

Attachment 2 – Summary of Decisions on Submissions

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions	Decision on Primary Submission
1.1	STET Limited	The decision to change the plan and develop the site should take into account the huge losses of native birds from the Tāmaki Estuary over the last 50 years. Local extinctions have happened and the trend is continuing due to loss of breeding, roosting and feeding habitat.		Reject
1.2	STET Limited	Opposed to plan change as development will impact on the coastal environment, including forest cover and corridor, reduce saltmarsh habitat and bird habitat.		Reject
1.3	STET Limited	Outcome of the plan change does not align with statutory documents.		Reject
2.1	Craig Brooks	Traffic impact on Highbrook Drive and effects on infrastructure.		Reject
3.1	Clarissa Jane Witehira	Traffic is heavy now and a housing subdivision will cause added congestion on an already congested road.		Reject
4.1	Julie Chambers	Decline the plan change, lack of evidence to support the land cannot be used for industrial purposes.		Reject
4.2	Julie Chambers	Steps should be taken to identify and address ecological value and coastal location.		Reject
4.3	Julie Chambers	Traffic congestion and social costs of high-density housing in isolated location.		Reject
4.4	Julie Chambers	The application should be rejected because the shoreline is soft sandstone and subject to human generated wave action erosion, damaging property and depositing sediment pollution into the Tamaki Estuary.		Reject
4.5	Julie Chambers	No examination of public health risks due to heavy metal pollutants from the motorway being likely present in the riverbank sediment.		Reject

5.1	Davina Mihaka	Number of houses in this location (traffic and coastal environment suitability).		Reject
6.1	Ngāti Te Ata Waiohua	Ngāti Te Ata Waiohua Cultural Impact Assessment (CIA) is required to ensure our values, history and preferred environmental/cultural recommendations are captured, and included in the decision making moving forward. Plan change is inconsistent with the RMA, including sections 6(e), 6(f) 7(a) and 8	FS01 Otahuhu Historical Society	Withdrawn
6.2	Ngāti Te Ata Waiohua	Reject application unless matters raised in the submission can be adequately addressed.		Withdrawn
7.1	Jennifer Kay Tongotongo	Extra vehicles associated with THAB zone unacceptable.		Reject
7.2	Jennifer Kay Tongotongo	Retain Business/Light Industrial where the effects on the road will be far less.		Reject
8.1	Wayne Ronald Oliver	Decline the plan change, retain existing business zone.		Reject
8.2	Wayne Ronald Oliver	Native planting should be retained to avoid coastal erosion and stability. Geotechnical report makes light of coastal erosion. Barge dock and proposed recreation area unsuitable in this location. Best use of this land is for it to be set aside as open space as a reserve contribution when the inevitable subdivision of the rest of the former Otahuhu power station site takes place.		Reject
9.1	Tāmaki Estuary Protection Society	Seeks the current zoning to be retained, or the area be established as a natural reserve.		Reject
9.2	Tāmaki Estuary Protection Society	Area is of ecological importance due to the presence of wetlands and as geologically vulnerable due to its susceptibility to erosion from increasingly prevalent marine vessel wave action and until now, unanticipated, unprecedented severe rainfall events. The shoreline is soft sandstone and subject to erosion, from stormwater events and wave action, depositing sediment pollution into the Tāmaki Estuary.		Reject

9.3	Tāmaki Estuary Protection Society	Severe traffic congestion that will arise because of this development, be noted as an isolating factor for the proposed development and the negative societal consequences (and costs) of high-density low-cost housing being built in isolated locations, be taken into account		Reject
9.4	Tāmaki Estuary Protection Society	ITA be rejected. It contains inaccurate information.		Reject
9.5	Tāmaki Estuary Protection Society	Zoning remains light industrial, so the existing barge port can be retained as such, to keep the Tāmaki River as a viable water-based transport route.		Reject
9.6	Tāmaki Estuary Protection Society	Confuses public and private benefits – including costs of housing in isolated location on public services including transport and social networks.		Reject
9.7	Tāmaki Estuary Protection Society	Seeks the plan change be rejected because there has been no examination of public health risks due to pollutants from heavy metals and toxic chemicals likely being present in the sediment, or health impacts from stormwater generated erosion.		Reject
10.1	Penny Nelson, Director-General of Conservation	Reject the plan change, as there is no certainty that adverse effects of development will be avoided, remedied or mitigated through esplanade reserves, and would be inconsistent with the New Zealand Coastal Policy Statement (Policies 11(a); 11(b), 14 and 15) and s6(c) of the RMA.		Reject
10.2	Penny Nelson, Director-General of Conservation	If the plan change is approved, it includes a coastal zone or overlay of at least 20m width, which ensures that coastal values are protected and the NZCPS 2010 is complied with, without relying on uncertain future esplanade provisions.		Accept to the extent incorporated in amendments
11.1	Business East Tamaki Incorporated	Existing Business zoned land should be safeguarded for industrial purposes. There is an undersupply of industrial land in in East Tamaki. Protecting business zoned land and providing for industrial growth is a directive of the Auckland Plan and AUP. NPSUD also emphasises the need for business zoned land.		Reject

		Changing the zoning would not meet these directives/objectives.		
11.2	Business East Tamaki Incorporated	Site is unsuitable for residential development as it is not close to commercial, educational or other services, and has constrained options for active modes of transportation.		Reject
11.3	Business East Tamaki Incorporated	Highbrook Drive is already heavily trafficked and it is concerned that the peak hour queue lengths on Highbrook Drive (which would extend northwards beyond the proposed site access intersection) will mean that the subject site access intersection will not be able to function safely and efficiently. It will also be adversely affected by traffic effects from the downstream motorway interchange roundabout.		Reject
12.1	Goodman	Goodman is not opposed to the change to residential land use, at an appropriate density and scale, accepting that residential land use could be developed on the land if appropriately managed.		Accept to the extent incorporated in amendments
12.2	Goodman	Goodman do not want any change in use to create traffic effects over and above what would be created under the current zoning.		Accept to the extent incorporated in amendments
12.3	Goodman	Apply the THAB zone to the land for up to 200 dwellings conditional on all transport upgrades in the precinct plan being provided.		Accept to the extent incorporated in amendments
12.4	Goodman	Amend Activity Table 14.4.1(A2) to delete (A2)(i) and introduce new (A3) stating that "Activities that do not comply with Standard 14.6.1 Maximum Number of dwellings is a non-complying activity".		Reject
12.5	Goodman	Any other relief to address matters raised in the submission.		Accept to the extent incorporated in amendments
13.1	Kathryn leGrove	Tamaki River is an important shorebird habitat and will be affected by sedimentation. Sea level rise and erosion means the site is unsuitable for residential zoning.		Reject

13.2	Kathryn leGrove	Barge dock should remain an option for transportation purposes.		Reject
13.3	Kathryn leGrove	ITA does not reflect actual effects of the rezoning – including operation of SH1, maintenance of pylons. How will safety and maintenance of weir be managed.		Reject
13.4	Kathryn leGrove	It is essential access from Waitemata remain in use in case Great South Road is unsuitable. Retain industrial use.		Reject
14.1	Auckland Transport	<p>Decline the plan change. Reasons include:</p> <ul style="list-style-type: none"> • Site unsuitable for high density residential use. Adverse transport effects that arise when development occurs without required transport infrastructure and services being provided and cannot be addressed without an appropriate implementation plan and funding to support the planning, design, consenting and construction of the transport infrastructure and services necessary to support the development. • AT sceptical of proposed framework to address effects. • For this part of the transport network, it is of particular importance to maintain the safe, efficient, and effective operation with respect of the movement of freight and goods. • No evidence to support permitted baseline scenario for industrial activity to consider the potential need for additional transport network effects, mitigation and subsequent consequential amendments to precinct provisions. <p>Inconsistent with RPS, NPS-UD, THAB zone.</p>	FS02 Goodman	Reject
14.2	Auckland Transport	Auckland Transport also seeks any further, other, or consequential relief required to respond to the reasons for this submission and/or give effect to the decisions requested.		Accept to the extent incorporated in amendments
14.3	Auckland Transport	<i>Concerns with Modelling Approach and Baseline Scenario</i>	FS02 Goodman	Accept to the extent incorporated

		<p>In the event that the Plan Change is to be approved the following options for relief are requested:</p> <ul style="list-style-type: none"> - Updates to the modelling within the ITA to remove reference to 90,000sqm and 18,000sqm of industrial floorspace as a Baseline Scenario; or - Additional modelling for a 500 residential unit development; - Provision of a development feasibility appraisal to support the assumed 'permitted baseline' for the 90,000sqm and 18,000sqm of industrial floorspace within the 'Baseline Scenario'. - If 18,000sqm is not demonstrated as feasible, the reduced and feasible floorspace and reduced baseline should be rerun through the applicant's ITA modelling and a further review of potential additional transport network effects and mitigation carried out. - A reduction to the number of residential units concluded as a 'permitted activity' within the applicant's precinct provisions should also be made if this conclusion is reached. - Any subsequent adverse effects on the transport network from updated modelling scenarios to be provided with mitigation and for that mitigation to be identified with updated precinct provisions (and possible precinct plan) with suitable staging and triggers (or potential caps). 		in amendments
14.4	Auckland Transport	<p><i>Concerns with safety and active modes</i></p> <p>In the event that the Plan Change is to be approved, request that a new standard I4.6.X requiring a new collector road (to Auckland Transport Design Standards, that provides a safe alternative for pedestrians and cyclists) to be constructed to connect the existing access (located opposite the Plan Change site but in the same ownership) to the Gridco Road / Hellabys Road intersection prior to occupation of the first dwelling.</p> <p>The Precinct Plan 1 is to then be updated accordingly to show the</p>	FS02 Goodman	Reject

		<p>general location of this new collector road.</p> <p>It is noted that the provision of this collector road may reduce impacts on the wider network and if this is agreed by the applicant, further modelling would be accepted that includes the provision of this link prior to occupation of the first dwelling.</p>		
14.5	Auckland Transport	<p><i>Bus stops</i></p> <p>In the event that the Plan Change is to be approved, the precinct provisions be amended to secure a pair of bus stops with shelters situated near the signalised crossing points in a tail-to-tail style setup.</p> <p>These two bus stop locations shall be confirmed in consultation with Auckland Transport and in place prior to first occupation of the first dwelling.</p>	FS02 Goodman	Accept to the extent incorporated in amendments
14.6	Auckland Transport	<p><i>Shuttle service</i></p> <p>In the event that the Plan Change is to be approved, additional information is requested from the applicant to understand the shuttle service viability for the precinct for both future residents and future potential employees including (but not limited to):</p> <ul style="list-style-type: none"> - key destinations for the shuttle service; - the frequency of such a service during morning and afternoon peaks, interpeak, weekdays and weekends; - its anticipated costs to deliver such a service; - a commitment for the shuttle service to be provided in perpetuity or until such time as a high frequency public transport service is operational in the immediate locality of the Plan Change. <p>Advice note:</p> <p>The applicant will also need to ensure the legality of providing a private bus shuttle under the Land Transport Management Act 2003.</p>	FS02 Goodman	Accept to the extent incorporated in amendments
14.7	Auckland Transport	<p><i>Freight route</i></p> <p>In the event that the Plan Change is to be approved, Auckland Transport seeks that evidence to show trip</p>	FS02 Goodman	Accept to the extent incorporated

		generation rates are accurate as a baseline to ensure effects on the transport network are accurately identified and appropriate mitigation secured.		in amendments
14.8	Auckland Transport	<p><i>New Road and Access Restrictions to Highbrook Drive</i></p> <p><i>arterial road</i></p> <p>In the event that the Plan Change is to be approved, request that additional precinct provisions and amendments to the precinct plan be made to confirm vehicle and road access restrictions apply on Highbrook Drive as required, as an arterial road within the AUP(OP) planning maps.</p>	FS02 Goodman	Accept to the extent incorporated in amendments
14.9	Auckland Transport	<p><i>Gridco Road/Hellabys Road Intersection</i></p> <p>In the event that the Plan Change is to be approved, request that the Gridco Road/Hellabys Road intersection is upgraded/signalised by the applicant prior to first occupation of any residential unit. This should be captured as an infrastructure requirement in the precinct provisions.</p>	FS02 Goodman	Reject
14.10	Auckland Transport	<p><i>Noise</i></p> <p>In the event that the Plan Change is to be approved, request the provision of a technical acoustic assessment prepared by a suitably qualified expert to support the Plan Change's position that the noise mitigation proposed will achieve 40dB internal noise environment.</p> <p>Any additional mitigation necessary to avoid adverse effects should be addressed through precinct plan provisions.</p>		Accept to the extent incorporated in amendments
14.11	Auckland Transport	<p><i>Lack of stormwater provisions</i></p> <p>In the event that the Plan Change is to be approved:</p> <ul style="list-style-type: none"> • the applicant is to provide further information to demonstrate that the Plan Change area has sufficient space set aside to construct a replacement high-quality communal treatment device (ideally a constructed wetland) in accordance with GD01 which meets the same treatment outcomes as the existing 		Reject

		<p>device, particularly for the Highbrook Drive catchment as well as accommodate the stormwater treatment requirements of development enabled by the Plan Change</p> <ul style="list-style-type: none"> • further information is provided on what stormwater management approach is being taken • that the precinct plan and provisions are amended to include objectives, policies, and rules relating to stormwater including to address whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets (as a matter for discretion and policy). 		
14.12	Auckland Transport	<p><i>Number of dwellings</i></p> <p>In the event that the Plan Change is to be approved, delete policy I4.3(3).</p>		Accept to the extent incorporated in amendments
14.13	Auckland Transport	<p><i>Timing of Transport improvements</i></p> <p>In the event that the Plan Change is to be approved, seek for additional mitigation identified in this submission (and any further mitigation as a result of modelling requested) to be included in an updated Transportation Plan. Also, to ensure clearer trigger wording for delivery of the infrastructure required as mitigation including any consequential amendments to precinct provisions or mechanisms.</p>	FS02 Goodman	Accept to the extent incorporated in amendments
14.14	Auckland Transport	<p><i>Noise objective and policy</i></p> <p>In the event that the Plan Change is to be approved, retain the noise objective and policy provisions as drafted, subject to any amendments necessary as a result of the requested acoustic assessments to justify the precinct provisions drafting proposed.</p>		Accept to the extent incorporated in amendments
14.15	Auckland Transport	<p><i>Transport objective</i></p> <p>In the event that the Plan Change is to be approved, amend 14.2 Objective 3 to read:</p> <p>"Subdivision, use and development within the Highbrook Precinct ensures that adverse effects on the safety, capacity and efficiency of the operation of the local <u>surrounding</u></p>	FS02 Goodman	Accept to the extent incorporated in amendments

		transport network is avoided, remedied or mitigated".		
14.16	Auckland Transport	<p><i>New safety objective and policy</i></p> <p>In the event that the Plan Change is to be approved, Auckland Transport requests the addition of a new objective and policy addressing the safety issues for active mode users to and from the precinct with wording such as:</p> <p><u>Objective (4) - Pedestrians and cyclists from the Highbrook Precinct who would otherwise be vulnerable along State Highway 1 and Highbrook Drive are provided with safe connections to key nodes such as education, employment, and shopping.</u></p> <p><u>Policy (x) – Require active transport mode connections that are sensitive to a heavy vehicle dominant transport environment to be provided with safe alternative routes to also support reduction in dependency on private motor vehicles as a means of transport. Alternative active mode connection routes are to be of the highest quality and design.</u></p>	FS02 Goodman	
14.17	Auckland Transport	<p><i>Internal roading layouts</i></p> <p>In the event that the Plan Change is to be approved, Auckland Transport requests amendments to the precinct provision and plan (objectives, policies and rules) to make clear that any internal road network that is intended to be vested must be located outside of any hazard areas (E36.9) and separated from such areas by building platforms and the requirement for a hazard risk assessment (in accordance with E36.9 of the AUP-OP) be required for any subdivision, use or development at the Plan Change site to inform the location of any assets intended to be vested with Auckland Transport so as to be resilient to the effects of climate change.</p>		Reject
15.1	Heritage New Zealand Pouhere Taonga	Seeks an archaeological field survey to identify unrecorded archaeological sites and to address appropriate mitigation, including the avoidance and where appropriate the		Reject

		recognition and interpretation of sites in publicly accessible areas.		
15.2	Heritage New Zealand Pouhere Taonga	Seeks a full heritage impact assessment, identifying the historic heritage landscape of the entire plan change area, is undertaken to determine the wider heritage significance and therefore ensure appropriate protection is incorporated into the plan change provisions before a decision on the plan change is made.		Reject
15.3	Heritage New Zealand Pouhere Taonga	Would support the plan change with amendments as required to protect historic heritage landscape and archaeology following the completion by a qualified archaeologist of an archaeological assessment of the full extent of the plan change area.		Reject
16.1	The New Zealand Transport Agency	Seeks amendments and /or further information to provide greater certainty on effects of the proposed development. If the information requested is not provided and/or the effects generated by the proposal cannot be satisfactorily managed, then the plan change be declined.	FS02 Goodman	Accept to the extent incorporated in amendments
16.2	The New Zealand Transport Agency	Update the ITA based on a realistic baseline and provide evidence to substantiate the assumptions used in the ITA. The precinct provisions may need to be amended to include mitigation measures to be installed prior to development of the site as a result of this assessment.	FS02 Goodman	Accept to the extent incorporated in amendments
16.3	The New Zealand Transport Agency	Provide further information on safety effects generated by the proposed land use, particularly for pedestrians and potential wrong way drivers at the Highbrook Interchange. The precinct provisions may need to be amended to include mitigation measures to be installed prior to development of the site.	FS02 Goodman	Accept to the extent incorporated in amendments
16.4	The New Zealand Transport Agency	Provide further information as to the characteristics of the noise environment of the site and what controls will be required to ensure an adequate level of acoustic amenity for future residents of it. Depending on this information either retain or revise the relevant noise provisions.		Accept to the extent incorporated in amendments
17.1	Beth Evans	Decline as site is unsuitable for THAB zone. This includes distance		Reject

		<p>to a public transport hub; distance to supermarkets; frequency and diversity of destinations of closest public transport; rarity of THAB zone along coastal edge</p> <p>Impact on natural and coastal environment from maximising development.</p> <p>Esplanade reserve is not part of this plan change.</p>		
17.2	Beth Evans	Traffic projections/'baseline' comparison is difficult for community to understand. Should be compared with a vacant site.	17.2	Reject
18.1	Watercare Services Limited	In relation to the proposal's water supply solution, Watercare considers that there are no reasons to decline the plan change.		Accept
18.2	Watercare Services Limited	Wastewater can be serviced, provided that the developer mitigates the risk of potential overflows on the downstream network. Requests that the applicant works with Watercare in advance of lodging the resource consents for subdivision, to ensure a feasible solution is reached for wastewater.		Accept
19.1	Winston Su	Decline plan change as bad for birds, river and environment. Impact from storms on housing.		Reject
20.1	Nastassja Salt	Decline plan change because of impact on bird life.		Reject