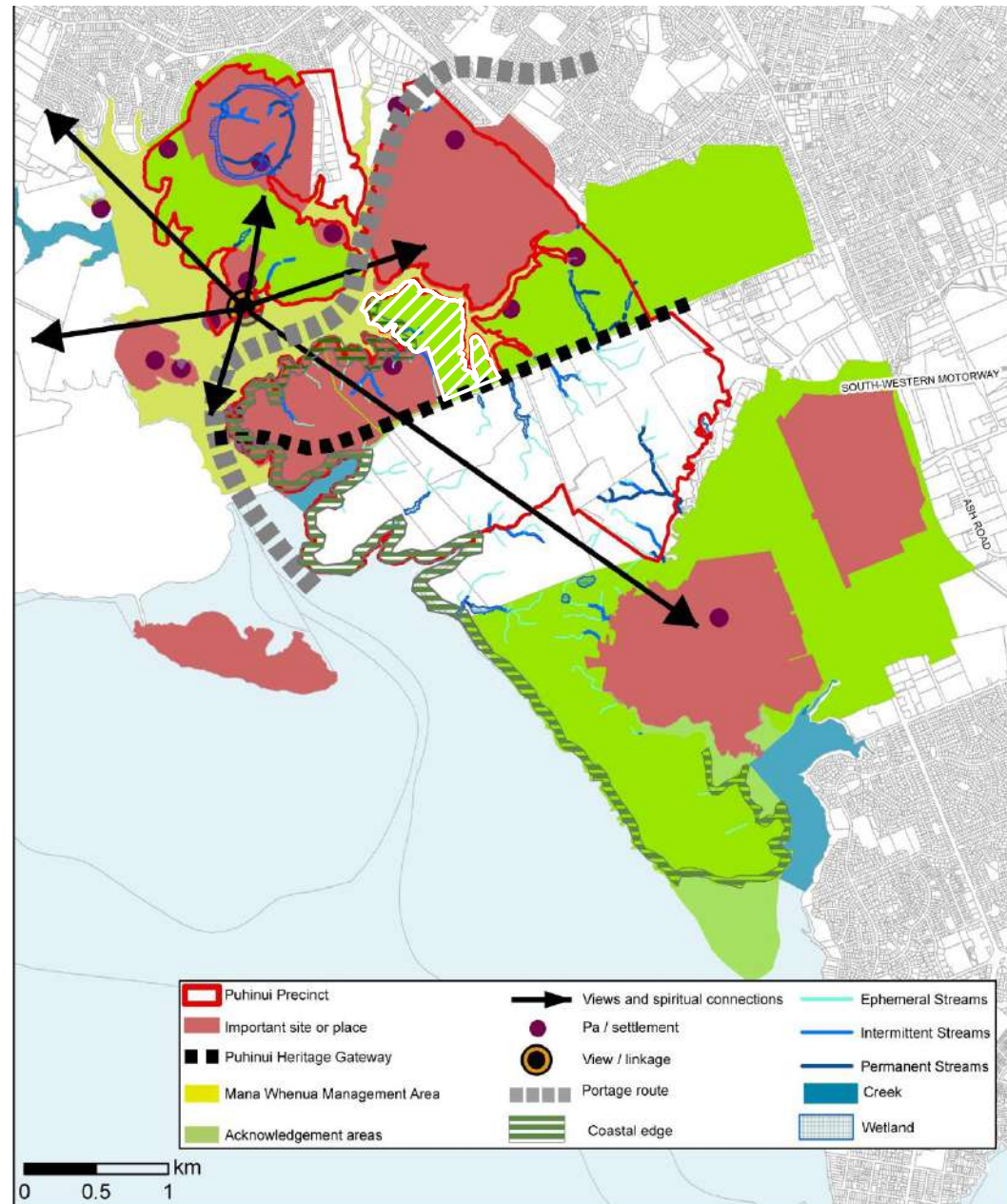
STATUS
Plan Change Application

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B-02

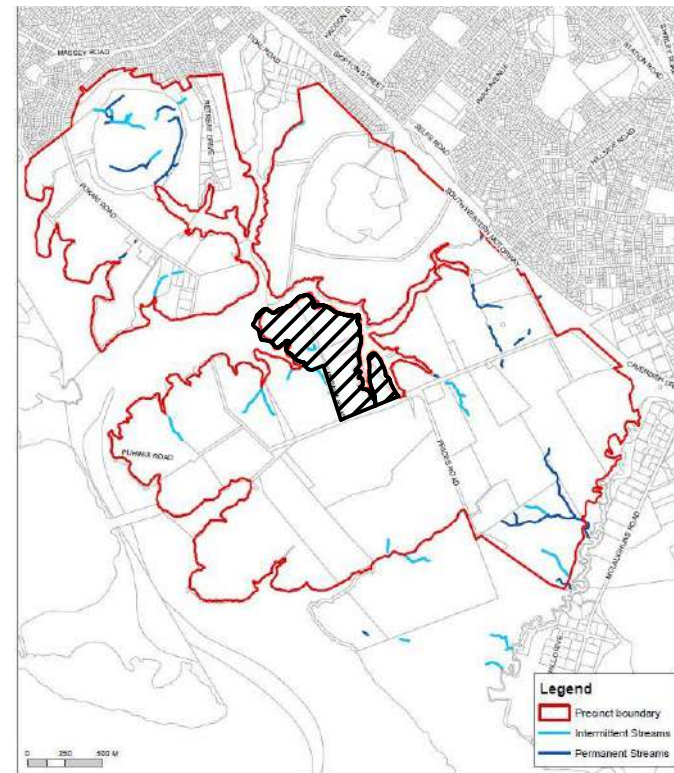
REVISION
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DATE
19/08/2024

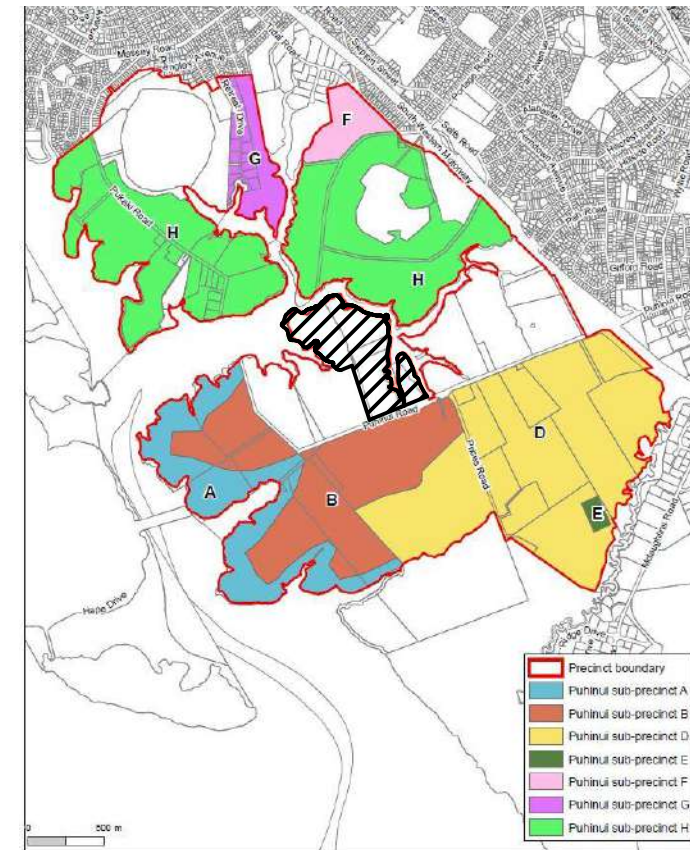
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I432.10.1 Puhinui: Precinct Plan 1 - Māori Cultural Landscape Values



I432.10.2 Puhinui: Precinct Plan 2 - Streams



I432.10.5 Puhinui: Precinct Plan 5 - Sub-Precincts

TITLE
AUP(OP) I432.10 Precinct
Plans

SCALE (A3) 0 200 500 1KM
1:50000

PROJECT
Campana Road Plan Change

CLIENT
Campana Road Plan Change Parties

JOB NO
2211-002

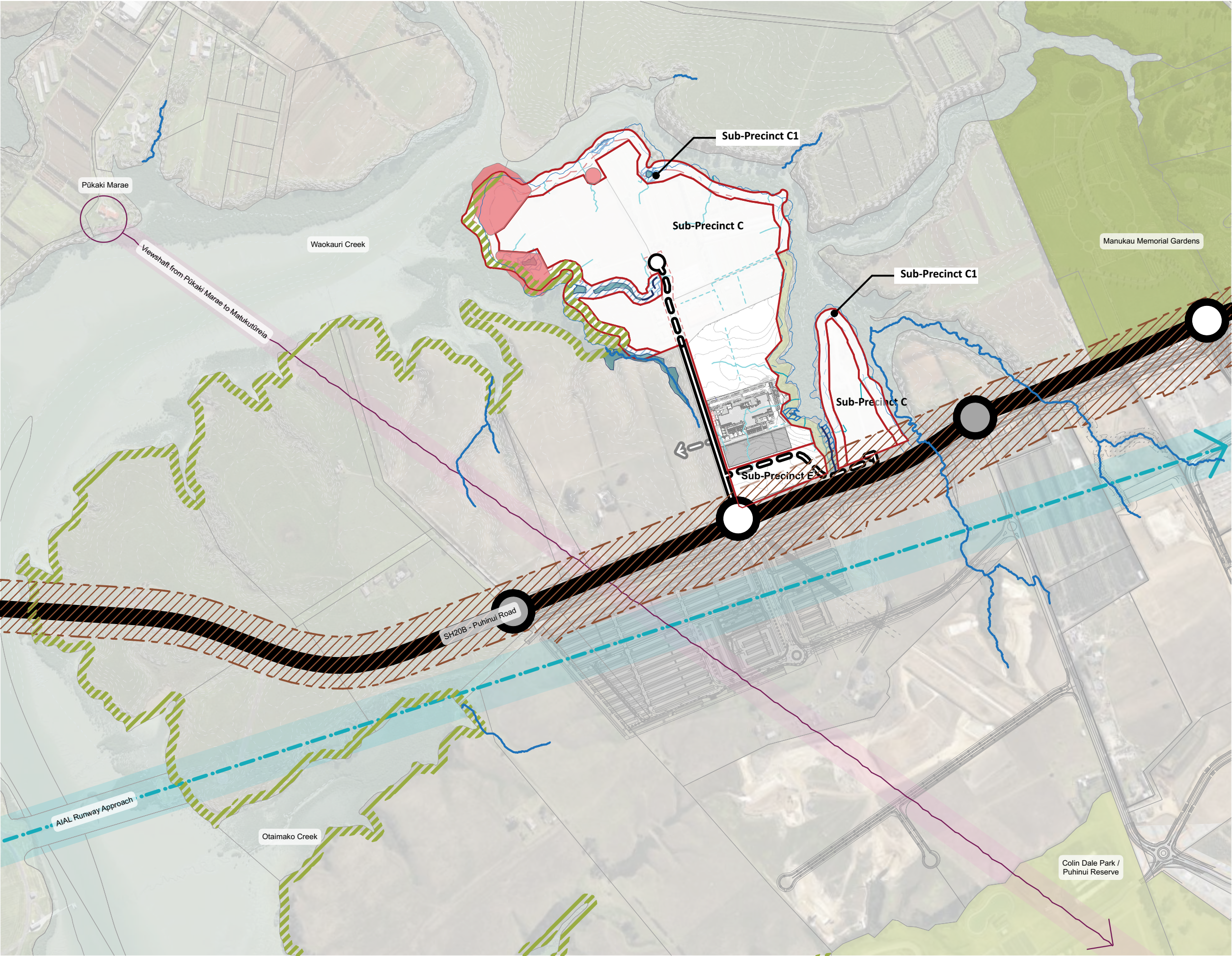
STATUS
Plan Change Application

DRAWING NO
B-03

REVISION
A

DATE
19/08/2024

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REV	ISSUE	DATE
A	Plan Change Application	19/08/2024

- LEGEND**
- Subject Sites / Sub-Precincts
 - Indicative Access to 457 Puhinui Road
 - Potential Future Connection Opportunity
 - State Highway 20B / Puhinui Road
 - Signalised Intersections
 - Intersections
 - Wetlands
 - Public Open Space
 - Coastal Edge Extent
Identified on I4...
 - Permanent Streams
Identified on Council GIS Maps
 - Overland Flow Paths
Subject Sites Mapped Only
 - Southern Gateway / Heritage Overlay
(40m Offset from Puhinui Road / NOR Designation)
 - Archeological Sites
Subject to Future Review

TITLE
Cultural Considerations

SCALE (A3) 0 50 100 200 NORTH

PROJECT
Campana Road Plan Change

CLIENT
Campana Road Plan Change Parties

JOB NO
2211-002

STATUS
Plan Change Application

DRAWING NO
B- 10

REVISION
A

DATE
19/08/2024

Saddleback

Attachment E

Campana Road Plan Change: archaeological assessment

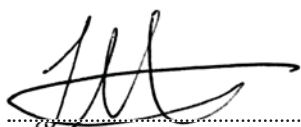
**report to
Capstone Projects**

Lucy Arrell

Campana Road Plan Change: archaeological assessment

report to
Capstone Projects

Prepared by:


Lucy Arrell

Reviewed by:


Matthew Campbell

Date: 8 August 2024

Reference: 23-1491

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Campana Road Plan Change: archaeological assessment

1 Introduction

Five landowners propose a Private Plan Change at 485 Puhinui Road, 467 Puhinui Road, 5 Campana Road, 10 Campana Road and 11 Campana Road (Lot 2 DP 402013, Allotment 190 Parish of Manurewa, Lot 1 DP 482013, Lot 3 DP 71211 and Lot 2 DP 71211). These properties are currently zoned Future Urban Zone in the Auckland Unitary Plan and are currently used for market gardening. The proposal is to rezone the properties to Light Industrial, which is consistent with surrounding properties. An archaeological assessment is required in support of the Private Plan Change application to Auckland Council. Tom Anderson of Capstone Projects, on behalf of the landowners, commissioned this assessment from CFG Heritage Ltd.

1.1 Statutory requirements

All archaeological sites, whether recorded or not, are protected by the provisions of the Heritage New Zealand Pouhere Taonga Act 2014 and may not be destroyed, damaged or modified without an authority issued by Heritage New Zealand Pouhere Taonga (HNZPT).

An archaeological site is defined in the Heritage New Zealand Pouhere Taonga Act as:

- (a) any place in New Zealand, including any building or structure (or part of a building or structure), that—
 - (i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and
 - (ii) provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and
- (b) includes a site for which a declaration is made under section 43(1).

The Resource Management Act 1991 (RMA) requires City, District and Regional Councils to manage the use, development, and protection of natural and physical resources in a way that provides for the wellbeing of today's communities while safeguarding the options of future generations. The protection of historic heritage from inappropriate subdivision, use, and development is identified as a matter of national importance (Section 6f).

Historic heritage is defined as those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, derived from archaeological, architectural, cultural, historic, scientific, or technological qualities.

Historic heritage includes:

- historic sites, structures, places, and areas
- archaeological sites;
- sites of significance to Māori, including wāhi tapu;
- surroundings associated with the natural and physical resources (RMA Section 2).

These categories are not mutually exclusive and some archaeological sites may include above ground structures or may also be places that are of significance to Māori.

Where resource consent is required for any activity the assessment of effects is required to address cultural and historic heritage matters.

2 Methodology

The following digital data sources were consulted:

- Site records from the New Zealand Archaeological Association (NZAA) Site Recording Scheme (SRS) were obtained from ArchSite (<https://nzarchaeology.org/archsite>)

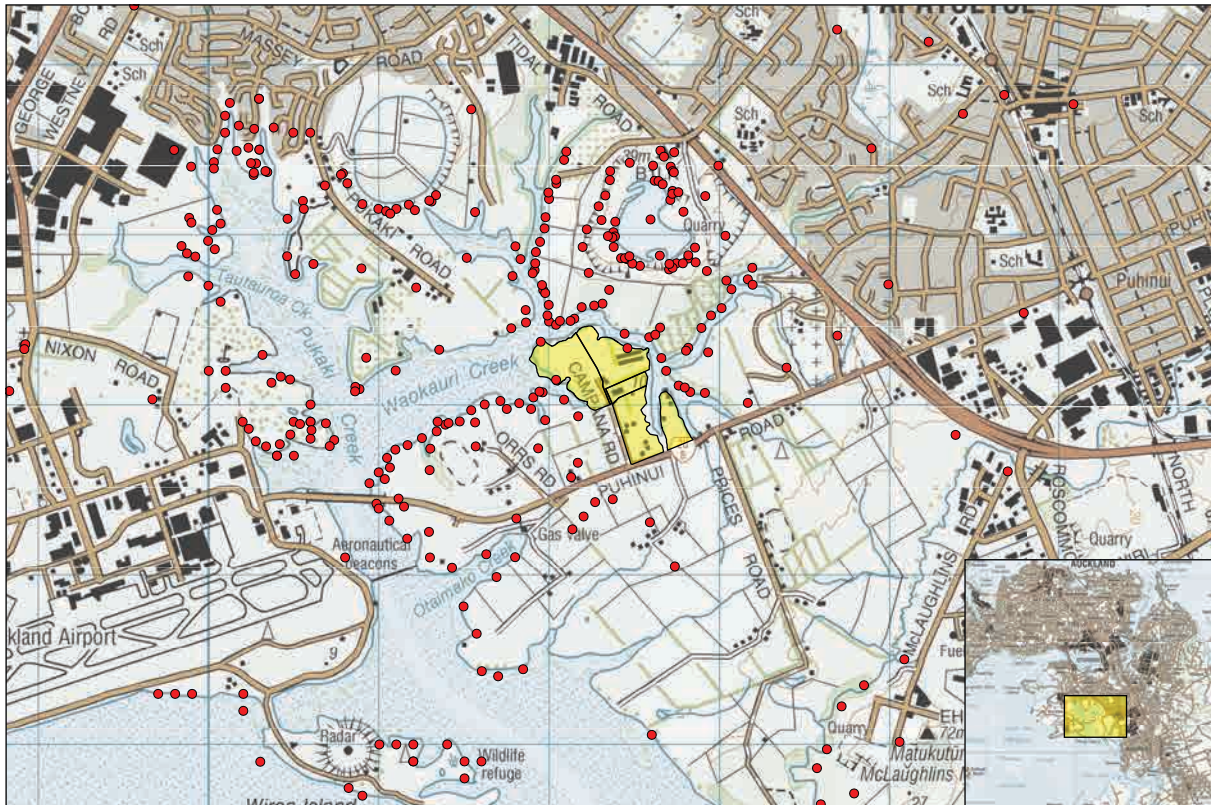


Figure 1. Location of the Campana Road Plan Change area and archaeological sites recorded in the area.

- Records of previous archaeological investigations in Manukau were obtained from the HNZPT digital library (<https://dl.heritage.org.nz/greenstone3/library/collection/pdf-reports/>)
- Historic images including photographs, drawings, and paintings searched for primarily through the online catalogues of the Alexander Turnbull Library
- Historic maps and plans held by Land Information New Zealand (LINZ) were accessed using QuickMap
- The Auckland Council Cultural Heritage Inventory (CHI) and the Auckland Council GeoMaps GIS viewer were searched for any areas of cultural significance in the vicinity (<https://geomapspublic.aucklandcouncil.govt.nz/viewer/index.html>).
- Soil types in the area were identified from S-Maps online viewer maintained by Landcare Research (<https://smap.landcareresearch.co.nz/app/>)
- OurEnvironment was searched for vegetation and soil information (scinfo.org.nz)
- Aerial photography was accessed from RetroLens (Retrolens - Historical Imagery Resource)
- LINZ for surveys, imagery, property details.

An archaeological survey was undertaken on 26 October 2023 by Lucy Arrell of CFG Heritage Ltd. This was a visual inspection undertaken on foot, supplemented by test pitting and a 1.1 m gum spear. The primary focus of the survey was to identify any possible archaeological features or material which may be impacted by works.

3 Background

The Manukau Harbour is located on the southwest of the Tāmaki Isthmus and flows into the Tasman Sea through a narrow (2.2 km) channel. The plan change sits between the multiple volcanic fields that comprise Auckland. To the southeast is Matukutūruru / Mount Wiri and Matukutūreia / Mount McLaughlin, and multiple tuff rings known as the Puhinui Craters. Five hundred metres

north of the plan change is Ngā Kapua Kohuora / Crater Hill, to the west of which is Te Pūkaki Tapu o Poutukeka / Pūkaki Lagoon, a 600 m wide explosion crater. These latter volcanoes, along with Māngere Lagoon, Waitomokia, Kohuora, and Robertson Hill, are collectively known as Nga Tapuwae a Mataoho, 'The Sacred Footprints of Mataoho.' Crater Hill comprises of a scoria tuff cone that has been largely quarried away, while most of the encircling tuff ring remains (Taylor 1982: 2). Crater Hill is bounded on three sides by the Waokauri Creek, which flows north of the plan change and feeds into Pūkaki Creek (Taylor, 1982: 3). Pūkaki Creek is a broad tidal inlet that flows into the Manukau Harbour to the west. Much like the Puhinui Creek Estuary, the Waokauri Creek estuary features thick silt deposits with expanding mangrove forests along its banks and flats (Bickler et al. 2008: 4).

The plan change area is constituted of mostly imperfectly drained soils, with the thick mangrove swamps to the northeast. Most of the project area is described as clay, with some parts recording loam and silt deposits over a clay base. Prehuman vegetation across the project area is projected to have been dense, old growth kauri forest. These forests were part of a wider landscape of native conifers, such as kahikatea, rimu, and mataī. A surviving reference to these old kauri forests is the name Waokauri creek, meaning 'kauri forest' (Tonson 1966: 27). An ancient sub-fossil kauri forest in the tidal mud flats to the west of the plan change is partially buried by prehuman eruptions at Maungataketake (Marra et al. 2006: 2160).

Today the Manukau region is divided between residential sprawl in all directions from the plan change area but the west, which is mostly divided into grassed paddocks and industrial development, mostly associated with Auckland Airport. The project area is bounded to the north by the Waokauri Creek, which is a tributary to the Pūkaki Creek to the west. These waterways are bounded by extensive mudflats that are classed as a significant ecological area in the Auckland Unitary Plan, though they are increasingly infiltrated by mangroves.

3.1 *Pre-European Māori*

Settlement across the broader Manukau area was focussed on the construction and occupation of pā on the hills and volcanic cones that characterise the landscape. These include Ngā Kapua Kohuora / Crater Hill, Matukutūruru / Mount Wiri, Matukutūreia / Mount McLaughlin, and Te Pane o Mataoho / Māngere Mountain. Prior to their currently quarried states, views between Crater Hill pā and Matukutūreia would have been evident, linking the landscape across great distances (Campbell et al. 2013: 46). Manukau is connected around its harbour and to other areas of Tāmaki Makaurau by waterways, portages at New Lynn connect to the Whau River and the Waitemata harbour, and Ōtāhuhu to the Tāmaki River and the Hauraki Gulf (Campbell et al. 2013: 27). Importantly, the Waokauri also acted as a portage route northeast to the Tāmaki River, between Ngā Kapua Kohuora / Crater Hill and Te Pūkaki Tapu o Poutukeka / Pūkaki Lagoon (Puhinui Structure Plan 2016). The Waokauri portage eliminated the need for travellers to pass around the Māngere Peninsula (Hooker 1997: 29). These portages connect the Manukau Harbour to the broader Tāmaki isthmus, and as such the project area is part of a continuous archaeological landscape.

The Te Waiohūa confederation occupied the Māngere and Puhinui area. Ngā Kapua Kohu Ora / Crater Hill would have been the central focus of the archaeological landscape across the Puhinui area (Campbell et al. 2013: 46). Also important was the Pūkaki Lagoon (District Plan – Manukau Section). The soils that surround the volcanic cones tend to be fertile and good for gardening, making the broader Manukau area attractive for pre-European Māori settlement. Archaeological evidence of gardening and subsistence across the landscape includes food preparation and cooking areas, and pits for storing surplus food (Taylor 1982: 13, Foster et al. 1985, Sullivan 1973). A range of food gathering was undertaken by Māori throughout the region, as indicated by the number of shell middens across the landscape, including within the plan change area. These middens are evidence of widespread marine exploitation and intensive occupation of the area, along with stone tools and flakes, aligned postholes, and evidence of woodworking, gardening, and food storage (Campbell et al. 2013: 13, 55; Taylor 1982: 13).

3.2 Historic

The first European contact in Manukau was made in 1820 by Rev. Samuel Marsden and Mr J. L. Nicholas, who travelled from the Bay of Islands aboard the brig *Active* (Tonson 1966: 31). One of the first European settlers documented in the Manukau area was Thomas Mitchell, an Australian timber merchant who was drawn to settle in 1835 after noticing kauri trunks from the Manukau Harbour. Mitchell's residence is shown on one of the earliest charts of the region, by Thomas Wing of the *Fanny* (Tonson, 1966: 43). The Church Missionary Society first established outposts in Manukau in 1836, and it is around these stations that the first European settlements were formed.

A vast block of land known as Clendon's grant was allocated to Captain James Reddy Clendon in 1842, extending from the Manukau Harbour into the fertile farmlands of Papatoetoe (Tonson 1966: 56). The grant was offered to Clendon by the 1840 Government as payment for the purchase of his Bay of Islands Estate (Campbell et al. 2013: 9). The Wiri grant was not settled by Clendon, nor developed, and over time was split and sold into smaller farms. Wesleyan Mission stations began to be established in the late 1840s, and in 1849 an area in Ihumātao came under their charge (Tonson 1966: 47). The Ihumātao Mission station and a school were built adjacent to the nearby Māori settlement and using Māori labour, under the supervision of Rev. H.H. Lawry.

Manukau was a part of the Great Survey of New Zealand in 1853 which included a chart of the Manukau Harbour by Commander Byron Drury of the *Pandora* (Figure 2). The arms of the Waokauri Creek are mapped accurately, though it is unnamed. On a north bank of the Pūkaki Creek is a point labelled 'Nga-nui Pt' and three buildings are visible (Figure 2). These are Marmaduke Nixon's farmstead, as pointed out in his own map where the Nga-nui point is labelled as 'My Hut' (Campbell et al. 2013:7). Nixon's map labels the span between the Waokauri and Pūkaki Creeks as 'Native Land', and indicates approximate structures thought to represent a Māori settlement, or individual raupō whare. Nixon occupied the land here from 1852 to 1854, before becoming a prominent figure in the Land Wars.

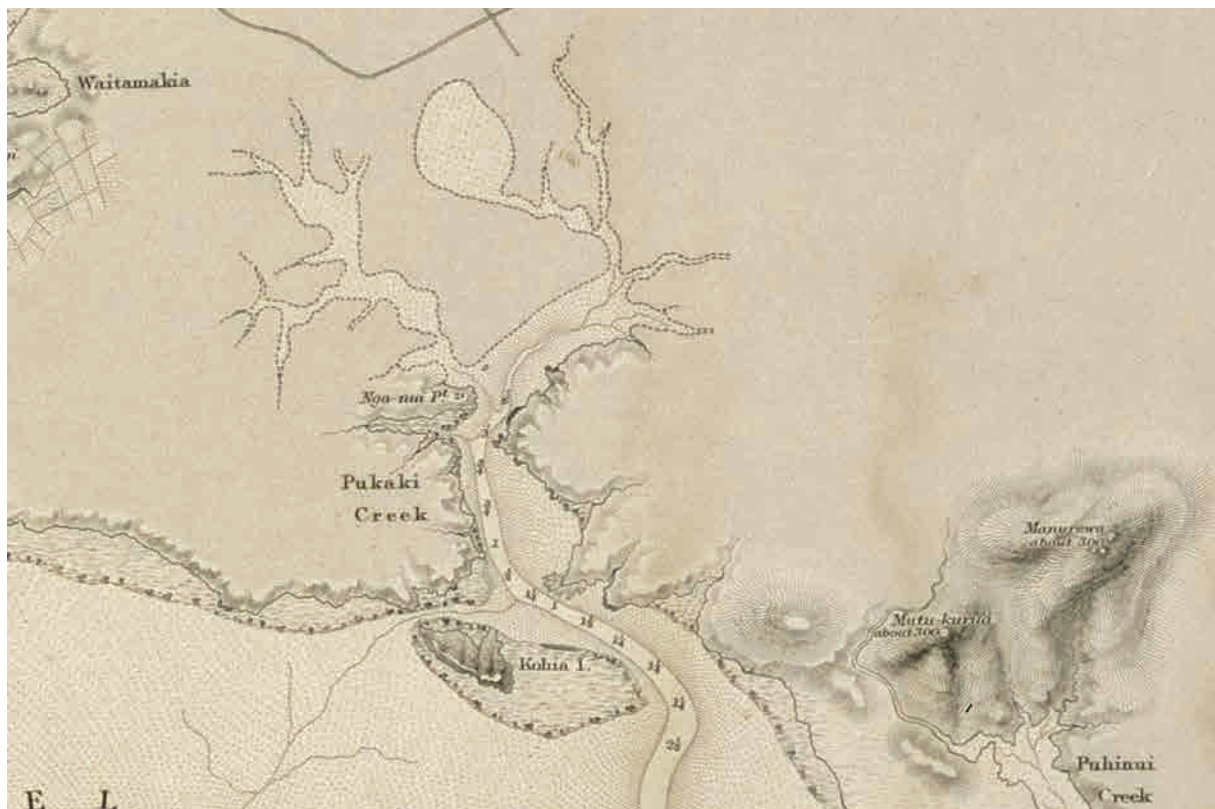


Figure 2. Details of Commander Drury's 1853 chart of the Manukau Harbour (Alexander Turnbull Library).

Plan SO 238 from 1866 (Figure 3) shows the plan change area sitting below Waokauri Creek. The two properties along Puhinui Road are marked as being owned by Francis William Claude, though his land south of Puhinui Road had since been purchased by Thomas McLaughlin in 1845, and is marked in the name of his son William McLaughlin. Above these two properties, to the north, is a block owned by William Thorne Buckland, yet to be divided into the two separate properties present today. Land marked north of the Waokauri Creek is listed for 'Native purposes' and is consequently open for sale (Campbell et al. 2013). There are no visible annotations or markings indicating structures, other than the Papahinau Chapel erected in 1863 (R11/230). This area, known as Papahinau, just west of the plan change area, was occupied by Te Ākitai from the early 19th century through until 1823. The land was reoccupied in 1835 through until 1863, at which point Te Ākitai refused the oath of allegiance to the Crown and moved into the Waikato (Foster and Sewell 1995). The historic pattern of Te Waiohūa settlement around the Manukau area was disturbed by 1860s land confiscations following the New Zealand Land Settlements Act 1863, including the seizure of 1300 acres at Mangere and Pūkaki respectively, and 110 acres at Ihumātao (District Plan – Manukau Section).

Lot 190, a part of the plan change area sitting between two arms of the Waokauri Creek, is depicted in Plan SO 23261 as having multiple buildings and an 'old orchard' owned by Mrs Bickers (Campbell et al. 2013: 16). This survey was made in 1925, and the description 'old' could mean the buildings date far earlier. The landscape surrounding the plan change was historically used as farmland, with farming likely beginning following 1845 when Clendon's Grant was subdivided (Clough and Prince, 2000). The primary land use remained farming throughout the 19th and early 20th century, until the 1960s onwards, when quarrying and then industrial development began. The earliest aerial photo showing the plan change area dates to 1939, and shows it to be grassed paddocks with buildings limited to the edges of Puhinui Road (Figure 4). Vegetation is shown to be far more limited than it is presently, with the banks of the Waokauri Creek predominantly clear.

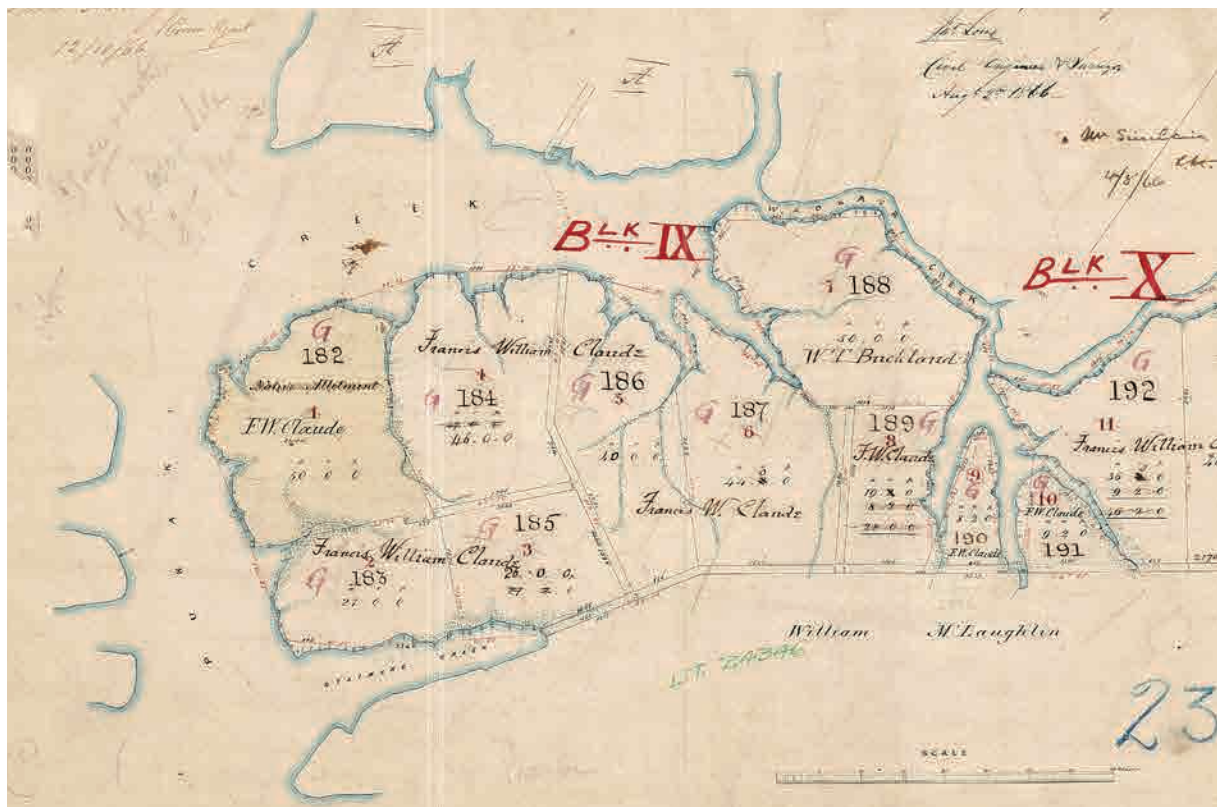


Figure 3. Detail of plan SO 238, dated to 1866, showing the properties of W. T. Buckland and F. W. Claude.

3.3 Archaeological background

Early archaeological surveys in the Manukau region were undertaken by Agnes Sullivan (1973, 1975) recorded most of the known sites around the Pūkaki Creek and Ngā Kapua Kohu Ora / Crater Hill. Sullivan's (1973) investigations at the Lower Pūkaki Creek recorded 62 new sites, including the relocation of the Papahināu kāinga (R11/229), a 19th century Māori settlement area south of the Waokauri Creek and just west of the plan change. The area has been subsequently resurveyed since with new sites including houses, gardens, terraces, and Māori and European artefacts (Foster and Johns 1983; Foster and Sewell 1995). On revisiting Papahināu, Campbell (et al. 2013) reported it as partially destroyed and heavily obscured. The site remains an important example of historic period Māori occupation. Sites recorded by Sullivan (1975) at Ngā Kapua Kohu Ora / Crater Hill consist of pits, gardens, burial caves and middens, altogether forming an extensive archaeological landscape, which Campbell et al. (2013) describes as including not just the hill itself but the southern slopes down to the Waokauri Creek. Further investigations at Ngā Kapua Kohu Ora / Crater Hill found houses, cobbled platforms, pits, and the extensive shell middens that are characteristic of the Manukau inlet banks (Foster et al. 1985).

Excavations at Puhinui (R11/25) found the largest evidence for stonefields in the area at Matukutūreia / Mount McLaughlin, identifying cultivation areas up to 1500 m² (Lawlor 1981). The Puhinui Peninsula appeared to be largely used for gardening and shellfish exploitation, with little evidence of intensive occupation (Bulmer 1992; Clough and Turner 1998; Bickler et al. 2008). Bickler et al. (2008) observed that visible midden sites appear to be far larger and more complex than surface evidence might suggest, and that midden erosion is a critical issue for the future. The same conclusion was reached during the investigation of a creekside midden exposure (R11/602) along a northern arm of the Waokauri, which was found in a flat paddock alongside pits, hāngi, postholes and terraces



Figure 4. Detail of aerial photo SN139/33/8, dated to 1939 showing land use of the plan change area.

(Taylor 1982: 7). Taylor (1982: 14) proposed that there is a high probability that other streambank sites in the area recorded primarily as middens also conceal a similar complexity of occupation.

Directly to the east of the plan change area several dense middens were uncovered during the extension of the Manukau Memorial Gardens, comprised of primarily tuangi and pipi in a charcoal stained soil (Clough and Prince 1999). Large scale excavations took place to the west of the plan change when the Auckland Airport developed its northern runway by the harbour shore (Campbell 2011; Hudson and Campbell 2011). This area (R11/859) contained burials interpreted as demonstrating the reinforcement of memory and group identity, as well as occupation evidence including finely made artefacts, kumara storage pits, and houses, dated between the 16th and 18th centuries. Investigations during further airport extensions identified fire scoops, postholes, and midden (Campbell and Moses 2023). Though most was disturbed, ground penetrating radar located dense subsurface midden deposits subsurface.

Campbell et al. (2013) conducted a broad survey of the Pūkaki area, including the Waokauri Creek and the plan change, as well as Ngā Kapua Ora / Crater Hill, Pūkaki Lagoon, Pūkaki Peninsula, Puhinui Reserve, Papahināu, Pūkaki Chapel and Waituarua Pā. Metimeti (R11/541), a historic kainga approximately 400 m from the plan change area, was unable to be located. The midden sites located inside the plan change area (R11/2855, R11/1111, R11/1112) were revisited. All were observed to be visible from the creek banks, and shell and stone flakes were scattered across the market gardens and ploughed fields, as well as in the mudflats along the creek banks. The stone flakes include Manukau cherts, Tūhua / Mayor Island obsidian, Motutapu greywacke and Tahanga basalt from the Coromandel, fashioned into adze flakes, grinders and drill points. Investigations by Bader (2023) in the northeast corner of 485 Puhinui Road found sparse shell scattering and a charcoal rich topsoil that may indicate archaeological subsurface features across the Waokauri Creek edge.

3.4 NZAA Sites

Archaeological sites within 100 m of the Campana Road plan change area are predominantly midden sites (R11/1114, R11/1116, R11/619, R11/616, R11/618, R11/615, R11/610, R11/609, R11/591, R11/578, R11/577, R11/46). These midden sites contain various indicative of substantial occupation, notably obsidian and adze flakes. Some garden sites are also recorded within 100 m of the plan change area (R11/618, R11/46), as is a cluster of three historic late 19th century rubbish dumps (R11/2853).

3 archaeological sites, all middens, are located in the plan change area.

3.4.1 R11/2855

A shell midden covering an approximately 30 x 15 m area first recorded by Campbell et al (2013). The shell is predominantly tuangi and is exposed in recently cultivated soil. Three green and grey obsidian flakes, and one chert flake, were found in the midden. A further 2 m x 100 mm thick shell lens was found heading down to the mudflats in the west. The rest of the scarp was thickly vegetated and was thought to cover more midden. Three obsidian flakes were found in vehicles tracks 100–300 m to the southwest, and are thought to have been transferred from the midden by vehicles.

3.4.2 R11/1111

An extensive midden scatter across a cultivated field and along the Waokauri creek bank first recorded by B. Cramond and M. Taylor (1981). In the creek bank thin lenses of shell were visible, as were red and yellow chert flakes and 19th century black beer bottle glass sherds. Midden and flakes are scattered across the promontory market garden and in poor condition in this area. The main midden concentration is found in the northwest quadrant of the property along the Waokauri Creek, and further stone flakes are found spread through the mudflats. A separate small midden exposure is found in the southeast corner of the market garden measuring 10 x 10 m.

3.4.3 R11/1112

A tuangi midden on the south bank of the Waokauri Creek opposite Ngā Kapua Kohu Ora / Crater Hill, found 4 m from the mangrove choked creek inlet. This site was originally recorded by B. Cramond and M. Taylor (1981). The bank in which the shell midden sits is eroding.

4 Field survey

At all properties, there was a focus on exposed soils and the perimeter edges which featured eroded edges sloping down toward creek mudflats. Dense vegetation and steep, muddy slopes meant that not all creek banks were able to be examined well for any traces of archaeology.

4.1 485 Puhinui Road

This property is comprised of flat and gently rolling land, almost entirely used as active and abandoned market gardens. The edges of all markets gardens and paths were grassed with a deep, soft topsoil. The eastern edge of the property is densely forested and dropped sharply down to mangrove swamp with little visibility through the forested edges (Figure 5).

The sparse shell scatters and charcoal stained soils identified by Bader (2023) were visited and the area probed but were not relocated. The surface along the perimeter edges and non-active market gardens along the eastern side of the property were probed for any material such as midden. No midden was found, and two test pits showed that the soils along the forested edge were soft and deep, while the topsoil around the abandoned market gardens was shallow atop very hard clay



Figure 5. Impeded view east from the eastern edge of the perimeter at 485 Puhinui Road.



Figure 6. Scatter of bricks and concrete blocks at the southeast corner of 485 Puhinui Road.

(Table 1). Though visibility was extremely limited and traversing down the embankment was not viable, it is possible that midden remains are located down the bank and along the swamp edges.

At the southeast corner of the property under thick forest and bush cover there is a scatter of worn bricks and small concrete blocks, as well as a shard of blue and white ceramic (Figure 6). Probing around this surface material found there to be further subsurface material. This material could relate to late 19th or early 20th century activity, though there was no diagnostic material visible across the surface materials to provide any firm date.

4.2 467 Puhinui Road

This property is separated from the other plan change allotments by the creek bed and mangrove swamp, and the high steep forested banks on either side. It is accessible from Puhinui Road. The property is comprised of gently rolling fields that are divided into paddocks, a circular driveway, and a series of buildings at the northern end of the property.

No sites are recorded within the boundaries of this property, and none were detected by probing. As with the other properties, the soil along the creek bank was soft and no surface or subsurface material was detected. Dense vegetation around streams meant they were often inaccessible but were viewed where possible.

4.3 5 Campana Road

This property was divided into flat grassed areas and inactive market gardens to the east end of the property, and a large gravelled and concreted carpark and warehouse buildings to the west (Figure 7).



Figure 7. Pack house building and largely gravelled carpark found at the west end of 5 Campana Road.

The forested edges of the creek bank were walked and found to be largely inaccessible due to dense vegetation. Probing found the soil along the bank to be very soft and highly churned, no material was found across the property.

4.4 10 Campana Road

This property is comprised of mostly unused market gardens and a densely vegetated strip that continues down to the Waokauri creek banks. The mudflats of the creek are heavily silted and choked by mangroves. The north end of the property was accessible through to the banks of the Waokauri creek and was walked over and probed.

Site R11/1111 is recorded on the property in the muddy banks of the Waokauri Creek and scattered throughout the market gardens at the north end of the property. The abandoned fields were covered with sparse scattered cockle shell, though probing and testing pitting revealed no intact subsurface midden, though it did find sparse fragmented shell intermixed with the topsoil (Table 1). This is aside from the previously reported midden exposure in the northeast corner of the property. This exposure was visible from the surface, though significantly smaller than its original estimation of 10 x 10 m, measuring presently at approximately 3 x 3 m (Figure 8, Figure 9). Probing found the depth to be 300 mm at its centre then progressively shallower as it radiated outwards. A further two test pits were excavated toward the west of the promontory, and sparse fragmented shell intermixed with the topsoil, though no signs of any intact midden deposits. .

The mudflats of the south bank of the Waokauri Creek were choked by mangroves and heavily silted (Figure 10). A small surface oyster scatter was found spilling out of the edge of the vegetation and measured approximately 1.5 m wide, and probing indicated it extends further down (Figure 11). Further oyster lenses were found closer to the low tide water line, and the area was thick with mud snail shells (*Amphibola crenata*) (Figure 12). No artefactual material was found, and probing revealed



Figure 8. Midden exposure (R11/1111), looking northward toward the Waokauri Creek, 10 Campana Road.



Figure 9. Midden exposure (R11/1111) showing fragmented tuangi shell, 10 Campana Road.



Figure 10. View northwards from the Waokauri Creek mudflats, 10 Campana Road.



Figure 11. Thick layer of oyster shell in Waokauri Creek bank, 10 Campana Road.



Figure 12. Thin lenses of oyster shell extending west around the promontory, 10 Campana Road.



Figure 13. View eastward of ploughed fields with surface scatters of fragmented shell, 10 Campana Road.



Figure 14. View westward toward Pūkaki Creek, where site R11/2855 was recorded, 10 Campana Road.

no subsurface midden along the mudflats. Movement further west around the promontory was not possible due to heavy silt and thick vegetation.

The ploughed fields of the property have visible shell scatters extending across most of their length, identifiable as tuangi, pipi and scallop (Figure 13). These areas were probed, and test pitted for subsurface midden, however no intact middens were found below the surface. One small obsidian flake was found toward the centre of the property. The site (R11/1111) generally appears to be in poor condition, having been considerably ploughed. Site R11/2855 was unable to be relocated and is presumed to be obscured by the heavy vegetation of the western perimeter or eroded down the steep bank slopes (Figure 14). Any views toward the Pūkaki Creek from this location are obscured.

4.5 11 Campana Road

This property is divided into market gardens that are presently in use. The ploughed fields were walked, probed, and test-pitted with the intention of detecting any visible or subsurface midden, but none was found. The entire perimeter was walked, and it is notable that the property has high steep banks down to the Waokauri Creek that are almost entirely inaccessible, however they do provide mostly clear views out north and eastwards toward Ngā Kapua Kohu Ora / Crater Hill and the arms of the Waokauri Creek (Figure 15).

The mudflats before the creek were accessible in limited cases, and where possible were surveyed. No archaeology was detected, including the midden site of R11/1112 which was unable to be relocated (Figure 16). Probing detected no subsurface remains buried by silt and no shell or stone fragments were visible on the surface. The area is heavily overrun with mangroves and silt deposition, which are the likely cause behind difficulties in site relocation.

During a subsequent site visit on 23 April 2024a previously unrecorded midden was seen at the top of the steep bank down to the Waokauri Creek, and was recorded as site R11/3513. This



Figure 15. View northeast from the banks of 11 Campana Road toward Ngā Kopua Kohu Ora / Crater Hill.



Figure 16. Location where site R11/1112 is recorded to be, 11 Campana Road.



Figure 17. Newly recorded midden R11/3513.

midden was about 4 m long, 100 mm deep and was comprised mostly of small tuangi (*Austrovenus stutchburyi*). It did not seem to be a very extensive site although it was not probed to see how far it extended (Figure 17).

Table 1. Test pit locations and descriptions.

Test Pit	Description	Property
1	300 mm of friable dark topsoil with roots and gravel; natural subsoil visible at 300 mm below surface.	Lot 2 DP 402013
2	100 mm of friable dark topsoil with roots and gravel; hard natural clay at 100 mm below surface.	Lot 2 DP 402013
3	150 mm of topsoil; 150 mm of mixed silty clay subsoil, no natural subsoil found.	Lot 2 DP 71211
4	150 mm mixed dark brown topsoil with sparse fragmented shell inclusions; natural yellow clay silty subsoil at 150 mm below surface.	Lot 3 DP 71211
5	200 mm mixed dark brown topsoil with relatively dense fragmented shell inclusions; natural yellow clay silty subsoil at 200 mm below surface.	Lot 3 DP 71211
6	250 mm mixed dark brown topsoil; natural clay silty subsoil at 250 mm below surface.	Lot 3 DP 71211
7	200 mm dark brown friable topsoil with sparse shell fragments; natural yellow clay subsoil at 200 mm below surface.	Lot 3 DP 71211
8	200 mm dark brown friable topsoil; natural yellow clay subsoil at 200 mm below surface.	Lot 3 DP 71211
9	200 mm compacted brown topsoil; natural yellow clay subsoil 200 mm below surface.	Lot 3 DP 71211



Figure 18. Location of the recorded sites on the properties.

5 Assessment

The following assessment of values use the criteria in Chapter D17 of the AUP and follows the Auckland Council Methodology for Evaluating Historic Heritage Significance (2019). Where sites have the same values they have been grouped and assessed jointly.

5.1 R11/2855

Historical	This is a pre-European Māori site related to settlement and land use in the area. This site has moderate historical value.
Social	This site is on private property and has no known social value.
Mana whenua	Only mana whenua can comment on the value of the site to them.
Knowledge	Middens can provide information about the subsistence and occupation patterns of pre-European Māori populations. If charcoal or other datable material is found within a secure context, they could provide temporal information about the use of the features dated. This site has moderate knowledge value.
Technology	There is unlikely to be any unique technological attributes at this site. This site has no technology value.
Physical	The physical condition of the site is unknown, but if it is intact as described by Campbell et al (2013) it would have moderate physical values.
Aesthetic	The above-ground condition of this site remains partially intact and would have some aesthetic values.
Context	Middens pertain to the wider archaeological context in the area and can be used as indicators of where larger scale archaeological landscapes may exist. This site has moderate contextual value.

This site is protected under the HNZPTA 2014. It has moderate values based on its highest values, which are its historical, knowledge, and contextual values. Retention of these values is desirable though loss of heritage values can be partially mitigated.

5.2 R11/1111

Historical	This is a pre-European Māori site related to settlement and land use in the area. This site has moderate historical value.
Social	This site is on private property and has no known social value.
Mana whenua	Only mana whenua can comment on the value of the site to them.
Knowledge	Middens can provide information about the subsistence and occupation patterns of pre-European Māori populations. If charcoal or other datable material is found within a secure context, they could provide temporal information about the use of the features dated. This site has high knowledge value.
Technology	There is unlikely to be any unique technological attributes at this site. This site has no technology value.
Physical	The physical condition of the site is poor in some areas and fair in others and has moderate physical values.
Aesthetic	The above-ground condition of this site is fair in some places and retains moderate aesthetic values.
Context	Middens to the wider archaeological context in the area and can be used as indicators of where larger scale archaeological landscapes may exist. This site has high contextual value.

This site is protected under the HNZPTA 2014. It has moderate values based on its highest values, which are its historical, knowledge, and contextual values. Retention of these values is desirable though loss of heritage values can be partially mitigated.

5.3 R11/1112

Historical	This is a pre-European Māori site related to settlement and land use in the area. This site has moderate historical value.
Social	This site is on private property and has no known social value.
Mana whenua	Only mana whenua can comment on the value of the site to them.
Knowledge	Middens can provide information about the subsistence and occupation patterns of pre-European Māori populations. If charcoal or other datable material is found within a secure context, they could provide temporal information about the use of the features dated. This site has moderate knowledge value.
Technology	There is unlikely to be any unique technological attributes at this site. This site has no technology value.
Physical	The physical condition of the site is unknown, but if it is intact as described by Campbell et al (2013) it would have moderate physical values.
Aesthetic	The above-ground condition of this site is unknown, but if it is intact as described in Campbell et al (2013) it would have some aesthetic values.
Context	Middens pertain to the wider archaeological context in the area and can be used as indicators of where larger scale archaeological landscapes may exist. This site has moderate contextual value.

This site is protected under the HNZPTA 2014. It has moderate values based on its highest values, which are its historical, knowledge, and contextual values. Retention of these values is desirable though loss of heritage values can be partially mitigated.

5.4 R11/3513

Historical	This is a pre-European Māori site related to settlement and land use in the area. This site has moderate historical value.
Social	This site is on private property and has no known social value.
Mana whenua	Only mana whenua can comment on the value of the site to them.
Knowledge	Middens can provide information about the subsistence and occupation patterns of pre-European Māori populations. If charcoal or other datable material is found within a secure context, they could provide temporal information about the use of the features dated. This site has moderate knowledge value.
Technology	There is unlikely to be any unique technological attributes at this site. This site has no technology value.
Physical	The physical condition of the site is fair and has moderate physical values.
Aesthetic	The above-ground condition of this site remains intact and would have some aesthetic values.
Context	Middens pertain to the wider archaeological context in the area and can be used as indicators of where larger scale archaeological landscapes may exist. This site has moderate contextual value.

This site is protected under the HNZPTA 2014. It has moderate values based on its highest values, which are its historical, knowledge, and contextual values. Retention of these values is desirable though loss of heritage values can be partially mitigated.

6 Conclusions

The previously recorded midden sites have been identified as potential constraints on the proposed plan change. Three Māori sites are included within the boundaries of the project area (R11/2855, R11/1111, R11/1112). These sites are connected to the wider Waokauri Creek landscape and could provide important information regarding pre-European and historic Māori occupation of South Auckland. One historic site is located at 485 Puhinui Road and would require further investigation to determine its timeframes and values. Extensive ploughing across the plan change area is likely to have damaged archaeological remnants, however the possibility remains that archaeology remains below the immediate surface. Since the initial assessment an exploratory investigation of R11/1111 and R11/2855 was undertaken which showed that, despite the level of ploughing, middens and pits remain intact below the plough zone (Campbell and Arrell 2024).

7 Recommendations

These recommendations are only made based on the archaeological potential that has been outlined above. Any other values associated with special interest groups, including tangata whenua, can only be determined by them. It is recommended that:

- when development commences and earthworks plans become available, full archaeological assessments are undertaken to determine if an authority to destroy, damage or modify archaeological sites or features must be applied for from Heritage New Zealand Pouhere Taonga (Heritage NZ) under Section 44 of the Heritage New Zealand Pouhere Taonga Act 2014;
- since archaeological survey cannot always detect sites of traditional significance to Māori, or wāhi tapu, the appropriate tangata whenua authorities should be consulted regarding the possible existence of such sites, and the recommendations in this report.

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Attachment F

TO: Campana Land Owners' Consortium
COPY TO: David Clark, Saddleback
FROM: Angela Tinsel, Senior Ecologist

Date: 30 July 2024
Document No: 10158-003-1

ECOLOGY RESPONSE – REQUEST FOR FURTHER INFORMATION – CAMPANA PRIVATE PLAN CHANGE REQUEST

Campana Land Owners' Consortium submitted a private plan change request to rezone land at Campana Road, Puhinui. The application was supported by an Ecological Impact Assessment report (Viridis, 2024). Auckland Council has reviewed the application material and provided a request for further information.

Capstone Projects Limited, on behalf of the Campana Landowners' Consortium, engaged Viridis Limited to respond to the queries raised as they pertain to ecological matters. A summary of each query provided by Auckland Council is italicised below, followed by our responses to the applicable queries.

- *The Application Documentation has not assessed the proposal against the provisions of section B7 of the Auckland Unitary Plan (AUP) Regional Policy Statement (RPS) or the provisions of the National Policy Statement for Freshwater Management (NPS:FM), or the National Policy Statement for Indigenous Biodiversity (NPS:IB). Please provide an assessment against AUP RPS section B7, the NPS:FM and the NPS:IB.*

An assessment against these documents is contained within Section 9.5 of the EclA. However it appears that further assessment against the provisions is required in the Planning Report by Saddleback. This is to be addressed by Saddleback.

- *The effects on indigenous fauna have been stated as low despite no formal surveys being undertaken to determine if indigenous fauna are present or not. The conclusion relating to fauna effects has been based off desktop and habitat assessments alone. Relying on desktop surveys and nearby records only infers what species may be present on site. Concluding effects based on this alone is speculative. Specific fauna assessments are required to determine which species are present to better inform the effects, mitigation measures and certainty the provisions of the precinct will give effect to the NSP:IB. Please provide a fauna assessment based on a specific survey of the site.*

No fauna surveys were undertaken because the small amount of vegetation on the site that would be affected by future development is of low ecological value and provides little habitat for native fauna such as birds, bats and lizards. The mixed native and exotic vegetation that is of moderate ecological value and provides most of the potential habitat for indigenous fauna within the site is within 25 m of the coast or within 20 m of a wetland and therefore would be protected from removal by the coastal yard (Chapter H17 and Puhinui Precinct rules) or vegetation management (Chapter E15) rules of the AUP-OP.

When the site is developed, resource consent applications will be required to assess the ecological effects of the proposed works and any vegetation removal on indigenous fauna. Where potential habitat for indigenous fauna is affected, then consent conditions can be applied to require fauna management plans, which could involve relocation of reptiles, bird surveys prior to vegetation clearance within the bird nesting season and bat roost habitat assessment of larger trees prior to felling.

Given the limited amount of potential fauna habitat affected, the protections provided by the coastal and riparian yards and associated precinct and AUP-OP provisions, and the ability to mitigate any adverse effects on fauna through requiring fauna management plans tailored to the proposed works, it is considered that the potential effects on indigenous fauna are able to be minimised and mitigated. Requiring fauna surveys across the site for the purposes of the plan change is considered excessive and not commensurate with the scale and significance (to indigenous biodiversity) of the proposal.

- *The structure plan appears to be inconsistent with the vegetation types present on site. The areas identified as 'orchard planting' also contain indigenous planting which the ecological assessment classifies as amenity plantings. The ecological value of the vegetation in these areas has collectively been classified as low. Despite these indigenous trees being small clusters or rows of trees there may be value in identifying and retaining them due to the ecological function that larger trees provide to the wider landscape. It should accordingly be confirmed what larger indigenous trees of value should be retained (where practicable) or relocated to other areas on site. Please provide an arboricultural assessment identifying and confirming the value of individual / groups of trees.*

Amenity and orchard trees have been grouped as a vegetation category because they provide similar ecological values, in that they are typically individual or small groups of spaced out trees planted for amenity or food purposes, with grass, or sometimes mulch, beneath and around them. Some of these trees are indigenous, however the nature of their planting, maintenance and lack of connection to other vegetated areas mean that they hold similar ecological values to the exotic trees within this category.

The purpose of an ecological assessment at a plan change stage is to identify ecological values at a high level to guide application of appropriate policies and rules for the wider site. More detailed and specific ecological assessments are undertaken at the resource consent stage when the specifics of the proposed works are being developed, and this is when it is appropriate to look more closely at the ecological values of individual and groups of trees and determine what type of mitigation may be appropriate where there are significant ecological effects. The resource consent application phase would also be a more appropriate time to undertake an arboricultural assessment of the values of individual and groups of trees.

- *There is no assessment on the adequacy of the proposed 10m riparian yard for wetlands. The AUP E15 Vegetation management and biodiversity standards applies a 20m protected vegetation setback from wetlands. Please provide an assessment of the appropriateness of providing for a smaller wetland yard (buffer) setback than what is anticipated in the existing AUP standards.*

The AUP-OP E15 clause relates to vegetation alteration or removal within 20 m of a wetland and will still apply. The AUP-OP provisions do not contain a wetland yard or setback. The proposed inclusion of wetlands in the riparian yard provisions of the precinct formalises a minimum wetland setback and gives the ability to require planting around wetlands, where there is no tool for that currently (other than consent conditions) in the AUP-OP. Therefore inclusion of wetlands in the 10 m riparian yard will improve the level of protection for wetlands and will not result in a smaller wetland yard or buffer than what currently applies in the AUP-OP.

- *While there is mention of planting riparian yards to 10m and the coastal protection yards to 20m, there is no mention of planting the wetland buffers. The yard enhancements should be more prescriptive than simply stating planting. A link to AUP:OP Appendix 16 Guideline for native*

revegetation plantings of the should also be specified. Please provide further detail of what species are appropriate for enhancing wetland buffers, referencing (as appropriate) the AUP:OP Appendix 16 Guideline

The inclusion of "wetlands" in the description of Riparian Yards in I432.6.3 has addressed this gap to ensure that planting is required in wetland buffers by Clause I432.6.3 (2). This clause should be expanded to clarify that wetland buffers must be planted to a 10m depth and include reference to Appendix 16:

(2) Riparian yards must be planted with locally sourced indigenous species to a minimum depth of 10m from the edge of intermittent and permanent streams and wetlands, in accordance with Appendix 16 Guideline for native revegetation planting. Walkways and cycleways may be located within the riparian yard.

References

Viridis, 2024: Campana Road, Private Plan Change, Ecological Impact Assessment. 12 March 2024.

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Attachment G

CAMPANA ROAD PROPOSED PLAN CHANGE - CLAUSE 23 RESPONSE

CLIENT: CAMPANA LAND OWNERS CONSORTIUM

This memo is provided in response to letter “RE: Clause 23(1) Resource Management Act 1991 Further Information – Private Plan Change request” dated 8 May 2024 provided by Auckland council in relation to the proposed private plan change at Campana Road, Puhinui. The response is provided covers items SW1 – SW5 & GW1 for which are detailed below.

SW1 – STREAM EROSION

Stream erosion – watercourse 14 & 33

Information Concern

SMP section 6.5.1 notes that the majority of the site discharges to the coast and no hydrology mitigation is required. However a portion of the site will discharge to “Watercourse 14” and 33 – that matter needs to be assessed. This should consider the state of the stream and the vulnerability of the stream to erosion. Mitigation could consider inclusion of instream measures or of flow mitigation depending which is more appropriate for the stream in this location.

Information Request SW1 - watercourse 14 & 33

Please provide information on the potential effects of changes in stormwater runoff flows to the streams and discuss any mitigation needed to protect the streams from erosion.

Maven Response:

Engagement with Te Akitai Waiohū was undertaken to develop stormwater management principles and values for the SMP. As a result the following provision has been included within the SMP which will also ensure that the effects of stream erosion will be mitigated by reducing the runoff from frequent rain events.

- is considered the DFO.

Frequent Rain Event Management – Hydrology mitigation SMAF 1 is not required for most of the PCA area except Campana Road which discharges toward an existing stream. Stormwater reused tanks are proposed for all roof areas which will provide a minimum of 5mm retention. For the hardstand/ driveway and other impervious areas, 5mm of retention is required where ground soakage is feasible. This approach is in line with Te Akitai Waiohū Principle.

SW2 - STORMWATER MITIGATION – CAMPANA ROAD

Stormwater mitigation - Campana Road

Information Concern

Swales have not been a preferred asset in the road corridor by AT on other projects and without the asset owner in principle approval this may not be a viable option to provide the required mitigation.

Information Request SW2 - Stormwater mitigation - Campana Road

Please confirm that the proposed swale has been discussed with Auckland Transport as the future asset owner of this device.

Maven Response:

Swales have initially been proposed on Campana due to the following:

- A Wiri oil underground pipeline located within the existing road reserve and swales provide a conveyance mechanism without piping so reduces any disturbance within the proximity to this.
- Provides a means of treatment and ground infiltration given the limited space within the road reserve to achieve SMAF1 compliance

We do note that Campana Road is an existing road reserve and applicant is receptive to amending cross section to align with alternative Auckland Transport requirements if so required but no feedback was received from them to date. This could be achieved through retaining walls and alternative devices to comply with the SMAF requirements.

SW3 - STORMWATER NETWORK & FLOOD MANAGEMENT - INFORMATION

Stormwater network and flood management - Information

Information Concern

Further information is required in respect of the Stormwater network and flood management measures required to support future development.

Information Request SW3 - Stormwater network and flood management

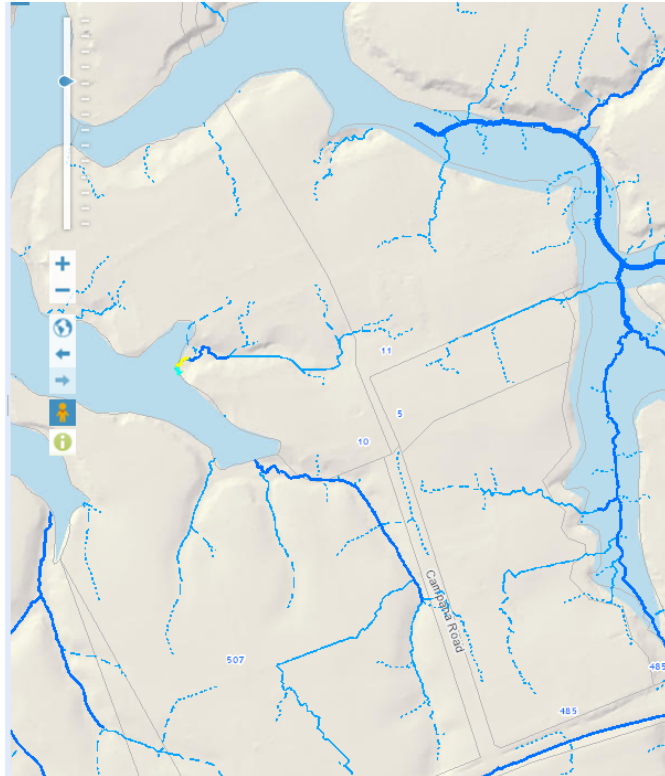
Please:

- provide a plan to show indicative layout of the proposed public stormwater network.
- provide a plan to show post earthworks overland flow paths and areas that will have ponding of water with a flow rate of over 2m³/s.
- provide the indicative number and location of private and public coastal/stream outfalls intended to serve the proposed plan change area.

Maven Response:

- A development masterplan has not been developed as part of the plan change application as subdivision of the sites is not yet proposed. It is expected that this will be completed under a future resource consent application. It is however anticipated that the extent of public piped networks (if any) would be limited to the Campana Road reserve and that on lot pipework would be private lines and outfalls to the existing OLFP discharge points within the site that would be subject to relevant assessment under a resource consent process.
- Specific flooding analysis of the site has not been undertaken due to the coastal nature and discharge from the site not presenting any potential for downstream issues and the gradients and levels of the site not presenting any specific channellings. Specific analysis of OLFP's and ponding will be completed in a future detailed design and resource consent process once a more detailed development proposal in line with the new zoning provisions has been completed and final earthworks modelling determined. It is however noted that under the existing Auckland Council modelling for 100 yr scenario with Climate Change that the largest catchment within the PCA relates to a peak flow of 1.8m³/s with a 64.5% impervious area for context. Although impervious areas and catchments may differ as part of future development we anticipate that this level of analysis can be managed under a subsequent resource consent process.

Overland Flow Paths - 3ha to 100ha (25,000)	
Attribute	Value
Peak Flow 100yr Future 3.8 degree (m3/s)	1.8
Peak Flow 10yr Future 3.8 degree (m3/s)	1.07
Peak Flow 2yr Future 3.8 degree (m3/s)	0.5
Catchment Area (m2)	49151
Impervious Future (%)	64.5
Impervious Existing (%)	19.33
CN average Future	83.52
CN average Existing	65.1
ToC Future (min)	0.34
ToC Existing (min)	0.42
Slope (%)	2.11
Peak Flow 100yr Existing (m3/s)	0.76
Peak Flow 10yr Existing (m3/s)	0.39
Peak Flow 2yr Existing (m3/s)	0.15
Channelisation Factor	1
Max Flow Length (m)	505.49
Rainfall 100yr Existing (mm)	197.37
Rainfall 10yr Existing (mm)	129.61
Rainfall 2yr Existing (mm)	74.02
Rainfall 95th Existing (mm)	32.82
Rainfall 90th Existing (mm)	23.98
Catchment Areas Group	3ha to 100ha
OLFP Segment Length (m)	12.33
Line ID	3554464



- We expect the indicative outfall locations to be as shown by the red arrows (20 locations) below on the extract of Appendix B from Viridis Ecological Impact Assessment to the modelled OLFP's and intermittent drains. Although this will be subject to a detailed design process based on determination of final development layout.



SW4 – STORMWATER QUALITY

Stormwater quality treatment

Information Concern

Section 6.4.1 of the Stormwater Management Plan proposes excluding roofs from needing water quality treatment if constructed from inert materials. However Table 6.5.3 states an expectation for the provision of bioretention or proprietary devices. The SMP has outlined that stormwater quality treatment and containment/removal of potential accidental spill of contamination will be addressed by each future lot. Further details are required of potential measures that may be implemented to address stormwater quality for future development. This should be based on an assessment of the likely site size and development type to be established, i.e. on what basis measures on the current water quality strategy is made.

Information Request SW4 – Stormwater quality treatment

Please:

- **clarify and confirm what/if mitigation is proposed for roofs within the Plan Change area.**
- **provide clarification whether the proposed approach is feasible for all developable land with consideration of landform of the area, whether there will be some area that no treatment will be provided, and the risks involved of discharging contaminants to the receiving environment.**
- **provide indicative quantities of raingardens, proprietary devices, swales and tree pit required to serve the future developable land, and comment whether alternative solutions have been considered.**

Maven Response:

- Quality Treatment for roof areas is not proposed if they are to be constructed of inert materials. This will then then be collected in a tank (sized for at least 5mm storage) which is dedicated to grey water reuse. Section 6.4.1 of SMP also states that as an alternative option the below will be implemented which could include bioretention or proprietary devices as applicable.

Or,

- An alternative level of mitigation 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 considered the BPO.
- The proposed approach will be feasible to all developable land and the final proposal can be catered to ensure that the requirements of the SMP can be achieved.
- The uses of light industrial land is variable and the final development proposal is not yet determined hence the provision of the toolbox is more appropriate at time of plan change application. A more specific detailed layout of stormwater would be provided within future resource consent applications, and subject to review at such time. The SMP does provide adequate flexibility such that solutions can be explores within future developments If valid for the proposal.

SW5 – PIPING OF STREAM

Piping of streams

Information Concern

For adequate assessment, further details are required of the intermittent stream intended to be piped as part of the planned development.

Information Request SW5 - Piping of streams

Please provide further detail of the intermittent stream intended to be piped as part of the planned development.

Maven Response:

There are no intermittent streams recorded within the site that are proposed to be piped. Any permanent streams that are present will have sufficient setbacks in accordance with ecological guidelines. Extract from Viridis report below.

6.1.3 Streams

Small catchment sizes within the site means that there are few streams. Only two permanent streams, and no **intermittent** streams, have been identified within the PPC area.

GW1 – POTENTIAL GROUNDWATER EXTRACTION

Potential Groundwater Extraction

Information Concern

Chapter 8.0 of the submitted Infrastructure Report indicates that the proposed development will be serviced by a new public water network extension, consistent with the intended upgrades identified within Watercare's scheme. No information has been provided as to whether the applicant has considered an alternative water supply should there be delays to the planned upgrades by Watercare for the area. If it is considered that groundwater abstraction may be an option, high level assessments of potential water use requirements and information on the availabilities of groundwater from the underlying aquifers is required.

Information Request GW1 - Potential Groundwater Extraction

Please confirm that no need is envisaged for an alternative or back-up water supply plan, in the event that there are delays to the intended Watercare upgrades.

Maven Response:

There are existing groundwater take consents on the site as referenced in Babbage Report 66766- Freska Produce Wiri Hydrogeological Setting Final dated 28 September 2023. It is envisioned that these may be used for an interim servicing strategy for a portion of the light industrial land while Watercare upgrades occur. As per the Babbage report, the allowable groundwater take for 11 Campana Road is 25,000m³/year which is equivalent to 68.5m³/day. Figure 3 in the Babbage report also indicates there is an additional 3 active groundwater takes within the proposed plan change area which could contribute. Based on Maven Wastewater and Water Servicing Strategy Report 285001 dated 15/11/2023 the peak daily demand for water is 588,280l/day (588m³/day) based on Watercare code of practice. The proposed SMP also requires that buildings within the light industrial land also provide for rainwater harvesting for non-potable reuse which will

reduce demand. Although the combination of the above is not expected to provide servicing to the max probable development of the site, it should be assumed that this may be an appropriate measure for consideration as an interim servicing strategy. This would need to be further detailed at resource consent stage with full details of the final proposed land use and details of the allowable groundwater take within the plan change area.

CLOSING

We trust the above will meet your satisfaction and please feel free to contact the undersigned for additional clarification if required.



Ryan Wyllie (CPEng)

Associate

Attachment H

Campana Road, Wiri

Coastal Erosion and Hazards Assessment

for: Campana Landowners Consortium c/ Capstone Projects



Job No: 67471

Version: Final

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Author(s)	
	Sasha Eremin
	Environmental Scientist
Reviewer(s)	
	Lobo, Luiz Coutinho
	Environmental Science and Engineering Lead - Associate

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EXECUTIVE SUMMARY

Babbage Consultants Limited (Babbage) has been engaged by Campana Landowners Consortium c/ Capstone Projects Limited to undertake a desktop Coastal Hazard and Erosion Assessment (CHEA) across multiple sites at Campana Road, Wiri, Auckland.

This report evaluates the potential impacts of coastal hazards and erosion on specific lots in the area. The assessment aims to guide future development and hazard mitigation strategies by estimating future shoreline changes and inundation extents.

The results of the assessment are as follows:

- The future Average Shoreline Change and Inundation Extent (ASCIE) is estimated at 0-3.6 meters (based on the Site setting) and 2.8-16.6 meters (based on AVF/CVZ lithology information).
- The lots with relatively higher potential effects include Lot 3 DP 71211, Lot 2 DP 71211, and Allot 190 PSH OF Manurewa. It must be noted that most of the area susceptible to coastal erosion and inundation at the Site are areas of the respective lots that are below the cliff.
- For the 2130 planning horizon, a maximum inundation potential of 5.1 meters is derived. Given the site elevation of 5 to 10 meters, the inundation risk is considered low.
- The 20 meters Open Space setback zone (from the CMA) was proposed to account for the effects of the ASCIE 8.5+ prior the CHEA. Based on the calculations above, 20 m setback will be sufficient to mitigate the predicted effects of ASCIE8.5+.

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1 INTRODUCTION

Babbage Consultants Limited (Babbage) has been engaged by Campana Landowners Consortium c/ Capstone Projects Limited to carry out a Coastal Erosion and Hazards Assessment (CEHA) for Campana Road, Wiri, Auckland - Allot 190 PSH FO Manurewa, Lot 2 DP402013, Lot 1 DP 402013, Lot 2 DP 71211 and Lot 3 DP 71211 (the Site). The assessment is intended to support the Plan change for the proposed Site redevelopment.

To be able to proceed with the redevelopment, a CEHA has been requested by Council.

Areas of concern provided by the council are:

- MHWS sits at a contour level of about 2m in the Auckland council GIS maps.
- The Site is also within the Coastal Inundation 1 per cent AEP plus 1m Control in the AUP.
- Policy 24 of the New Zealand Coastal Policy Statement (NZCPS) requires that coastal hazard assessments for development, are based on a 100 year projection. This 100 year projection needs to consider the effects of climate change on coastal erosion and instability over that time frame.
- The RMA, and Policy 25 of the NZCPS require avoiding increased risk of development in area affected by coastal hazard areas over at least the next 100 years.
- AUP Policy E36.3 requires identification of land that may be subject to natural hazards, considering the likely effects of climate change including coastal erosion, coastal inundation and land instability.
- The Proposed Plan Change area is within a coastal erosion hazard area (CEHA) as per the AUP definition. The site triggers part (b)(i)) of the CEHA definition (as below from Chapter J of the AUP).

(b) at an elevation less than 7m above mean high water springs if the activity is within:

- (i) Inner Harbours and Inner Hauraki Gulf: 40m of mean high water springs;
or
- (ii) Open west, outer and Mid Hauraki Gulf: 50m of mean high water springs.

The overall aim of this assessment is to understand the coastal processes acting in the proposed location and identify existing shoreline movement trends. This will assess local shore morphology and position, inundation and erosion hazards, and take into consideration future sea-level rise and climate change effects to inform an assessment of the effects.

This CEHA follows the 2021 Guidelines set out in Carpenter (2021), 'Coastal hazard assessment in the Auckland region.

1.1 Site location and land use

The addresses of the lots that form the Site proposed for redevelopment and plan change are presented in Table 1 and Figure 1.

Table 1. Site identification.

Address	Legal description	Area (ha)
11 Campana Road, Wiri	Lot 2 DP 71211	8.12
467 Puhinui Road	Allot 190 PSH OF Manurewa	3.44
485 Puhinui Road	Lot 2 DP402013	7.16
5 Campana Road	Lot 1 DP 402013	2
10 Campana Road	Lot 3 DP 71211	9.90

Note: Source – Auckland Council GIS maps (AC Geomaps) data service website¹.

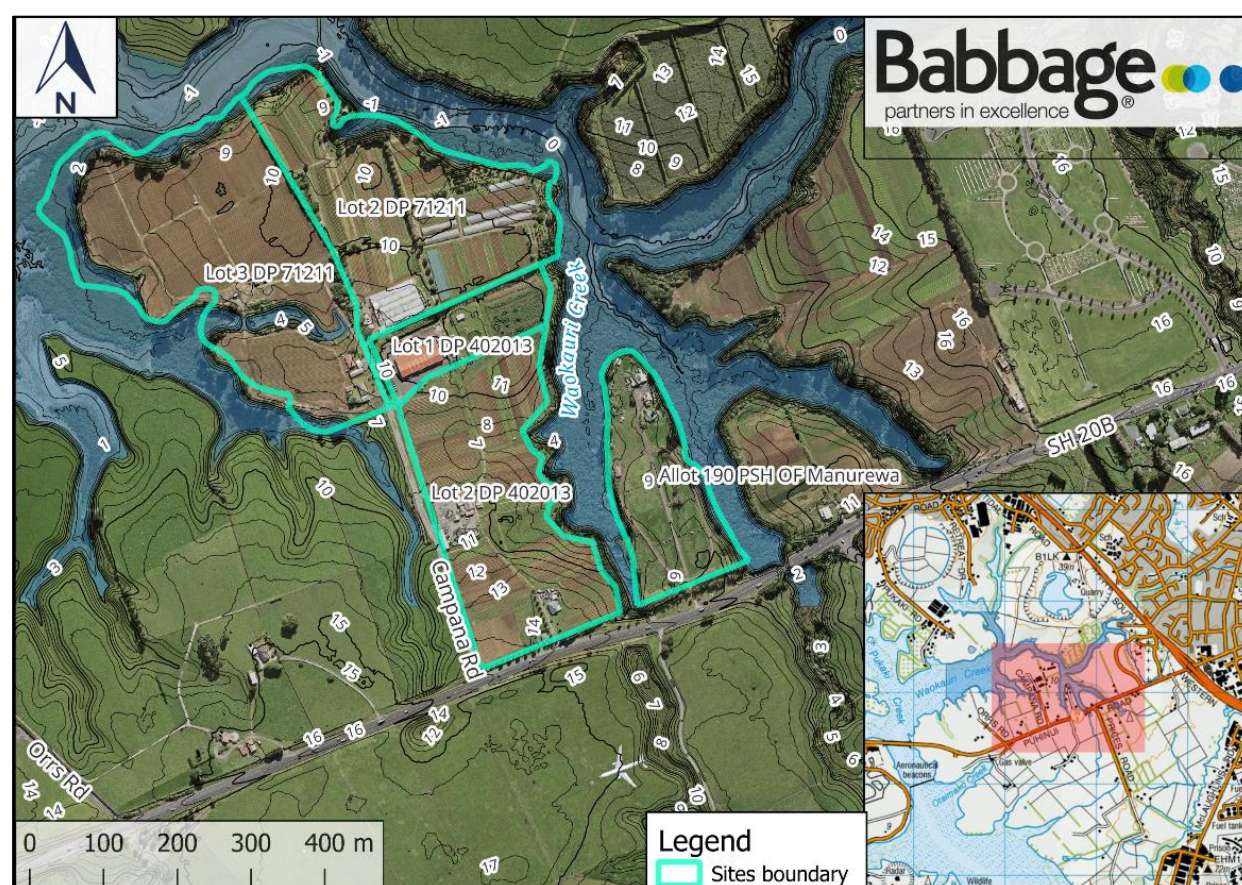


Figure 1. The Site surrounded by channels of the Waokauri Creek system and Puhinui Road.

The existing topography of the Site is predominantly flat, with a maximum elevation of around 10m RL, gently sloping downwards to approximately 5 m RL at the edges of sites. The slopes from the Site to the

¹ Auckland Council GEOMAPS 8 July 2024. Retrieved from <https://geomapspublic.aucklandcouncil.govt.nz/viewer/index.html>

creek are ranging from 5 to 8 meters in elevation and descend to sea level at angles ranging from 14 to 33 degrees. These slopes are densely vegetated and well protected at the toe by mature mangroves.

The Site features various low-set farm buildings, greenhouses, and associated farm pathways. The Site is surrounded by channels of the Waokauri Creek system to the East, North and West. To the South the Site borders on Puhinui Road (part of SH20B).

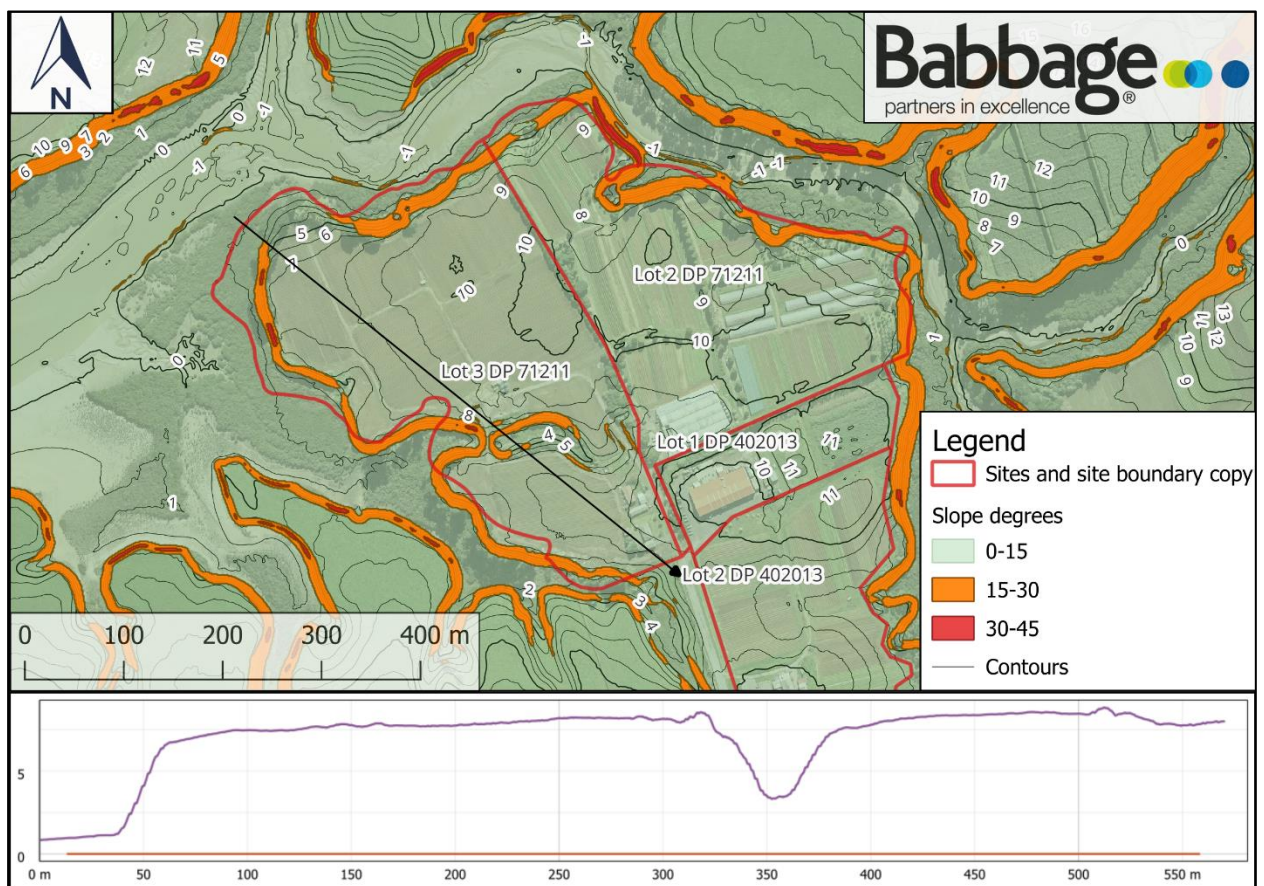
1.2 Topography

1.2.1 Lot3DP71211 (10 Campana Road, Wiri, Auckland)

The property extends 520 m inland from the most northeastern point to the base right corner. The property is surrounded by Waokauri Creek and dense mangrove vegetation to the North and West parts of the lot. The vegetation extends from the edge of the property into the creek by 30 to 180 m. The lot is situated north of Puhinui Road (part of SH20B) and to the left of Campana Road.

Covering 9.9 ha, the property lies at an elevation of 0 to 10 m above sea level. The shoreline area features steep slopes 15° to 30° with localised very steep sharp inclines of 30° to 45° , while the main body of the lot is predominantly flat with gentle slopes of 0° to 3° . The property and the surrounding lots are used for agriculture and glasshouses.

The topography of the site can be seen in **Error! Reference source not found.**



Note: the black arrow indicates the direction of the cross-section; the orange line in the plot area is indicating site area.

Figure 2. Lot 3 DP 71211 topography.

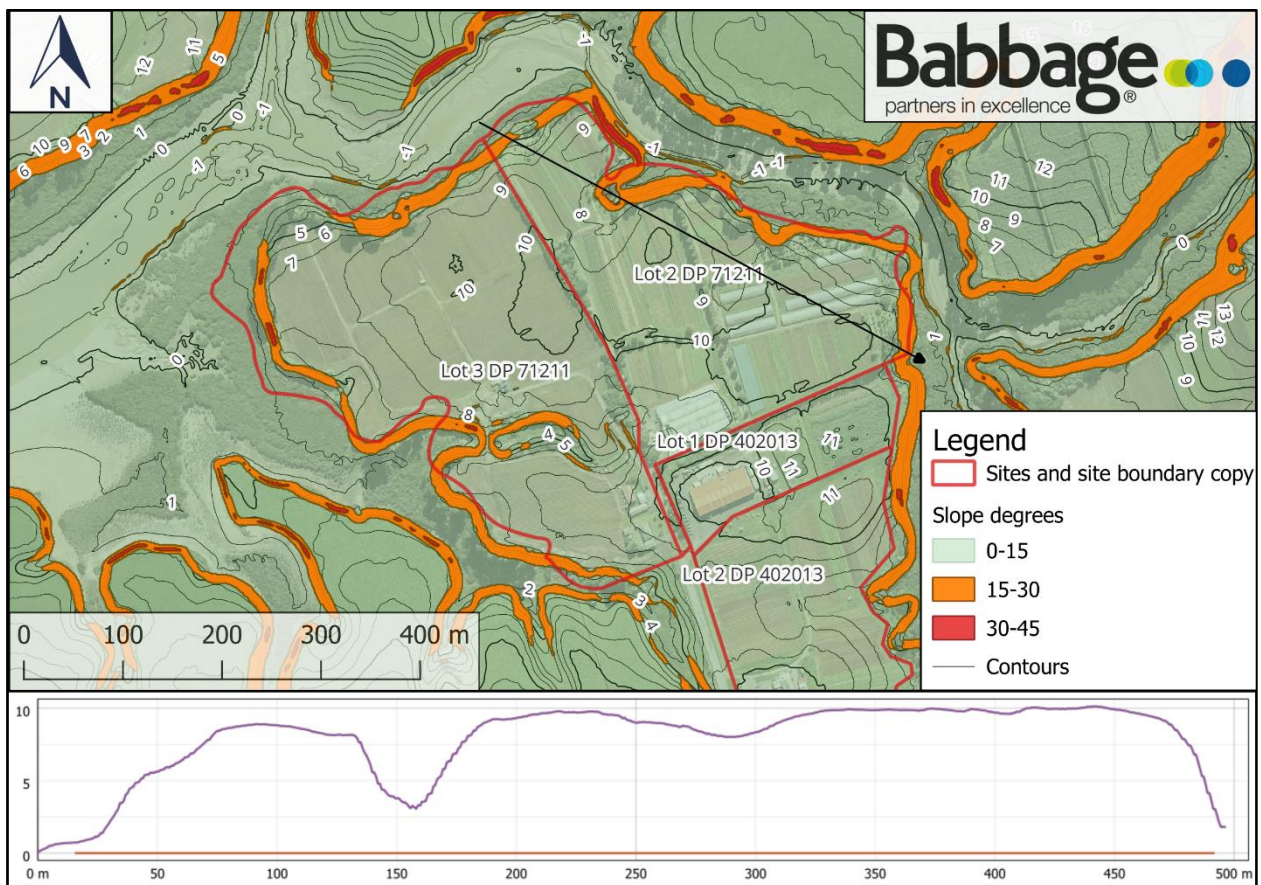
1.2.2 Lot2DP71211 (11 Campana Road, Wiri, Auckland)

The property extends 400 m inland from the most northeastern point to the base. The property is surrounded by Waokauri Creek and dense mangrove vegetation the North and East parts of the lot. The vegetation extends from the edge of the property into the creek by 30 to 60 m. The lot is situated north of Puhinui Road (part of SH20B) and to the right of Campana Road.

Covering 8.12 ha, the property lies at an elevation of 0 to 10 m above sea level. The shoreline area features gentle to moderately steep slopes of 15° to 30°, with localised areas of 30° to 45° of steep sharp inclines, while the main body of the lot is predominantly flat with gentle slopes of 0° to 3°. The property and the surrounding lots are used for agriculture and glasshouses.

The topography of the site can be seen in Note: the black arrow indicates the direction of the cross-section; the brown line in the plot area is indicating site area.

Figure 3.



Note: the black arrow indicates the direction of the cross-section; the brown line in the plot area is indicating site area.

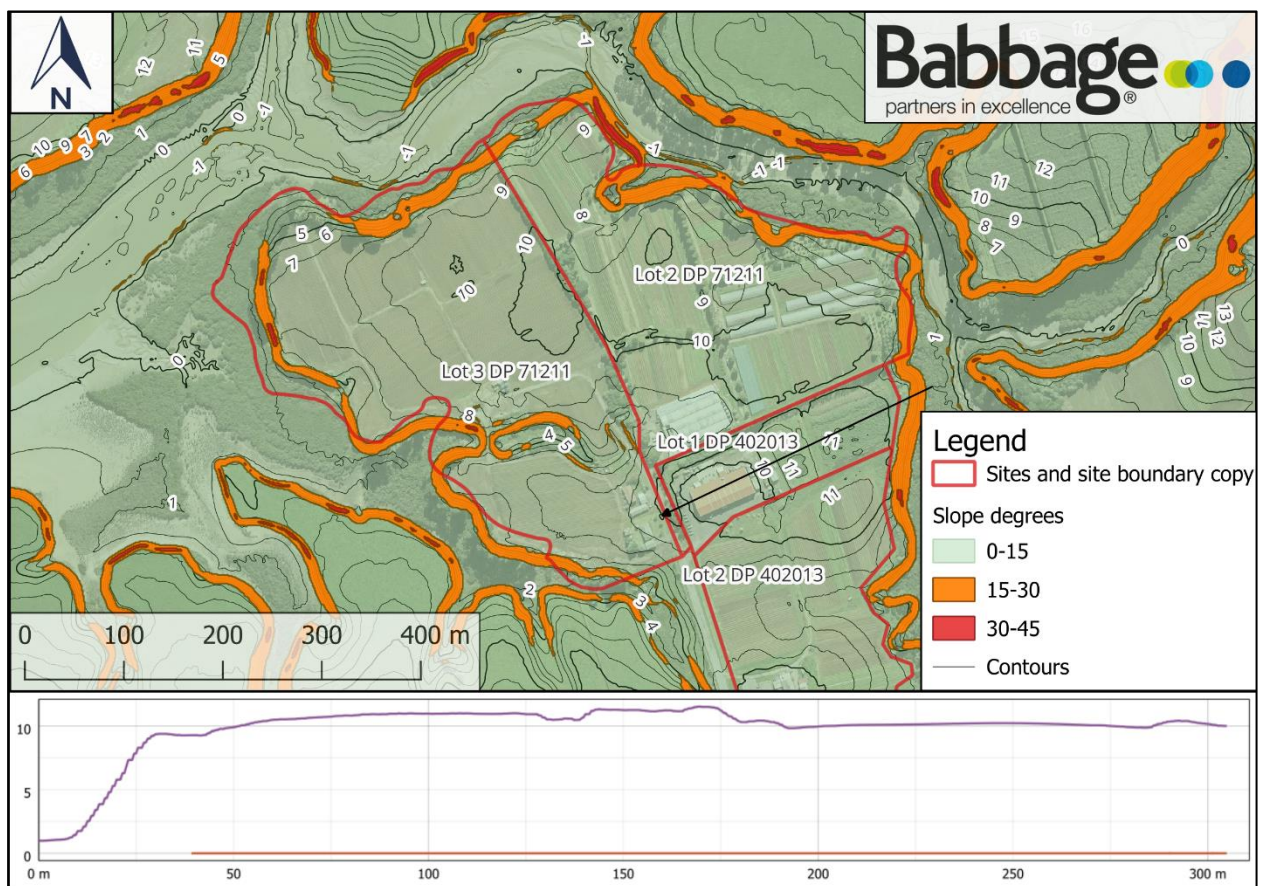
Figure 3. Lot 2 DP 71211 topography.

1.2.3 Lot1DP402013 (5 Campana Road, Wiri, Auckland)

The property extends 250 m inland from the most east shore and borders Campana Road on the west side of the lot. The shoreline of the property borders the Waokauri Creek and dense mangrove vegetation, which extends from the edge of the property into the creek by 60 to 80 m. The lot is situated north of Puhinui Road (part of SH20B) and to the right of Campana Road.

Covering 2 ha, the main body of the property lies at an elevation of 9 to 12 m above sea level. The shoreline area features gentle to moderately steep slopes of 15° to 30°, with the main part of the lot predominantly flat with gentle slopes of 0° to 5°. The property and the surrounding lots are used for agriculture and glasshouses.

The topography of the site can be seen in Figure 4.



Note: the black arrow indicates the direction of the cross-section; the blue line in the plot area is indicating site area.

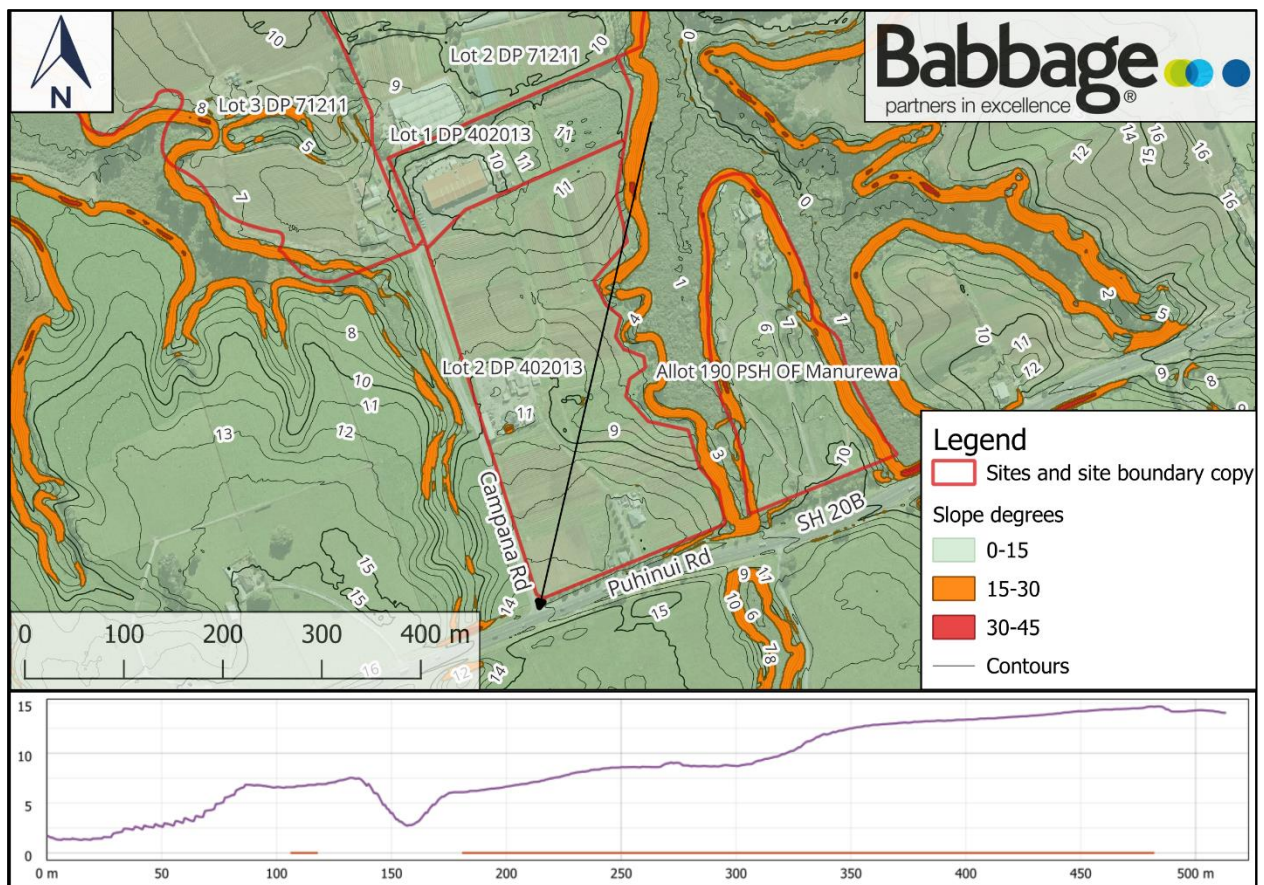
Figure 4. Lot 1 DP 402013 topography.

1.2.4 Lot2DP402013 (485 Puhinui Road, Wiri, Auckland)

The property extends 200 m inland from the most east border and borders Campana Road on the right side of the road. The shoreline on the east of the property borders Waokauri Creek and dense mangrove vegetation, which extends from the edge of the property into the creek by 60 to 100 m. The lot borders Puhinui Road (part of SH20B) at the southern boundary and Campana Road to the western boundary.

Covering 7.16 ha, the main body of the property lies at an elevation of 5 to 15 m above sea level. The shoreline area features gentle to moderately steep slopes of 15 ° to 30° with localised area of steep slope of 30 ° to 45 °, while the main part of the lot is predominantly flat with gentle slopes of 0 ° to 15 °. The property and the surrounding lots are used for agriculture and glasshouses.

The topography of the site can be seen in Figure 5.



Note: the black arrow indicates the direction of the cross-section; the green line in the plot area is indicating site area.

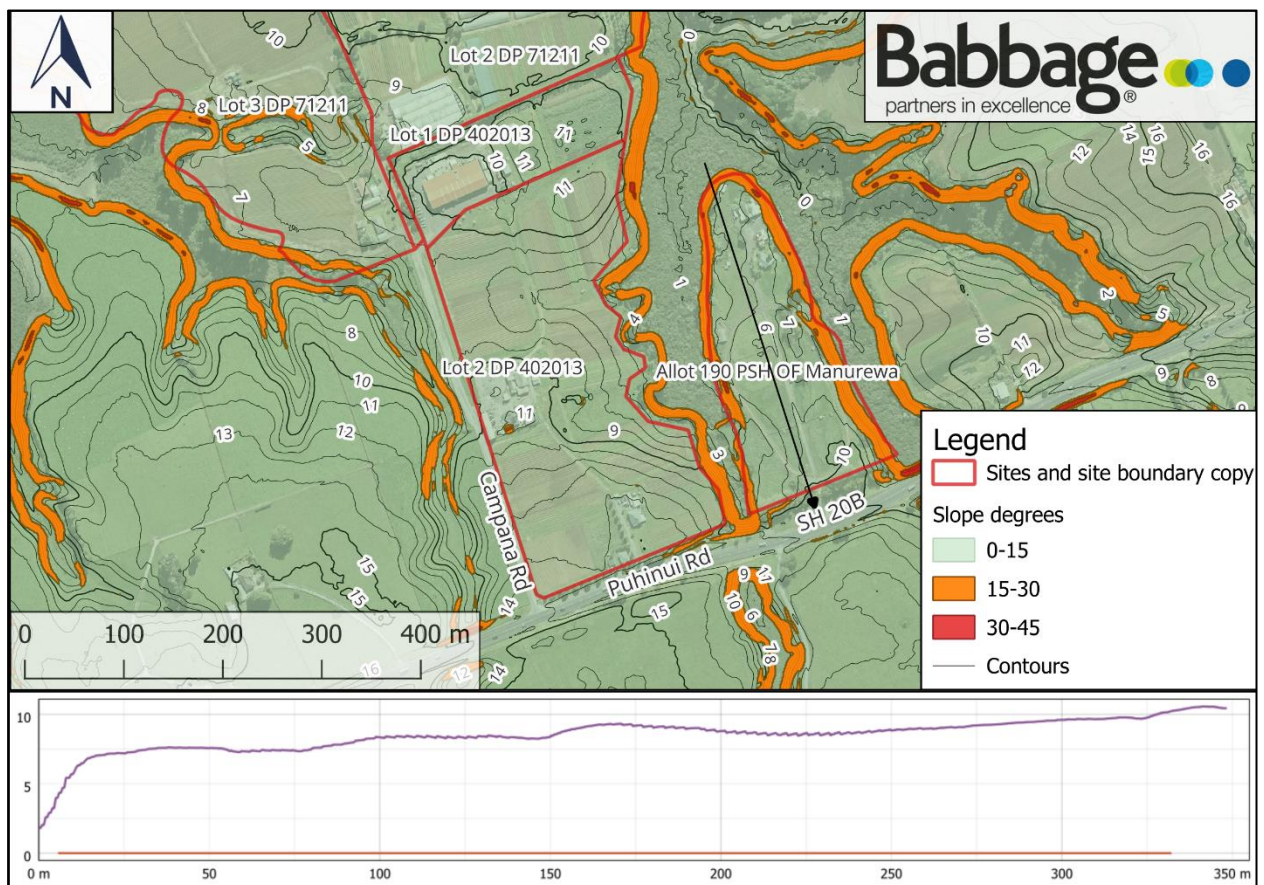
Figure 5. Lot 2 DP 402013 topography.

1.2.5 Allot190PSF OF Manurewa (467 Puhinui Road, Wiri, Auckland)

The property extends 330 m inland from its northern border and borders Puhinui Road on the southern lot boundary. The shoreline surrounds the property from west to north to east, edging Waokauri Creek and dense mangrove vegetation, which extends into the creek by 60 to 70 meters.

The lot covers 3.44 ha with the main body of the property lying at an elevation of 4.5 to 10.3 m above sea level. The shoreline area features gentle to moderately steep slopes of 15 ° to 30° with localised areas of steep slopes of 30 ° to 45 °, while the main part of the lot is predominantly flat with gentle slopes of 0° to 3°. The property and the surrounding lots are used for agriculture and glasshouses.

The topography of the site can be seen in the Figure 6.



Note: the black arrow indicates the direction of the cross-section; the black line in the plot area is indicating site area.

Figure 6. Allot190PSF OF Manurewa topography.

1.3 Historic Shoreline Change

A desktop assessment of aerial imagery suggests a low energy environment, with heavy vegetation growth observed around the Site. An analysis of historical aerial imagery from AC Geomaps and Retrolens² (1972 - 2016) reveals shoreline changes as can be seen in Figure 7.

Most of the shoreline changes have been caused by the growth of mangrove forests at the toe of the cliff and other stabilising vegetation growing on the slopes. This results in the movement of the shoreline outward by 10-150 meters.

According to Roberts, R., N Carpenter and P Klinac (2020), the cliff toe erosion for the area of Manukau Harbour is estimated at 10 – 15 meters per century (0.12m/yr) as shown in Figure 8.

This estimate is not in line with the observations made from historical aerial imagery and does not take into account the vegetation and the coastal setting of the Site.

Based on the historical aerial photos, no significant cliff toe movement/erosion was observed.

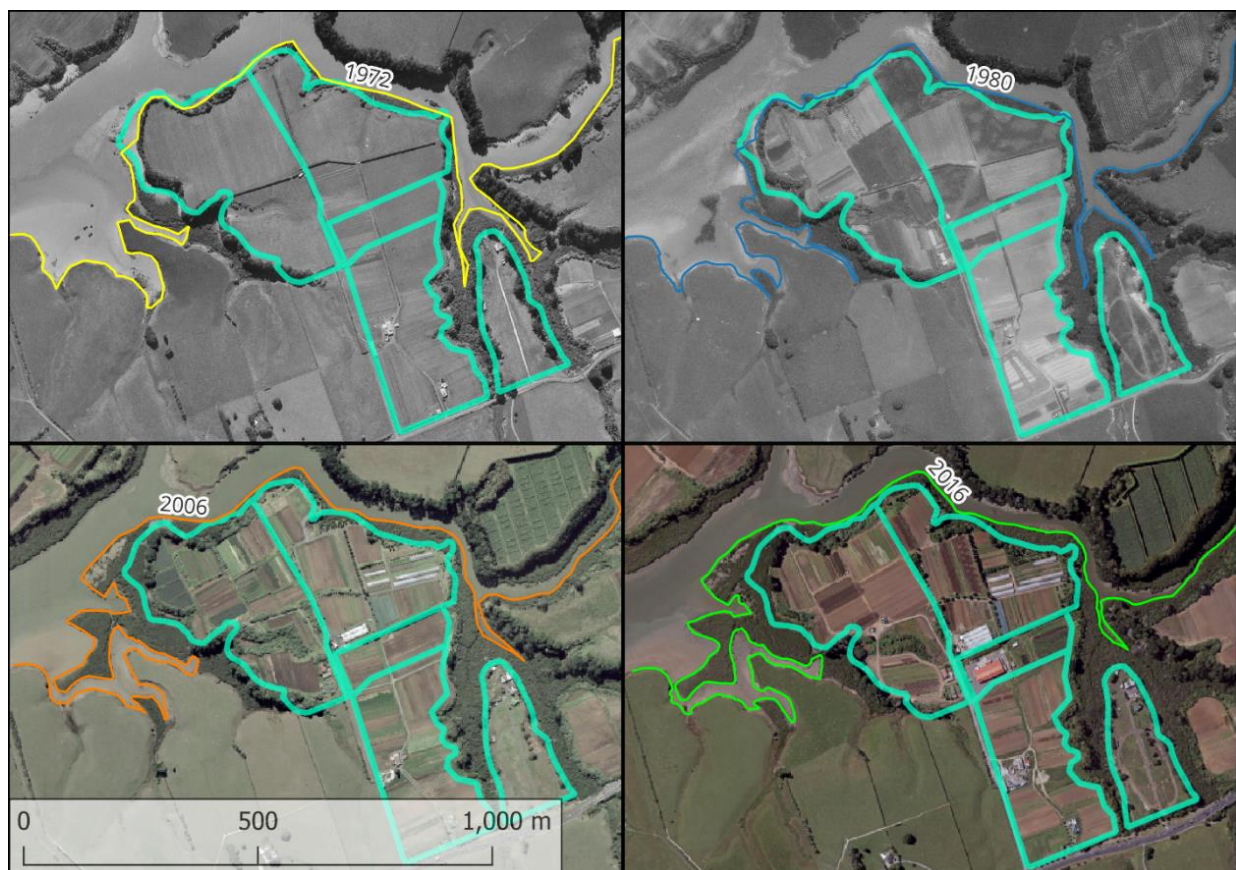


Figure 7. Historical aerial images from 1972, 1980, 2006 and 2015-2016 (AC Geomaps).

² Retrolens Aerial Photography, sourced from <http://retrolens.nz> and licensed by LINZ CC-BY 3.0.

1.3.1 Accretion calculations for the Site

West Part of the Site (Lot 3 DP 71211)

From 1972 to 2016 (44 years), the western part of Lot 3 DP 71211 has experienced significant shoreline movement due to accretion. The shoreline has moved by approximately 7 to 9 meters. In certain localised areas of the lot, accretion has been as much as 150 meters.

Rate of Movement:

- General Accretion: $(7\text{m to }9\text{m})/44\text{years} \approx 0.16\text{m/year} - 0.20\text{m/year}$
- Localised Accretion: $150/44\text{years} \approx 3.41\text{m/year}$

Thus, general accretion for the western part of the Site would be **0.18 m/year** and localised accretion of **3.41 m/year**.

North-Western Border (Lot 3 DP 71211)

The north-western border of Lot 3 DP 71211 has also seen considerable accretion, with the shoreline movement between 30 to 60 meters.

Rate of Movement:

- $(30\text{m to }60\text{m})/44\text{years} \approx 0.68\text{m/year} - 1.36\text{m/year}$

Thus, general accretion for the western part of the lot would be **1.02 m/year**.

Northern Border (Lot 3 DP 71211 and Lot 2 DP 71211)

The northern border shared by Lot 3 DP 71211 and Lot 2 DP 71211 has experienced accretion of 10 to 15 meters.

Rate of Movement:

- $(10\text{m to }15\text{m})/44\text{years} \approx 0.23\text{m/year} - 0.34\text{m/year}$

Thus, general accretion for the western part of the lot would be **0.28 m/year**.

Eastern Part (Allot 190 PSH OF Manurewa, Lot 2 DP 402013, Lot 1 DP 402013, and Lot 2 DP 71211)

In the eastern part of the Site, including Allot 190 PSH OF Manurewa, Lot 2 DP 402013, Lot 1 DP 402013, and Lot 2 DP 71211, the shoreline has moved by 5 to 30 meters.

Rate of Movement:

- $(5\text{m to }30\text{m})/44\text{years} \approx 0.11\text{m/year} - 0.68\text{m/year}$

Thus, general accretion for the western part of the Site would be **0.39 m/year**.

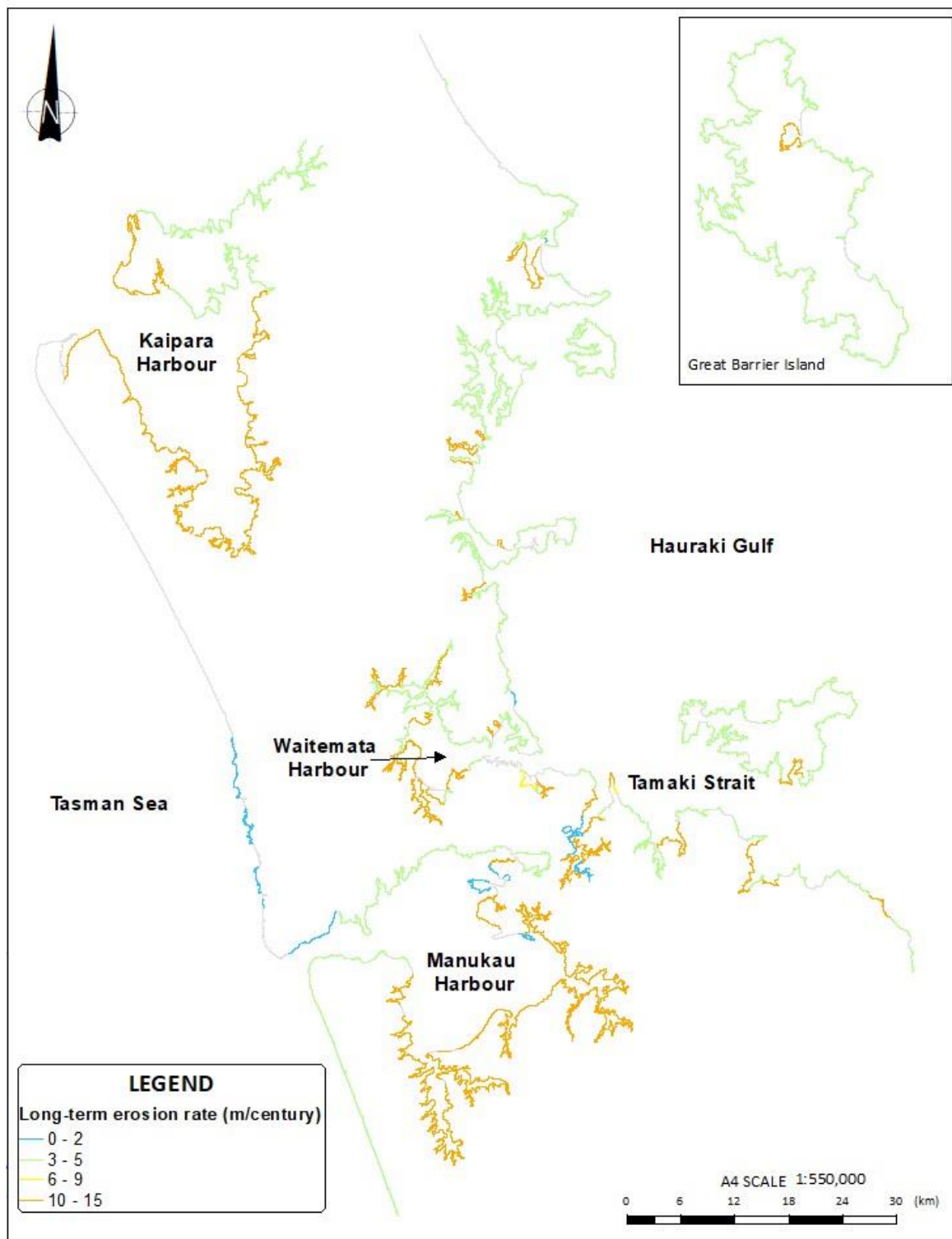


Figure 8. Long-term erosion rates (m/century) for cliffs excluding uncertainty (Roberts et al. 2020)³

³ Roberts, R., N Carpenter and P Klinac (2020). Predicting Auckland's exposure to coastal instability and erosion, Auckland Council, technical report, TR2020/021 (p.204)

2 GEOMORPHIC SETTING

The Geological map GNS (Science, 2020), extract shown in Figure 9, classifies the Site area as situated at the junction between two soil formations:

- Takaanini Formation (previously referred to as Puketoka Formation) consisting of conglomerate, sandstone, ignimbrite, breccia, tephra, peat and lignite of Late Pliocene to Middle Pleistocene River deposits
- the Kerikeri Volcanic Group (part of Auckland Volcanic Field) (AVF) consisting of lithic tuff, comprising comminuted pre-volcanic materials with basaltic fragments, and unconsolidated ash and lapilli deposits.

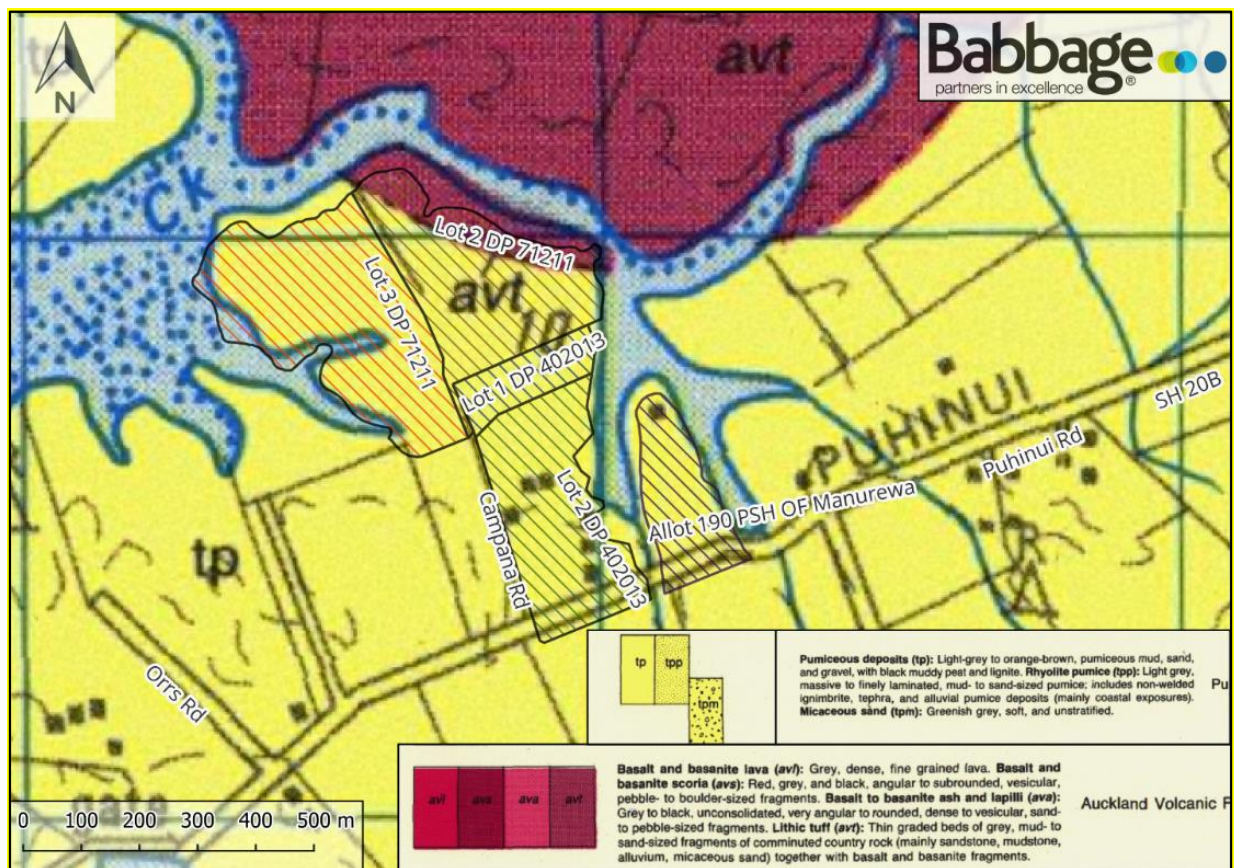


Figure 9. Local geology in the area of the area of interest. Campana road, Wiri, Auckland (GNS, 2022).

In the “Predicting Auckland’s Exposure to Coastal Instability and Erosion” (TR2020/021)⁴, presents a summary of adopted long-term erosion values for lithologies within the Auckland Region. As observed in

⁴ Roberts et al. (2020) for Auckland Council

Table 2, retreat rates (LTR_h) for AVF range are between 2-10 meters per 100 years, or 0.02–0.1 meters per year, with the Geological Strength Index (GSI) estimated as 65 ± 5 ⁵.

The value of 6 meters per 100 years as a weighted average. Based on the information available, values of 0.02 m/yr (minimum), 0.06m/yr (as best estimate) and 0.1m/yr (maximum) will be adopted for the future ASCIE calculations.

Table 2. Summary of adopted LT values per lithology of the Auckland Region (Roberts et al., 2020)

Lithology	LT (m/century) excluding uncertainty
Puketoka Formation	2 to 15
Awhitu Group	3
AVF/CVZ	2 to 10
Waitakere Group	1 to 2
ECBF	1 to 15 (typically 3-6)
Pākiri Formation	1 to 10
Northland Allochthon	4 to 10
Waipapa Group	3 to 5

Note: Extracted from Roberts et al (2020) Table 5.3. Values adopted for calculations are highlighted.

Table 3. Geological rock units Domain assignment

Domain	Sub-domain	Domain description	Spatial description
Auckland Volcanic Field (AVF) and Coromandel Volcanic Zone	N/A	Lava / lava-breccia, andesite, dacite, tuff, ash, lapilli and scoria. The lavas range from moderately strong, to very strong (20 to 250 MPa). GSI values greater than 40	

Note: Extracted from Roberts et al (2020) Table 2.3.

Table 4. Average historical long-term retreat (LTR_h) values based on GSI.

GSI range	Historical LTR_h (m/100yrs)	$LTR_h \times F$ (m/100yrs)
>80	1	1.25
75 $\pm$ 5	2	2.5
65 $\pm$ 5	3	3.75
52.5 $\pm$ 5	4	5
35 $\pm$ 5	5	6.25
<20, soft cliffs	10	12.5

Note: Extracted from Roberts et al (2020) Table 1.3. Values adopted for calculations are highlighted.

⁵ Marinos & Hoek, 2001, and Cai et al., 2004

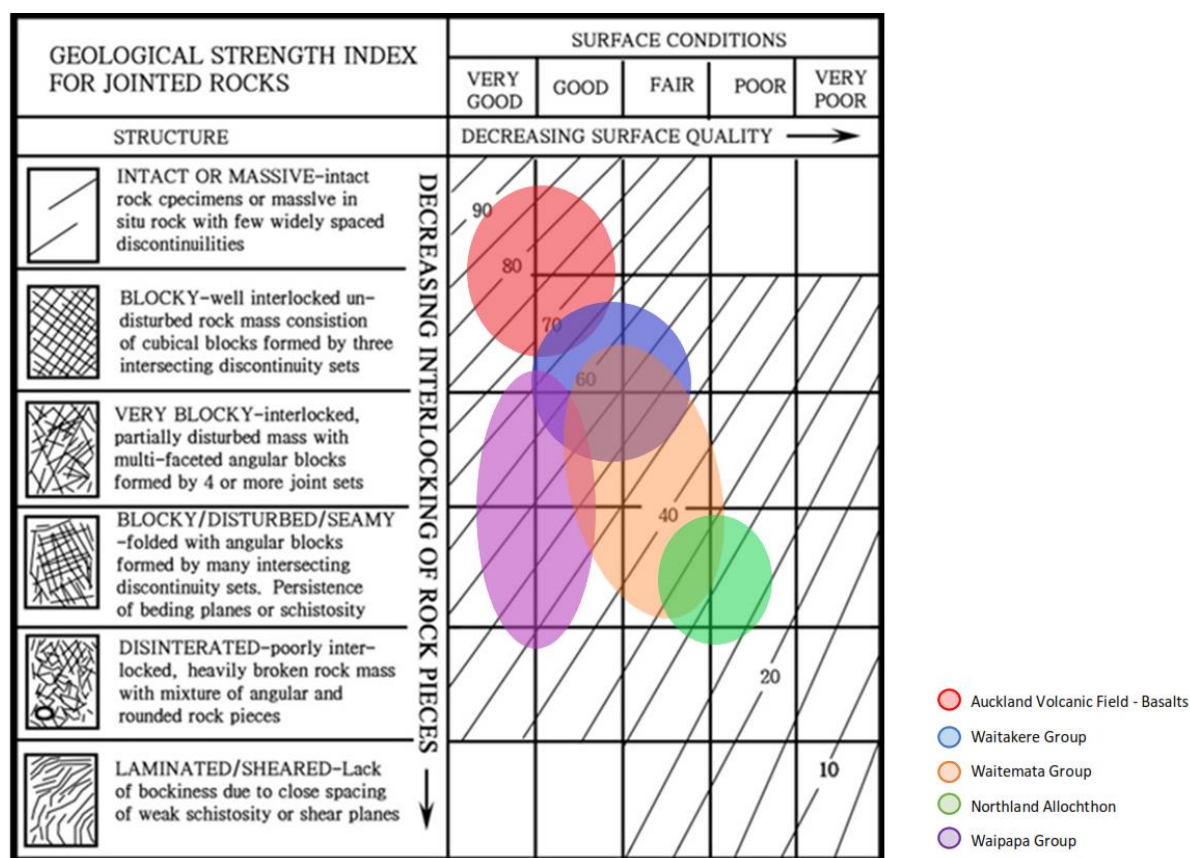


Figure 10. Geological Strength Index (GSI)⁶

Table 5. Geological strength index (GSI), slope angles for determining coastal areas susceptible to erosion.

GSI/Category	Slope angles (°)	
	Possible	Unlikely
Alluvium	26	18
Coastal Sediments	32	22
GSI: 20 ±10	32	22
GSI: 40 ±10	36	26
GSI: 60 ±10	49	36
GSI: 80 ±10	67	45

Note: Extracted from Roberts et al (2020) Table 5.8. Values adopted for calculations are highlighted.

⁶ Adapted from Roberts, R., N Carpenter and P Klinac (2020). Predicting Auckland's exposure to coastal instability and erosion, Auckland Council, technical report, TR2020/021 (p.221)

3 COSTAL PROCESSES

3.1 Tides

The astronomical tidal range (lowest astronomical tide (LAT) to highest astronomical tide (HAT)) in the Auckland Harbour is approximately 3.6 m. The mean spring and neap tidal range are presented in Table 6. Port of Auckland astronomical tidal range (source LINZ, Standard Port Tidal Levels)

Table 6. Port of Auckland astronomical tidal range (source LINZ, Standard Port Tidal Levels)

	MHWS	MHWN	MLWN	MLWS	MSL
To CD (chart datum)	3.3	2.8	1.1	0.5	1.9
To MSL (mean sea level)	1.4	0.9	-0.8	-1.4	0.0

Note: these are astronomical, or predicted tides; several metocean factors such as wind speed and direction, wave height, period and direction, barometric pressure, etc., influence the actual tidal level at a site at any one time.

Linear interpolation was used to interpolate tide levels to all vertices along the guiding coastline using the known levels for points that were nearest to tide output locations. Near the site of interest, the tidal elevation was interpolated from Figure 11 and estimated to be between 2.01-2.05 m RL (AVD-46). Therefore, for the purpose of this assessment, a MHWSC of 2.03 m RL (AVD-46) is adapted as the MHWS for the Site.

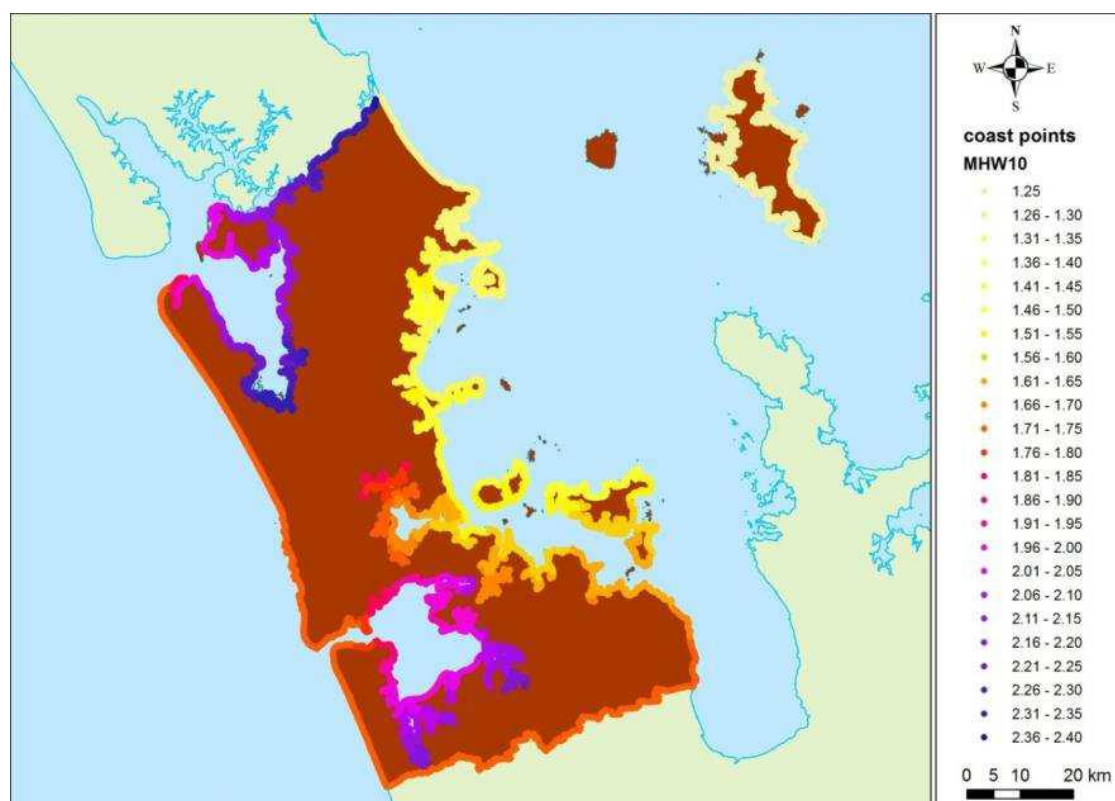


Figure 11. MHW10 tide elevation interpolated onto vertices along the guiding coastline.⁷

⁷ Stephens & Wadhwa (2012)

3.2 Storm Tides

Storm tide is a combination of components that represent a major portion of extreme water levels. It is defined as the sea-level peak reached during a storm event, resulting from a combination of the monthly mean sea-level anomaly, tide level (usually Mean High Water Springs, MHWS), and storm surge.

NIWA (2013; TR2016/07) undertook a comprehensive study to predict storm tide levels for the Auckland Region, including the Site.

Mean sea-level offsets to AVD-46 for Manukau Harbour is +0.22 m.

The 1 in 100-year return period storm tide at site #47 was determined to be 2.92 meters (relative to AVD-46), including a +0.22 meter offset for baseline mean sea level (present-day estimate) Table 7 and Figure 13.

Table 7. Extreme sea-level in the Manukau Harbour.⁸

Site	Easting (NZTM)	AEP:	0.39	0.18	0.1	0.05	0.02	0.01	0.005
		ARI: Northing (NZTM)	2 yr	5 yr	10 yr	20 yr	50 yr	100 yr	200 yr
47	1761037	5903271	2.55	2.61	2.66	2.72	2.83	2.92	3.02

Note: Elevations are relative to AVD-46 including +0.22 m offset for baseline mean sea level (present-day estimate). Elevations calculated from simulated data.

3.3 Sea Level Rise

Sea level rise projections are crucial for planning projects that consider future hazards.

The NZ SeaRise program offers various scenarios for this purpose. For long-term planning with adaptation strategies, such as land-use changes or redevelopment, a dynamic adaptive pathways planning approach is recommended. This approach utilizes a range of "medium confidence" sea level rise scenarios, including Vertical Land Movement (VLM) data, extending out to the year 2130.

However, for situations requiring immediate decisions and prioritizing risk avoidance, a more conservative approach is advisable. In such cases, the "medium confidence" scenario with a higher projection, like the SSP5-8.5 H+ (83rd percentile of SSP5-8.5 or p83) out to 2130, should be used.

The location closest to the site has a VLM rate of -2.6 mm/year, Figure 12; which is adopted as the VLM rate for the Site. Historical sea level rise (s_h) is estimated as 1.7 ± 0.1 mm/year (Hanna & Bell, 2012) and will be used in our ASCIE calculations. To determine the future sea level rise (s_f), the value from RCP8.5H+ was adopted, Figure 13.

⁸ Stephens, S., Wadhwa, S and Tuckey, B (2016). Coastal inundation by storm-tides and waves in the Auckland region. Prepared by the National Institute for Water and Atmospheric Research, NIWA and DHI Ltd for Auckland Council. Auckland Council technical report, TR2016/017

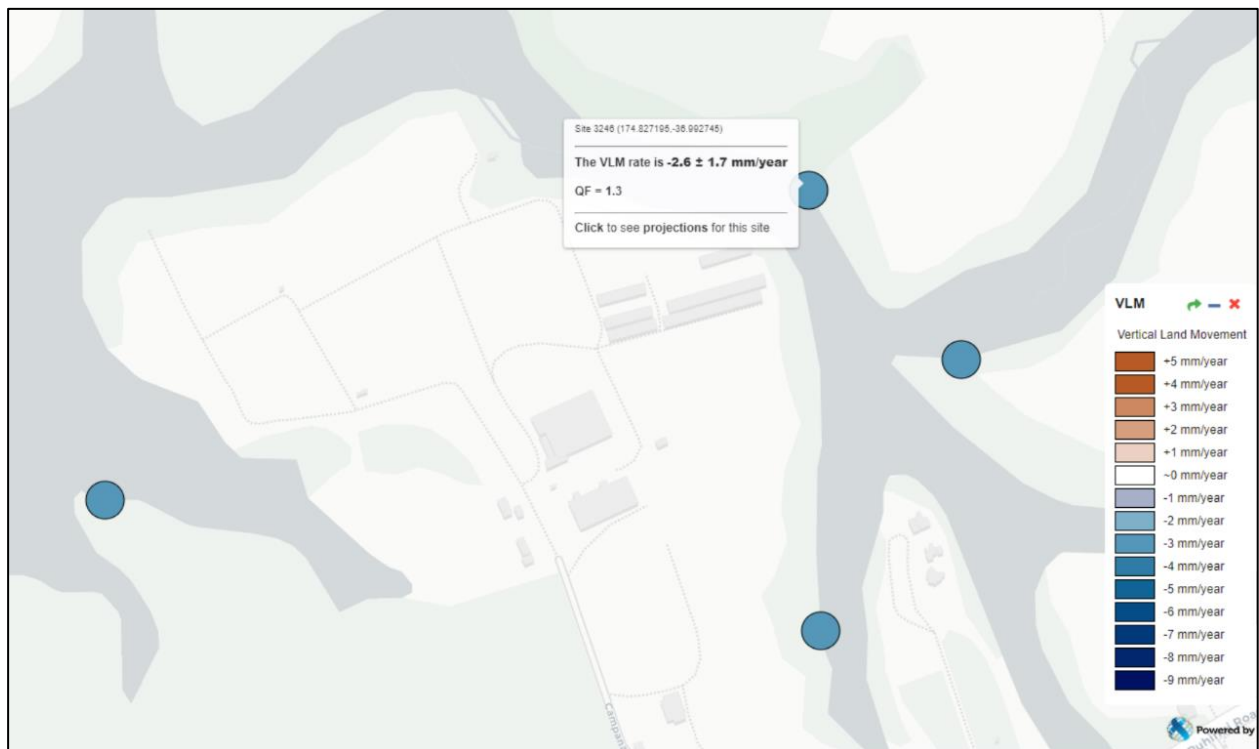


Figure 12. Vertical Land Movement rate -2.6 mm/year near the site.

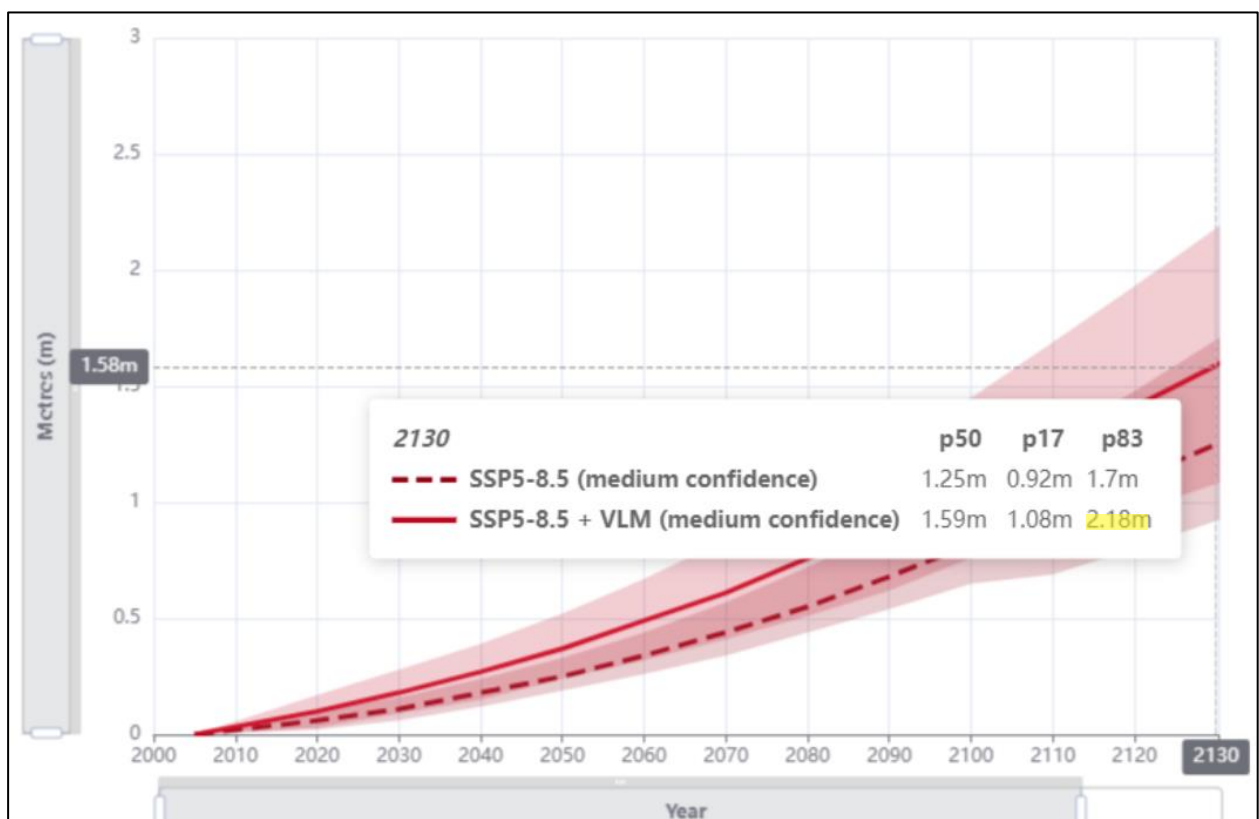


Figure 13. Sea level rise projection to 2130 (SSP-8.5 H)

3.4 Wave Set-up

The SSP5-8.5 (medium confidence) SLR + VLM (p83) projection to the 2130 planning horizon is 2.18 meters, combined with 1 in 100/yr storm tide prediction of 2.92 m (Table 7), we can assume a maximum inundation potential of 5.1 m for the Site Figure 14. The inundation level considering a 1 in 100-year return period storm tide at the Site for the present day and for a 1 m and 2 m sea level rise (SLR) projection can be seen in the AC Geomaps coastal inundation map (Figure 15).

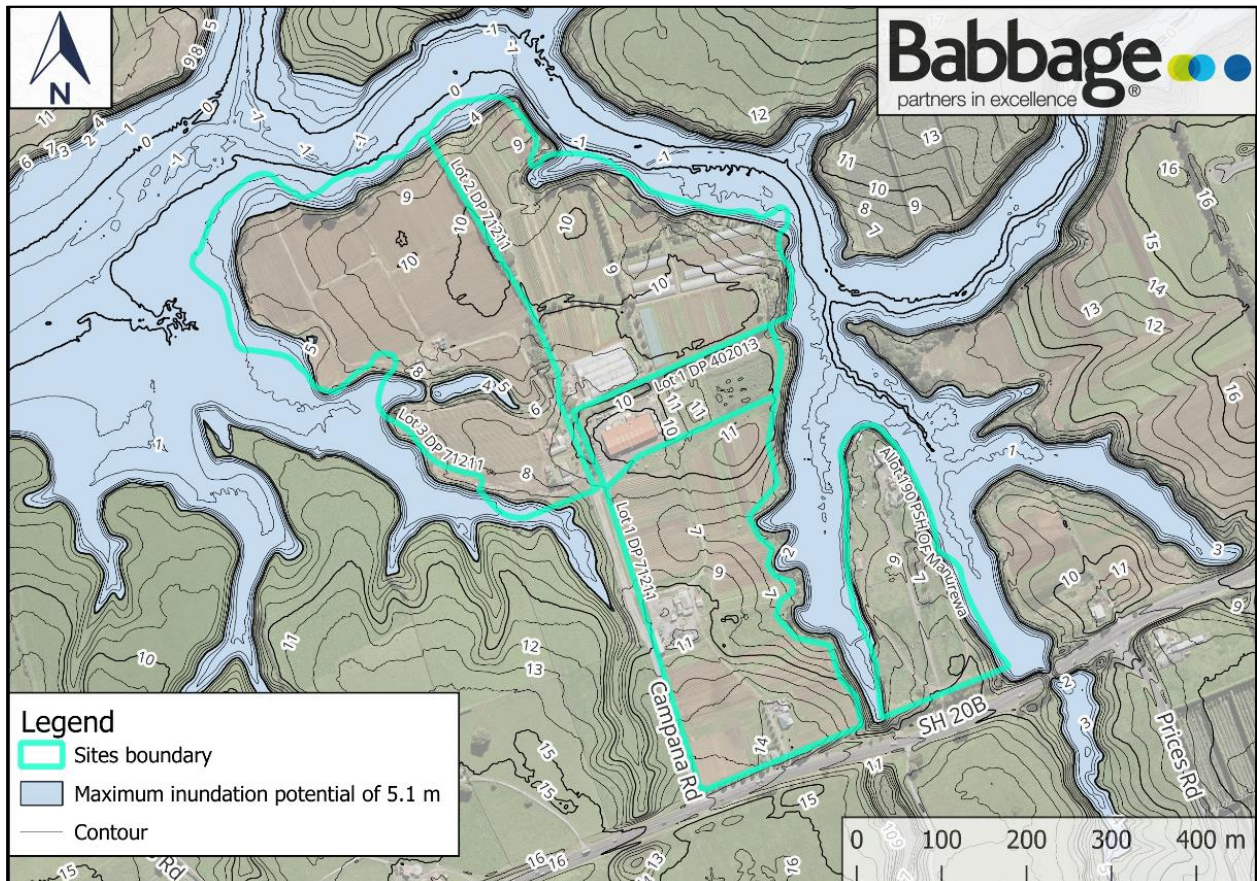


Figure 14. Maximum Inundation Potential of 5.1 meters



Figure 15. AC Geomaps Plan illustrating the Coastal Inundation (1% AEP) and (ARI).

4 FUTURE ASCIE CALCULATIONS

The Areas Susceptible to Coastal Instability and Erosion (ASCIE) lines identified in (Auckland Council Geomaps) Figure 16 indicate a potential for coastal instability and erosion hazards affecting most lots on the Site. Future erosion predictions for the 2130 RCP8.5+ scenario suggests ~20m of land loss (approximately measured back from current slope crests). Values from Geotechnical Investigation by Babbage Consultants⁹ and the values relevant to the local geology were adopted and used for the further calculation of the Site specific ASCIE.

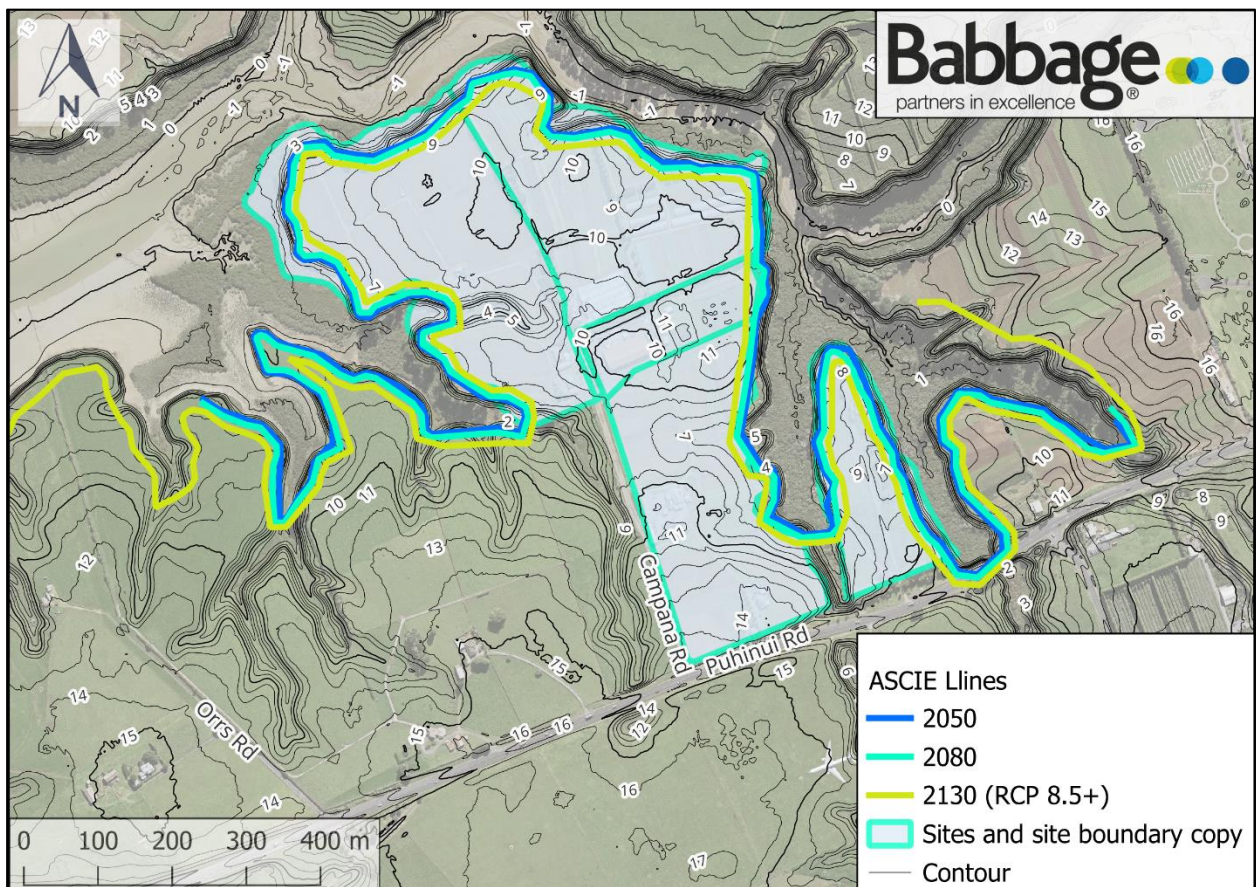


Figure 16. AC Geomaps (adapted) ASCIE indication lines

For the Site, no erosion has been observed, though shoreline accretion of 0.18 m/yr to 3.41 m/yr was estimated by georeferencing historical images Figure 7.

The minimum adopted consolidated shoreline response factor to SLR for Auckland geological units for AVF/CVZ lithology, the rate of **0.01** m/yr (m -value) was adopted and applied to the future ASCIE calculations (Roberts et al., 2020). Values for the cliff (hc) elevation were extrapolated from the Digital

⁹ Babbage 2024. 11 Campana Road, Wiri, Auckland Geotechnical Assessment Report. A report prepared for Campana Landowners Consortium c/ Capstone Projects Limited by Babbage Consultants Limited. July 2024.

Elevation Model (DEM)¹⁰ for the calculation of ASCIE and are considered as 5 m.

For calculating of AVF/CVZ averages, values from (Roberts, R., (2020)) were adopted and can be found in Table 8. The future ASCIE cliff retreat calculations for Site are presented in Appendix A. Based on the values extrapolated from local DEM, the elevation (h_c) of the soil layer was estimated as 5 m. The range of 15°, 30°, 45° were assumed as the most common cliff slopes degrees (α_s) around the Site. To provide a range for the cliff erosion, the weighted average (best estimate), minimum and maximum values were used in calculating future ASCIE. The results can be found in Appendix A.

Table 8. Analysed slope profile (rock, soil and combined) for each lithology.

Geotechnical Domain	Rock (°)				Soil (°)				Rock/Soil ratio	Composite (°)			
	Mean height (m)	50%	10%	1%	Mean height (m)	50%	10%	1%		Mean height (m)	50%	10%	1%
Tauranga Group / Puketoka Formation					15	48	34	31		13	48	34	31
Awhitu Group	50	39	35	31	15	21	18	15	77%	53	38	33	30
Auckland Volcanic Field / Coromandel sub-group (East)	30	42	26	15	18	36	22	15	63%	37	42	24	15
Waitakere / Volcanic (West)	68	66	40	29	47	52	33	26	59%	48	63	38	28
Waitemata - ECBF	20	51	27	23	7	26	14	11	74%	24	48	27	24
Waitemata - Pakiri Formation	28	54	28	25	16	40	36	25	64%	29	54	28	25
Northland Allochthon	7	26	14	9	-	-	-	-		-	26	14	9
Waipapa Group	19	42	30	16	10	25	16	13	67%	20	42	31	16

Note: Extracted from Roberts et al (2020) Table 5.6. Values adopted for calculations are highlighted.

Based on the historical aerial photography shoreline change investigation, the average accretion rate in the site area ranges between 0.18 m/year and 3.41 m/year. Observations of accretion, combined with the insignificant cliff slope erosion rates concluded from historical aerial photography between 1972 and 2016, suggest that the future ASCIE values provided by Auckland City Council and calculated for the area are very conservative for the site.

In summary, based on the above calculations and the information provided by the Auckland City Council, the percentages of the area affected by cliff erosion (not considering stabilizing effects from vegetation and coastal setting of the Site) are mentioned in the summary

¹⁰ Toitū Te Whenua Land Information New Zealand. (2018). *Auckland North LiDAR 1m DEM (2016-2018)* [Data set]. Retrieved from <https://data.linz.govt.nz/layer/106410-auckland-north-lidar-1m-dem-2016-2018/>

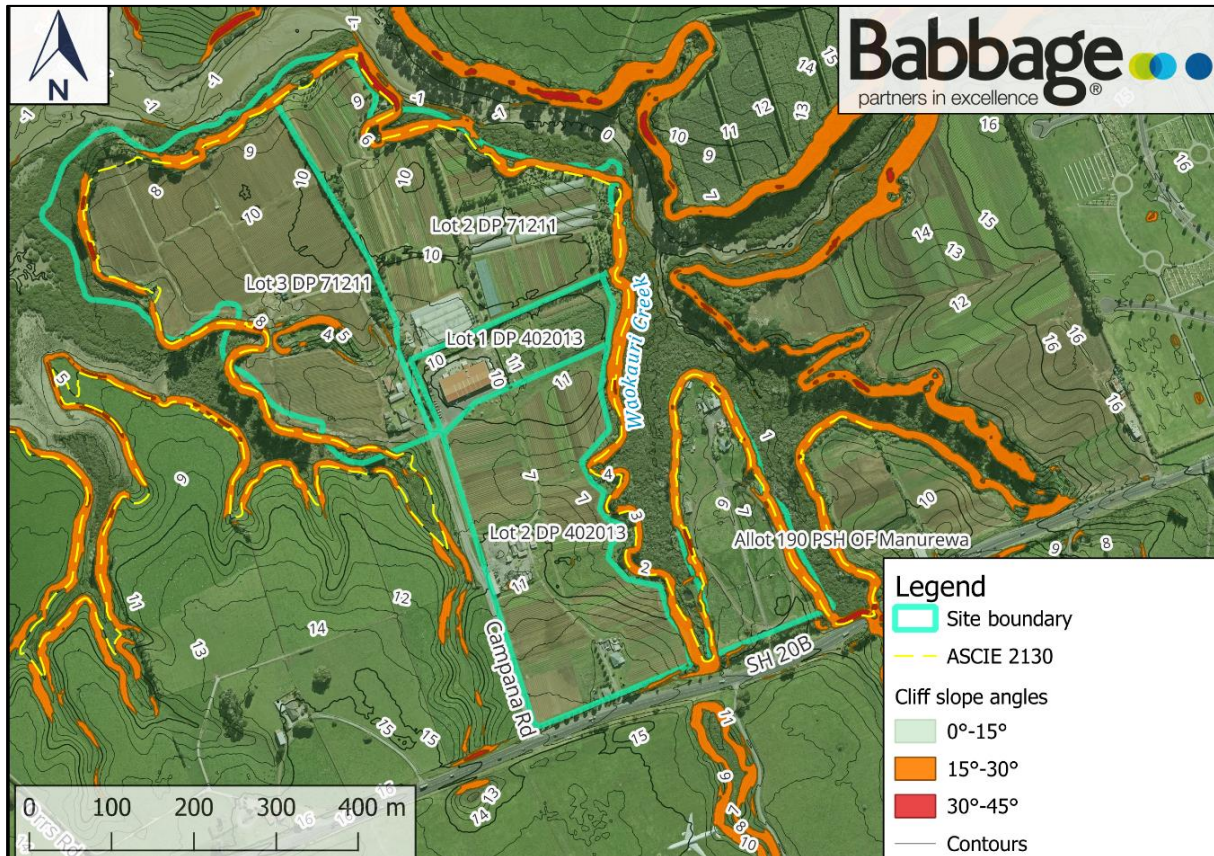


Figure 17. ASCIE 2130 based on the Site calculations and AVF/CVZ averages.

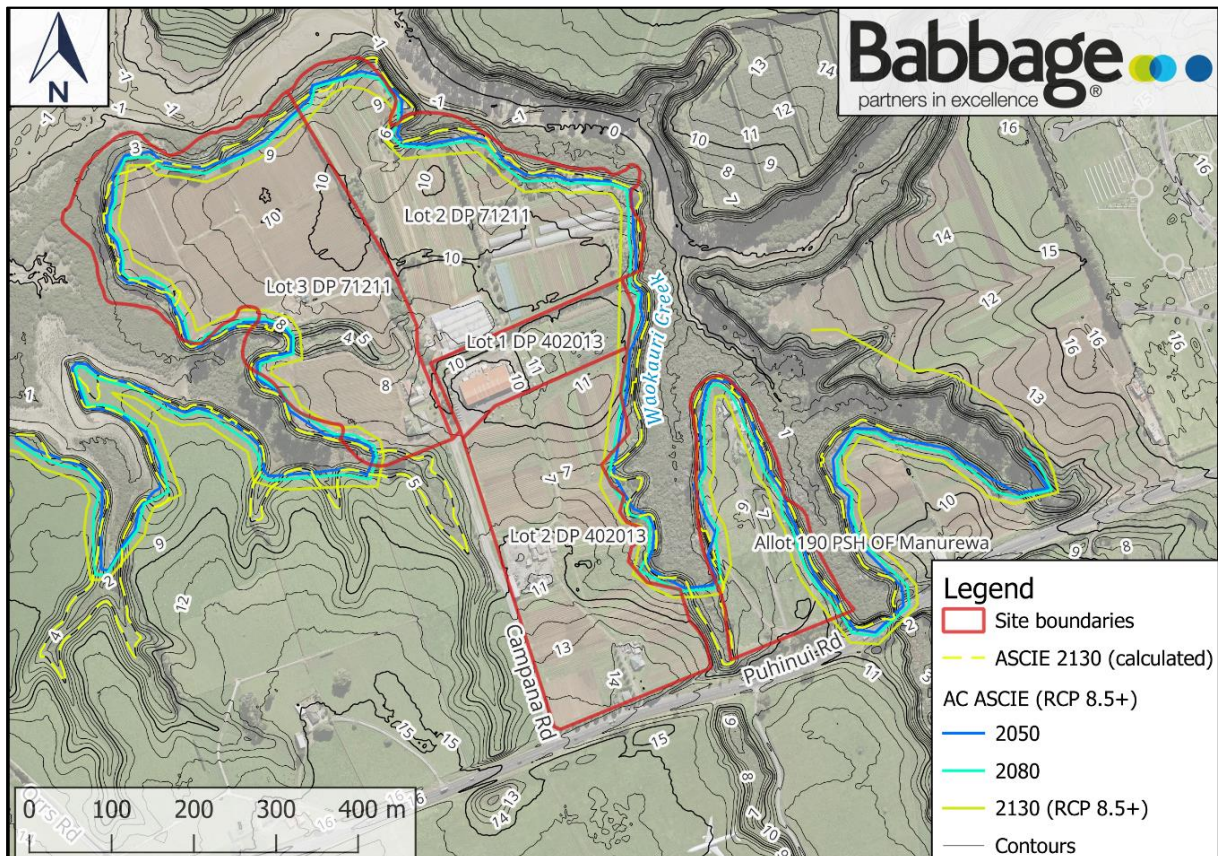


Figure 18. Auckland Council ASCIE 2130 compared to Calculated ASCIE 2130.

5 CONCLUSION AND RECOMMENDATIONS

Based on the Coastal Hazard and Erosion Assessment for Campana Road, the best estimate of future ASCIE relative to the 5 meter cliff slope elevation, is 0-3.6 meters (site specific) and 2.8-16.6 meters (based on AVF/CVZ lithology information).

Table 9. Summary of the affected areas.

Address	Legal description	Area (ha)	ASCIE 2130 (ha)	%
11 Campana Road	Lot 2 DP 71211	8.1	0.7	8.9
467 Puhinui Road	Allot 190 PSH OF Manurewa	3.4	0.3	7.6
485 Puhinui Road	Lot 2 DP402013	7.2	0.02	0.3
5 Campana Road	Lot 1 DP 402013	2.0	0.0	0.0
10 Campana Road	Lot 3 DP 71211	9.9	0.9	9.4

The sections of interest are:

- Lot3DP71211 due to relatively high percentage of the lot affected by predicted erosion and maximum coastal inundation.
- Lot2DP71211 due to relatively high percentage of the lot affected by predicted erosion
- Allot 190 PSH OF Manurewa due to relatively high percentage of the lot affected by predicted erosion

It must be noted that most of the area susceptible to coastal erosion and inundation at the Site are areas of the respective lots that are below the cliff. Furthermore, these calculations are highly conservative, as they do not consider the historical accretion rate (determined from historical aerial imagery), the low-energy environment due to the coastal setting deeper into the harbour, and the presence of established stabilizing vegetation on and below the cliff slope.

For the 2130 planning horizon, under the SSP5-8.5+ (medium confidence) SLR + VLM (p83) projection, a sea level rise of 2.18 meters is anticipated. Combined with a predicted storm tide of 2.92 meters, this results in a maximum inundation potential of 5.1 meters. However, given that the cliff crest elevation is 5 meters, the potential inundation does not pose high risk to the Site.

The 20 meters Open Space setback zone (from the CMA) was proposed to account for the effects of the ASCIE 8.5+ prior the CHEA. Based on the calculations above, 20 m setback will be sufficient to mitigate the predicted effects of ASCIE8.5+ as shown in Figure 19.

Provided that set-back of at least 20m from MHWS of 3 meters is maintained (or from the CMA), the policies as set out in E36 (Natural Hazards and Flooding), E38 (subdivision-urban), and 106 of the RMA (1991) (Subdivision Consents) are considered to be satisfied. Consequently, the coastal inundation and

erosion hazards are likely to have little to no impact to future buildings over a planning horizon to the year 2130 (as per MfE, 2022¹¹).

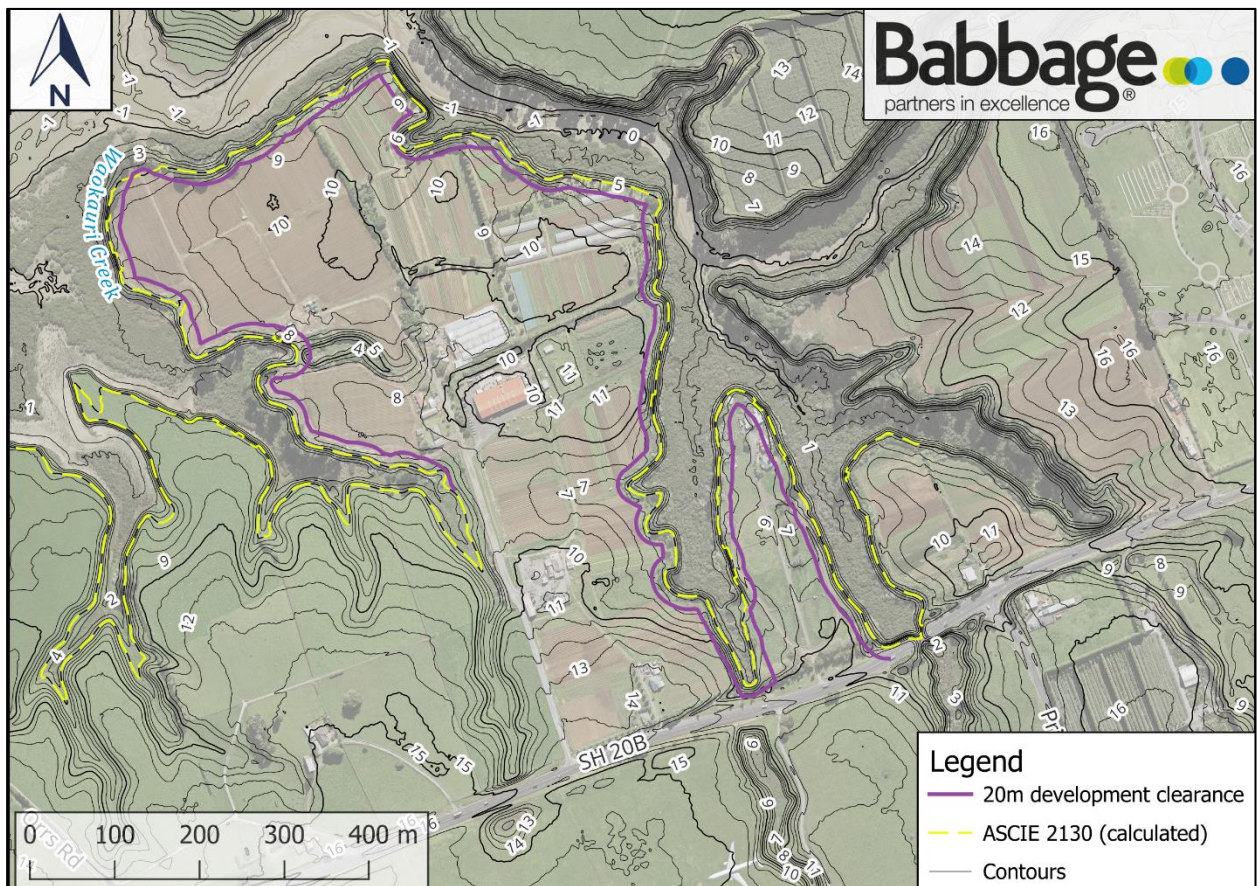


Figure 19. Setback boarder to mitigate the effects of the ASCIE 2130.

¹¹ Ministry for the Environment (MfE). (2022). Interim guidance on the use of new sea-level rise projections. Compiled by R.G. Bell with input and reviews by J. Lawrence, T. Naish, R. Levy and, S. Allan and reviewed by the Ministry for the Environment and a few local government practitioners.

REFERENCES

Books

1. Stephens, S., & Wadhwa, S. (2012). Development of an updated Coastal Marine Area boundary for the Auckland Region. National Institute of Water & Atmospheric Research Ltd (HAM2012-111). Hamilton, New Zealand.
2. Stephens, S., Wadhwa, S and Tuckey, B (2016). Coastal inundation by storm-tides and waves in the Auckland region. Prepared by the National Institute for Water and Atmospheric Research, NIWA and DHI Ltd for Auckland Council. Auckland Council technical report, TR2016/017
3. Roberts, R., N Carpenter and P Klinac (2020). Predicting Auckland's exposure to coastal instability and erosion, Auckland Council, technical report, TR2020/021
4. Riley. (2015, February 2). Geotechnical Investigation Proposed Residential Development 259 Beach Road, Campbells Bay. 01281/1-A. Unpublished report prepared for Mr Felton, PO Box 653, Orewa, Auckland 0946.

Websites

1. www.searise.takiwa.co
2. www.geomapspublic.aucklandcouncil.govt.nz
3. <https://www.linz.govt.nz/guidance/marine-information/tide-prediction-guidance/standard-port-tidal-levels>

APPLICABILITY AND LIMITATIONS

Restrictions of Intended Purpose

This report has been prepared solely for the benefit of Campana Landowners Consortium c/ Capstone Projects as our client with respect to the brief. The reliance by other parties on the information or opinions contained in the report shall, without our prior review and agreement in writing, be at such party's sole risk.

Legal Interpretation

Opinions and judgements expressed herein are based on our understanding and interpretation of current regulatory standards, and should not be construed as legal opinions. Where opinions or judgements are to be relied on they should be independently verified with appropriate legal advice.

Maps and Images

All maps, plans, and figures included in this report are indicative only and are not to be used or interpreted as engineering drafts. Do not scale any of the maps, plans or figures in this report. Any information shown here on maps, plans and figures should be independently verified on site before taking any action. Sources for map and plan compositions include LINZ Data and Map Services and local council GIS services. For further details regarding any maps, plans or figures in this report, please contact Babbage Consultants Limited.

Reliability of Investigation

Babbage has performed the services for this project in accordance with the standard agreement for consulting services and current professional standards for environmental site assessment. No guarantees are either expressed or implied.

Recommendations and opinions in this report are based on discrete sampling data. The nature and continuity of matrix sampled away from the sampling points are inferred and it must be appreciated that actual conditions could vary from the assumed model.

There is no investigation that is thorough enough to preclude the presence of materials at the site that presently, or in the future, may be considered hazardous. Because regulatory evaluation criteria are constantly changing, concentrations of contaminants present and considered to be acceptable may in the future become subject to different regulatory standards, which cause them to become unacceptable and require further remediation for this site to be suitable for the existing or proposed land use activities.

Appendix A

Calculation Sheets

Area Susceptible to Coastal Instability and Erosion



Babbage Consultants Limited
Level 4, 68 Beach Road, Auckland 1010
PO Box 2027, Shortland Street
Auckland 1140, New Zealand
T 09 379 9980 F 09 377 1170
E admin@babbage.co.nz www.babbage.co.nz

Project No:	67471		
Project:	Campana Road, Plan Change		
Calc:	SE	Date:	16/08/2024
Check:		Date:	

Details: Calculation based on the Local geology (composite) and the typical slope angles and cliff heights.

The areas susceptible to coastal instability and erosion has been calculated as per Auckland Council Technical Report 2020/021.

Values used for the calculation of Future ASCIE for Campana Road, Wiri, Auckland.

Approximate Existing Cliff Profile

					Existing	"Typical slope" based on local Geology
Cliff height	m	5	Cliff face rock slope (ar):	°	5	42
Cliff face rock height (hcr):	m	5	Cliff face soil slope (as):	°	0	36
Cliff face soil height (hcs):	m	0	Cliff face rock slope (ar):	rad	0.09	0.73
Years (T)		106	Cliff face soil slope (as):	rad	0.00	0.63
Typical Height	m	37				

Toe Erosion

Geological Unit	AVF		
Exposure (environment energy)	Low		
Long-term historical retreat LTRH	0.060	m/yr	average of min and max (Robert, R., (2020)) Appendix D cp 1.1 Tbl 1.3
Geological Stability Index GSI ±5	70	-	(Robert, R., (2020)) Appendix D cp 5.2
Consolidated response factor (m)	0.1	-	Based on Table 5.6 for Auckland geological units and exposures
Historic toe erosion	0.18-1.02	m/yr	Based on review of public information (e.g. aerial photographs, site records, property file information).
Historic sea level rise (sh)	0.0017	m/yr	(Robert, R., (2020)) cp 2.7.3
Theoretical sea level rise (sf)	0.0206	m/yr	((RCP8.5H+) + T)
Theoretical toe erosion (LTf)	0.077	m/yr	(Robert, R., (2020)) cp 5.5.2 Eq. 5.3
Theor. SLR (RCP8.5H+)	2.18	m	www.searise.takiwa.co (year 2130)

Future ASCIE

Cliff Toe Erosion	0.5	m	Cliff Toe Erosion = (LTRH+LTf)*T (Equation 1-2)
Current ASCIE (from existing toe)	-1.48	m	Current ASCIE = (h _{cr} /tanα _r) + (h _{cs} /tanα _s) (Equation 4.3)
Future ASCIE (from existing toe)	-1.0	m	Future ASCIE = (LT _f × T) + (h _{cr} /tanα _r) + (h _{cs} /tanα _s) (Equation 4.4)
Future ASCIE	-0.01	m/yr	

A sketch summarising the definition of the ASCIE for cliffs and beaches is given in Figure 4 and Figure 5.

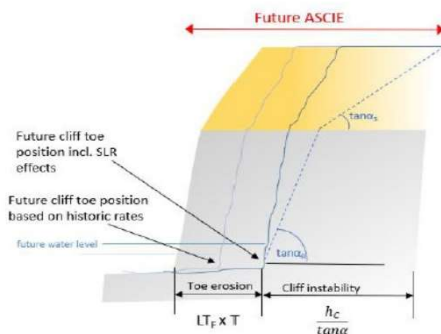


Figure 4: Definition sketch for Areas Susceptible to Coastal Instability and/or Erosion on consolidated (cliff) shoreline. Soil is shown in yellow, with rock below in grey.

Area Susceptible to Coastal Instability and Erosion



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T 09 379 9980 F 09 377 1170
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Details: Calculation based on the Local geology (composite) and the typical slope angles and cliff heights.

The areas susceptible to coastal instability and erosion has been calculated as per Auckland Council Technical Report 2020/021.

Values used for the calculation of Future ASCIE for Campana Road, Wiri, Auckland.

Approximate Existing Cliff Profile

					Existing	"Typical slope" based on local Geology
Cliff height	m	5	Cliff face rock slope (ar):	°	15	42
Cliff face rock height (hcr):	m	5	Cliff face soil slope (as):	°	0	36
Cliff face soil height (hcs):	m	0	Cliff face rock slope (ar):	rad	0.26	0.73
Years (T)		106	Cliff face soil slope (as):	rad	0.00	0.63
Typical Height	m	37				

Toe Erosion

Geological Unit	AVF		
Exposure (environment energy)	Low		
Long-term historical retreat LTRH	0.060	m/yr	average of min and max (Robert, R., (2020)) Appendix D cp 1.1 Tbl 1.3
Geological Stability Index GSI	70	-	(Robert, R., (2020)) Appendix D cp 5.2
Consolidated response factor (m)	0.1	-	Based on Table 5.6 for Auckland geological units and exposures
Historic toe erosion	0.18-1.02	m/yr	Based on review of public information (e.g. aerial photographs, site records, property file information).
Historic sea level rise (sh)	0.0017	m/yr	(Robert, R., (2020)) cp 2.7.3
Theoretical sea level rise (sf)	0.0206	m/yr	((RCP8.5H+) + T)
Theoretical toe erosion (LTf)	0.077	m/yr	(Robert, R., (2020)) cp 5.5.2 Eq. 5.3
Theor. SLR (RCP8.5H+)	2.18	m	www.searise.takiwa.co (year 2130)

Future ASCIE

Cliff Toe Erosion	0.5	m	Cliff Toe Erosion = (LTRH+LTf)*T (Equation 1-2)
Current ASCIE (from existing toe)	-5.84	m	Current ASCIE = (h _{cr} /tanα _r) + (h _{cs} /tanα _s) (Equation 4.3)
Future ASCIE (from existing toe)	-5.4	m	Future ASCIE = (LT _f × T) + (h _{cr} /tanα _r) + (h _{cs} /tanα _s) (Equation 4.4)
Future ASCIE	-0.05	m/yr	

A sketch summarising the definition of the ASCIE for cliffs and beaches is given in Figure 4 and Figure 5.

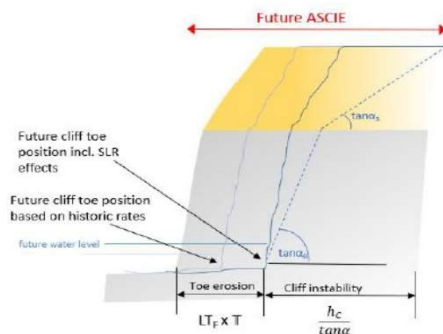


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Auckland 1140, New Zealand
T 09 379 9980 F 09 377 1170
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Details: Calculation based on the Local geology (composite) and the typical slope angles and cliff heights.

The areas susceptible to coastal instability and erosion has been calculated as per Auckland Council Technical Report 2020/021.

Values used for the calculation of Future ASCIE for Campana Road, Wiri, Auckland.

Approximate Existing Cliff Profile

					Existing	"Typical slope" based on local Geology
Cliff height	m	5	Cliff face rock slope (ar):	°	30	42
Cliff face rock height (hcr):	m	5	Cliff face soil slope (as):	°		36
Cliff face soil height (hcs):	m	0	Cliff face rock slope (ar):	rad	0.52	0.73
Years (T)		106	Cliff face soil slope (as):	rad	0.00	0.63
Typical Height	m	37				

Toe Erosion

Geological Unit	AVF		
Exposure (environment energy)	Low		
Long-term historical retreat LTRH	0.060	m/yr	average of min and max (Robert, R., (2020)) Appendix D cp 1.1 Tbl 1.3
Geological Stability Index GSI	70	-	(Robert, R., (2020)) Appendix D cp 5.2
Consolidated response factor (m)	0.1	-	Based on Table 5.6 for Auckland geological units and exposures
Historic toe erosion	0.18-1.02	m/yr	Based on review of public information (e.g. aerial photographs, site records, property file information).
Historic sea level rise (sh)	0.0017	m/yr	(Robert, R., (2020)) cp 2.7.3
Theoretical sea level rise (sf)	0.0206	m/yr	((RCP8.5H+) + T)
Theoretical toe erosion (LTf)	0.077	m/yr	(Robert, R., (2020)) cp 5.5.2 Eq. 5.3
Theor. SLR (RCP8.5H+)	2.18	m	www.searise.takiwa.co (year 2130)

Future ASCIE

Cliff Toe Erosion	0.5	m	Cliff Toe Erosion = (LTRH*LTf)*T (Equation 1-2)
Current ASCIE (from existing toe)	-0.78	m	Current ASCIE = (h _{cr} /tan α_r) + (h _{cs} /tan α_s) (Equation 4.3)
Future ASCIE (from existing toe)	-0.3	m	Future ASCIE = (LT _F × T) + (h _{cr} /tan α_r) + (h _{cs} /tan α_s) (Equation 4.4)
Future ASCIE	0.00	m/yr	

A sketch summarising the definition of the ASCIE for cliffs and beaches is given in Figure 4 and Figure 5.

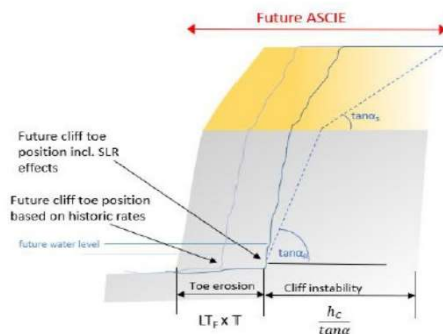


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Details: Calculation based on the Local geology (composite) and the typical slope angles and cliff heights.

The areas susceptible to coastal instability and erosion has been calculated as per Auckland Council Technical Report 2020/021.

Values used for the calculation of Future ASCIE for Campana Road, Wiri, Auckland.

Approximate Existing Cliff Profile

					Existing	"Typical slope" based on local Geology
Cliff height	m	5	Cliff face rock slope (ar):	°	45	42
Cliff face rock height (hcr):	m	5	Cliff face soil slope (as):	°		36
Cliff face soil height (hcs):	m	0	Cliff face rock slope (ar):	rad	0.79	0.73
Years (T)		106	Cliff face soil slope (as):	rad	0.00	0.63
Typical Height	m	37				

Toe Erosion

Geological Unit	AVF		
Exposure (environment energy)	Low		
Long-term historical retreat LTRH	0.060	m/yr	average of min and max (Robert, R., (2020)) Appendix D cp 1.1 Tbl 1.3
Geological Stability Index GSI	70	-	(Robert, R., (2020)) Appendix D cp 5.2
Consolidated response factor (m)	0.1	-	Based on Table 5.6 for Auckland geological units and exposures
Historic toe erosion	0.18-3.41	m/yr	Based on review of public information (e.g. aerial photographs, site records, property file information).
Historic sea level rise (sh)	0.0017	m/yr	(Robert, R., (2020)) cp 2.7.3
Theoretical sea level rise (sf)	0.0206	m/yr	((RCP8.5H+) + T)
Theoretical toe erosion (LTf)	0.077	m/yr	(Robert, R., (2020)) cp 5.5.2 Eq. 5.3
Theor. SLR (RCP8.5H+)	2.18	m	www.searise.takiwa.co (year 2130)

Future ASCIE

Cliff Toe Erosion	0.5	m	Cliff Toe Erosion = (LTRH+LTf)*T	(Equation 1-2)
Current ASCIE (from existing toe)	3.09	m	Current ASCIE = $(h_{ci}/\tan\alpha_r) + (h_{cs}/\tan\alpha_s)$	(Equation 4.3)
Future ASCIE (from existing toe)	3.6	m	Future ASCIE = $(LT_f \times T) + (h_{ci}/\tan\alpha_r) + (h_{cs}/\tan\alpha_s)$	(Equation 4.4)
Future ASCIE	0.03	m/yr		

A sketch summarising the definition of the ASCIE for cliffs and beaches is given in Figure 4 and Figure 5.

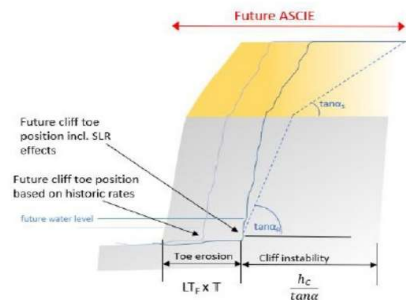


Figure 4: Definition sketch for Areas Susceptible to Coastal Instability and/or Erosion on consolidated (cliff) shoreline. Soil is shown in yellow, with rock below in grey.

Area Susceptible to Coastal Instability and Erosion



Babbage Consultants Limited
Level 4, 68 Beach Road, Auckland 1010
PO Box 2027, Shortland Street
Auckland 1140, New Zealand
T 09 379 9980 F 09 377 1170
E admin@babbage.co.nz www.babbage.co.nz

Project No:	67471		
Project:	Campana Road, Plan Change		
Calc:	SE	Date:	16/08/2024
Check:		Date:	

Details: Calculation based on the Local geology (composite) and the typical slope angles and cliff heights.

The areas susceptible to coastal instability and erosion has been calculated as per Auckland Council Technical Report 2020/021.

Values used for the calculation of Future ASCIE for Campana Road, Wiri, Auckland.

Approximate Existing Cliff Profile

					Existing	"Typical slope" based on local Geology
Cliff height	m	18	Cliff face rock slope (ar):	°	36	42
Cliff face rock height (hcr):	m	18	Cliff face soil slope (as):	°	0	36
Cliff face soil height (hcs):	m	0	Cliff face rock slope (ar):	rad	0.63	0.73
Years (T)		106	Cliff face soil slope (as):	rad	0.00	0.63
Typical Height	m	37				

Toe Erosion

Geological Unit	AVF		
Exposure (environment energy)	Low		
Long-term historical retreat LTRH	0.060	m/yr	average of min and max (Robert, R., (2020)) Appendix D cp 1.1 Tbl 1.3
Geological Stability Index GSI	70	-	(Robert, R., (2020)) Appendix D cp 5.2
Consolidated response factor (m)	0.1	-	Based on Table 5.6 for Auckland geological units and exposures
Historic toe erosion	0.18-1.02	m/yr	Based on review of public information (e.g. aerial photographs, site records, property file information).
Historic sea level rise (sh)	0.0017	m/yr	(Robert, R., (2020)) cp 2.7.3
Theoretical sea level rise (sf)	0.0206	m/yr	((RCP8.5H+) + T)
Theoretical toe erosion (LTf)	0.077	m/yr	(Robert, R., (2020)) cp 5.5.2 Eq. 5.3
Theor. SLR (RCP8.5H+)	2.18	m	www.searise.takiwa.co (year 2130)

Future ASCIE

Cliff Toe Erosion	0.5	m	Cliff Toe Erosion = (LTRH+LTf)*T (Equation 1-2)
Current ASCIE (from existing toe)	2.32	m	Current ASCIE = (h _{cr} /tan α_r) + (h _{cs} /tan α_s) (Equation 4.3)
Future ASCIE (from existing toe)	2.8	m	Future ASCIE = (LT _f × T) + (h _{cr} /tan α_r) + (h _{cs} /tan α_s) (Equation 4.4)
Future ASCIE	0.03	m/yr	

A sketch summarising the definition of the ASCIE for cliffs and beaches is given in Figure 4 and Figure 5.

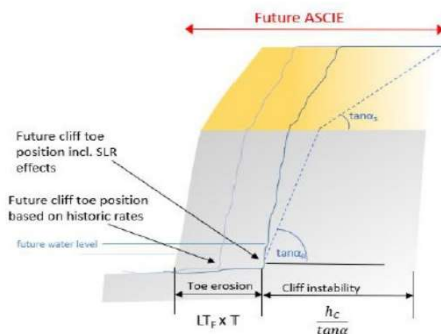


Figure 4: Definition sketch for Areas Susceptible to Coastal Instability and/or Erosion on consolidated (cliff) shoreline. Soil is shown in yellow, with rock below in grey.

Area Susceptible to Coastal Instability and Erosion



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Project No:	67471		
Project:	Campana Road, Plan Change		
Calc:	SE	Date:	16/08/2024
Check:		Date:	

Details: Calculation based on the Local geology (composite) and the typical slope angles and cliff heights.

The areas susceptible to coastal instability and erosion has been calculated as per Auckland Council Technical Report 2020/021.

Values used for the calculation of Future ASCIE for Campana Road, Wiri, Auckland.

Approximate Existing Cliff Profile

					Existing	"Typical slope" based on local Geology
Cliff height	m	37	Cliff face rock slope (ar):	°	42	42
Cliff face rock height (hcr):	m	37	Cliff face soil slope (as):	°	0	36
Cliff face soil height (hcs):	m	0	Cliff face rock slope (ar):	rad	0.73	0.73
Years (T)		106	Cliff face soil slope (as):	rad	0.00	0.63
Typical Height	m	37				

Toe Erosion

Geological Unit	AVF		
Exposure (environment energy)	Low		
Long-term historical retreat LTRH	0.060	m/yr	average of min and max (Robert, R., (2020)) Appendix D cp 1.1 Tbl 1.3
Geological Stability Index GSI	70	-	(Robert, R., (2020)) Appendix D cp 5.2
Consolidated response factor (m)	0.1	-	Based on Table 5.6 for Auckland geological units and exposures
Historic toe erosion	0.18-1.02	m/yr	Based on review of public information (e.g. aerial photographs, site records, property file information).
Historic sea level rise (sh)	0.0017	m/yr	(Robert, R., (2020)) cp 2.7.3
Theoretical sea level rise (sf)	0.0206	m/yr	((RCP8.5H+) + T)
Theoretical toe erosion (LTf)	0.077	m/yr	(Robert, R., (2020)) cp 5.5.2 Eq. 5.3
Theor. SLR (RCP8.5H+)	2.18	m	www.searise.takiwa.co (year 2130)

Future ASCIE

Cliff Toe Erosion	0.5	m	Cliff Toe Erosion = (LTRH+LTf)*T (Equation 1-2)
Current ASCIE (from existing toe)	16.15	m	Current ASCIE = (h _{cr} /tan α_r) + (h _{cs} /tan α_s) (Equation 4.3)
Future ASCIE (from existing toe)	16.6	m	Future ASCIE = (LT _f × T) + (h _{cr} /tan α_r) + (h _{cs} /tan α_s) (Equation 4.4)
Future ASCIE			

A sketch summarising the definition of the ASCIE for cliffs and beaches is given in Figure 4 and Figure 5.

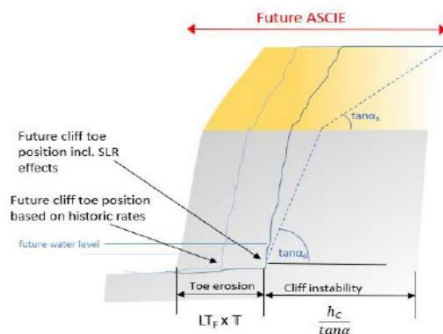


Figure 4: Definition sketch for Areas Susceptible to Coastal Instability and/or Erosion on consolidated (cliff) shoreline. Soil is shown in yellow, with rock below in grey.

Auckland

Address | Level 4, 68 Beach Road, Auckland 1010

Post | PO Box 2027, Shortland Street, Auckland 1140, New Zealand

Ph | 64 9 379 9980

Fax | +64 9 377 1170

Email | contact-us@babbage.co.nz

Hamilton

Address | Unit 1, 85 Church Road, Pukete, Hamilton 3200

Post | PO Box 20068, Te Rapa, Hamilton 3241, New Zealand

Ph | +64 7 850 7010

Fax | +64 9 377 1170

Email | contact-us@babbage.co.nz

Christchurch

Address | 128 Montreal Street, Sydenham, Christchurch 8023

Post | PO Box 2373, Christchurch 8140, New Zealand

Ph | +64 3 379 2734

Fax | +64 3 379 1642

Email | solutions@babbage.co.nz

Babbage Consultants Australia Pty Ltd – Australia

Address | Suite 4, Level 2, 1 Yarra Street, Geelong,

Victoria 3220, Australia

Ph | +61 3 8539 4805

Email | contact-us@babbage.co.nz

www.babbageconsultants.com.au

www.babbage.co.nz



Attachment I

11 September 2024

Auckland Council
C/- Peter Reaburn
Consultant Planner: preaburn@xtra.co.nz

Dear Peter

RESOURCE CONSENT APPLICATIONS: 96A TRIG ROAD, WHENUAPAI

Introduction

1. I am the project manager and strategic advisor for the Applicant. While I have a legal background, I am not presently acting as the applicant's lawyer or counsel, but necessarily bring my past experience to my present role. I have historically had to consider Clause 25(4)(c), and have also refreshed my memory in that regard.
2. I have been asked to the Clause 25(4)(c) question arising as part of the applicant's response to the Clause 23 request for further information.

Clause 25(4)(c)

3. Clause 25(4)(c) states:

The local authority may reject the request in whole or in part, but only on the grounds that—

- (a) the request or part of the request is frivolous or vexatious; or
- (b) within the last 2 years, the substance of the request or part of the request—
 - (i) has been considered and given effect to, or rejected by, the local authority or the Environment Court; or
 - (ii) has been given effect to by regulations made under section 360A; or
- (c) **the request or part of the request is not in accordance with sound resource management practice**; or
- (d) the request or part of the request would make the policy statement or plan inconsistent with Part 5; or
- (e) in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than 2 years.

4. I have quoted the entirety of Clause 25(4) above for context, as that is relevant to any interpretative exercise as to what "sound resource management practice" means in the context of Clause 25(4). As is well

known, the meaning of legislation must be “ascertained from its text and in the light of its purpose and its context”.¹ As the highest courts have also confirmed, “context is everything”.²

5. The observation may immediately be made that each of subclauses (a)-(b) and (d)-(e) are all directed at avoiding the waste of time on something that is unlikely to ever succeed (ie (a), or (d)), or, has recently been considered and should not be revisited so soon (ie within 2 years, (b), and (e)). It is also clear that the result is akin to a strike out, as if the request is refused, then it can go no further (unless appealed). As is also well known, particularly at the “first instance” stage, strike out powers are rarely exercised. In fact, I cannot think of one instance in over 25 years of being involved in resource management matters where a strike out has occurred at a Council stage in a matter I have been involved with. To reject a plan change request under clause 25(4) is effectively a form of rarely used strike out.³
6. This suggests a high hurdle before clause 25(4)(c) can be invoked to reject a Plan Change request on the basis that it is not in accordance with “sound resource management practice”.

Research

7. This position is backed up by a simple check on key databases. There are very few cases relating to an appeal under clause 25(4)(c). A few appeals to the Environment Court were settled by consent.⁴ As they were settled by consent, they provide limited guidance.
8. In *Kerikeri Falls Investments Ltd v Far North District Council* [2010] NZRMA 425, the Court stated (emphasis added) at [47]:

It is our interpretation of subcl (c) of cl 25(4), that “sound resource management practice” must, if it is to have a meaning, be referable to the purpose and principles of the Act in Part 2. Our finding, having regard to the wording of subcl (c), is that the present request should not be rejected as “not in accordance” with such practice. **Instead, to the very limited extent that the merits of the case are relevant under cl 25, the purpose of the Act would be better served by the acceptance of the request under cl 25(2)(b), and Council proceeding to notify it under cl 26.**

9. The leading case, and only superior Court decision, appears to be *Malory Corporation Ltd v Rodney District Council* [2010] NZRMA 392.

¹ Legislation Act 2019, s10(1).

² Eg the Privy Council in *McQuire v Hastings District Council* [2002] 2 NZLR 577 (PC) at [9].

³ A claim should only be struck out where a court can be certain that it cannot succeed, because, for example, it is “so clearly untenable” and “[p]articular care is required in areas where the law is confused or developing”: *Couch v Attorney-General* [2008] 3 NZLR 725 at [33].

⁴ *Fletcher Residential Ltd, The Neil Group Ltd and Matvin Group Ltd v Auckland Council* [2024] NZEnvC 49; *Orakei Point Trustee Ltd v Auckland Council* [2019] NZEnvC 117 at [18].

In upholding the Environment Court's approach, and consistent with *Kerikeri Falls*, the High Court said at [88] and [95]:

There appears, on the authorities to which I have been referred, no definitive answer to the question of what constitutes sound resource management practice. The expression was recently examined by Judge Newhook in *Kerikeri Falls Investments Ltd v Far North District Council*. Judge Newhook at [31] in an aside added the words "whatever that is". **However, at [47] the Court, again expressing a proper uncertainty over the words, said that they "must, if it is to have a meaning, be referable to the purpose and principles of the Act in Part 2"**. The Judge went on to observe that, to the very limited extent that the merits of a case are relevant under cl 25, the purpose of the Act would be best served by acceptance of a request with consequential notification.

...

It would be unhelpful for me, in the context of this appeal, to embark on some definition of what are clearly very broad words. I agree with Judge Newhook the words "sound resource management practice" should, if they are to be given any coherent meaning, be tied to the Act's purpose and principles. **I agree too with the Court's observation that the words should be limited to only a coarse scale merits assessment**, and that a private plan change which does not accord with the Act's purposes and principles will not cross the threshold for acceptance or adoption.

10. To the extent that timing might be an issue, ie is the request for a plan change premature, the High Court said, at [98] (in reference to the "sound resource management practice" criterion):

In general terms I think it is drawing a long bow to hold that a timing issue (assuming a request's timing is not frivolous or vexatious) **will result in an otherwise unobjectionable proposal offending**.

Application

11. Mr Clark and Mr Gray have addressed how the application – at least on a "coarse scale merits assessment" – cannot be said to be out of accordance with the purpose of the Act.
12. Using the strike out analogy, it is clearly arguable that the proposal is in accordance with the purpose of the Act (or to put it another way, it the proposal is not "so clearly untenable" that it cannot succeed), and so (as in *Kerikeri Falls*):

... the purpose of the Act would be better served by the acceptance of the request under cl 25(2)(b), and Council proceeding to notify it under cl 26.

13. I respond briefly to the more particular three "areas" raised of concern. These are largely also addressed by the specialist experts.

Transport infrastructure and “Policy I432.3 (10)”

14. The proponent’s transportation expert has addressed whether there is in fact “appropriately planned and funded transportation infrastructure”. I note that the text does not require the infrastructure to actually be in place.
15. Policy I432.3 (10) states:

Recognise and provide connections to Puhinui Reserve, Colin Dale Park and the wider open space network in land use development while ensuring adverse effects on the transport network are avoided.
16. The RFI refers to “timing and sequencing of integrated development” with reference to Policy I432.3 (10), so perhaps it was intended to be a reference to Objective I432.2 (10), which states:

The timing and sequencing of integrated development provides for the efficient and effective provision of all infrastructure including transport networks, stormwater, wastewater drainage networks, water, power, gas and telecommunication supply networks.
17. This is not a particularly directive Objective. It certainly does not say development may only occur when it existing infrastructure is available. The proponent’s evidence is that for the storage yard activities that are envisaged, there will be not material transportation impacts; so it integrates with the existing transportation infrastructure. When more capacity is unlocked, greater development will be able to occur. This meets the timing and sequencing objective of I432.2(10). It certainly does not make the proposal “untenable” on its face.

Proposed I432.6.1(4)

18. Proposed I432.6.1(4) currently provides a permitted activity standard as follows:

No land use, other than storage and lock up actives that comply with (a-c) below, shall be undertaken within sub-precinct C or sub-precinct E (north) unless the following standards are met:

 - (a) The storage and lock up facility shall be unmanned.
 - (b) The total traffic movements from the Campana Road / Puhinui Road intersection (excluding movements associated with SPCA activities) shall not exceed a maximum of 50 movements per hour.
 - (c) The total traffic movements from the existing access to 457 Puhinui Road shall not exceed a maximum of 5 movements per hour.
19. This provides a clear set of constraining standards. If they are met – then the activity will be permitted (subject to compliance with other permitted standards). If they are not, then the activity will be non-complying. The standard provides for the efficient and effective use of

the land for proposals that comply with the standard. For those that do not, there is a consent pathway to allow them to be undertaken.

20. Accordingly, while the final form of Proposed I432.6.1(4), and the extent of its implications can be debated, the proposal is not “untenable” on its face as a consequence of the inclusion of this proposed standard.

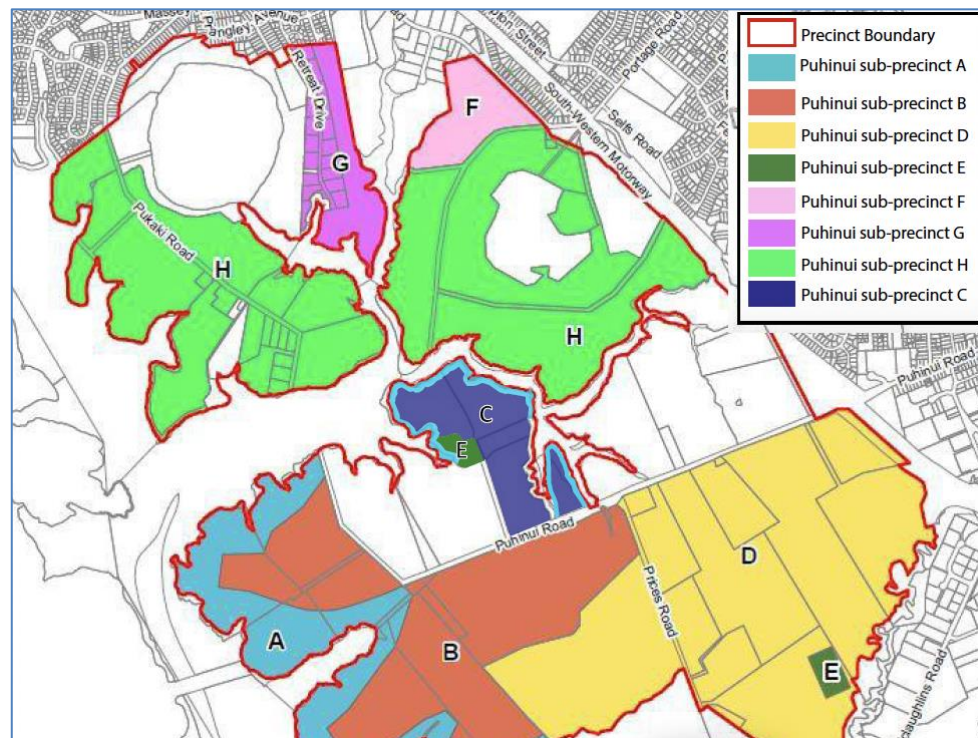
Geographical extent of the proposed PPC

21. The RFI states:

... The live-zoned and new subprecinct C (and associated sub-precincts A and E) would be situated between (to the east and west of) land that would remain zoned FUZ.

This raises questions about how and even whether the PPC could adequately integrate with other land in this area that would potentially have the same zoning and be in the same sub-precinct (C). In that respect it is considered inappropriate for the proposed provisions to refer to a “Campana” name as that may well be inappropriate for a latter, wider, sub-precinct. That proposal alone indicates that there has been insufficient consideration given to wider integration – an issue also raised in the Clause 23 Strategic Planning specialist questions.

22. The issue is illustrated in the following plan:



23. While the observation is correct, factually (ie the proposed sub-precinct would have FUZ land to its east and west), if it was necessary to include all remaining land, or just the land either to the east, or to the west, then

the proponent would be coupled to the wishes of the landowners to the east and/ or the west. That could prevent efficient use of the subject land for a significant period of time, which is not consistent with sound resource management practice.

24. The concept of integrated management is also not defined in the RMA, but it cannot reasonably be invoked to preclude bringing areas into live zoning in an incremental way. This is particularly the case when the original reasons for leaving the land out of the live zoning have been addressed – or at least there is a very arguable case that they will be able to be addressed.

Conclusion

25. While it may have been reasonable to ask the question about “sound resource management practice”, it would be unreasonable to reject the private plan change request on this basis. The result would be an appeal to have the Environment Court reconsider the issue on aa de novo basis. I doubt the Court would cut the proposal off at the pass, which would mean that the proponent (and the Council) would have been put to unnecessary costs), and delay.
26. I also note that the application is supported by experienced (and in some cases very experienced) specialist experts, many of whom have advised, or continue to advise (on separate matters) the Council. While there may be differences of opinion and a need to have the proposal tested through the usual process, this is not a case where the information and assessment put forward in support of the proposal is so wanting that it might reasonably be considered for rejection as failing to represent “sound resource management”.

Yours faithfully



JAMES GARDNER-HOPKINS
Consultant | Advisor | Project Manager

M: 021 277 1425 | T: 09 889 2776 | E: james@jgh.nz
www.jgh.nz

11 October 2024

Campana Land Owners Consortium
c/- David Clark, Planner, Saddleback

via email: david@saddleback.nz

Dear David,

RE: Clause 23(2) Resource Management Act 1991 Further Information – Private Plan Change request by Campana Land Owners Consortium

The Council specialist's team has reviewed your Clause 23 responses. There are matters on which further clarification is required which are outlined in this letter.

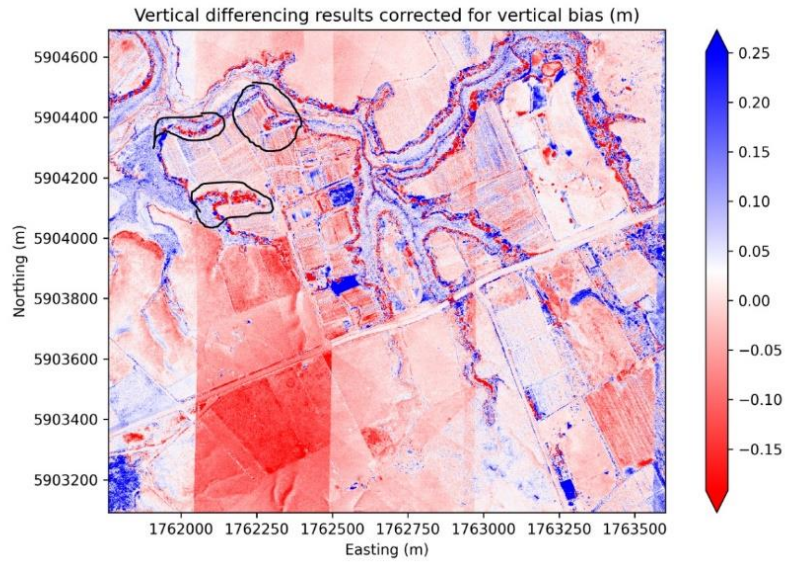
LANDSCAPE / VISUAL

We await your response to the original Clause 23 requests. Pending that response there may be a further request for information.

COASTAL HAZARD / EROSION (Tola Omidiji Auckland Council Senior Coastal Specialist)

It is considered that sufficient information has yet to be provided on coastal hazard and associated erosion matters.

The RMA, and Policy 25 of the New Zealand Coastal Policy Statement (NZCPS) require avoiding increased risk of development in areas affected by coastal hazard over at least the next 100 years. In addition, Policy 24 of the NZCPS requires parties to undertake coastal hazard assessments **using the best available information**. It is without doubt that the subject site is within a coastal hazard erosion area (see snippet below showing areas of negative vertical change/erosional shoreline changes (red) at the Applicant's site between 2013 and 2017).



The Applicant, through Babbage, has not undertaken a site-specific coastal hazard assessment using the Council's technical document and the current MfE Interim guidance (2024) that incorporates sea level projections and Vertical Land Movement (VLM). Council considers the regional scale ASCIE estimate is not accurate for an individual site and hence the need for the Applicant to undertake a site-specific assessment.

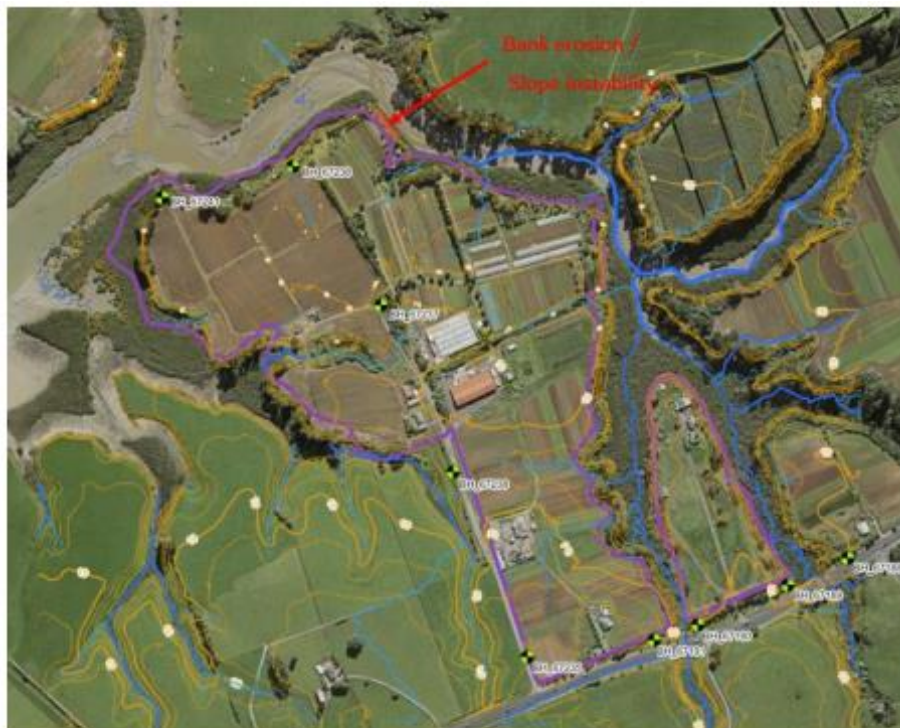


Figure 3: Location of bank erosion section

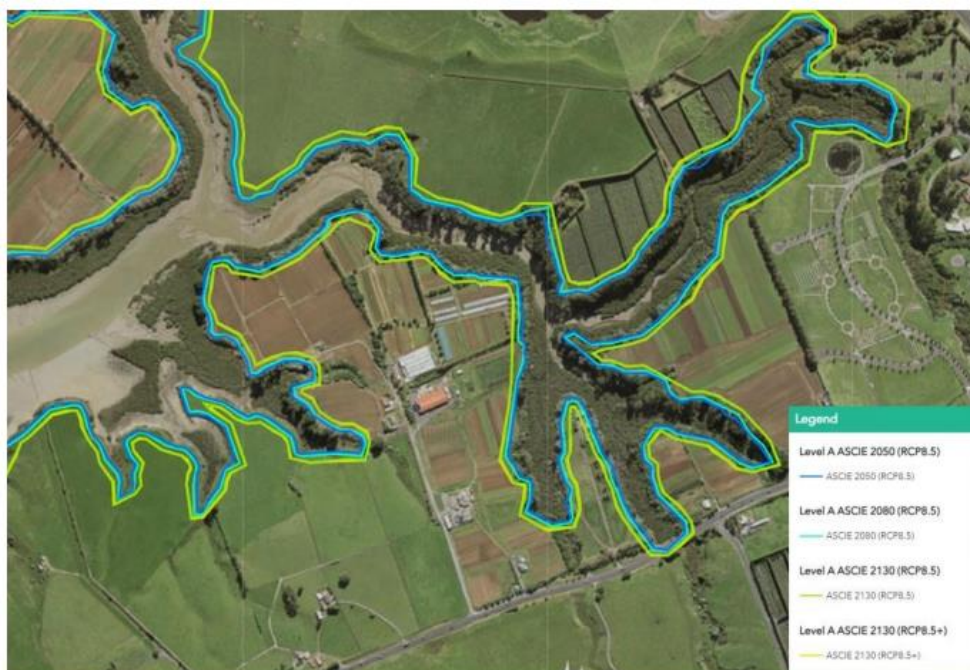


Figure 5: Excerpt of the Auckland Coastal Instability and Erosion Map

The Applicant's Geotech Appraisal Report (page 12) states "..... Future erosion predictions for the 2130 RCP8.5 scenario suggests ~20m of land loss (approximately measured back from current slope crests) is possible (Figure 5)". Regarding sea level rise scenarios, the IPCC's 6th Assessment Report (2021–22) adopted a new core set of future representative scenarios, based on Shared Socio-economic Pathways (SSPs). There has been a transition from the previous representative concentration pathways (RCPs) to SSP scenarios. The Council's regional ASCIE forecasts were based on RCP scenarios. Further, the ASCIE projections did not include VLM which has a direct impact on the local sea levels along New Zealand coastlines.

The Geotech report appears to place total reliance on the regional scale ASCIE. The report also lacks any maps or cross sections depicting the suggested ASCIE with respect to the current slope crests (page 12) to demonstrate that the "**overall risk from coastal hazards will likely have little impact** (see page 13, paragraph 1).

Request for information

1. **Please provide detailed calculations and values for parameters used in the conceptual formula to calculate the 100-year ASCIE. Sea level rise projections from the MfE 2024 (including Vertical Land Movement (VLM: <https://searise.takiwa.co/map> and the Auckland's Council's regional assessment document should be used in the 100-year ASCIE calculation. The updated formula in the Guideline Document GD 2021/010 and appropriate parameters in the Technical Report 2020/021 should be used to estimate the future 100-year ASCIE for the applicant's site.**
2. **Please provide maps/cross-section to indicate the proposed development in relation to the 100-year site specific ASCIE to demonstrate sections of the proposal landwards/seawards of the site-specific CEHA. If the development is inside the 100-year planning horizon, mitigation options should be included in the proposal.**

TREES (Carl Akroyd, Auckland Council)

Our ecologist has raised a continuing concern in relation to information relating to vegetation, and in particular trees. It is considered this information is best provided by an arborist.

Request for information

Please provide an arboricultural assessment that details the values of the trees on site and whether there are any trees worthy of adding to the Auckland Unitary Plan Notable Tree Schedule.

TRANSPORT (Andrew Temperley)

Council's Transport reviewer (Andrew Temperley) requests further information as follows.

Potential long-term transport outcomes resulting from Business – Light Industry Zoning

This request related to the potential long-term transport effects which could result from permitted development activities within the Business – Light Industry Zone, including traffic effects during both peak and off-peak hours, depending on particular development activities.

It was understood from the meeting with the Applicant on 31 July 2024 that further information was to be provided in relation to reasonable development scenarios which would be expected to occur under the Light Industrial Zoning, including GFAs for light industrial activities and supporting offices. However, the latest information provided does not appear to include a specific response to the original T1 item and the Clause 23 response as a whole appears to contain only limited information in relation to future land-use scenarios and activities, albeit the response to item II does contain some analysis in relation to transport effects of a likely development scenario.

Request for information

Further information is requested in relation to potential land-use scenarios associated with each of sub-precincts within the PPC area.

Staging of development activities and consequent traffic generation potential

Further information is considered necessary to understand the full potential transportation effects of the PPC when fully developed and inform appropriate transportation provisions and mitigation measures required.

The Transport Response provides an outline trip generation analysis based on a mix of warehousing / storage and ancillary office activity, which estimates an eventual traffic generation potential of 560 vehicles per hour (both ways). The adopted trip rates for this scenario are reasonable, albeit the response only considers trip generation associated with the one potential land-use scenario. The assessment of future traffic generation of the Consortium's land is primarily based on "generic light industrial" activities associated with Sub-Precinct C, while Sub-Precinct E allows for a broader range of land-use activities.

In the absence of clarification over potential land use scenarios, it is not clear as to how representative this land-use scenario may be in reality.

It is further noted that the above land-use scenario, resulting in up to 560 additional vehicles per hour, using the intersection of Campana Road / Puhinui Road, has not been modelled. A modelling assessment of this scenario is considered necessary to demonstrate whether the State Highway intersection would remain fit for purpose in its current form (see also the Trigger item below). It is noted that Waka Kotahi Guidelines for assessing Plan Changes require modelling assessments for 10 years into the future, in addition to the existing scenario.

Request for information

Having regard to the above, further information is requested in relation to traffic generation potential of land-use activities within the whole PPC area and consequent transport effects on the adjoining network.

Triggers for Transport Improvements and Mitigation Measures

Request for information

Having regard to the further information referred to above further information is sought on appropriate transportation infrastructure provisions and appropriate mitigation measures for the PPC development, in addition to identifying appropriate trigger points for improvements, including responsibilities for funding and delivery.

Operational and Safety Assessment of access to 457 Puhinui Road

The Applicant's response refers to the proposed alternative access to 457 Puhinui Road as shown on the Structure Plan, comprising an indicative realignment and repositioning of the existing service lane to 457 Puhinui Road within the SH20B road reserve.

While the response confirms that the new service lane will connect with Campana Road at least 30 metres north of the existing intersection with Puhinui Road, no detail is provided in relation to the form and operation of this service lane (e.g. one-way or two-way operation). The new service lane also raises questions in relation to its interaction with the adjoining intersection arrangement on Campana Road.

Critical constraints to this layout are likely to include, but not be limited to vehicle turning movements between the service lane, Campana Road and SH20B, particularly by trucks and larger commercial vehicles, if the site of 457 Puhinui Road continues to be served by such vehicles. Would trucks accessing SH20B to the east from 457 Puhinui Road undertake a 180-degree manoeuvre at the intersection with Campana Road? Or would the existing left-turn out manoeuvre be retained for this purpose?

Further information is needed in order to fully understand the traffic and safety impact of the PPC on the adjoining road network. The existing access intersection to 457 Puhinui Road is noted to already be handling regular truck movements, whilst constrained by a ban on the outbound right-turn manoeuvre and few convenient opportunities for vehicles to undertake U-turning manoeuvres along Puhinui Road in the immediate vicinity.

Request for information

Please provide a concept design for the combined intersection arrangement, including confirmation of layouts of road lanes, locations of traffic signals and vehicle tracking for critical manoeuvres.

Please address the service lane intersection should in the traffic modelling assessment discussed above. It is unclear whether this proposed access will have access restrictions or if it will provide access to Sub-Precinct E in the future.

Alternatively, please confirm whether the existing service lane is to be removed.

Campana Road Upgrade

It is acknowledged that details on the Campana Road upgrade, including an indicative cross-section that indicates sufficient legal road reserve width to deliver an appropriate urban collector road, have been provided. However further information is sought on the timing of the indicative extension further north of Campana Road.

Request for information

Please provide further information in relation to the trigger for the indicative extension further north of Campana Road.

STORMWATER (Zheng Qian, Gemma Chauh) (also Jason Smith in relation to associated ecology concerns)

SW 1

The Clause 23 response simply restates there will be a 5mm retention for roofs (and maybe for hardstand), with no detention. The impact of the runoff on the stream and whether the proposed mitigation will be sufficient is not assessed.

Requests for information

Please provide information as to whether detention for hydrology mitigation is to be provided, and if not, the reasons for that.

Please provide information on the potential for stream erosion (including any ecological consequences).

SW4

The response is acknowledged however it is noted that the SMP will need to be updated to remove the inconsistency in the wording.

SW 5

It is unclear from the information provided what intermittent streams are intended to be piped (this may also be an ecology concern).

Request for information

Please provide information on what intermittent streams are intended to be piped.

Indicative stormwater outlets

The SMP refers to maintaining flows into the existing wetlands. However the indicative outlets shown in the Clause 23 response show discharges directly to the coast.

There are a large number of intended outfalls. Multiple private outfalls will potentially become problematic as there will be a coastal esplanade reserve around the whole site (Local boards are not keen on multiple outfalls in public land).

Requests for information

Please clarify how it is intended to maintain flows into the existing wetlands.

Please clarify whether consideration has been given to future consent difficulties arising from multiple private outfalls crossing public land.

ARCHAEOLOGY (Rebecca Ramsay)

There are a number of areas where the information provided is not considered to be sufficient.

Requests for information

A1- Site Investigations

Please provide a copy of the exploratory investigation report (Campbell, M. and L. Arrell 2024. Campana Road, section 56 investigation: final report (HNZPTA Authority 2024/581). Unpublished CFG Heritage report to Pouhere Taonga Heritage New Zealand and Capstone Projects)

A4 – Additional Site

Please provide further information regarding the archaeological potential across the plan change area in light of the results of the exploratory investigation.

A5 – Site Information

Please identify archaeological sites R11/3513 and R11/1112 on precinct provision map “I432.10.5. Puhinui: Precinct plan 6 – Campana Road Structure Plan”.

A6 – AUP Chapter D17 and RPS B5

Please update these evaluations with the results of the exploratory investigations (including the discovery of pits and midden deposits associated to sites R11/1111 and R11/2855).

A7 – Site Scheduling

Please provide comment/assessment regarding scheduling against the RPS provisions (none has been provided).

STRATEGIC MATTERS (Rosie Stoney)

In response to RFI SP5 you state that comment on FDS matters will be provided in an updated planning report. We cannot be fully satisfied that SP5 has been addressed until that update is received.

If you have any queries arising from the above please contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Peter Reaburn'.

Peter Reaburn
Consultant Planner for Auckland Council

Notes on response to the Clause 23 Letter dated 11 October 2024

A formal response was not given, in entirety, to the further matters raised on the 11th of October 2024. The matters raised were addressed piecemeal ad outlined below:

Further Matters Raised	Response
<i>Landscape/Visual</i>	<i>Addressed in the Landscape and Visual Assessment provided in Appendix Q of the Planning Report.</i>
<i>Coastal Hazard/Erosion</i>	<i>Resolved in expert conferencing and fully addressed in the final Coastal Hazard Assessment provided in Appendix R of the Planning Report.</i>
<i>Trees</i>	<i>Addressed in the Arborist Report provided in Appendix S of the Planning Report.</i>
<i>Transport</i>	<i>Addressed via correspondence between Andrew Temperley (Council's nominated peer reviewer) and Don Mckenzie (Consultant Traffic Engineer engaged by the applicant). See Appendix K of the planning Report for the full correspondence.</i>
<i>Stormwater</i>	<i>Addressed via correspondence between Council and Maven (consultant engineers). See Appendix I of the Planning Report for the full correspondence.</i>
<i>Archaeology</i>	<i>Resolved in expert conferencing and fully addressed in the final Archaeological Assessment provided in Appendix G of the Planning Report.</i>
<i>Strategic Matters</i>	<i>Addressed in the Planning Report provided.</i>