Section 32 AA – Ngāti Hine, Greenacres Drive



Section 32AA Evaluation of Options for Ngāti Hine, Greenacres Drive

Option One: Full General Residential Zone (GRZ) Across the Site under the Option Two: General Residential Zone (GRZ) with Site-Specific Rules under the Option Three: General Residential Zone (GRZ) with Te Mataora Precinct under Proposed District Plan (PDP) (Original Request)

the Proposed District Plan (PDP)

Benefits:

- GRZ across the entire site provides the broadest development potential.
- Ngāti Hine could potentially utilise the site without restrictions, enabling residential units and greater staging flexibility.
- No overlays or specific rules relating to the ecological features on the site. Any ecological features would be managed by the Ecosystems and Indigenous Biodiversity chapter of the PDP requiring no additional rules or standards.
- Simple zoning for the site to achieve the housing aspirations for Ngāti Hine.

Costs:

- The evidence confirms the presence of a natural inland wetland. Full GRZ across the site creates significant risk of indigenous vegetation removal in relation to natural wetlands resulting in adverse ecological effects and is in conflict with the National Policy Statement for Freshwater Management 2020 (NPS-FM) and the National Policy Statement for Indigenous Biodiversity (NPS-IB). Notably Policy 6 of the NPS-FM seeks no further loss of wetland extent, and this approach does not address the ecological features of the site.
- Development within or near a natural inland wetland triggers noncomplying activity status under NES-F Regulations 52¹ & 54².
- Does not acknowledge the ecological features of the site and has perceived development outcomes that may not be possible for the site (ie. unencumbered residential development for the site).
- Does not fully consider the NPS-FM and NPS-IB outside of the current proposed Ecosystems and indigenous biodiversity chapter of the PDP noting the ecological features of the site.

Benefits:

Proposed District Plan (PDP)

- Site-specific rules within the GRZ can be tailored to control vegetation clearance, hydrology, earthworks, and stormwater in areas with wetland values. This reduces the risk of wetland loss, and indigenous vegetation clearance and better aligns with NPS-FM and the NPS-IB.
- Ngāti Hine is still able to develop the suitable areas with housing and | supporting facilities through the tailored rules within the GRZ.

Costs:

- Rules alone can manage environmental effects, but they do not incorporate Ngāti Hine's cultural values, aspirations, or kaitiakitanga responsibilities within the planning framework.
- Solely on site-specific rules does not achieve the cultural and ecological outcomes that a precinct's objectives and policies can provide, leading to a weaker and less certain framework for future resource consent processes.

Benefits:

- Provides opportunity in the in the precinct provisions so that there no wetland and or indigenous biodiversity loss where practicable and protects hydrology and ecological integrity, better aligning with the NPS-FM and the NPS-IB.
- Clear planning framework that is specific to the site. The precinct includes objectives, policies, and rules tailored to wetland protection where practicable; indigenous vegetation management, and Ngāti Hine's cultural values. This results in a long-term, coherent approach that acknowledges the ecological features of the site.
- The GRZ zoning along with the precinct provides a framework that ensures future development will avoid, where practicable, the most sensitive ecological areas, and that ecological features and their values will be maintained, and restored in the long term.
- The precinct provides opportunity identifies development land that enables Ngāti Hine to progress housing ambitions while restoring the wetland where practicable
- The precinct incorporates Ngāti Hine relationship to the land and incorporates planning provisions which supporting the iwi's broader social, cultural, and economic outcomes.

Costs:

- The proposed precinct requires ecological management plans, and restoration commitments as part of the information requirements under PRECxx-REQ1.3
- Monitoring obligations, Restoration and hydrological management may require ongoing monitoring and reporting.

Efficiency and Effectiveness

The updated evidence confirms the presence of a natural inland wetland on the site. Without additional controls, the GRZ does not manage earthworks and vegetation clearance in relation to the wetlands required under the NPS-FM and NES-FW. Urban development would likely trigger non-complying activities under NES-FW Regulations 52-54, making the option difficult in achieving the objectives and policies of the NPS-FM or the PDP.

This option acknowledges the presence of a natural inland wetland on the site and will introduce site specific additional rules into the GRZ. The additional rules would seek to control earthworks, and vegetation clearance in relation to the ecological features of the site.

The Proposed Te Mataora Precinct is an effective and efficient way to achieve Ngāti Hine's aspiration to deliver housing on the site while incorporating the necessary protection and restoration of ecological features. The precinct provides the most appropriate planning mechanism to give effect to the NPS-FM, particularly Policy 6 (no loss of wetland extent), because it enables development within the geotechnically suitable areas while clearly identifying

¹ Regulation 52 of the NES-F, Drainage of natural inland wetlands – non complying activities

² Regulation 54 of the NES-F, Drainage of Other activities – non complying activities

³ PRECxx-REQ1 Ecological and Restoration Plans, of the proposed Te Mataora Precinct.

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Although this option maximises development potential, the resource consenting pathway will be high risk, and option fails to address ecological constraints for the purpose of rezoning the site to GRZ.

This option allows for an opportunity to develop land through the GRZ while protecting the wetlands on the site, however does not efficiently allow for objectives and policies in the GRZ to give effect to Ngāti Hine's cultural relationship to the land.

The purpose of the rezoning to GRZ is to support residential development on the site, and without a supporting objective & policy framework, this approach provides resource consenting uncertainties for both Ngāti Hine and Council reducing the effectiveness of the option, Further, the introduction of site-specific objectives and policies would appear "out of place" in the GRZ when compared to the general structure of the PDP.

and protecting the natural inland wetland and associated ecological values. This integrated framework ensures development proceeds in a way that is both environmentally responsible and aligned with Ngāti Hine's cultural, social, and housing objectives.

Through proposed Objective PRExx–O1, Ngāti Hine is recognised as mana whenua, proposed Objective PRExx–O3 enables iwi-led residential and community development while maintaining cultural and ecological values, and proposed Policy PRExx–P4 requiring Te ao Māori principles to guide development and wetland restoration, the precinct provides clear, upfront direction that aligns cultural, environmental, and development outcomes.

Proposed PRECxx–O2, O3 and O4 ensures development occurs in a way that maintains, restores, and enhances wetland and biodiversity values, while proposed PRECxx–P1 to P3 applies the effects management hierarchy to avoid adverse effects wherever practicable and require restoration at the time of subdivision, use and development. Proposed PRECxx–P4 further strengthens effectiveness by outlining Ngāti Hine's cultural relationship and kaitiakitanga responsibilities directly into development and ecological management, rather than relying on consent-stage assessment. PRECxx–R1 and information requirements in PRECxx-REQ1⁴ improve efficiency by providing clear upfront expectations, reducing uncertainty and streamlining future consenting.

Although a precinct requires a more detailed rules, it provides significant long-term efficiency gains by creating clear and effective consenting pathways for the development of the site.

Conclusion of Option

Overall, this option is not considered the most appropriate as it fails to respond to ecological features of the site and does not align with the objectives and policies of the NPS-FM and NPS -IB.⁵

Overall, this option is only partially effective in achieving a well-functioning urban environment when considering the NPS-FM and NPS-IB.

Overall, this option is the most efficient use of the land, delivering greater housing capacity while aligning with the NPS-FM and NPS -IB direction to enable well-functioning urban environments.

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⁵ Clause 2.1 (objectives and 2.2 (policies) of the NPS FM.