## Attachment D: Assessment of the relevant National Policy Statements and National Environmental Standards

| Plan / Policy Document | Key Objectives and Policies | Summary and Assessment |
|---|---|---|
| **National Policy Statements (NPS)** | | |
| **National Policy Statement on Urban Development 2020 (NPS-UD)** | | |
| **NPS-UD** | Obj:1, 5, 6 and 8<br><br>Pol: 1(c), (e) & (F), 6(e) 9, 10(b) | The NPS:UD seeks to ensure urban environments are well-functioning and enable all people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety *(Objective 1 and Policy 1)*. Within the NPS-UD, Auckland is recognised as a Tier 1 urban environment and is therefore subject to a greater policy direction in terms of intensification and density of urban form. The NPS-UD directs that urban development is integrated with infrastructure planning and funding decisions *(Objective 6 and Policy 10)* and is strategic over the medium to long term and emphasise the importance of providing short, medium and long term residential and business capacity. The NPS-UD requires long-term strategic planning for urban development, with planning decisions contributing to well-functioning urban environments. Particular consideration of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments *(Objective 5 and Policy 9)* and urban environments support for the reduction in greenhouse gas emissions and resilience to climate change *(Objective 8, Policy 6)* is also required.<br><br>As a Road of National Significance (RoNS) in the Government Policy Statement on Land Transport 2024 (GPS 2024), Mill Road has been identified as an essential corridor that "…*when complete, will reduce congestion, improve safety, support housing development to address New Zealand's ongoing housing crisis, boost economic growth, and provide a more resilient roading network."* Relevantly in relation to this Project, Manukau is identified through the Auckland Future Development Strategy 2023-2053 (FDS) as a major growth node. Mill Road is specified in the FDS as a key bulk infrastructure pre-requisite to support urban development readiness.<br><br>By 2031, as a result of anticipated population and employment growth (up to 52% by 2052) travel times along the Project corridor are projected to increase by over 20% during the AM peak and 40% during the PM peak. The forecast rapid growth, driven by nearby proposed developments, will add further significant traffic pressure on the corridor.[1] The Project is therefore critical to maintaining efficiency, reducing congestion, and supporting economic prosperity in alignment with GPS objectives.<br><br>Through the provision of this identified necessary (critical) transport infrastructure the Project is consistent with the objectives and policies of the NPS-UD to support housing development and economic growth in proximity |

[1] Mill Road Rons Stage 1: Economic Case

| | | |
|---|---|---|
| | | to the Mill Road corridor in Manukau (including in the vicinity of this Project), while contributing to a well-functioning urban environment.<br><br>Specifically the Project will provide for improved traffic efficiency on the Mill Road Corridor between Redoubt Road interchange and Phillip Road resulting in increased accessibility and journey reliability between housing, jobs, community services, natural spaces, and open spaces, facilitating public transport and incorporating new active transport facilities. Of note the Project is anticipated to result in:<br>• Significant travel time savings from the Project with over 25% faster journeys in the Mill Road / Redoubt Road corridor during peak hours.<br>• More reliable journeys along the Project corridor with more than a 9% reduction in congestion, enabling smoother, free-flowing travel throughout the day.<br>• Improved freight reliability with more than 8% of freight trips along the route experiencing less congestion, boosting productivity and enhancing the efficiency of the transport network.<br><br>In addition, the provision of a safer and more resilient Mill Road corridor between Redoubt Road interchange and Phillip Road is expected to reduce future DSI crashes by over 60% against the do-minimum option. The Project will also provide an alternative, safe, more viable route during unplanned events on SH 1.<br><br>The Project will also deliver benefits to the urban environment by shifting traffic away from key active mode and public transport corridors such as Great South Road and Porchester Road. This shift will improve the efficiency of public transport services and safety for active mode users and improve freight reliability, noting that approximately 11% of the overall traffic volumes on Mill Road (between Polo Prince Dr and Ranfurly Road) are heavy (freight) vehicles. |
| **National Policy Statement for Freshwater Management 2020, Amended January 2024 (NPS-FM)** | | |
| **NPS-FM** | Obj: 1<br><br>Pol: 1,2, 4 5, 6, 7 and 9 | The NPS:FM provides a framework for the management of freshwater. Relevant policies in the NPS-FM include:<br>• Policy 2: Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.<br>• Policy 5, which seeks to ensure that freshwater is managed to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and improved;<br>• Policy 6, which seeks that there is no further loss of the extent of natural inland wetlands; and<br>• Policy 9: The habitats of indigenous freshwater species are protected. |

| | | |
|---|---|---|
| | | Clause 3.22(1) of the NPS-FM requires Auckland Council to include a policy in its plan, [and that policy has been added], that the "loss of extent of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where":<br><br>*1(a) The loss of extent or values arises from any of the following:*<br>*vi. the maintenance or operation of specified infrastructure, or other infrastructure (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020*<br><br>*1(b) The regional council is satisfied that:*<br>i. *the activity is necessary for the purpose of the construction or upgrade of specified infrastructure; and*<br>ii. *the specified infrastructure will provide significant national or regional benefits; and*<br>iii. *there is a functional need for the specified infrastructure in that location; and*<br>iv. *the effects of the activity are managed through applying the effects management hierarchy;*<br><br>The Project is for the purpose of the construction of 'specified infrastructure' that will provide significant national and regional benefits. While the Project will avoid waterbodies as far as practicable, there is a functional need for the Project in that location, as the Project connects two existing parts of the roading network on land which has been designated in the AUP(OP) for that purpose. Some streams and wetlands have been identified that are unable be avoided, and some works will be required in those locations, including reclamation and culverting. The adverse effects of the Project on water bodies and freshwater ecosystems will be appropriately managed in accordance with the effect management hierarchy, through the implementation of management plans and the relevant conditions of consent. |
| **National Policy Statement for Highly Productive Land 2022, Amended August 2024 (NPS-HPL)** | | |
| **NPS:HPL** | Obj: 1<br><br>Pol: 1, 8 and 9 | The NPS-HPL seeks to ensure highly productive land is protected for use in land-based primary production, both now and for future generations. The NPS-HPL requires that territorial authorities avoid the inappropriate use and development of highly productive land. Under the NPS, HLP includes land that is zoned general rural or rural production and is mapped as Land Use Capability (LUC) class LUC 1, 2, or 3.<br>NPS-HPL clause 3.4(2) excludes any land identified as FUZ from highly productive land as these areas have been through a planning process to be identified as suitable for urban development.<br><br>In addition, Clause 3.9(2)(h) of the NPS-HPL states:<br>*A use or development of highly productive land is inappropriate except where at least one of the following applies to the use or development, and the measures in subclause 3 are applied…*<br>*(h) it is for an activity by a requiring authority in relation to a designation or notice of requirement under the Act*<br>*…* |

| | | |
|---|---|---|
| | | *(j) it is associated with one of the following, and there is a functional or operational need for the use or development to be on the highly productive land:*<br>*(i) the development, operation, or decommissioning of specified infrastructure, including (but not limited to) its construction, maintenance, upgrade, expansion, replacement, or removal*<br><br>The southern end of the Project corridor traverses LUC Class 2 and 3 land (as mapped on the Auckland Council geomaps) that is zoned Rural - Mixed Rural Zone,. The NPS-HL is therefore applicable to this land.<br><br>The NPS-HPL recognises that there may be situations where it is appropriate for use and development to occur on highly productive land. The Project meet the definition of an exemption under Clause 3.9(2) of the NPS-HPL, because the use and development of this land is required in relation to a designation or a notice of requirement under the RMA. The project is also associated with the maintenance, operation, upgrade, or expansion of specified infrastructure, and have a functional or operational need for the use or development to be on the highly productive land (Clause 3.8(2)(j)(i)) as the Project connects two existing parts of the roading network. The project is not expected to significantly erode or fragment the highly productive land, because the project predominantly follows the existing road corridor therefore large parcels of land are not required, and as the mixed rural land is located solely on the eastern side of the project corridor, avoiding severance effects. Any adverse effects of the project on adjacent highly productive land will be appropriately mitigated prior to construction is required. |
| **National Policy Statement for Indigenous Biodiversity 2023 - Amended October 2024 (NPS-IB)** | | |
| **NPS-IB** | Obj: 1<br><br>Pol: 1, 3, 4, 7, 8 and 10 | The NPS-IB provides direction on the management of indigenous biodiversity. The objective is to “maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity”.<br><br>The Project will not affect any Significant Natural Areas (SNAs) as recognised under the NPS-IB, however there will be adverse effects on indigenous biodiversity that is not within a SNA, notably Cheesman’s Bush and Watercare Bush (classified as Significant Ecological Areas under the AUP(OP)).<br><br>With regard to areas outside a SNA the indigenous biodiversity Policy 8 seek that “the importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for”. Clause 3.16 also applies to indigenous biodiversity outside SNAs and states:<br>*(1) If a new subdivision, use, or development is outside an SNA and not on specified Māori land, any significant adverse effects of the new subdivision, use, or development on indigenous biodiversity outside the SNA must be managed by applying the effects management hierarchy.* |

| | | |
|---|---|---|
| | | *(2) All other adverse effects of any activities that may adversely affect indigenous biodiversity that is outside an SNA (other than indigenous biodiversity on specified Māori land (see clause 3.18)), must be managed to give effect to the objective and policies of this National Policy Statement.*<br><br>Clause 3.11 of the NPS-IB provides a pathway for specified infrastructure that impacts SNAs, recognising the significant regional and national public benefits that may be provided.<br><br>Additionally, Policy 10 provides for activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing that are recognised and provided for as set out in this National Policy Statement.<br><br>The Project is for the purpose of the construction of 'specified infrastructure' that will provide significant national and regional benefits. The Project has a functional need to be constructed in the proposed location within and proximate to areas with indigenous biodiversity values, and the actual and potential adverse effects on the indigenous biodiversity will be appropriately addressed in accordance with the effects management hierarchy. As such the Project is considered to be is consistent with the specific NPS-IB provisions relating to the construction of specified infrastructure. |
| **National Policy Statement on Electricity Transmission (NPS-ET)** | | |
| **NPS:ET** | Obj: 1<br><br>Pol: 1, 2, 10 | The NPS-ET provides direction on the management of the electricity transmission. The objectives and policies seek to recognise that the efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, its people and the environment by managing both the environmental effects of transmission and the environmental effects of third parties on the transmission network.<br><br>Policy 10 also requires, to the extent reasonably possible, activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised by third parties.<br><br>The project will require the relocation of one existing electricity transmission tower. Works will be managed to reduce the potential adverse effects from working beneath and around the National Grid. Engagement is occurring with Transpower in relation to relocation options, confirmation of working room clearance around transmission lines during construction and minimising potential impacts on the electricity networks as far as practicable. |

| | | |
|---|---|---|
| **National Environmental Standards (NES)** | | |
| **National Environmental Standards for Freshwater 2020 (NES-FW)** | | |
| **NES:FW** | | The NES:FW regulates activities that pose risks to the health of freshwater and freshwater ecosystems and give effect to the NPS-FM. The Project will require earthworks and the diversion of water within proximity of natural wetlands and the construction of culverts within stream beds. The regulations of relevance to these aspects of the proposal include those designed to protect natural inland wetlands, protect urban and rural streams from in-filling, and to ensure connectivity of fish habitat (fish passage).<br><br>The Project is for the purpose of the construction of 'specified infrastructure' that will provide significant national and regional benefits. The Project has a functional need to be constructed in the proposed location proximate to natural wetlands, and the actual and potential adverse effects on the natural wetlands will be appropriately addressed in accordance with the effects management hierarchy. As such the Project is considered to be is consistent with the specific NES-FW provisions relating to the construction of specified infrastructure. Further, the proposed culverts will be designed and constructed to provide for appropriate fish passage. |
| **National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS)** | | |
| **NES:CS** | | The NES-CS is a nationally consistent set of planning controls and soil contaminant values. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed, and if necessary, the land is remediated or the contaminants contained to make the land safe for human use. It applies to activities that disturb the soil if the relevant piece of land is, or has previously been, a Hazardous Activities and Industries List (HAIL) site.<br><br>A Detailed Site Investigation will be prepared and provided with the substantive application, to quantify the nature and extent of soil contaminant conditions within the Project area. This assessment will be completed in accordance with Ministry for the Environment Contaminated Land Management Guideline No 5, Site Investigation and Analysis of Soils (revised 2021) and be used to determine whether further site management is required. If required, a Contaminated Land Management Plan will be prepared prior to the commencement of any land disturbance activities and will be prepared in accordance with the Ministry for the Environment Contaminated Land Management Guidelines No. 1, Reporting on Contaminated Sites in New Zealand (revised 2021). |
| **National Environmental Standards for Air Quality 2004 (NES-AQ)** | | |
| **NES:AQ** | | The NESAQ provides a framework to identify and assess ambient air quality, setting a guaranteed minimum level of health protection. The construction and operation of a roading project can result in adverse impacts on |

| | | |
|---|---|---|
| | | human health and the environment from associated impacts on air quality, primarily as the result of dust generated by earthworks.<br><br>The potential effects of the Project on ambient air quality during the construction will be managed through the implementation of standard dust management measures to be implemented as part of the CEMP. Once the new corridor is operation, the air quality impacts will not material. |
| **National Environmental Standards for Sources of Human Drinking Water 2007 (NES-DW)** | | |
| **NES:DW** | | The NES-DW sets out a framework for the effective management of drinking water in New Zealand through reducing the risk of contamination – from source (including surface water and groundwater) through to the treatment plant and distribution system. This includes ensuring that the effects of activities in catchments on drinking water sources are considered in decisions on resource consents and in regional plans.<br><br>The Project works will be occurring in proximity of the Watercare Services Ltd (WSL) water supply infrastructure, including Hunua 4 pipeline, Redoubt Road reservoir and Mill Road reservoir complex. Engagement with WSL is ongoing, and works will be managed to reduce the potential for adverse effects on the water supply network from working in proximity to key infrastructure. The project will also involve works which interact with groundwater in the catchment, effects in this regard will be managed through the implementation of management plans and the relevant conditions of consent. |
| **National Environmental Standards for Electricity Transmission Activities 2009 (NES-ET)** | | |
| **NES:ET** | | The NES-ET set out a national framework of permissions and consent requirements for activities on existing electricity transmission lines and give effect to the NPS-ET. Regulated activities include the operation, maintenance and upgrading of existing lines. They apply only to existing high voltage electricity transmission lines.<br><br>The project will involve the relocation of one existing electricity transmission tower, requiring consent under the NES-ET. Engagement with Transport is ongoing, and works will be managed to reduce the potential adverse effects on the electricity network from working beneath and around the National Grid. |