

11 December 2023

Auckland Council

Attn: Michele Perwick

Via email: michele.perwick@aucklandcouncil.govt.nz

Dear Michele

Pilkington Park Plan Change Request – Response to Clause 23 Request for Further Information

Thank you for your letter dated 9 October which set out a number of further information requests under Clause 23(1) to Schedule 1 of the Resource Management Act 1991 relating to the above private plan change request.

This letter sets out our responses to the matters raised in your letter, and is supported by the following attachments:

- Attachment 1: Urban Design Memo
- Attachment 2: Provision of Open Space Map
- Attachment 3: Height in Relation to Boundary Comparison
- Attachment 4: Landscape Memo
- Attachment 5: Economic Memo
- Attachment 6: Transport Memo
- Attachment 7: Acoustic Memo
- Attachment 8: Identification of KiwiRail Land
- Attachment 9: Correspondence with KiwiRail
- Attachment 10: Assessment of Relevant Plans
- Attachment 11: Assessment of the RPS

The requests and our responses are set out overleaf.

In response to the clause 23 requests for further information, a number of amendments have been made to the proposed Pilkington Park Precinct Provisions, appended to this response.

Yours sincerely | Nāku noa, nā

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	Reasons for request	Specific Request	Response
	<i>Urban Design</i>		
UD1	<p>This is a significant, highly accessible brownfield site under single ownership. Future redevelopment of this site needs to be carried out in a co-ordinated manner to avoid piecemeal / ad-hoc redevelopment without consideration of the bigger picture.</p> <p>Successful large-scale brownfield urban redevelopments are often guided by comprehensive approaches such as master planning or establishing strategic outcomes for the site. Local examples of this are TRC, Stonefields and Te Tauoma.</p> <p>Yet it is understood that this proposal relies on the provisions of the draft precinct and the underlying BMU zoning to deliver outcomes.</p>	<p>Comprehensive development</p> <p>Section 2.2 of the Urban Design Assessment confirms that ‘any future development would be subject to a comprehensive design process’.</p> <p>Please clarify what is meant specifically by ‘subject to a comprehensive design process’ and how a comprehensive design for this site would be processed.</p>	Refer to the Urban Design Memo included at Attachment 1 .
UD2	<p>The streetscape environment along Apirana Avenue / Pilkington Road towards the town centre is compromised in terms of pedestrian safety (CPTED) and amenity. The open space zoned land (comprising 84% of the site’s frontage along the eastern boundary contains well-established specimen trees / vegetation) making visibility into the site from the street very difficult and, creating a large setback the street edge.</p>	<p>Streetscape Outcomes</p> <p>Please provide information on how future development will ensure positive streetscape outcomes from a CPTED point of view, to encourage walkability to and from the site.</p>	Refer to the Urban Design Memo included at Attachment 1 .

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	<p>The site is highly accessible. It is located within the proposed walkable catchment of the Glen Innes town centre and train station. An increase in pedestrian traffic associated with future development in a BMU zone is likely, and this raises the need for information on how CPTED matters, will be addressed to encourage walkability to and from the site.</p>		
UD3	<p>It is understood that greater building height and residential density is an outcome the applicant wishes to achieve for this site. The plan change proposal does not include additional residential amenity standards other than minimum dwelling size, outlook, and specific acoustic provisions along the western boundary. Therefore, the BMU zone and proposed precinct provisions are not likely to provide enough certainty to ensure broader residential amenity outcomes will be achieved.</p>	<p>Residential amenity outcomes Further analysis is requested to determine whether the provisions of the plan change proposal are sufficient to address residential amenity outcomes for this site or whether additional standards i.e. shading due to greater building height, building separation, overlooking, privacy, outdoor living spaces would be required to manage onsite residential amenity.</p>	<p>The following is noted in relation to the management of residential amenity under the proposed provisions and operative Mixed Use zone provisions:</p> <ul style="list-style-type: none"> • The proposed plan change request seeks to apply the operative provisions within the Mixed Use zone to the Plan Change area. The operative Mixed Use zone provides for dwellings as a permitted activity under H13.4.1(A2) and includes relevant standards for new buildings and residential dwellings under H13.6. • While dwellings are provided for as permitted activity in the Mixed Use zone, any new buildings will require resource consent under rule H13.4(A45), which gives the Council’s ability to assess whether the proposed building achieves the anticipated outcomes of the zone, including “a mix of compatible residential and non-residential activities” (Objective H13.2(8)), and “a high level of amenity” (Objective H13.2(9)). This framework will ensure that any new development will need to be compatible with the local context, and able to co-existing with existing activities.

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		<ul style="list-style-type: none"> Standard H13.6.1 Building Height permits total building heights of up to 21m and 27m across a number of existing Mixed Use zoned sites. For example, the Mixed Use zone around Mt Wellington Highway and Carbine Road, Redoubt Road, and Remuera Road permit buildings heights up to 27m through a height variation control. Residential development within these sites is managed in accordance with the operative Mixed Use zone standards. The management of residential amenity for residential activities and buildings up to 27m under the operative provision of the Mixed Use zone is therefore consistent with the existing approach under the AUP. 						
<i>Non Cl23(1) request matter/other comments</i>								
UD4	<p>The plan change area site is a large-scale (7ha) brownfield parcel of land in single ownership. The site is within walking distance of Glen Innes Town Centre and Train Station and, is well-located in terms of proximity to open spaces, employment areas, public transport and other amenities.</p> <p>The plan change proposal presents an opportunity to intensify the site with a mix of commercial and residential activities. However, this needs to be considered holistically, to ensure that future development of such a strategic site can be undertaken in a coordinated and integrated manner.</p> <p>The BMU zone allows for generous flexibility of residential and commercial land uses and the proposed precinct provisions seek to manage amenity for activities sensitive to noise associated with the railway located along the western boundary and to remove the HIRB provision along the eastern boundary. The BMU zone and proposed precinct provisions do not provide enough direction to ensure both strategic planning and good design outcomes are achieved. This should include:</p> <ul style="list-style-type: none"> - Coordinated movement and land use development across the plan change area. 	<p>Consideration to these matters is noted below:</p> <table border="1" data-bbox="1272 807 1955 1366"> <thead> <tr> <th data-bbox="1272 807 1518 847">Matter Raised</th> <th data-bbox="1518 807 1955 847">Comment</th> </tr> </thead> <tbody> <tr> <td data-bbox="1272 847 1518 1038">Coordinated movement and land use development across the plan change area</td> <td data-bbox="1518 847 1955 1038">This matter will be addressed through amendments proposed to the Pilkington Park Precinct, including to the Precinct Description, Objective IX.2(1) and (2), Policy IX.3(3), and IX.8.1(1)(b), and IX.8.2(1)(b).</td> </tr> <tr> <td data-bbox="1272 1038 1518 1366">Ensuring desirable built form / streetscape outcomes along the Apirana Avenue and Pilkington Road frontage, where the site adjoins the Council-owned open space / road reserve to promote and encourage safe</td> <td data-bbox="1518 1038 1955 1366">This matter will be addressed through the following matters of discretion and assessment criteria within the Mixed Use zone provisions: <ul style="list-style-type: none"> H13.8.1(3)(c): the extent of glazing provided on walls fronting public streets and spaces and the benefits it provides; H13.8.1(3)(e): the application of Crime Prevention through Environmental </td> </tr> </tbody> </table>	Matter Raised	Comment	Coordinated movement and land use development across the plan change area	This matter will be addressed through amendments proposed to the Pilkington Park Precinct, including to the Precinct Description, Objective IX.2(1) and (2), Policy IX.3(3), and IX.8.1(1)(b), and IX.8.2(1)(b).	Ensuring desirable built form / streetscape outcomes along the Apirana Avenue and Pilkington Road frontage, where the site adjoins the Council-owned open space / road reserve to promote and encourage safe	This matter will be addressed through the following matters of discretion and assessment criteria within the Mixed Use zone provisions: <ul style="list-style-type: none"> H13.8.1(3)(c): the extent of glazing provided on walls fronting public streets and spaces and the benefits it provides; H13.8.1(3)(e): the application of Crime Prevention through Environmental
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	<ul style="list-style-type: none"> - Ensuring desirable built form / streetscape outcomes along the Apirana Avenue and Pilkington Road frontage, where the site adjoins the Council-owned open space / road reserve to promote and encourage safe pedestrian connections to and from the site. - Ensuring broader residential amenity outcomes beyond what the BMU zone requires. <p>In addition, further consideration is needed to ensure that a greater level of certainty can be given to achieving a comprehensive development for a site of this scale and significance through the consenting process. For example, considering the inclusion of special information requirements such as a masterplan to be prepared at the time of the first application for subdivision or land use within the precinct to address the following:</p> <ul style="list-style-type: none"> • Overall layout • Movement network and site access • Location of open space and landscaping at a high level (in particular, along the rail corridor where there is an opportunity for a landscaped buffer) • Building footprints to help illustrate the relationship between buildings and spaces and how these support the intended outcomes for the site • Land use and densities • Housing typologies • Site opportunities e.g., a ‘marker’ building at the northern-most corner of the site fronting the Apirana Avenue roundabout; retention of existing significant vegetation; etc <p>For such a large site area, reliance on the AUP and the basic consenting processes is unlikely to result in good urban design outcomes.</p>	pedestrian connections to and from the site.	<p>Desing principles to the design and layout of buildings adjoining public spaces;</p> <ul style="list-style-type: none"> • H13.8.2(3)(g), (h), and (k) and Policy H13.3(3): require development to be of a quality and design that positively contributes to: (a) planning and design outcomes identified in this Plan for the relevant zone; (b) the visual quality and interest of streets and other public open spaces; (c) pedestrian amenity, movement, safety and convenience for people of all ages and abilities.
		Ensuring broader residential amenity outcomes beyond what the BMU zone requires	Refer to UD3 above.
		Overall layout	This matter will be addressed through proposed IX.8.1(1)(b), and IX.8.2(1)(b).
		Movement network and site access	<p>This matter will be addressed through proposed IX.8.1(1)(b) and IX.8.2(1)(c) and (e).</p> <p>These considerations will also be addressed under the provisions of Chapter E27 Transport.</p>
		Location of open space and landscaping at a high level (in particular, along the rail corridor where there is an opportunity for a landscaped buffer)	<p>This matter will be addressed through the following matters of discretion and assessment criteria within the Mixed Use zone provisions:</p> <ul style="list-style-type: none"> • H13.8.1(3)(g): the positive effects that landscaping, including required landscaping, on sites adjoining public spaces is able to contribute to the

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			<p>amenity values of the people using or passing through the public space;</p> <ul style="list-style-type: none"> H13.8.2(3) and Policy H13.3(3)(c): require development to be of a quality and design that positively contributes to: ... (c) pedestrian amenity, movement, safety and convenience for people of all ages and abilities. Proposed IX.8.2(1)(d).
		Building footprints to help illustrate the relationship between buildings and spaces and how these support the intended outcomes for the site	Future building footprint are not known at this time, however, proposed IX.8.1()(b) and IX.8.2(b), (c), and (e) will provide discretion to consider the relationship between buildings and spaces and how these support the objectives of the Precinct.
		Land use and densities	This will be managed under the Business Mixed Use Activity Table (H13.4) and the relevant bulk and location standards.
		Housing typologies	This matter is managed under the Business Mixed Use Activity Table (H13.4) and the relevant bulk and location standards.
		Site opportunities e.g., a 'marker' building at the northern-most corner of the site fronting the Apirana Avenue roundabout; retention of existing significant vegetation.	The northernmost corner of the Plan Change area and existing vegetation are located outside of the proposed Pilkington Park Precinct.
<i>Open Space/Parks/Community Facilities</i>			

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OS1	<p>The s32 report states: “In summary, the surrounding open space, amenities, and social facilities are accessibly by active modes of transport and are of a sufficient size to cater for the social and cultural needs and well-being of future residents of the Plan Change area.”</p> <p>Aside from listing nearby open spaces, the basis for this conclusion is not explained. The number of residents who may potentially occupy the site has not been provided, nor the demand for open spaces in the future estimated. It is not clear if existing open spaces in the area will cater for existing users and people from the development over time.</p>	<p>Open Space Needs</p> <p>Please provide an estimate of the occupancy of the site if developed to the maximum permitted by the proposed zone and standards and provide an assessment of open space needs, for example the size and proximity of local purpose reserves based on council’s open space provision policy and expected development within the area permitted by the plan and PC85.</p>	<p>The estimated maximum occupancy of the site is 711 residential dwellings under the highest density development scenario. This estimated occupancy is a maximum under the highest potential density, whereas the Mixed Use zone provides for a range of other non-residential activities to be developed.</p> <p>It is considered that the existing open spaces in the area will cater for the needs of any future residents, including as the Plan Change are is developed over time. In accordance with the provision metrics for open space needs, Attachment 2 identifies all open spaces available to meet the needs of future residents and accessible within a 400m and 1000m walking distance in accordance with the accessibility anticipated for high and medium density areas.</p>
OS4	<p>No analysis has been provided to demonstrate that removing the HIRB standard and increasing the maximum building height would be the most effective and efficient means to achieve objectives (B2.31 and IX.2.2) discussed in the s32 report.</p>	<p>Building height and Height in relation to boundary</p> <p>Please provide bulk and location drawings which demonstrate the difference in built outcomes from applying the BMU’s HIRB standard compared to the proposal to have no HIRB control alongside open space, while also considering the proposed 21m and 27m maximum building heights.</p> <p>Please explain how the difference in built form made possible by excluding the HIRB control results</p>	<p>Comparison drawings are included at Attachment 3.</p> <p>The benefits of this option are identified at Table 3 of the of the Section 32 Report.</p>

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		in any material beneficial outcomes with respect to the listed bullet point objectives in the s32 report.	
OS5	This information is required to determine future potential effects on council's land asset.	<p>Road crossings</p> <p>Please provide an assessment of how any new or altered road crossings to future development on site could affect the council reserve and how these effects would be managed.</p>	<p>The Plan Change area includes four existing vehicle crossings from Pilkington Road and Apirana Avenue and any new or altered vehicle crossings will be determined at the time of future development. The potential effects will be managed through the resource consent and land owner approval processes.</p> <p>As Pilkington Road and Apirana Avenue are identified as arterial roads under the AUP planning maps, resource consent will be required for any new vehicle crossing or the use of the existing vehicle crossings to service new activities under E27.4.1 (A5).</p>
	<i>Landscape</i>		
L1	The plane heights as indicated on Auckland Council GIS Maps are accurate to a degree, however where development is within close proximity to a viewshaft (such as the proposed increased heights of future built form would be), a survey report undertaken by a registered survey is typically provided to demonstrate compliance. In this instance, the HVC was informed by the existing viewshaft overlays and aims to not impede these but does not confirm if this has been surveyed accurately.	<p>Surveyor's report</p> <p>Please provide a surveyor's report / calculation to confirm the plane heights (rolling height method) across the site in relation to the co-ordinates within Schedule 9 to confirm the suitability of the 21m and 27m Height Variation Control (HVC).</p>	<p>The AUP, including provisions of the RPS, includes objectives, policies, rules, and standards that seek to protect significant views to and between the maunga.</p> <p>Chapter D14 includes provisions which manage development within the Volcanic Viewshaft Overlay. In particular, buildings and structures that do not intrude into a viewshaft must confirm compliance through a report from a registered surveyor. In this case, the provisions of D14 will apply at the time of future development.</p> <p>There are also existing sites within the region where the maximum building height permitted by the underlying zone exceeds that of the volcanic viewshaft contour, for example, the Metropolitan Centre zone around New Market. In these</p>

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			<p>instances, views to and between maunga are managed and protected under the provisions of the Overlay chapter.</p> <p>Therefore, the proposal will not compromise protection of the views to or between the maunga and their values, which are managed under existing provisions of the AUP. The operative D14 provisions will ensure accurate survey at the time of future development.</p>
L2	<p>Viewpoint photos from seven representative catchments identified by the assessor within the LVA have been provided, however, to understand the potential landscape effects (including landscape character, visual amenity and connections/views to the maunga) of the proposed HVC more information should be provided visually to represent the appropriateness of the HVC.</p>	<p>Photo simulations Please provide a set of images which visually demonstrates from the seven viewpoints used in the Landscape & Visual Effects Assessment (LVA), the comparison between the existing Business Light Industry (BLI) (20m), PC78, buildings within a walkable catchment (21m) and the proposed 21m and 27m HVC.</p>	<p>Refer to the Landscape Memo included at Attachment 4.</p>
L3	<p>The LVA recognises the presence of the scheduled volcanic viewshafts, and briefly notes that the HVC will not impede these elements. As part of the AUP (OP) Regional Policy Statement B4 – Natural Heritage aims to protect both significant public views (viewshafts) and views between Auckland’s maunga, are protected from inappropriate subdivision, use and development (B4.3.1 (1)).</p>	<p>Maunga Please provide an assessment of views between maunga; including from Maungarei (Mount Wellington) to Rangitoto and Maungarei to Te Taurere (Mount Taylor). This assessment is to be supported by photo simulations of the potential effects of future development under the various maximum building heights of the</p>	<p>Objective B4.3.1(1) seeks to protect significant public view to and between Auckland’s maunga from inappropriate subdivision, use and development. Policy B4.3.2(1) and B4.3.2(2) give effect to Objective B4.3.1(1) by identifying and evaluating views to or between maunga and including these views within Schedule 9 Volcanic Viewshafts Schedule. Objective D14.2(1) of the Volcanic Viewshafts and height Sensitive Areas Overlay Chapter also gives effect to the RPS by seeking to protect regionally significant views to and between Auckland’s maunga. Therefore, views between maunga are managed and appropriately protected under the operative AUP framework</p>

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		AUP BLI zone, Proposed PC78 BMU zone and the proposed HVCs.	and volcanic viewshaft controls, which will apply to future development within the Plan Change area. As discussed above, the proposed plan change will provide for building heights that are below the contour of the volcanic viewshaft, and will not compromise protection of the views to or between the maunga and their values.
L4	The LVA has undertaken an assessment of the potential visual amenity effects resulting from the change in zoning proposed by the PPC. The assessor in 'Part 6.1 Neighbourhood Perspective' concludes that "potential visual effects from a neighbourhood perspective to be very low" but it is unclear if this is the effects relating to the visual amenity effects only or also the impact on landscape character values. The assessor is asked to provide clarity on the impact of the PPC on the landscape character effects, and visual amenity values (as a subset of landscape values).	<p>Landscape character</p> <p>Please provide a clear assessment and level of effects, the PPC may have on landscape character values from a local and wider landscape perspective, including the impact the HVC will have on the biophysical, associative and experiential values (this includes urban values / characteristics).</p>	Refer to the Landscape Memo included at Attachment 4 .
	<i>Non Cl23(1) request matter/other comments</i>		
1	See Urban Design non Cl23 matters.		
2	Note: There are inconsistencies in the height variations shown on the planning maps and the Executive Summary of the s32 report.		We confirm the height variation sought is 21m. This will be updated in subsequent revisions of the s32 report.
3	Note: The Landscape and Visual Effects Assessment methodology notes that "the assessment has been prepared in accordance with Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines (May 2022)". It is noted that the most recent version of TTatM is dated July 2022 ('Te Tangi a te		This is noted and will be updated in subsequent revisions of the Landscape and Visual Effects Assessment.

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	Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022').		
	<i>Economic Effects</i>		
E1	This information will help understand the site within the industrial space market context of the Auckland region and the eastern/southern catchment area (as defined in economic assessment).	<p>Site activity</p> <p>Please provide information on the site's current and recent past activity. For the existing activity, it would be helpful to advise on the geographic catchment areas served and approximate employment levels.</p>	Refer to the Economic Memo included at Attachment 5 .
E2	While this potential activity can be partly inferred from the industrial land assessment, it would be useful to estimate the likely potential development (taking into account likely facility if the site remained zoned BLI. This will be helpful to understand any economic effect of a change in local employment opportunity.	<p>Employment potential</p> <p>Please provide an assessment of the employment potential on the site within the current BLI zone provisions applied and any changes in the level of employment with a change to a B-MU zone.</p>	
E3	It is important to understand the effects of commercial activity that could be enabled to establish on the site, on the role and function of the Glen Innes town centre. This includes understanding whether the commercial activity may dilute any retail/commercial activity within the existing core centre area.	<p>Commercial activity</p> <p>Please provide an estimate of the level and type of commercial activity able to be established on the site if a B-MU zone is applied.</p> <p>In particular, it is important to understand the potential level of retail and other centres-based activity that could be reasonably accommodated on the site if it</p>	

	Reasons for request	Specific Request	Response
		were developed with a commercial focus.	
E4	This information will be useful in understanding part of the economic costs and benefits of the proposal relating to the additional demand from household growth in this location.	<p>Residential activity</p> <p>Please provide an economic assessment of the likely residential household yield on the proposed site or any assessment of the appropriateness of residential development in this location.</p> <p>Please identify any additional demand generated for retail, hospitality and household services commercial activity from the additional household growth.</p>	
	<i>Stormwater</i>		
HW1	<p>This information is required to enable understanding of the plan change proposal.</p> <p>Auckland Council Healthy Waters holds a NDC for stormwater which commenced on 30 October 2019. Diversions and discharges of stormwater through the public network are permitted by the NDC provided that the discharges and network are authorised by a SMP, and the impervious area is lawfully established. This includes a privately built network that wants to connect to the public stormwater network.</p>	<p>Stormwater discharge</p> <p>Please confirm if the Applicant wishes to apply for a private stormwater discharge consent or seek to be considered under the Auckland Council Healthy Waters Regionwide Stormwater Network Discharge Consent (NDC).</p> <p>If the Applicant seek to come under the NDC, please submit a Stormwater Management Plan (SMP) as part of the plan change proposal.</p>	Stormwater management for redevelopment will be determined as part of the future consenting process, where a private stormwater discharge consent or consideration under the NDC will be sought. The Plan Change proposal does not include or provide for the development of new buildings.

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	<p>For large brownfields re-developments (i.e. 20 lots and over or more than 5,000m² of impervious area), it is a requirement of the NDC that a SMP is notified with the plan change documents and meets the NDC's requirements, including Schedule 2 (which sets out the NDC's strategic objectives, outcomes, and targets) and Schedule 4 (the performance requirements).</p> <p>HW2-5 below will be relevant should the Applicant seek to come under the NDC.</p>		
HW2	<p>There is flooding identified downstream of the plan change area and the Applicant needs to explain how they intend to ensure that any flooding impacts downstream are avoided, remedied, or mitigated.</p> <p>Section 3.1.2 of the Civil Engineering Report stated that stormwater treatment and hydrology mitigation is required but did not address whether attenuation of the 10% and 1% AEP events will be required.</p> <p>It is recommended that attenuation of the 10% AEP event is considered. Considering that greater than 50% of the site area is to be redeveloped, this means that the pre-development scenario should be considered as greenfield to establish attenuation requirements.</p>	<p>Stormwater attenuation</p> <p>Please provide an assessment of downstream network capacity, network upgrade requirements, post development drainage catchments and assessment of effects.</p> <p>If the Applicant does not want to undertake the above assessments, then flood modelling will be required to support the plan change proposal to demonstrate that there will be no increase in flood risks downstream.</p>	<p>The plan change proposal is to rezone the site from the Business – Light Industry zone to the Business – Mixed Use zone, and no new buildings or development is proposed at this time. It is noted that the site is currently developed to 100% impervious surfaces, and any future redevelopment will not add additional stormwater loading to the downstream network.</p> <p>Schedule 4 of the NDC sets out the attenuation requirements that would apply to any future redevelopment of the Plan Change area, as noted at Section 3.1.2 of the Civil Engineering Report.</p> <p>On the basis that the requirements of the NDC will apply to future redevelopment, and the ability to accommodate a suitable stormwater management solution is available, stormwater effects associated with the proposal can be appropriately managed.</p>

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HW3	<p>Section 3.1.3 of the Civil Engineering Report is confusing. It referenced the treatment of all impervious surfaces with a GD01 device, but then also mentioned Chapter J of the AUP(OP) and treatment of High Contaminant Generating Areas.</p> <p>The request is to clarify our understanding of the proposed stormwater treatment.</p>	<p>Stormwater treatment</p> <p>Please confirm if stormwater treatment of all impervious surfaces with a GD01 device is proposed.</p>	<p>As identified above, no new development or impervious surfaces are proposed. As such, GD01 devices are not proposed at this time.</p> <p>As detailed in Section 3.1.3 of the Civil Engineering Report, any future stormwater quality devices that are needed must be designed in accordance with GD01. The AUP(OP) also includes additional standards contained in Chapter E9 Stormwater quality - High contaminant generating car parks and high use roads. The relevant requirements of GD01 and the AUP will apply at the time of future development.</p>
HW4	<p>Section 3.1.4 and Appendix B of the Civil Engineering Report provided generic retention and detention volume calculations, assuming that the entire development will be 100% impervious.</p> <p>No geotechnical information has been provided to suggest that retention through infiltration would be possible. Therefore, it should be assumed that full detention will be required, with guidance provided that infiltration testing will be required at the next stage of the development design.</p> <p>Section 3.1.4 suggested that the retention and detention volume could be provided through rain tanks, tree pits and raingardens. This would appear to be promoting small scale devices which would not be cost effective for Auckland Council and/or Auckland Transport to maintain.</p>	<p>Stormwater retention and detention</p> <p>Please provided information to demonstrate how the retention and detention requirements will be met to service any future development enabled by the plan change proposal.</p> <p>Please note, it is requested under the NDC requirements that the consideration of communal devices, together with approximate locations are provided.</p>	<p>Stormwater retention and detention needed to accommodate future development would be made up of both private systems and public systems, depending on the developed layout of the site. The size of the Plan Change area provides flexibility in how stormwater management facilities are provided for.</p> <p>It is also noted that should the site be proposed to be included under the NDC, a SMP will be prepared at the time of future development.</p>

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HW5	<p>Section 3.1.6 of the Civil Engineering Report stated that there are no significant flow paths on the site. It considered that there will not be any impact on flooding downstream as the existing flow path will be incorporated into the development design.</p> <p>However, Auckland Council's GeoMaps indicates that there is a flowpath on the site that has a contributing catchment of over 44,000m². We are wanting to avoid any downstream flooding impacts from future development of the site.</p>	<p>Flooding and overland flow path</p> <p>Please demonstrate how the existing overland flow path on the site will be incorporated into the development design to avoid any potential impacts on flooding downstream.</p>	<p>The potential effects on existing overland flow paths will be assessed at the time of future development. Chapter E36 Natural hazards and flooding of the AUP(OP) includes resource consent requirements for activities in overland flow paths. This includes diverting the entry or exit point, piping or reducing the capacity of any part of the overland flow path (E36.4.1(A41)) and the location of buildings and structures within or over an overland flow path (E36.4.1(A42). In the event that future redevelopment involves activities in overland flow paths, the existing provisions and resource consent requirements of the AUP(OP) will manage any potential impacts on flooding downstream.</p>
<i>Transport</i>			
T1	<p>Traffic volumes from future development on the site has implications for the capacity of the local network to accommodate more activity and corresponding traffic demand.</p>	<p>Existing roads Section 3.2 of ITA</p> <p>Please provide an assessment to determine whether the static traffic volumes on adjoining roads are a result of the local network operating at capacity as opposed to being a result of flattened traffic demand?</p>	<p>Refer to the Transport Memo included at Attachment 6.</p>
T2	<p>It is unclear when the 'Links to Glen Innes Cycleways' project will be implemented. This project will be critical in improving accessibility for future residents from an active modes perspective.</p>	<p>AT Cycleways programme Section 3.5 & 3.6 of ITA</p> <p>Please include construction timeframes for Auckland Transport's Links to Glen Innes Cycleways project in the ITA.</p>	<p>We understand that construction for this phase of the Links to Glen Innes Cycleways project is planned for completion in 2024.</p>

	Reasons for request	Specific Request	Response
T3	This is helpful to understand the level of reach demonstrated Figures 11 and 13.	Walking and cycling speed assumptions Section 3.5 & 3.6 of ITA Please provide the underlying walking and cycling speed assumptions	Refer to the Transport Memo included at Attachment 6 .
T4	It is unclear whether there are any underlying safety issues along the corridor corresponding to active modes.	Crash records Section 3.7 of ITA Please advise whether any of the crashes involved pedestrians or cyclists.	Refer to the Transport Memo included at Attachment 6 .
T5	The Tāmaki Regeneration Programme will result in additional development occurring in the coming decades, which will likely occur at the same time as development within the plan change area. This needs to be considered. Any other future development that may occur within the surrounding area should also be discussed in this section.	Neighbouring developments Section 3.10 of ITA Please describe the potential development that will occur in the vicinity, including the wider Tāmaki Regeneration Programme.	Land surrounding the Plan Change area is zoned THAB and MHU, and within the Tāmaki Regeneration area. Other than those consented or completed developments set out at Section 3.10 of the ITA included at Appendix 7 of the Section 32 Report, the future planned development within the vicinity is unknown. In relation to trip generation, it is noted that both the Plan Change area and surrounding environment, including the Tāmaki Regeneration area, are highly accessible to both existing and planned public transport and active mode infrastructure, which will ensure that transport choice is available to future site users.
T6	The trip rate for terraced houses stated in table 3 is incorrect and should be updated to a midpoint of 0.575.	Trip rates [minor error] Section 6.2 of ITA Please add the correct trip rate for terraced houses in table 3, and confirm rates are peak hourly trip rates.	Refer to the Transport Memo included at Attachment 6 .

	Reasons for request	Specific Request	Response
T7	It is unclear what source has been used for the trip rates in table 4.	<p>Trip rates Section 6.2 of ITA</p> <p>Please confirm the source of the trip rates used for non-residential activities in table 4 and confirm rates are peak hourly trip rates</p>	
T8	<p>It is important to understand the traffic flow assumptions underpinning this assessment, and to be confident that the calculations have been made accurately for both roundabouts.</p> <p>[Note that the Auckland Forecasting Centre may be able to assist in providing future traffic volumes.]</p>	<p>Traffic forecasts Section 6.2 of ITA</p> <p>Please outline how figures 29 and 30 relating to future peak hour traffic flows have been developed. Specifically:</p> <ol style="list-style-type: none"> a. When were the underlying intersection surveys collected? b. What is the peak hour for the evening period? c. Has an allowance for the removal of existing activity on site been made? d. Has an allowance for growth and/or the addition of other consented/anticipated development (other than the under construction Tāmaki Regeneration Programme build)? 	

	Reasons for request	Specific Request	Response
		<p>Is all traffic generation anticipated to be (new) primary trips on the network?</p> <p>e. What is the basis of the trip distribution assumptions used?</p>	
T9	<p>This is considered best practice to ensure the Sidra model appropriately reflects the current operating environment.</p>	<p>Sidra modelling Section 6.4 & 65.5 of ITA Please provide the Sidra intersection models and confirm whether the existing Sidra models' performance has been calibrated against observed roundabout performance (e.g. current observed delays or queue lengths in peak hours)?</p>	
T10	<p>These intersection works are in AT's forward work programme and should be tested in the modelling.</p>	<p>Sidra modelling _ Merton Road roundabout Section 6.4 & 6.5 of ITA Please undertake a sensitivity test for the Merton Road roundabout to reflect the reduced capacity shown in figure 10 of the ITA?</p>	
T11	<p>To establish whether the existing 1.8m wide footpath along the site frontage, existing nearby footpaths that provide access between the site and pedestrian destinations, and AT's proposed zebra</p>	<p>Level of service for pedestrians Please provide an assessment of the level of service to be provided for pedestrians. This should focus on the connections across Apirana</p>	

	Reasons for request	Specific Request	Response
	crossings at the Merton Road / Apirana Avenue roundabout provide a satisfactory level of service for pedestrians.	Avenue to other likely destinations and take into account AT's proposed zebra crossings at the Merton Road/Apirana Avenue roundabout.	
<i>Noise and Vibration</i>			
NV1	The assessment describes the existing 'legal' environment with no reporting of the existing noise environment at the site. This information is required to assess compatibility with any future residential activity.	<p>Existing noise environment</p> <p>Please provide comments on the existing noise environment in regard to existing ambient and background levels and the contribution from business activities, rail and road traffic sources.</p>	Refer to the Acoustic Memo included at Attachment 7 .
NV2	As no rail noise measurements were completed, it is important to confirm the KiwiRail noise guideline is appropriate for this Site.	<p>Railway noise</p> <p>Please confirm the KiwiRail guideline for railway noise of 70 dB LAeq(1hour) at 12m from the track is representative for design purposes.</p>	
NV3	The KiwiRail document titled 'Model district plan provisions' clearly refers to 'All zones – at any point within 100 metres from the legal boundary of any railway network'.	<p>Railway noise effects area</p> <p>Please provide additional comments/evidence why the recommended 60m effects area is appropriate for this site.</p>	
NV4	Although acoustic treatment will mitigate indoor noise levels to a reasonable level, a minority of future occupants may still be	<p>No-complaints covenant</p> <p>Please advise if a no-complaint covenant is appropriate for</p>	As identified proposed precinct provision for activities sensitive to noise within 60m of the rail corridor will provide a reasonable and appropriate level of mitigation for any

	Reasons for request	Specific Request	Response
	annoyed to the extent that complaints may be made to KiwiRail.	ensuring reverse sensitivity effects on KiwiRail are avoided.	potential adverse effects on indoor noise levels. The risk of actual or potential reverse sensitivity effects is therefore considered to be very small, such that a no-complaints covenant is not necessary or appropriate.
NV5	Setback distance is a critical mitigating factor and an indicative setback distance should be quantified. Such distances are also necessary for the safe operation of the Eastern Railway Line.	Minimum setback distance Please advise the recommended minimum setback distance that Activities Sensitive to Noise should be located from the rail corridor to ensure compliance with the recommended rail vibration criterion of 0.3mm/s vw95.	Refer to the Acoustic Memo included at Attachment 7 .
NV6	Road traffic noise, like rail noise, is not controlled by any AUP standards, but traffic noise effects have not been discussed.	Road traffic noise Please advise if road traffic noise (existing & future) from the two arterial roads next to the eastern site boundary will give rise to adverse effects in buildings containing Activities Sensitive To Noise.	Refer to the Acoustic Memo included at Attachment 7 .
<i>Non Cl23(1) request matter/other comments</i>			
1	Paragraph 8.1 design considerations do not specifically include designing facades (that are most exposed to rail noise) to comprise a more solid construction (i.e. minimal glazed areas) and without balconies or, designing internal layouts so that non-habitable space share the most exposed façade. These design considerations should be discussed.		The proposed precinct provision for activities sensitive to noise within 60m of the rail corridor sets out the internal noise level that new buildings must achieve. While methods to achieve this, include the location, orientation and layout of buildings and the use of construction materials, the proposed provision will provide flexibility for

	Reasons for request	Specific Request	Response
			<p>future developers, and does not specify how the required internal noise levels must be achieved.</p> <p>As the layout of future development is not yet known, the proposed provision is effective and efficient as it will ensure that the appropriate internal noise levels necessary to mitigate noise effects will be achieved.</p>
<i>Planning, Statutory and other matters</i>			
P1	To enable a full understanding of the location the two landholdings making up the subject site and how this could potentially affect future development capacity and site viability.	<p>Planning maps</p> <p>Please provide a plan showing the extent of the KiwiRail landholdings to be included within the proposed plan change area to be rezoned.</p>	This map is included at Attachment 8 .
P2	No evidence of an agreement by the landowner has been provided.	<p>KiwiRail railway corridor</p> <p>Please provide evidence of Kiwirail's agreement to include part of their railway corridor within the plan change.</p>	Kiwirail's agreement to include this land within the Plan Change is included at Attachment 9 .
P3	This is a requirement of clause 21 (2) - Form of the request under Schedule 1 of the RMA. It will enable a full understanding of the views of those people and organisations the Applicant consulted with.	<p>Consultation</p> <p>Please provide further information on the views of the people and organisations the Applicant has consulted with and how the Applicant has specifically responded to those views.</p>	Consultation undertaken during the development of the Proposed Plan Change is included at section 6 of the Section 32 Report, including the matters raised by each organisation. The consultation undertaken and nature of comments and feedback received are considered to be commensurate with the scale and complexity of the Plan Change application.
P4	The Tamaki Regeneration Company (TRC) was established by Central Government and Auckland Council to facilitate the regeneration of Tamaki. TRC estimates	<p>Tamaki Regeneration Masterplan</p> <p>Please provide an assessment of the proposal against the strategic</p>	An assessment against the relevant strategic priorities and key moves of the Tamaki Regeneration Masterplan is included at the Attachment 10 .

	Reasons for request	Specific Request	Response
	<p>that 2500 public houses will transform into 10,500 new private and market affordable and public homes. There will be additional growth on non-TRC owned land.</p> <p>The proposed site lies within the Tamaki Employment Precinct of this Masterplan. It is important to understand how the proposed plan change aligns with the strategic priorities and key moves set out in that masterplan.</p>	<p>priorities and key moves of the Tamaki Regeneration Masterplan.</p>	<p>Overall, it is considered that the proposed plan change is in keeping with the key moves, priorities identified within the Employment Precinct, and overall regeneration priorities.</p>
P5	<p>Policy B.6.5.2(7) requires a Māori cultural assessment in structure planning and plan change processes.</p>	<p>Cultural values assessment Please provide a cultural values assessment.</p>	<p>Mana whenua groups with a registered interest in the Plan Change area were notified during the development of the Plan Change proposal. A total of 15 mana whenua groups were contacted, and no requests for further engagement, including the preparation of a CVA, were received. This is further detailed section 6.1 and Appendix 5 of the Section 32 Report.</p> <p>Existing provisions in the AUP(OP) in relation to mana whenua values, including those associated with landscape, and sites, places, and areas of significance will also apply to the Plan Change area.</p>
P6	<p>This is required for a full understanding of the proposed plan change under the RPS.</p>	<p>Regional Policy statement (RPS) Please provide an analysis of the proposed plan change in relation to the AUP RPS chapters B3 – Infrastructure, Transport, Energy, B6 Mana Whenua and B10 Environmental Risk.</p>	<p>An assessment against the relevant provisions under Chapters B3, B6, and B10 are included at Attachment 11.</p>

	Reasons for request	Specific Request	Response
P7	This is required to fully understand the proposed plan change in relation to the Local Board plan.	<p>Local Board</p> <p>Please provide an analysis of the proposed plan change in relation to the Maungakiekie-Tamaki Local Board Plan 2020.</p>	<p>An assessment against the relevant outcomes under the Maungakiekie-Tamaki Local Board Plan 2020 is included at Attachment 10.</p> <p>Overall, it is considered that the proposed plan Change is in keeping with Outcomes Three, Four, and Six, and is not inconsistent the other outcomes identified within the Maungakiekie-Tamaki Local Board Plan.</p>
P8	The Auckland Plan shows Glen Innes as a development area and one where substantial investment will be made. This information is required for a full understanding of the proposed plan change in relation to the demands of development enabled by the plan change and what is / what is not provided for in Council's LTP.	<p>Funding</p> <p>Please provide an analysis of the proposed plan change in relation to the Auckland Council Ten Year Budget / Long Term Plan 2018-2028</p>	<p>The following is noted in relation to the 10-year Budget 2021-2031 Long Term Plan:</p> <ul style="list-style-type: none"> • Auckland Housing Programme and Tamaki Growth Support: <ul style="list-style-type: none"> ○ Over the next 10 years council will focus on supporting growth in a few key areas, including investing \$733 of infrastructure into an additional 9,300 homes, 2,800 jobs, and 27,400 people in the area. ○ Council is working in collaboration with central government on delivering \$188 million of shovel-ready infrastructure projects for the Auckland Housing Programme areas, including Tamaki. • Tāmaki Reserves Development: <ul style="list-style-type: none"> ○ Retain and bring forward growth-funding for the Tāmaki Reserves development, to support the significant level of housing development and growth occurring in the Tāmaki area.
	<i>Non Cl23(1) request matter/other comments</i>		
	Non Cl23(1) request matter/other comments – See Non cl23 Urban Design.		Noted. Please refer to the Urban Design responses included above.