

# Attachment 1

## Auckland Council

### Request for Further Information under s.92 Resource Management Act 1991

### Notices of Requirement by Auckland Transport for the South Frequent Transit Network

Issue identifier	Reference (Report name, section, page number)	Further Information Requested	Reasons for further information request
<b>Planning and General Matters</b>			
P1	Form 18 for NoRs 1 to 4	Please confirm that all the Certificates of Title for the sites subject to the NoRs have been checked. Please advise whether the contents of any of the Certificates of Title for the sites subject to the NoRs would impede the imposition of the NoRs.	To confirm that the sites subject to the NoRs are not subject to legal constraints which would impede the imposition of the NoRs on them.

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P2	Form 18 for NoRs 1 to 4	Please confirm the total areas of land being designated for each NoR location.	Appendix B of each Form 18 contains a Schedule of Directly Affected Properties, but the total areas of land being designated for each NoR location have not been provided.
P3	Form 18 NoR 2, NoR 4	Please provide information as to how NoR 2 and NoR 4 'Key Connections' "enable the South FTN".	<p>Form 18 for Notice of Requirement 2 (NoR 2), as well as various other documents, including Appendix A to the AEE, describe the proposed road upgrades as providing for:</p> <p><i>Upgrade of adjoining <b>Key Connections</b> to the FTN – Popes Road, and the Drury section of Great South Road between Waihoehoe Road and State Highway 1 (SH1).</i></p> <p>Form 18 states:</p> <p><i>NoR 2 is for a portion of works required to <b>enable the South FTN</b> – specifically, the construction, operation, and maintenance of upgrades to Great South Road between Waihoehoe Road and SH1 to accommodate general traffic lanes, walking and cycling facilities, as well as all associated works (emphasis added).</i></p> <p>Further information is needed to explain how NoR 2 and NoR 4 'Key Connections' "enable the South FTN".</p>
P4	Form 18, Attachment C, Proposed Conditions	Please provide further information regarding the intended purpose of proposed Condition 1 in relation to the requirement that works be undertaken in general	<p>Proposed Condition 1 reads (in part):</p> <p><i>(a) Except as provided for in the conditions below, and subject to final design and Outline Plan(s), works within the designation shall be undertaken in general accordance with the following in Schedule 1:</i></p> <p><i>(i) the Project Description; and</i></p> <p><i>(ii) Concept Plans.</i></p>

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		<p>accordance with the ‘Concept Plans’ in Schedule 1, when those concept plans only identify the ‘Designation boundary and provide no details of the concept design (which are shown on the General Arrangement drawings).</p>	<p>Schedule 1 of Form 18 for NoR 1, says that the proposed works are shown in the Concept Plans and lists the works that are purportedly shown in the Concept Plans:</p> <p><i>The proposed work is for the construction, operation, maintenance of upgrades to Great South Road between Manukau and Drury. The proposed work is shown in the following Concept Plans and includes:</i></p> <ul style="list-style-type: none"> <li><i>a) upgrades to Great South Road to accommodate bus priority measures, general traffic lands, and walking and cycling facilities in eight locations;</i></li> <li><i>b) associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;</i></li> <li><i>c) Reconfiguration of local roads, where the proposed work intersect with local roads; and</i></li> <li><i>d) Construction activities including vegetation removal, establishment of construction areas and the regarding of driveways.</i></li> </ul> <p>However, the only information contained in the ‘Concept plans’ in Schedule 1 of the four Form 18s are plans that outline the designation boundary. The Concept Plans do not show the proposed works listed (e.g. embankments, retaining walls, culverts, stormwater management systems etc). Those works are shown on the Design Drawings in Volume 3, as General Arrangement drawings.</p>
P5	Form 18, Attachment C, Proposed Condition 1	Please confirm that the “project description” that Condition 1 refers to is contained in Schedule 1 and identify which part of Schedule 1 is “the project description”.	Proposed Condition 1 refers to “the Project Description”. However, Schedule 1 does not contain any heading or subheading using that term, and it is not readily apparent which part of the content is intended to be ‘the project description’.

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P6	Form 18, Attachment C, Proposed Condition 3	Please provide further information as to why proposed Condition 3 for land use integration is limited to 'Developer' and 'Development Agency' as defined in the Proposed Conditions.	<p>Condition 3 is for a Land use Integration Process that provides that at any time prior to the Start of Construction, a nominated contact will be available to engage with a Developer or Development Agency. The term 'Developer' is defined in the 'Abbreviations and definitions' section of the proposed Conditions as:</p> <p style="text-align: center;"><i>“Any legal entity that intends to master plan or develop land adjacent to the designation”.</i></p> <p>Development Agency is defined in the Condition as:</p> <p style="text-align: center;"><i>“Public entities involved in development projects”.</i></p>
P7	Form 18, Attachment C, Proposed Conditions 7 and 8 Outline Plans and Management Plans	Please provide further information why proposed Condition 6 is limited to network utility operators and does not include Council.	Proposed Condition 6 provides that prior to the start of Construction Works, Network Utility Operators with existing infrastructure located within the designation will not require written consent under section 176 of the RMA for certain activities listed in the proposed Condition. The NoR are proposed over a large number of Council parks and land used by Council and it is not apparent why the same exemptions for Council works are not included in the exemptions to needing s.176 consents from the requiring authority in the proposed condition.
P8	AEE, Volume 4  Form 18,	Please provide further information about how the recommendations provided in the AEE and supporting technical reports of measures to mitigate adverse effects are	The conditions relating to management plans need to provide for clear and certain outcomes and reflect the various specific measures that the NoR AEE and supporting technical assessments recommend. One example is the recommendation of the transport expert regarding signalisation of Firth Street / Great South Road intersection, which is repeated in the AEE. However, it is not apparent that either the detailed design or a management plan provided as part of an Outline Plan must incorporate such

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	Attachment C, Proposed Conditions	intended to be implemented in proposed Conditions, management plans, an Outline Plan or other means.	recommendations.
P9	Form 18, Attachment C, Proposed Conditions 8 and 9	Please provide further information regarding the reasons why certain management plans and schedules to management plans are proposed to be exempt from forming a part of the Outline Plan.	Proposed Condition 8 'Management Plans' exempts submission of the Stakeholder Communication and Engagement Management Plan and Construction Noise and Vibration Management Plan Schedules from being submitted as a part of an Outline Plan pursuant to s.176A. It is not apparent from the AEE why these management plans should be exempt from forming a part of the Outline Plan.
P10	Form 18, Attachment C, Proposed Condition 12 Advice Note	Please provide further information as to the effects of the proposed Advice Note in proposed Condition 12. Please provide further information that identifies how the 'corridor widening' purpose of the NoR is not 'road widening' as that term is used in the Definition of front yard in the AUP:OP.	<p>The Advice Note located at the end of proposed Condition 12 reads:</p> <p><i>This designation is for the purpose of construction, operation and maintenance of an arterial transport corridor and it is not for the specific purpose of "road widening". Therefore, it is not intended that the front yard definition in the Auckland Unitary Plan which applies a set back from a designation for road widening purposes applies to this designation. A set back is not required to manage effects between the designation boundary and any proposed adjacent sites or lots.</i></p> <p>It is understood that the intention of this advice note is to minimise the extent to which new development or redevelopment of sites has front yards larger than necessary, particularly for situations where land within a designation is no longer needed for construction or operations of the public work. However, it is not clear that the NoR is not, at least in part, for the purpose of 'road widening'. Form 18 for NoR 1 states that:</p>

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			<p><i>NoR 1 is for a portion of works required to enable the South FTN – specifically, the operation of the Great South Road FTN route. This includes the construction, operation, and maintenance of upgrades to Great South Road at eight locations between Manukau and Drury, to accommodate bus priority measures, general traffic lanes, walking and cycling facilities, as well as all associated works.</i></p> <p>...</p> <p><i>The purpose of NoR 1 is consistent with the activities outlined above. In general terms, the activities to be enabled by the designation include <b>corridor widening</b>, intersection upgrades, bridge upgrades, environmental mitigation, temporary construction areas, ancillary structures and other activities required to enable the Great South Road FTN route. (emphasis added).</i></p> <p>Form 18 for NoR 2, NoR 3 and NoR 4 contains a similar statement that the purpose of the NoR includes 'corridor widening'.</p> <p>Further information explaining how 'corridor widening' is not 'road widening' is needed, so as to understand the effect of the proposed Advice Note. Road is defined in the RMA as having the same meaning as s.315 of the Local Government Act 1974. There is no definition of 'road corridor' in the Local Government Act 1974. The following definition of road, which says that 'road' is 'road corridor' or 'road reserve' was accessed on Auckland Transport's website on 20 October 2023 <a href="https://at.govt.nz/about-us/working-on-the-road">https://at.govt.nz/about-us/working-on-the-road</a></p> <p><i>Road definition</i></p> <p><i>The road (road corridor or road reserve) is defined as the area from the private property boundary on one side to the property boundary on the other. This includes the berm (grass verge), footpath and carriageway.</i></p> <p>It is also not clear what this advice note will mean for the eventual proximity of new</p>

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			development or redevelopment of sites in relation to the edge of the widened road corridor, if the extent to which the designation provided for by the South FTN NoR affects frontages is disregarded when front yard setbacks are being determined for that new development and redevelopment of those sites. Further explanation of the intent and anticipated outcomes from the advice note is needed.
P11	AEE, Table 8-1: 'Lapse periods sought for NoRs and rationale', p39	Please provide further information of how NoR 2 integrates with the 3 adjacent projects referred to in 'Table 8-1: Lapse periods sought for NoRs and rationale'	<p>The rationale for the lapse period for NoR2 states:</p> <p><i>The rationale/premise for the upgrade of the Drury section of Great South Road is the need to provide for integration with three adjacent projects – the SH1 Drury Interchange, the upgrade of Waihoehoe Road, and the Drury Train Station. These projects are funded under the New Zealand Upgrade Programme (NZUP), are designated and largely consented, and are proposed to be implemented in the mid-to-late 2020s.</i></p> <p>How the integration with other projects affects the requested lapse period needs further explanation.</p>
P12	AEE, 10.2 Traffic and Transport, Table 10-2	Please provide further information regarding the positive transport effects of each of the four separate NoR.	The 'positive transport effects' relate to the overall South FTN project, and are not identified in relation to each of the four NoR. Unless the 4 NoR are all inseparable parts of the South FTN, the positive effects of each NoR needs to be explained.
P13	AEE, 10.2.5 Recommended measures to avoid, remedy or mitigate	Please provide further information as to how the NoR – specific matters recommended in the AEE (page 74) are addressed in the Proposed	<p>A Construction Traffic Management Plan (CTMP) is recommended in the AEE and proposed Condition19 requires a CTMP. However, the recommended matters for the CTMP to address for NoR-specific effects do not appear to be included in proposed Condition 19 or any other proposed Condition. The matters are:</p> <p><i>In relation to NoR-specific effects, it is recommended that the CTMP considers:</i></p>

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	potential adverse effects  Form 18, Attachment C, Proposed Conditions	Conditions contained in Attachment C to the Form 18s for the four NoR.	<ul style="list-style-type: none"> <li>• For NoR 1: How public transport will be maintained for the community if the Slippery Creek bridge is to be closed for construction. This may include providing for additional or altering services to serve the affected communities. This requirement also applies to other bus routes that could be impacted by construction activity;</li> <li>• For NoR 1: How active mode connectivity is maintained across Slippery Creek during construction;</li> <li>• For NoR 1: How to maintain connectivity across Slippery Creek bridge during construction if Mill Road and/or the Opaheke N-S arterial corridors are not yet in the network. If one or more corridors are not in the network, the requirement for connectivity should be reviewed at the time; and</li> <li>• For NoR 3: How a connection may be maintained for all modes across Alfriston Road bridge.</li> </ul>
P14	AEE  Landscape Effects Assessment, p23  Form 18, Attachment C, Proposed Conditions	Please provide further information relating to the proposed treatment of land that is identified in the designation review (proposed by proposed Condition 4) as no longer being needed for designation but which cannot be reintegrated into an existing developed site or be developed (e.g. if the parcel of land is too small or has insufficient access to enable housing or business	<p>The Landscape Effects Assessment states (page 23):</p> <p><i>the balance of the land of the affected properties which formed part of the designations (and which don't form part of the now new road corridors or mitigation requirements) will be subject to a designation review condition which could result in the partial uplift of the proposed designation boundary from those properties (including landscape provisions where there may be insufficient land area to feasibly develop). As such, there are opportunities for reintegration of this land. This could include enabling its redevelopment (by others) in accordance with the broader urban intensification direction and their underlying land use zoning.</i></p> <p>Further information is needed to understand how the potential adverse effects of areas of land that is no longer needed for designation, but which cannot be reintegrated into other sites or developed, will be managed. This assessment should also discuss the likelihood of</p>

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		development).	land not being able to be reintegrated.
P15	AEE, 10.4.5.2 Operational (traffic) noise	Please provide further information regarding the reasons why the proposed Conditions do not provide for any person to access and view the operational traffic noise contours.	Proposed Condition 3 'Land Use Integration Process' would enable developers to request access to traffic noise modelling contours, but it is not apparent why the noise contours produced in the technical assessment supporting the NoR could not be made more widely and readily available, including to the general public to access if they wish, through inclusion in the NoR (e.g., as a schedule) or on the website proposed in proposed Condition 2 Project Information.
P16	Form 18, Attachment C, Proposed Conditions, Proposed Condition 23  Section 11.1 Construction Noise and Vibration Management Plan of the Construction Noise and	Please provide further information to clarify whether the Schedule required by proposed Condition 23 will identify a hierarchy of mitigation measures.	<p>While proposed Condition 23 requires the schedule to set out BPO measures it does not require a hierarchy of mitigation measures and does not reflect the recommendations of Section 11.3 Noise Mitigation Measures of the Construction Noise and Vibration Assessment in Volume 4 of the NoR, which recommends:</p> <p><i>A hierarchy of mitigation measures will be adopted through the CNVMP and Schedules (where produced), as follows:</i></p> <ul style="list-style-type: none"> <li>• <i>Managing times of activities to avoid night works and other sensitive times;</i></li> <li>• <i>Liaising with neighbours so they can work around specific activities;</i></li> <li>• <i>Selecting equipment and methodologies to restrict noise;</i></li> <li>• <i>Using screening/enclosures/barriers; and</i></li> <li>• <i>Offering neighbours temporary relocation.</i> <p><i>By following this hierarchy, the best practicable option (BPO) for mitigation will be implemented, whilst avoiding undue disruption to the community</i></p> </li></ul>

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	Vibration Assessment in Volume 4		
P17	Form 18, Attachment C, Proposed Conditions, Proposed Condition 12	Please provide further information regarding proposed Condition 12, and in particular why it does not have an objective of identifying measures to avoid, remedy or mitigate adverse landscape and visual effects.	<p>Proposed Condition 12 is that an Urban and Landscape Design Management Plan (ULDMP) be prepared prior to the start of construction for a stage of work, with the stated objective of the ULDMP being:</p> <p><i>“(b) The objective of the ULDMP(s) is to:</i></p> <p><i>(i) Enable integration of the Project’s permanent works into the surrounding landscape and urban context; and</i></p> <p><i>(ii) Ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment”.</i></p> <p>Information is needed as to why the proposed Condition 12 does not have as an objective of the ULDMP the avoidance, remedy or mitigation of adverse landscape and visual effects.</p>
P18	Form 18, Attachment C, Proposed Conditions, Proposed Conditions 9 and 12	Please provide further information regarding public and community inputs to the ULDMP	<p>Information is needed as to whether and how community inputs to the ULDMP will be included. Proposed Condition 12(c) and 12(d) provides for Mana Whenua and key stakeholders participation respectively, but the proposed Condition does not stipulate public or community participation.</p> <p>The term ‘key stakeholders’ is not defined in the proposed Conditions set out in Form 18. Proposed Condition 9 relating to a ‘Stakeholder Communication and Engagement Management Plan (SCEMP) requires that prior to submitting any Outline Plan the requiring authority identify a list of key stakeholders, community groups, organisations, and businesses who will be engaged with and the methods and timing for engaging with landowners and occupiers. This provides no clarity as to who might be considered to be ‘key stakeholders’, if it is not any of the persons and groups listed (i.e. the term ‘key</p>

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			stakeholders' does not appear to be inclusive of 'community groups, organisations and businesses or landowner and occupiers').
P19	Form 18, Attachment C, Proposed Conditions, Proposed Conditions 32 - 36	Please provide further information to clarify the timing of the proposed steps included in the traffic noise conditions and how that timing relates to the detailed design / construction of the project / construction of stages of Works	<p>The timing and process for identifying the BPO mitigation for the PPFs is somewhat unclear. Proposed Condition 32 says "prior to construction of the project" the Detailed Mitigation Options for the PPFs identified in Schedule 4 will be developed. Proposed Condition 35 is that "prior to the Start of Construction" PPFs that may require Building Modification Mitigation will be identified. Proposed Condition 36 says "prior to Construction" if access is allowed by the owner of a building an assessment of noise reduction performance of the existing building will be carried out. This wording regarding the timing elements of the traffic noise conditions differs to that used in other proposed conditions:</p> <ul style="list-style-type: none"> <li>- prior to the Start of Construction for a Stage of Work (proposed Condition 13, 16, 19, 22, 24, 26, 27, 28)</li> <li>- prior to the submission of the Outline Plan (proposed Condition 15)</li> <li>- prior to the start of Construction Works (proposed Condition 18)</li> <li>- prior to the start of construction to which it relates (proposed Condition 23)</li> <li>- At the start of detailed design for a Stage of Work</li> <li>- Implemented within 12 months of Completion of Construction of the project</li> </ul> <p>It is not clear whether proposed Condition 35 "prior to the start of Construction" relates to the whole NoR project or a Stage of Work.</p> <p>Proposed Condition 36 "Prior to the Start of Construction in the vicinity of each Category C Building..." is unclear and uncertain as to what "in the vicinity" means.</p>
P20	Form 18, Attachment C, Proposed	Please provide further information as to whether a Tree Management Plan	The AEE (Section 10.5.5 Recommended measures to avoid, remedy or mitigate potential adverse effects, p87) identifies that a Tree Management Plan may identify trees for relocation:

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	<p>Conditions, Proposed Condition 27</p> <p>AEE, 10.5.5</p>	<p>proposed in proposed Condition 27 would include assessment and identification of trees for transplanting.</p>	<p><i>Where good quality trees are identified for removal, consideration of tree transplanting will be included in the TMP. An assessment of the quality of the trees and the feasibility of transplanted will form part of the plan.</i></p> <p>However, this matter is not listed in proposed Condition 27 in Form 18 as a requirement for a TMP to identify.</p>
P21	<p>AEE, Section 10.7.5</p> <p>Form 18, Attachment C, Proposed Conditions</p> <p>Proposed Condition 16 CEMP</p>	<p>Please provide further information to identify whether and how matters detailed in section 10.7.5 for a CEMP will be addressed through proposed Condition 16 or other proposed Conditions.</p>	<p>Section 10.7.5 identifies recommended measures to avoid, remedy or mitigate potential adverse flooding effects. This identifies key matters to include in a Construction Environmental Management Plan, which includes the following matters not provided for in the proposed CEMP Condition:</p> <ul style="list-style-type: none"> <li>- Minimising the physical obstruction to flood flows at the road sag points;</li> <li>- Staging and programming to provide new drainage prior to raising road design levels and carry out work when there is less risk of extreme flood events;</li> <li>- Carrying out earthworks during the summer / dry months to reduce the risk of flooding; and</li> <li>- Managing the overland flow paths to make sure flows are not diverted toward existing buildings or properties.</li> </ul>
P22	<p>Appendix A Assessment of Alternatives</p>	<p>Please provide further information as to the interrelationship between the widening of road corridors to enable bus lanes and whether public transport will be provided. This may include explanation of</p>	<p>The positive transport effects are stated as including “better quality, frequency and reliability for public transport along FTN routes”. The identification of positive transport effects appears to assume the provision of public transport services that the NoR will enable (by enabling the room for bus lanes). However, it seems that if funding is not provided for public transport then potentially the designated land could be used for additional general traffic lanes and none of the assumed positive transport effects from public transport would eventuate. Further explanation of the precursors and co-requisites for construction of the</p>

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		whether it is appropriate to assume the positive effects of the provision of public transport if the proposal enables the additional road lanes to be used by general traffic rather than for public transport.	project, particularly in relation to bus lanes, would be beneficial.
P23	Table 10-9 Summary of recommended NoR specific operational flood risk measures	Please provide further information as to which proposed Conditions contain the recommendations to avoid or mitigate flood effects that are set out in Table 10-9 Summary of recommended NoR specific operational flood risk measures	Table 10-9 Summary of recommended NoR specific operational flood risk measures identifies specific recommendations for the avoidance or mitigation of flood effects of each NoR. The proposed Conditions do not appear to reflect those recommendations. An example of a recommendation in Table 10-9 that does not appear to be included in any of the proposed Conditions is: "keep the current vertical alignment with no lifting or lowering of the road crest" for NoR 1.
P24	Social Impact Assessment, Table 12-26 AEE, general Form 18, Attachment C, Proposed	Please provide further information as to whether a pedestrian / cyclist connection from Beaumonts Way to Weymouth Road has been considered as one way of mitigating adverse effects of the proposed closure of Beaumonts	<p>The General Arrangement Drawing for NoR 3, Section 7.2.6.1 Transport Assessment and section 9.6 of the Social Impact Assessment address a proposed closure of Beaumonts Way intersection with Weymouth Road. Section 9.6.1 of the Social Impact Assessment states:</p> <p><i>There may also be a small increase in travel time for .... residents and visitors to properties along Beaumont Way with the removal of a direct vehicle connection from Beaumont Way to Weymouth Road. This may result in a change in way of life and people's daily travel patterns and routines to work, education or leisure</i></p>

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	Conditions	Way road connection to Weymouth Road. If it has been considered and dismissed please provide reasons.	<p><i>activities, however delays are considered to be <b>low</b> overall.</i></p> <p>Table 12-26 Local Community Assessment of Social Impacts on page 118 of the Social Impact Assessment states that the ability to avoid/manage or mitigate negative impacts of the closure of Beaumonts Way by the formation of a cul de sac is “unlikely” and Mitigation is proposed as “N/A”. The General Arrangement Drawing for NoR 3 appear to illustrate some form of linkage (pedestrian/ cycle?) to Weymouth Road but this does not appear to be discussed in any of the AEE or supporting technical documents, and is not the subject of any of the proposed Conditions set out in Form 18.</p>
P25	<p>AEE, Table 11-4 Matters of national importance</p> <p>Form 18, Attachment C, Proposed Conditions, Proposed Conditions</p>	<p>Please provide further information as to how the proposed Conditions can give greater certainty that the two identified historic heritage sites affected by NoR 1 will be protected.</p> <p>The two items identified in Section 10.9 of the AEE are as follows:</p> <p><i>Papakura Old Central School, R12/1154 (02830), NZAA (AUP:OP), “1920s stone gate has potential to be destroyed”.</i></p> <p><i>WWI Memorial, 12924 (02801),</i></p>	<p>The proposed Conditions do not give any degree of certainty that the avoidance of the two historic heritage sites shown in the concept design will be achieved.</p> <p>The assessment in Table 11-4 Matters of national importance states:</p> <p>The Project will not adversely affect scheduled historic heritage sites. As noted in Section 10.9 above, while two historic heritage extents of place fall within the boundaries of NoR 1, direct impacts on the features <b>are avoided by the concept design</b> (emphasis added).</p> <p>No proposed Condition requires the concept design (shown in the General Arrangement Drawings) to be implemented. Therefore, the means of ensuring that the works avoids destroying the historic heritage stone gates at Papakura Old Central School or the WWI Memorial are not clear.</p>

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		<i>CHI (AUP:OP), "Modifications to edges of memorial structure".</i>	
P26	Form 18 Attachment C, Proposed Conditions, Proposed Condition 7 Outline Plan  AEE	Please provide further information as to what is intended to be included in the 'Ecological Management Plan' listed in proposed Condition 7.	<p>Proposed Condition 7 states that the Outline Plans to be submitted in accordance with s.176A RMA may include "(vi) Ecological Management Plan". However, there is no proposed Condition that sets out the objective of an 'ecological management plan' or the details of what this management plan would include.</p> <p>It is understood that an Ecological Management Plan would typically relate to a pre-construction ecological survey to be carried out at the start of the detailed design stage, which would include field work to determine areas where an Ecological Management Plan would apply. The pre-construction survey would include matters such as whether Threatened or At Risk birds were present and whether they nested in areas affected by the works. Such an ecological management plan would generally have the objective of avoiding, remedying, mitigating, offsetting or compensating adverse effects on identified biodiversity areas and would detail specific measures such as buffers, timing of works, and the like.</p>
P27	All	Please provide a word version of the all of NoR documents (not in protected formatting).	A Word version will assist in the subsequent phases of the assessment of the NoR, including preparation of assessment reports.
<b>Historic Heritage Effects</b>			
HH1	Assessment of Archaeological	Please provide a built heritage assessment which assesses the	The Assessment of Archaeological and Heritage Effects does not adequately identify and assess the built heritage values within and near the proposed designation boundaries within

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	and Heritage Effects	heritage values of historic heritage within and near the proposed designation and identifies measures to avoid, remedy or mitigate adverse effects on built heritage values.	the NoR, and does not adequately identify measures to ensure that potential adverse effects on historic heritage values are avoided, remedied or mitigated.
HH2	Assessment of Archaeological and Heritage Effects  Assessment of Construction Noise and Vibration Effects  AEE	Please provide an assessment of the potential adverse effects of vibration during construction on identified historic heritage items within and near the area of the NoR.	The built heritage assessment should also be used to identify historic buildings within or near to the NoR as sensitive structures in a revised Assessment of Construction Noise and Vibration Effects. This should include:  The 1920s stone gates at Papakura Old Central School, R12/1154 (02830), NZAA (AUP:OP), which are stated as having “the potential to be destroyed”.  WWI Memorial, 12924 (02801), CHI (AUP:OP), which is stated as having “Modifications to edges of memorial structure”.
<b>Construction Noise and Vibration and Operational Noise</b>			
CNV1	South FTN - Assessment of Construction	Vibration is referred to as exceeding certain categories, but no specific levels are	Understanding magnitude of potential vibration construction effects.

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	Noise and Vibration Effects - Final for lodgement - 131023	<p>provided, so the magnitude and therefore effect is unable to be quantified as it is for noise. Given the use of emissions radii for sources indicative levels (acknowledging lack of specifics at this stage) this information should be readily available. Please provide the upper expected levels of vibration, as has been provided for noise. This will then enable parties to understand potential effects with reference to Table 6-2 of the report.</p>	
CNV2	South FTN - Assessment of Construction Noise and Vibration Effects - Final for lodgement - 131023	Please update the report to rectify the large discrepancy between the description of potential noise effects in the assessment sections for the NoRs and Table 6.	<p>The noise effects for levels over 80 dB <math>L_{Aeq}</math> are described in Table 6-1 as “<i>Untenable for both office and residential environments. Unlikely to be tolerated for any extent of time.</i>” However, in the NoR assessment sections the description for those levels is “<i>effects are likely to include loss of concentration, annoyance, and a reduction in speech intelligibility.</i>” This is potentially misleading to parties reading understanding of effects and should be made clearer.</p>

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ONV1	South FTN - Assessment of Operational Noise Effects - Final for lodgement - 131023	Please clarify how has noise from the proposed bus lane(s) been incorporated into the model.	There is limited information describing the model input details with regard to this aspect.
ONV2	South FTN - Assessment of Operational Noise Effects - Final for lodgement – 131023 (NoR 1)	What mechanisms (i.e., existing designation conditions) exist in relation to noise performance of road sections between the NoR1 designations?	A low noise road surface is noted as the 'do minimum' design assumption (required by the proposed conditions) for NoR 1. This assumption forms the basis of the assessment of noise effects. Understanding whether this approach is likely to continue across the wider project will help to inform greater understanding of potential noise effects at the edge of the NoR.
ONV3	South FTN - Assessment of Operational Noise Effects - Final for lodgement – 131023 (Section 3.2)	Please provide greater clarity on why a condition to ensure vibration effects are maintained as assumed in the assessment has not been included.	Traffic vibration has not been assessed based on the road design avoiding uneven surfaces but there is no proposed condition that would require this outcome.

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ONV4	South FTN - Assessment of Operational Noise Effects - Final for lodgement – 131023	Please confirm where road widening associated with the NoRs brings vehicles/lanes closer to properties than under the current/existing scenario(s) and whether this results in increased noise levels at receivers.	Inform understanding of the proposal and effects.
<b>Ecological Effects</b>			
ENZL1	Assessment of Ecological Effects, Section 3, page 8 and Section 8, page 41, and Table 8-3, page 48	Please provide further information to specifically address highly mobile fauna, and show that adverse effects have been avoided, minimised, or remedied.	<p>NPS:IB requires an assessment to look more broadly and consider site selection and alignment at a finer scale and take a precautionary approach. NPS-IB Policy 15: Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range.</p> <p>Loss in connectivity due to permanent habitat loss, and light and noise effects from the road, which leads to fragmentation of terrestrial, wetland and riparian habitat.</p>
ENZL2	Assessment of Ecological Effects, Section 3,	Please provide further information on effects on the receiving environment, including freshwater, riparian, and	<p>There is scope within the designation to address (including to avoid) some potential effects/concerns/regional matters through design considerations at the detailed design phase.</p> <p>NPS:FM and NPS:IB require an assessment to look more broadly and consider site</p>

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	page 8, Section 9, page 58,	wetlands. With regards to bridge upgrades, and stormwater management. Including which effects can be avoided. Please consider including ecological input during design phase.	selection and alignment at a finer scale and take a precautionary approach.
ENZL3	Assessment of Ecological Effects, Section 8, page 39 and page 40 Section 7, page 37	Please consider including ecological input during the design development and detail design phase specifically for lighting. A detailed lighting design should be prepared consistent with the Environmental Management Plan.	Lighting at night has the potential to modify the behaviour of birds and bats if they are foraging within the area or roosting in nearby. As part of the road upgrade, the lighting will also be upgraded. The new streetlights will most likely be stronger (brighter) and have a different light pattern and be taller than the old lights. This is therefore a good opportunity to minimise light spill and effects during the design phase to be incorporated into detailed designs, to minimize the effects.
ENZL4	Assessment of Ecological Effects, Section 9, page 60 and Section 7, page 37	Please consider including ecological input during the design development and detail design phase specifically for bridge design in relation to fish passage.	Existing infrastructure upgrades will include new bridge structures replacing existing undersized structures. This will improve habitat connectivity for freshwater and terrestrial species due to improved fish passage and improved riparian habitat connectivity. The new bridge designs can be used as an opportunity to minimise effects on freshwater habitat as well as fish passage and manage invasive species.

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ENZL5	Assessment of Ecological Effects, Section 8, page 38 and Section 7, page 37	Please consider including ecological input during the design development and detail design phase specifically for bridge design in relation to bats.	<p>Existing infrastructure upgrades will include new bridge structures replacing existing undersized structures. The new bridge designs can be used as an opportunity to minimise effects on bats.</p> <p>The desktop assessment revealed several stream systems and areas of vegetation with large trees (e.g., areas of TL.1, TL.2, TL.3, WF7) within the Project Area that long-tailed bats have the potential to utilise (likely only for foraging), based on previous survey data.</p>
ENZL6	Assessment of Ecological Effects, Section 9, page 59	<p>Please consider including the requirement for a Bat management plan for all NoRs.</p> <p>Conditions to include preconstruction bat surveys and potential habitat surveys to confirm (potential) presence and habitat use. If it is determined that bats are present within the zone of influence and bat habitat will be impacted, then a bat management plan will be implemented as outlined in the Assessment of Ecological Effects on page 59. Bat management should be consistent with any regional</p>	<p>Disturbance and displacement of individuals (existing).</p> <p>No project specific bat surveys were undertaken because desktop investigations confirmed bat activity within the ZOI. The ecological value of long-tailed bats is Very High. Given the confirmed bat activity, the presence of potential roosting habitat, (several stream systems and areas of vegetation with large trees (e.g., areas of TL.1, TL.2, TL.3, WF7) within the Project Area. As well as the large number of trees ≥15 cm DBH to be removed (see the Arboricultural Assessment), it would be appropriate for the applicant's ecologist to recommend bat management aligned with the latest DOC protocols.</p>

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		consent conditions (and the Wildlife Act 1953) that may be required for regional compliance.	
ENZL7	Assessment of Ecological Effects, Section 8, page 39	Please implement DOC Vegetation Removal Protocols to ensure all trees within the ZOI are appropriately risk rated. Using the current version of DOC protocols to identify potential high-risk roosting trees to mitigate impacts on roosting long-tailed bats.	<i>Existing desktop records (DOC, 2022a) confirm the presence of long-tailed bats (Chalinolobus tuberculatus) within 10km ZOI of the Project Area. No project specific bat surveys were undertaken because desktop investigations confirmed bat activity within the ZOI. The ecological value of long-tailed bats is Very High. Given the confirmed bat activity, the presence of potential roosting habitat, and the large number of trees ≥15 cm DBH to be removed (see the Arboricultural Assessment), it would be appropriate for the applicant's ecologist to recommend bat management aligned with the latest DOC protocols.</i>
ENZL8	Assessment of Ecological Effects, Section 10, page 63	Please include the requirement for a Lizard management Plan for NoR 4.	The effects on TAR herpetofauna species due to the removal of district plan trees/vegetation required mitigation. A LMP for NoR 1 – 3. However, there is significant vegetation removal in NoR 4, which would require the same mitigation.
ENZL9	Assessment of Ecological Effects, Section 9,	Please consider including the requirement for an Avifauna management plan for all NoRs for all TAR birds. Using the	South FTN Project area presents suitable breeding TAR bird habitat. The ecological value of TAR birds is assessed to be Very High. It may therefore be appropriate to manage effects on avifauna through avoidance, minimisation, or mitigation.

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	page 59	latest version of Native bird nesting protocols.	
<b>Landscape and Visual Effects</b>			
LA1	Otūwairoa / Slippery Creek (NoR 1)  Hingaia Stream (NoR 2)	Please provide a fuller assessment of the visual amenity and landscape character effects of the proposed higher bridge levels at Otūwairoa / Slippery Creek and the Hingaia Stream.	<p>The Landscape Effects Assessment states (in 5.1.2.1, page 33) that the replacement bridge at Otūwairoa / Slippery Creek is identified in the indicative design for NoR 1 as being proposed to be approximately 3m higher than the existing bridge (an increase in the bridge vertical level) and states that this will change the character of the area through the introduction of the bridge, earthworks and land formation required for the addition of the retaining walls.</p> <p>A fuller assessment of the visual amenity and landscape character effects of the bridge from public spaces (e.g. Slippery Creek Reserve) and private properties (e.g. houses on Great South Road either side of the bridge in the vicinity) needs to be provided.</p> <p>In Section 5.1.4 the Landscape Effects Assessment recommends measures relating to earthworks required to build the bridge and fill batters / bridge abutments. These should be incorporated into the proposed conditions (see LA2 below).</p> <p>The Landscape Effects Assessment states (in 5.2.2.1, page 36) that the replacement bridge across the Hingaia Stream in NoR 2 is proposed in the indicative design to be 4m higher than the existing bridge (an increase in the bridge vertical level) and states that this will change the character of the area through the introduction of the bridge, earthworks and land formation required for the addition of the retaining walls.</p>

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			<p>Again, a fuller assessment of the of the visual amenity and landscape character effects of the bridge from public spaces and private properties is needed.</p> <p>In Section 5.2.4 the Landscape Effects Assessment recommends measures relating to earthworks required to build the bridge and fill batters / bridge abutments. These should be incorporated into the proposed conditions (see LA2 below).</p>
LA2	<p>Otūwairoa / Slippy Creek (NoR 1)</p> <p>Hingaia Stream (NoR 2)</p>	<p>Please provide incorporation of more site specific and prescriptive mitigation measures into proposed Designation Condition 12 – Urban and Landscape Design Management Plan particularly in regard to the design and detailing of the Otūwairoa / Slippy Creek and Hingaia Stream bridges, earthworks and land formation required for the addition of the retaining walls.</p>	<p>The Landscape Effects Assessment recommends that the preparation of an Urban and Landscape Design Management Plan (<b>ULDMP</b>) is a condition on the respective designations and should include a number of measures to mitigate potential landscape character and visual amenity effects. These measures are outlined under Sections 5.1.4 and 5.2.4.</p> <p>Proposed Designation Condition 12 – Urban and Landscape Design Management Plan contains fairly generic conditions. I consider the mitigation measures outlined in Sections 5.1.4 and 5.2.4 are more prescriptive and site specific and should be incorporated into the ULDMP conditions, particularly in regard to the bridges, earthworks and land formation required for the addition of the retaining walls, and integration of the structures into the surrounding urban landscape context.</p>
LA3	NoR 3	<p>Please provide a fuller assessment of the visual amenity and landscape character effects of the proposed replacement bridges over the NIMT and SH1.</p>	<p>The Landscape Effects Assessment states (in 5.3.2.1, page 42) states that the NIMT rail bridge is proposed to be approximately 3m higher than the existing bridge and the SH1 bridge at approximately 2m higher (an increase in the bridge vertical level). Retaining walls will also be required for these structures. The earthworks and landform modification required to build the bridge across SH1 will also require a considerable amount of fill which will encroach into Alfriston Park.</p>

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			<p>A fuller assessment of the visual amenity and landscape character effects of the NIMT and SH1 bridges from public spaces (e.g. Alfriston Park) and private properties (e.g. houses on Alfriston Road and Weymouth Road either side of the bridges in the vicinity) needs to be provided.</p> <p>In Section 5.3.4 the Landscape Effects Assessment recommends measures relating to earthworks required to build the bridge and fill batters / bridge abutments. These should be incorporated into the proposed conditions (see LA4 below).</p>
LA4	All NoRs	Please provide incorporation of more site specific and prescriptive mitigation measures into proposed Designation Condition 12 – Urban and Landscape Design Management Plan.	<p>The Landscape Effects Assessment recommends that the preparation of an Urban and Landscape Design Management Plan (<b>ULDMP</b>) is a condition on the respective designations and should include a number of measures to mitigate potential landscape character and visual amenity effects. These measures are outlined under Section 4.5 as well as throughout the report.</p> <p>Proposed Designation Condition 12 – Urban and Landscape Design Management Plan contains fairly generic conditions. I consider the mitigation measures outlined in Section 4.5 are more prescriptive and site specific and should be incorporated into the ULDMP conditions, particularly in regard to the bridges, earthworks and land formation required for the addition of the retaining walls, and integration of the structures into the surrounding urban landscape context.</p>
LA5	NoR 1 and NoR 3	Please provide incorporation of more site specific and prescriptive mitigation measures into proposed Designation Condition 12 – Urban and Landscape Design	<p>The Landscape Effects Assessment under Section 4.2.2 notes:</p> <p><i>‘The proposed construction works will be visible from those properties adjacent to the designation boundaries, often in close proximity. The removal of buildings and vegetation within the designation boundary will also expose views to the Project and construction works for those adjacent dwellings whose views of the respective road corridors will have</i></p>

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		Management Plan.	<p><i>previously been screened. This is particularly the case for properties along NoR 3 and to a lesser extent for NoR 1.'</i></p> <p>And in Section 5.4 notes:</p> <p><i>'In relation to visual amenity, the designations provide an upgrade to existing road corridors and will not be seen out of context, albeit through road widening to enable the movement of vehicles, buses and active modes to complement the anticipated growth within the area. Any vegetation which was removed along the road edge (including within private property) during the construction phased will be replaced 'like for like' which is outlined within conditions and the ULDMP'.</i></p> <p>This mitigation recommendation is not contained within the proposed conditions and needs to be included.</p>
<b>Traffic and Transport Effects</b>			
T1	Transport Assessment 4.1.6	Please provide an assessment of effects on properties affected by the removal of right turn movements as the result of the likely installation of traffic islands, or if islands would not be installed, an assessment of safety at the intersection.	<p>The Transport Assessment notes <i>"For existing properties, our design philosophy for the Projects has been to retain existing access and movement wherever feasible. Unless it has been identified that a solid median/ traffic island is required for safety or operational reasons, the assessment has assumed a flush median."</i></p> <p>Documentation that identifies where islands may be required for safety or operational reasons has not been located. If the documentation provides this information please advise the location.</p> <p>It is expected traffic islands would be required on Alfriston Road at Fleming St due to traffic signals being installed at the nearby Alfriston Rd/ Claude Rd intersection. Islands in that</p>

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			<p>location could affect several properties on Alfriston Road, Fleming St and Hyde St.</p> <p>It is expected islands would be required on Great South Rd at Coulthard Tce due to traffic signals being installed at the nearby Gt South Rd/ Park Estate Rd intersection. Islands in that location could affect several properties on Gt South Rd and all properties in Coulthard Tce.</p> <p>The assessment should consider detour distances and travel times, and the crash risks associated with U-turn movements.</p> <p>If the assessment identifies that no traffic islands would be installed, please provide an assessment of the crash risks at the above intersections arising from a lack of islands.</p>
T2	General Arrangement Drawings / Transport Assessment	<p>Please show the extents of the proposed bus lanes on the drawings.</p> <p>Alternatively, if a decision on the type of lane to be provided has not yet been made, please provide an assessment of the alternatives (e.g. T2, T3, freight, or general traffic lane).</p>	<p>The general arrangement drawings do not show the proposed extent of the bus lanes, which are described by the documentation as a fundamental part of, and reason for, the Project.</p> <p>The transport assessment describes the considerable benefits arising from the introduction of bus lanes which are a key aspect of the Project. If an alternate type of lane could be implemented instead the benefits are likely to be substantially over-stated and the assessment should be updated.</p>
T3	Transport Assessment 7.2.6.2 Parking	Please confirm if the existing indented parking bays on Alfriston Road are to be	<p>There is an indented parking bay on Alfriston Rd at #28 with two spaces, and an indented bay at #106 Alfriston Rd with two spaces.</p> <p>The transport assessment states that all on-street parking in NOR3 is to be removed. It</p>

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		removed, and if so, please provide an assessment of the effects of those spaces being removed.	also notes there is no on-street parking within NOR 3 except for two bays on Gt South Rd at McAnnalley St. As the two bays on Alfriston Rd are not identified it is unclear if they are to remain or be removed.
T4	AEE Assessment of Alternatives	Please describe the alternative methods considered in arriving at the proposed designation footprint, particularly in relation to the potential for retaining walls instead of batter slopes, and/ or describe the circumstances in which a retaining wall would be used.	The general arrangement drawings show batter slopes in several locations. It is expected that the use of retaining walls could result in reductions in the area of land required in a few locations, but a description of this evaluation has not been found in the documentation. If this decision can only be made at the detailed design stage it would be useful to understand when and how a decision on edge treatment could be made.
<b>Flooding Effects</b>			
F1	Assessment of Flooding Effects	Please consider in the event the 3.8 degree climate change scenario is adopted as the 'standard' scenario in place of the current 2.1 degrees, should a sensitivity analysis be completed for a further conservative scenario (i.e. more	Information is required in order to better understand future climate change risk for the proposed works enabled by the NoR.

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		conservative than 3.8 degrees).	
F2	Assessment of Flooding Effects	Can you please comment of the land required to construct and operate the stormwater treatment/attenuation ponds (e.g. NoR 3 and 4). For example being located in the floodplain, is attenuation a necessary outcome (leading to requiring pond construction), or would alternative devices located in the road reserve suffice to meet any water quality/retention and detention requirements.	Information is required in order to better understand the use of land/designation extent.
F3	Assessment of Flooding Effects  Form 18, Proposed Conditions	Please provide further information as to whether the proposed NoR conditions been implemented elsewhere in the region such that you are able to comment on any issues that have arisen in meeting the mitigation outcomes.	Information is required in order to better understand condition implementation

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F4	<p>Assessment of Flooding Effects</p> <p>Form 18, Proposed Condition 14(ii)</p>	<p>Please provide further explanation of the following condition:</p> <p><i>No more than a 10% reduction in freeboard in a 1% AEP event for existing authorised habitable floors with a freeboard of over 150mm.</i></p> <p>This has the potential to reduce freeboard in the 1% event to less than 500mm, the standard stipulated in Council's Stormwater Code of Practice.</p>	<p>Information is required in order to better understand the outcomes of the proposed NoR Conditions.</p>
<b>Social Impact Assessment</b>			
SAI1	<p>SIA Introduction; p.viii; p.2; Section</p>	<p>Please clarify the methodological scope of the Social Impact Assessment in relation to the Phases of the</p>	<p>There are inconsistencies within the Social Impact Assessment (SIA) and between AEE describing the methodological scope of the assessment. The SIA Introduction (pi) states "<i>Specifically, this Report considers the actual and potential effects associated with the <b>construction and operation</b> of the Project on the existing and likely future environment as</i></p>

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	3.2.1.2; Section 3.3; and AEE p98	Project.	<p><i>it relates to social impacts and recommends measures that may be implemented to avoid, remedy and/or mitigate these effects.</i>” (my bold). In Section 3 of the SIA (p.viii) it states, “<i>The methodology has been developed to identify and predict the key social impacts of the <b>designation, construction, and operation phases</b> of the Project</i>”. On p.98 of the AEE states “<i>The Social Impact Assessment... assesses the actual and potential social impacts associated with the <b>planning (route protection phase), construction, operation and maintenance</b> of the NoRs on regional, wider and local communities... and provides recommended measures that may be implemented to avoid, remedy and/or mitigate these impacts</i>”.</p> <p>Section 3.2.1.2 of the SIA states: “<i>This Report considers the actual and potential social impacts associated with the following project stages:</i></p> <ul style="list-style-type: none"> <li>• <b>Planning</b> (period of time until confirmation of designation);</li> <li>• <b>Pre-construction</b> (period of time from confirmation up until pre-construction period);</li> <li>• <b>Construction</b> (including detailed design and property acquisition); and</li> <li>• <b>Operation and maintenance</b>”.</li> </ul> <p>These inconsistent references cause confusion, particularly as the scope of assessment will have a bearing on the need to fully understand the effects of each of these Project phases on specifically affected, in-proximity parties and whether or not these effects are appropriately avoided, remedied and mitigated by the proposed Conditions at public notification. As the SIA currently stands, and given the limitations and assumptions noted in the SIA (Section 3.3) regarding the lapse period between designation and construction, it is my opinion that the SIA:</p> <ol style="list-style-type: none"> <li>1) Provides a focus upon social effects of designation, particularly on landowners/ property, in relation to the next phase of full or partial acquisition of properties this</li> </ol>

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			<p>designation for route protection requires.</p> <p>2) Provides a broad summary of social effects themes arising from construction, but based on limited levels of consultation and engagement (as identified by the AEE and SIA) to date with specific, but not all directly-affected in-proximity parties who may be residing, operating businesses or using the community infrastructure affected by the Project now and into the future.</p> <p>3) Provides a broad summary of positive social effects arising from operation of the Project, but does not adequately address the potential positive or adverse social effects of proposed maintenance/ restoration/ re-instatement of the public realm works on in-proximity, directly affected parties.</p> <p>Therefore, because of the obvious time-lapse, the stated methodological scope of the SIA should be realistically adjusted and further clarity/ commentary provided on the limitations of the SIA to undertake a comprehensive assessment of social effects on in-proximity, directed affected parties during the construction, operation and maintenance phases of the Project that will be subject to further detailed design and Outline Plans of Works.</p> <p>This methodological issue also informs the basis of the following s92 requests for further information.</p>
SIA2	SIA, Section 3.1 and Section 7 – consultation and	Please provide further information regarding engagement and consultation with landowners, stakeholders and affected businesses and residents, in particular who has	<p>Section 3.1 Methodology – the diagram describes the SIA process. In step 3 the SIA team attendance at community information days refers to Section 0. There is no relevant section and the feedback and analysis of these information days is not available, please provide.</p> <p>Section 7 of the SIA summarises the number and type of consultation and engagement activities conducted between March – August 2023 and comments on themes of relevance</p>

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	engagement	been engaged, whether they are directly and indirectly impacted and what their feedback was.	to assessing potential social impacts. Without detailed analysis of the feedback at the open days, stakeholder meetings and landowner and stakeholder interviews it is difficult to validate the conclusions and adequacy of the SIA. For example, the AEE notes some 2000 community members and key stakeholders have been engaged. It would be relevant to see this feedback and note whether comments on social impact were received from parties in the wider community, local community and project areas. For example, it would be useful to provide a list of all in-proximity and affected parties in each project area of each NoR (through designation, construction and operation) and understand who has and has not been consulted to this point, and what their key feedback was. This would assist in understanding the comprehensiveness of the consultation with affected parties to date, their particular concerns or feedback, and enable a plan and suitable methodology for engaging during pre-construction and detailed design phases with all parties affected by the Project.
SIA3	SIA, Section 3 Social Impact assessment methodology	Please provide further information regarding the process by which the SIA has informed the matters assessed by other technical specialists.	It is important that social effects of the change processes proposed by each phase of the Project be initially identified and assessed through a SIA process and to then be integrated into other technical assessments to ensure these social effects are comprehensively and appropriately identified, assessed, managed and monitored. The SIA states it “considers the human implications of other technical assessments/ project components... does not seek to reassess matters considered by these technical specialists, but rather understands and assesses the intended and unintended social changes that will be experienced by people/ communities because of changes identified by these specialists”. This is somewhat confusing as it tends to imply that the SIA has depended on the technical specialists to identify social change processes of the Project.
SIA4	SIA, Appendix	Please provide further	Appendix E provides a summary of the assessment of social impacts (positive and

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	E, Sections 10.1 and 10.2, Form 18 (Conditions)	information that enables cross-referencing to ensure mitigations proposed in Appendix E and Sections 10.1 and 10.2 are included in the proposed Conditions, which also states responsibility on specific management plans (including the SCEMP) for these proposed mitigation strategies.	<p>negative) and mitigation proposed by SIA theme. For ease of reading and cross-referencing, these would benefit from identifying:</p> <ol style="list-style-type: none"> <li>1) at which phase (designation, detailed design, property acquisition, pre-construction and physical construction works, operation, maintenance) these impacts will occur and the mitigation required, helping the reader navigate;</li> <li>2) through cross-referencing, how they correspond with or are related to the narrative mitigation recommendations provided in Sections 10.1 and 10.2 of the SIA (that deal specifically with designation and construction phases);</li> <li>3) how each proposed mitigation strategies in the SIA (both Appendix E and Sections 10.1 and 10.2) are specifically linked to a technical specialism or management plan/ process and how the detail of these mitigation strategies are accurately represented in the proposed Conditions. For example, a review of the proposed Conditions, indicates that a number of the mitigation strategies proposed by the SIA are absent or not addressed, such as “Assist local shops to identify and relocate to nearby location” (p.116); “where properties are acquired AT can temporarily lease properties to ensure occupancy” (p.113).</li> </ol> <p>If specific recommendations for mitigation of social effects are proposed by the SIA, it is necessary and relevant for the SIA to explain how that mitigation has been incorporated into the Conditions and if not why not.</p>
SIA5	SIA, General	Please provide further information regarding the role of SIA as the Project phases progress. In particular, please specify the role of SIA in site	<p>The SIA notes that, given the lapse period between designation and construction and operation the receiving environment may be different from the existing environment. I agree. The community, people, families, businesses and households in proximity to the Project will likely change, and thus social impacts potentially experienced will be different and contingent upon their particular circumstances. It is unrealistic at this stage of the Project to</p>

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		<p>specific identification, assessment, monitoring and management of social effects, particularly for affected parties and sensitive receivers at the point of an Outline Plan of Works, to ensure the conditioned SCEMP and other Management Plans are able to adequately identify, assess, mitigate and manage the corresponding social effects, including business disruption.</p>	<p>provide a satisfactory assessment of social effects for this future environment. Therefore, it would be most beneficial to ensure that the Conditions provide for a further detailed assessment of social effects alongside finalising detailed designs and preparing an Outline Plan of Works.</p> <p>The proposed Condition 9 says the key stakeholders, community groups, organisations and businesses who will be engaged with will be identified and listed in the Stakeholder Communication and Engagement Plan. What this proposed Condition doesn't comment on is the method for identifying those individuals, groups and organisations and identifying the specific effects of the construction, operation and maintenance phases upon them. As a Condition to manage the effects of the Project, the SCEMP should not replace a process or methodology of adequately identifying affected parties, particularly vulnerable groups such as elderly, tenants in transitional or unsecure housing, children and low-income Pacific and Māori households, and the social effects of the Project construction processes upon them. A mechanism providing for further, site-specific assessment of social effects should be addressed by the SIA and proposed Conditions that specifically informs the SCEMP and other Management Plans of social impacts and mitigation measures required. It is noted in the AEE (p.112) that a Cultural Monitoring Plan is prepared prior to the start of construction works with the objective of identifying methods for undertaking cultural monitoring to assist in the management of any cultural effects during construction works. Please advise why a similar intervention is not considered currently relevant to address gaps in our future understanding of potential social effects.</p>
SIA6	SIA, Section 7, 8,9, 10; Section 2.2.1;	Please provide a comprehensive list of all directly affected and in-proximity	Whilst it is acknowledged that following designation, landowners will be consulted with as a priority to establish the property acquisition process under the PWA, their decision making in regards to the Project will have an impact on tenants, whether households or businesses.

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	Appendix D	businesses and residential properties that will be impacted by designation and construction phases in each NoR (Project Area level).	<p>The SIA has mentioned some general effects on rental supply and effects on business. However, given the lapse period and the need for further detailed design of construction works, it is impractical to provide a comprehensive assessment of specific effects on these households and businesses and the necessary mitigation measures that will likely be required.</p> <p>A review of the SIA finds that only some businesses have been commented on, such as KFC and McDonalds have been mentioned but others are missing from the assessment, such as Motels, Hotels and motor lodges for example (in NoR 3). Small businesses are likely local family owned and will not have the resources as would a corporate businesses to manage the cost and impacts of PWA processes, relocation or suffer disruption to their business during construction works.</p> <p>Similarly, notwithstanding the SIA's discussion on property acquisition for home-owners, there is a need for more information regarding rental households and the impacts of the Project upon them. For example, whilst a residential apartment block on Alfriston Rd is commented on there are other accommodation, housing vulnerable tenants (Gallagher Court and Poacher Guest House) which are not identified or mentioned.</p> <p>It is therefore, important firstly, that residential and business tenants are identified and are engaged in coordination with landlords regarding the potential social impact of full or partial acquisition and of construction works residential and business tenants are in close proximity to.</p> <p>Secondly, at least ahead of detailed design and property acquisition, provision should be made to fully understand and monitor the number, type and location of tenanted properties (business and residences). Provision should also be made in the Conditions (as noted in SIA3) for a mechanism by which potential social effects upon residential and business</p>

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			tenants are identified and assessed and adequate mitigation be proposed and designed early on, such as Hardship Funds, support for business relocation or other relevant business disruption management strategies.
SIA7	SIA, Section 6.4 and Appendix C (sections 3.7 – 3.10)	Please provide a comprehensive list of all directly affected and in-proximity community and social infrastructure that is impacted by designation and construction phases in each NoR (Project Area level).	<p>There appears to be some inconsistency and gaps in the SIA’s identification of in-proximity and directly impacted community and social infrastructure in each of Manurewa, Takaanini, Papakura and Drury local community and NoR Project areas. This results in some facilities and services not being identified, assessed or only being assessed for social impacts relating to designation or construction and vice versa.</p> <p>For example, a cursory look at the NoR Project areas, the following require further information:</p> <p><b>NoR 1 a and b</b> – Anderson Park is listed in Appendix E in relation to tree removal and size of recreation space, but does not appear in the main body of the text, particularly where the impacts on access to the park may be inhibited by construction.(see this gap in Section 6.4.1.1, p.21)</p> <p>(Also Nanaksar Educare Centre is spelt wrongly throughout the SIA)</p> <p><b>NoR 1c</b> – Pedestrian access to Te Mahia Train Station from Great South Road is lacking identification and analysis</p> <p><b>NoR 1d</b> – Aidans Reserve is located on the boundary of the NoR but not identified or analysed by the SIA.</p> <p><b>NoR 1f</b> – The Papakura War Memorial and green space at 280c Great South Rd is a significant, historical landmark of community significance that is not designated but is not</p>

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			<p>referenced by the SIA. For example, how will ANZAC Day events be impacted?</p> <p><b>NoR 1g</b> – Chisholm Corner Memorial Park is impacted by the designation and construction, affecting community access but not identified or analysed by the SIA. There is a public walkway at 326a/b Gt South Rd not identified as being impacted and Kirks Bush has not been identified. Also it appears that the designation/ Project maps may now be outdated as it is noted on Google Maps that the footprint of All About Children pre-school seems bigger and altered from the time the maps were produced.</p> <p><b>NoR 3</b> – Tadmore Park, Alfriston Park, Gallagher Park, Busy Bees pre-school and Gallagher Court (aged care facility) and the Māori Training Provider, Solomon Group at 236 Great South Road are not identified by the SIA and impacts on access and use during construction not assessed.</p>
SIA8	SIA, Section 6	Please explain why the Franklin Local Board area is not included as part of the 'wider community' – social area of influence.	The Project will likely have social impacts on people living in Drury, Pukekohe, Karaka, Bombay and Ardmore and other areas who either commute through or access schools, community facilities, services and businesses in the Project area. However, construction and operational impacts (positive and negative) on this wider community does not appear to have been reflected in the SIA.
SIA9	SIA, Section 8.2	Please provide further information regarding job creation, education and training opportunities during construction	These opportunities are significantly beneficial for NEET and young school leavers in the local areas and should be pursued under a pro-active strategy with local training partners and community stakeholders. However, this is not reflected in the proposed Conditions. Please explain how such an approach should be considered and how this is to be implemented in order to achieve the proposed positive effects.

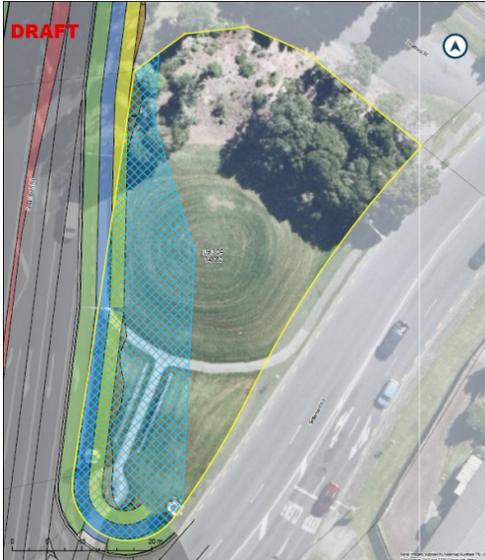
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<b>Urban Design Evaluation</b>			
UD1	Appendix A to the UDE	Please update Appendix A (Parts 1 – 6) to the UDE to clearly reference the relevant NoR in the titles of these sheets.	It is acknowledged that the relevant NoR reference is identified in the key on the UDE Appendix A drawing set. To assist with clarity in reviewing the documentation it is recommended the relevant NoR reference is also included within the titles of these drawings. This would improve clarity and better align the Urban Design Evaluation (UDE) with the General Arrangement plans for quick reference.
UD2	UDE Report, Figure 2-3, P8	Please update Figure 2-3 within the UDE to clearly show the NoR reference	Table 2-2 (p7) and Figure 2-3 (p8) outline where the NoRs are located within the wider network and which NoR is addressed within which part of the UDE Report. For clarity and ease of reference please include the NoR references on the map in figure 2-3.
UD3	AEE, Appendix A: Assessment of Alternatives p13	Please include illustrations of operative and proposed plan changes referenced within the AEE for clarity and completeness	The Assessment of Alternatives outlines a number of approved plan changes in the wider area. An illustration of the areas included within these plan changes would assist with understanding the impact this will have on the project area.
UD4	UDE Appendix A - Part 5 Sheet 13	Please provide urban design assessment of the impacts of the proposed closure of the Beaumonts Way/Weymouth Rd intersection.	The proposed closure of Beaumonts Way is identified in the General Arrangement drawings and UDE Appendix A sheet 13. This proposal will reduce connectivity and permeability for vehicular traffic to Manurewa town centre/Southmall. Please provide an assessment that addresses why this road is proposed to be closed, what provisions are proposed for active modes to access the bus and rail stations and the town centre, and what impact this will have for residents of Beaumonts Way and neighbouring streets (positive and negative).

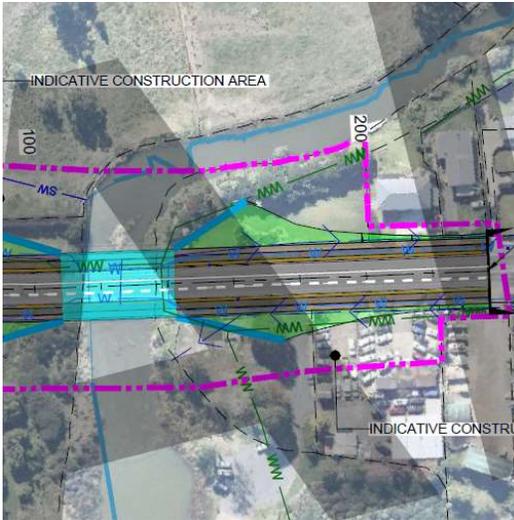
Issue identifier	Reference (Report name, section, page number)	Further Information Requested	Reasons for further information request
UD5	AEE/ UDE	Please provide urban design assessment of the proposed permanent constructed wetlands shown in the General Arrangement Drawings.	It is understood that some of the constructed wetlands shown in the General Arrangement Drawings are intended to be permanent, these will consequently have an effect on a range of urban design matters. The supporting technical assessment should address this.
UD6	UDE/ Conditions	Where outcomes are shown in the UDE, please include specific reference to them in the ULDMP condition or explain how these will be achieved by other methods / mechanisms.	<p>Within the UDE Appendix (Parts 1-6) site specific outcomes are shown, as listed below (note this list is not exhaustive), but no specific reference is made within the ULDMP condition to achieve these outcomes. Please clarify how the following outcomes will be achieved:</p> <ul style="list-style-type: none"> <li>- Demonstrate convenient, safe and legible active mode connectivity to Te Mahia Train Station (UDE Appendix A sheet 5);</li> <li>- Prioritise active mode crossing points at intersections to enable equitable local accessibility (shown on various UDE Appendix A drawing sheets)</li> <li>- Provide appropriately placed mid- block crossing and integrated accessibility into future Drury Train Station (UDE Appendix A sheet 12)</li> <li>- Prioritise retention and protection of established mature nature trees along Anderson Park, Central Park and Papakura Cemetery within NoR 1 and Tadmore Park within NoR 3</li> <li>- Additional active mode crossing at Papakura Stream to support continuity and completeness of network (UDE Appendix A sheet 15)</li> <li>- Provide a landscape response to form an appropriate interface with existing open</li> </ul>

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			space edges including Alfriston Park (UDE Appendix A sheet 14)
<b>Open Spaces (Parks)</b>			
PP1	AEE General and Section 10.3.3	<p>Please prepare a standalone report that addresses each of the areas identified below. The report should include, but not necessarily be limited to, the following elements:</p> <ol style="list-style-type: none"> <li>1. A detailed description of the physical work required or potentially required within each affected site, including construction and permanent changes post-construction.</li> <li>2. Assessment of potential environmental effects specific to the park or reserve area.</li> <li>3. Identification of potentially affected users of the space, with a specific focus on community groups and activities, such as RSL, sporting clubs etc. that may</li> </ol>	<p>The request for a standalone report is twofold: it aims to consolidate assessment and information across existing expert reports and plans, and to address information sufficiency gaps identified during the review of the application material. By creating a focused and comprehensive assessment of impacts on affected parks and reserves, the report is crucial for a nuanced understanding of community impacts, service disruptions, and mitigation or compensation strategies. This information will streamline the review process and provide the holistic evaluation essential for specialist parks planning input.</p>

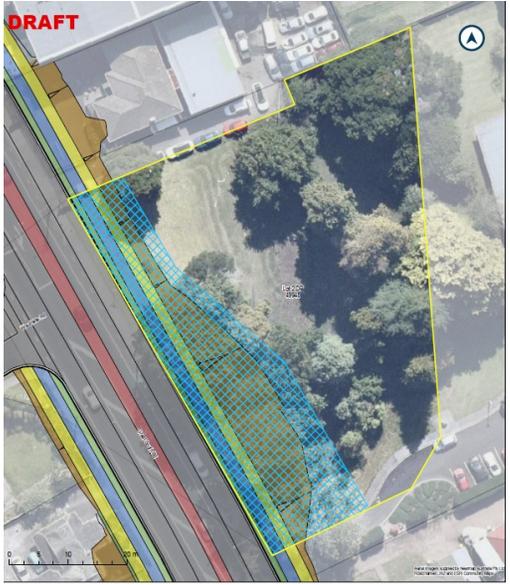
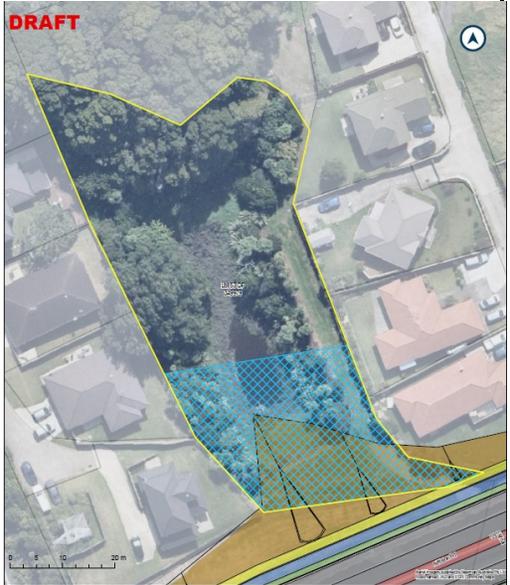
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		<p>be impacted by changes.</p> <ol style="list-style-type: none"> <li>4. A review of service impacts caused by the designation and works.</li> <li>5. An evaluation of the impact on the remaining public open space, including any changes to the accessibility and usability of the space.</li> <li>6. Proposed mitigation or compensation measures, with reference to greenway plans and local board plans for the area.</li> <li>7. Any other relevant factors you may deem critical to the parks planning assessment of the project.</li> </ol>	

PP1	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)
	<p>1. Anderson Park, NoR 1 58R Great South Road, Manurewa; LOT 8 DP 12984 NA316/57</p>		<p>2. Central Park Reserve, NoR 1 57R Wood Street, Papakura, ALLOT 205 SEC 11 VILLAGE PAPAKURA</p>	

PP1	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)
	<p>3. Papakura-Karaka War Memorial, NoR 1 278 Great South Road, Papakura, ALLOT 115 SEC 11 Village PAPAKURA</p>		<p>4. Chisholm Corner, NoR 1 312 Great South Road, Papakura, Lot 3 DP 148082, NA88A/621</p>	

PP1	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)
	<p>5. Slippery Creek Reserve, NoR 1 Road Reserve</p>	 <p>INDICATIVE CONSTRUCTION AREA</p> <p>100</p> <p>MS</p> <p>200</p> <p>INDICATIVE CONSTRU</p>	<p>5. Karaka Reserve, NoR 2 10R Karaka Road, Drury SEC 1 SO 65144</p>	 <p>DRAFT</p>

PP1	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)
	<p>6. Unnamed Esplanade Reserve, NoR 2 279 Great South Road, Drury, PT LOT 6 DP 77604</p>		<p>7. Gallaher Park (carpark and entrance), NoR 3 21R Alfriston Road, Manurewa LOT 4 DP 46314, LOT 5 DP 46314, NA6C/362</p>	

PP1	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)
	<p>8. Tadmore Park, NoR 3 238R Great South Road, Manurewa, LOT 2 DP 49948</p>		<p>9. Index Place Reserve, NoR 3 92R Alfriston Road, Manurewa LOT 53 DP 349979, RT 204563</p>	

PP1	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)	Property Name and NoR location, Address and Legal Description	Aerial (impacted area blue cross hatch)
	<p>10. Alfriston Park NoR 3 26R Saralee Drive, Manurewa, LOT 76 DP 203181, NA131D/492</p>	 <p>The aerial photograph shows a residential area with a large green field. A yellow boundary outlines the property. A blue cross-hatched area is overlaid on the field, indicating the impacted area. The word 'DRAFT' is visible in red in the top left corner of the image.</p>	<p>11. Addison Reserve NoR 4 21 Airfield Road LOT 1029 DP 516537, RT 808462</p>	 <p>The aerial photograph shows a residential street with a road intersection. A yellow boundary outlines the property. A blue cross-hatched area is overlaid on the road and adjacent area, indicating the impacted area. The word 'DRAFT' is visible in red in the top left corner of the image.</p>

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PP2	AEE Table 9-4	Please explain why Karaka Reserve and the Hingaia Street Esplanade Reserve are not included as part of the NoR 2 Receiving Environment description.	To understand the exclusion of these spaces despite being within the proposed work areas / designation boundaries.
PP3	AEE Table 9-5	Please explain why Tadmore Park, Index Place Reserve, and Alfriston Park are not included as part of the NoR 3 Receiving Environment description.	To understand the exclusion of these spaces despite being within the proposed work areas / designation boundaries.
PP4	AEE Table 9-6	Please explain why Addison Reserve is not included as part of the NoR 3 Receiving Environment description.	To understand the exclusion of this space despite being within the proposed work areas / designation boundaries.
PP5	AEE Section 10.3.3	Please explain, how was it was determined that the construction impacts on Alfriston Park and Index Place Reserve (presumed to be the 'unnamed informal recreation reserve') are greater than those on other locations?	The AEE specifies that construction impacts on Alfriston Park and Index Place Reserve are potentially greater than on other locations. However, it does not elaborate on the criteria or metrics used to reach this conclusion.

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PP6	AEE Section 10.3.4	<p>Regarding the assessment at “Effects on Open Spaces and Reserves”, please provide responses to the following:</p> <ol style="list-style-type: none"> <li>1. What specific mitigation measures are being considered to avoid tree removal, and where avoidance is not possible, what "significant planting response" is planned?</li> <li>2. How do the proposed mitigation measures align with any existing greenway or local board plans for the affected areas?</li> <li>3. What monitoring mechanisms are proposed to ensure the effectiveness of mitigation measures related to open spaces and reserves?</li> </ol>	<p>The AEE provides a general overview of operational effects on open spaces and reserves but lacks detailed information on mitigation measures, alignment with existing plans, and monitoring mechanisms. Obtaining this information will not only fill in gaps identified in the application but also facilitate a more thorough and context-specific assessment of the project's impact on local open spaces and reserves.</p>
PP7	AEE Section 10.3.5	<p>Regarding the fourth bullet in this section, please explain what criteria are being used to define 'practicable and appropriate' in the context of retaining established trees within open</p>	<p>The phrase 'practicable and appropriate' is subjective and requires clarification to ensure its appropriate application.</p>

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		spaces and reserves? How will these criteria be reflected and managed through the proposed designation conditions?	
PP8	AEE Section 10.3.5	What is meant by the term 'generous open space' as listed in the recommended Urban and Landscape Design Management Plan (ULDMP) measures? Does this refer to the creation of new public open spaces, or the enlargement or enhancement of existing ones?	The term 'generous open space' is not clearly defined in the application, leaving room for multiple interpretations.
PP9	AEE Section 10.7.4	Provide specific details on the potential increase in flood risks to each of the areas identified in PP1 (above).	While open spaces may be considered less vulnerable to flooding in comparison to habitable buildings, they serve critical community functions and environmental roles. Therefore, understanding the increased risk to these areas is important to allow for a comprehensive assessment of the project's operational effects.
PP10	Urban and Landscape Design Management Plan (ULDMP) – NoR Proposed	The proposed Urban and Landscape Design Management Plan (ULDMP) as set out under Condition 12, addresses various elements such as landscape treatment of permanent stormwater control	While the OSMP focuses more on the protection of recreational utility and the ULDMP seems to have a broader design scope, there may be areas of overlap. This raises questions about how the two plans are intended to interact. We would like to understand how the two plans will work in tandem to manage different aspects of open spaces effectively.

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	<p>Condition 12</p> <p>Open Space Management Plan (OSMP) – NoR Proposed Condition 13</p>	<p>wetlands and swales, re-instatement of construction and site compound areas, driveways, accessways, historic heritage places, and general planting—factors that are also relevant to some if not all the affected open spaces. The Urban Design Evaluation Report includes specific references to certain reserves and how the ULDMP will address key matters, for example, retention and protection of mature trees. How will the ULDMP differentiate from the proposed Open Space Management Plan (OSMP), especially in areas that both plans seemingly address? What is the formal relationship and interaction between these two plans, if any? How will it be ensured that there is appropriate coordination in the development of both including ensuring avoidance in</p>	

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		conflicting outcomes and the like?	
PP11	Open Space Management Plan (OSMP) – NoR Proposed Condition 13	What is the rationale for applying the OSMP only to open spaces listed in Schedule 5 under NoR 1 and 3? Could you provide explanations for why certain open spaces require the OSMP to apply while others do not? Please provide comment as to each site identified in PP1 (above).	It would be beneficial to understand the criteria or considerations behind focusing the OSMP on specific NoRs. A unified management approach across all NoRs could offer advantages.
PP12	Open Space Management Plan (OSMP) – NoR Proposed Condition 13	Part (c) of the OSMP condition states that the objective is to "minimise as far as practicable adverse effects on the recreation amenity." Some reserves serve functions beyond recreation. Is this condition too limiting in scope, and if so, will there be adjustments to accommodate non-recreational functions?	Some open spaces may have ecological, cultural, or other non-recreational functions. By only focusing on 'recreational amenity,' the OSMP might neglect other important aspects that contribute to the overall value of an open space.

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PP13	Open Space Management Plan (OSMP) – NoR Proposed Condition 13	In Part (c)(iii) of the OSMP, there's a reference to "measures to reasonably maintain the existing level of service." Could you clarify what is meant by "reasonably maintain"?	The term 'reasonably maintain' is somewhat ambiguous and could be open to interpretation. A clear understanding of what this entails is essential for assessing whether the OSMP will effectively manage the open spaces in question.
PP14	Anderson Park, Great South Road / Grand Vue Road	Rain gardens are proposed to be provided in widened berms approaching the intersection between Great South Road and Grand Vue Road. Please suggest indicative species for the rain gardens with concern being obstruction to sightlines approaching the intersection.	Placing rain gardens in the vicinity of the intersection has the potential to obstruct sightlines depending on the species chosen for said raingardens. It would be best to provide detail for the planting of the raingardens early so if species might not be suitable, we are able to advise this before establishment.
PP15	Anderson Park, Great South Road / Grand Vue Road	The proposed raingardens are directly adjacent to the cycleway. Will there be any form of safety measures between the rain garden and the cycleway?	It is common for a drop of approximately 30 to 50cm in the rain gardens after the media settles post construction which can become a safety hazard, particularly being next to a cycleway. An example of an easy safety feature that might reduce the risk of someone falling into the raingarden could be to include a small lip between the raingarden and the cycleway that would be visible at night.
PP16	Papakura-Karaka War	Access to the cenotaph appears to be lost with the proposed active mode path detouring	To ensure that the design modifications don't compromise safe and accessible pedestrian access to a site of heritage significance located within open space.

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	Memorial	behind. It is unclear how safe access is proposed to be maintained between the cenotaph and the grassed park that it adjoins. Please explain how it is expected that this space will function in a form that will be safe for pedestrians, including those with accessible needs.	
PP17	Chisholm Corner	Fill battering is proposed within Chisholm Corner, which has a distinctive mound with an RSL poppy on top. Please detail whether the works proposed in this location will change the distinctive shape of this mound.	To confirm that whether what may be interpreted as a distinctive landmark will be altered in a way that lessens its significance or recognisability.
PP18	Gallaher Park	What is proposed by way of mitigation for the loss of parking spaces in this location, and have the potential effects on sporting club users being considered?	To ascertain the implications for park users due to the proposed reduction in parking spaces and to understand any mitigation plans.

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PP19	Sheet 18, Urban Design Evaluation Plans	This sheet suggests works within Bruce Pulman Park, up to the Grove Road intersection. However, no designation is proposed within the Bruce Pulman Park boundaries. Please explain, as the detail on this sheet is not reflected on SGA-DRG-STH-005-GE-4400 General Arrangement Layout Plan NoR 4.	To resolve discrepancies between plans, ensuring that any proposed works in Bruce Pulman Park are accounted for in our assessment if necessary.