

**10 November 2023**

**Te Tupu Ngātahi**  
Supporting Growth  
PO Box 105218  
Auckland 1143

Cheryl Cleary  
c/o Auckland Council  
135 Albert Street,  
Auckland  
Private Bag 92300, Auckland 1142

Issued via email:

Dear Cheryl

**Re: Response to request for further information in accordance with section 92 of the Resource Management Act 1991 for the South Frequent Transit Network Project.**

We refer to your letter of 30 October 2023 requesting further information under section 92 of the Resource Management Act 1991 (RMA) in relation to the Notices of Requirement by Auckland Transport for four designations (NoRs 1 – 4).

This letter contains the response to each request. For ease of reference, the following table includes the request and the relevant response. Where appropriate, reference has been made to the relevant lodgement documentation that should be read in conjunction with a response.

As per Section 1.5 of the AEE, the Requiring Authorities have previously requested public notification of the Notices of Requirement for the South Frequent Transit Networks Project. As agreed, the Requiring Authority request that public notification proceeds on Thursday 16 November.

If you have any queries regarding the information contained in this response, please do not hesitate to contact me.

Kind regards



**Liam Winter**  
Planning Lead – South FTN

**Attachment A** – Social Impact s92 Response

## Response to s92 request for further information

Ref	Request	Response																														
<b>Planning and General Matters</b>																																
P1	<p>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.</p> <p><i>Rationale: 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.</i></p>	<p>Not all Certificates of Title for sites subject to the NoRs have been checked as this is not a requirement of s168(1) or the Form 18. However, site constraints have been considered to the extent necessary as part of the consideration of alternatives (as documented in the Assessment of Alternatives report) and to inform the designation boundaries. Effects on underlying property title interests are not matters that need to be assessed in terms of s171 and can be managed as necessary and appropriate via the Public Works Act regime which provides the relevant statutory scheme with respect to directly affected party title interests.</p>																														
P2	<p>Please confirm the total areas of land being designated for each NoR location.</p> <p><i>Rationale: 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.</i></p>	<p>The approximate total areas of land being designated by the NoRs are outlined as follows:</p> <table border="1"> <thead> <tr> <th>NoR</th> <th>Total Designation Extent (m<sup>2</sup>)</th> <th>Extent on private property (m<sup>2</sup>)</th> <th>Extent in road corridor (m<sup>2</sup>)</th> <th>Hydro extent (m<sup>2</sup>)</th> <th>Extent in rail corridor (m<sup>2</sup>)</th> </tr> </thead> <tbody> <tr> <td>NoR 1 (Great South Road FTN Upgrade)</td> <td>91,916</td> <td>22,404</td> <td>69,501</td> <td>0</td> <td>11</td> </tr> <tr> <td>NoR 2 (Great South Road Upgrade – Drury section)</td> <td>32,079</td> <td>12,808</td> <td>18,809</td> <td>462</td> <td>0</td> </tr> <tr> <td>NoR 3 (Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades)</td> <td>144,235</td> <td>75,895</td> <td>66,014</td> <td>0</td> <td>2,326</td> </tr> <tr> <td>NoR 4 (Takaanini FTN – Porchester Road Upgrade; and Popes Road Upgrade)</td> <td>184,802</td> <td>80,658</td> <td>103,637</td> <td>507</td> <td>0</td> </tr> </tbody> </table>	NoR	Total Designation Extent (m <sup>2</sup> )	Extent on private property (m <sup>2</sup> )	Extent in road corridor (m <sup>2</sup> )	Hydro extent (m <sup>2</sup> )	Extent in rail corridor (m <sup>2</sup> )	NoR 1 (Great South Road FTN Upgrade)	91,916	22,404	69,501	0	11	NoR 2 (Great South Road Upgrade – Drury section)	32,079	12,808	18,809	462	0	NoR 3 (Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades)	144,235	75,895	66,014	0	2,326	NoR 4 (Takaanini FTN – Porchester Road Upgrade; and Popes Road Upgrade)	184,802	80,658	103,637	507	0
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P3	<p>Please provide information as to how NoR 2 and NoR 4 'Key Connections' "enable the South FTN".</p> <p><i>Rationale: 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:</i></p> <p><i>Upgrade of adjoining Key Connections to the FTN – Popes Road, and the Drury section of Great South Road between Waihoehoe Road and State Highway 1 (SH1).</i></p> <p><i>Form 18 states:</i></p> <p><i>NoR 2 is for a portion of works required to enable the South FTN – 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><i>Further information is needed to explain how NoR 2 and NoR 4 'Key Connections' "enable the South FTN".</i></p>	<p>The term "South FTN" as used in the application is a catch-all term to describe the network which includes the Great South Road FTN route, the Takaanini FTN route, and the adjoining Key Connections to these routes. The Key Connections are within the scope of the proposed network referred to collectively as the "South FTN" which is intended to be considered as an integrated whole. However, the Key Connections are not intended as part of the route extents for bus services defined as FTN services (i.e. those that operate at least every 15 minutes between 7am-7pm, 7 days-a-week).</p> <p>Please refer to Section 1.1 of the AEE for further description. Additionally, the following diagram is provided to clarify the relationship between the routes comprising the wider South FTN network, and the four NoRs.</p>																														

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P4	<p>Please provide further information regarding the intended purpose of proposed Condition 1 in relation to the requirement that works be undertaken in general 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><i>Rationale: Proposed Condition 1 reads (in part):</i></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> <p><i>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:</i></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> <p><i>a) upgrades to Great South Road to accommodate bus priority measures, general traffic lands, and walking and cycling facilities in eight locations;</i></p> <p><i>b) associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;</i></p> <p><i>c) Reconfiguration of local roads, where the proposed work intersect with local roads; and</i></p> <p><i>d) Construction activities including vegetation removal, establishment of construction areas and the regarding of driveways.</i></p> <p><i>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.</i></p>	<p>The works are intended to be undertaken in general accordance with Schedule 1 which includes both the 'Project Description' and 'Concept Plan'. The concept plans included in the proposed condition set include the indicative design (monochromatic) within the designation boundaries. These have been derived from the General Arrangement Plans (supplied as Volume 3 of the lodgement package). The Project Description also covers the key components of the Project. As typical of large infrastructure projects, detailed design of the project works will be advanced via Outline Plan subject to the scope of the designation, its boundary and outcomes prescribed via conditions including management plans.</p>
P5	<p>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".</p> <p><i>Rationale: 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'.</i></p>	<p>The 'Project Description' refers to all of the descriptive text included in Schedule 1 before the Concept Plan(s) for each respective NoR. The Description begins with "The proposed work is for the construction, operation, maintenance, and upgrades to...".</p> <p>For clarity, a 'Project Description' sub-heading will be added into the proposed condition set.</p>
P6	<p>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> <p><i>Rationale: 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:</i></p> <p><i>"Any legal entity that intends to master plan or develop land adjacent to the designation".</i></p>	<p>The purpose of the Land Use Integration Process is to encourage and facilitate the integration of master planning and land use development activity on land directly affected or adjacent to the designation. The condition intends to support future development that may require more extensive coordination and/or a set process with the Requiring Authority due to the potential master-planning opportunities available, scale and/or complexity of the future development and/or the development entities involved (i.e., "Developers" or "Development Agencies" that may have many different people involved).</p> <p>For other landowners or interested parties that may wish to development land directly affected or adjacent to the designation, an information source will be established through the 'Project Information' condition which can provide relevant information/contact details for further advice including on the s176 process if any landowner or interested party wishes to advance development within the boundary. The 'Project Information' condition requires information on matters such as:</p> <p><i>(ii) contact details for enquiries;</i></p>

Ref	Request	Response
	<p>Development Agency is defined in the Condition as: “Public entities involved in development projects”.</p>	<p>(iv) the implications of the designation for landowners, occupiers and business owners and operators within the designation and where they can receive additional advice;...</p> <p>(vi) when and how to apply for consent for works in the designation under s176(1)(b) of the RMA.</p>
P7	<p>Please provide further information why proposed Condition 6 is limited to network utility operators and does not include Council.</p> <p><i>Rationale: 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.</i></p>	<p>Auckland Council Community Facilities is part of the Council family alongside the Requiring Authority and a level of co-ordination and discussion is anticipated over the course of the Project to support integrated development and positive outcomes for the community.</p> <p>Engagement with Auckland Council Community Facilities has been ongoing throughout the development of the AEE and will continue post lodgement. The inclusion of Council in this specific condition will be further considered. We intend to update the Auckland Council processing team on these discussions in advance of the hearing and preferably in advance of the release of the initial s42A report.</p>
P8	<p>Please provide further information about how the recommendations provided in the AEE and supporting technical reports of measures to mitigate adverse effects are intended to be implemented in proposed Conditions, management plans, an Outline Plan or other means.</p> <p><i>Rationale: 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 recommendations.</i></p>	<p>The specific recommendations made within the technical reports are provided for and addressed in the proposed conditions which are intended to be read as a whole. The conditions are broadly phrased to be outcomes-focused, recognising the longer implementation timeframes.</p> <p>Specific design solutions and recommendations will be further developed as part of the Outline Plan process, requirements of the proposed designation conditions, detailed design, and future resource consenting stages. The assessment undertaken is at a level to inform the NoR extent and to understand the envelope of effects.</p>
P9	<p>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.</p> <p><i>Rationale: 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.</i></p>	<p>AT does not propose to submit the Stakeholder Communication and Engagement Plan (SCEMP) via the Outline Plan process as it is to be provided to Council for information purposes after the Outline Plan for the stage of work but prior to construction. The SCEMP will include details of engagement to be undertaken during construction and relevant stakeholders based on information gathered through the detailed design and Outline Plan process. As this will occur during development of the outline plan process leading into commencement of construction, it is proposed to be provided to Council for information prior to the start of construction. Further as an engagement tool, as opposed to effects management outcome, AT considers that submission for information purposes is an appropriate requirement.</p> <p>Similarly, a Schedule to a CNVMP is to be provided for the construction to which it relates. The CNVMP is proposed to be provided as part of the Outline Plan and a Schedule to the CNVMP is generally only required where there is a requirement to undertake works beyond those already outlined in the CNVMP. Given the Schedule to the CNVMP is to be provided (if required) outside of the Outline Plan process, it is proposed that these Schedules will be required to be certified by Council.</p>
P10	<p>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> <p><i>Rationale: The Advice Note located at the end of proposed Condition 12 reads:</i></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>As noted, the intent of the advice note is to clarify that front yard setback rules for relevant adjoining zones do not apply from the edge of the designation boundary to ensure that front yard setbacks are not larger than necessary and result in an unintended land use integration outcome. To this end, the advice note states that the designation is not for the purpose of ‘road widening’ to clarify that the AUP:OP definition of front yard is not intended to be measured from the designation boundary in this context.</p> <p>Notwithstanding this, it is acknowledged that ‘road widening’ and ‘corridor widening’ are otherwise similar in meaning on the ground. The purpose of the advice note is to clarify the interpretation of plan rules as they relate to the designation boundary rather than debate the scope of physical works. Accordingly, while we consider the advice note is an important clarification for land use integration outcomes, it could be deleted if required to avoid confusion. This advice note was only added to assist integration concerns raised by Council urban design experts and other public entities in the past.</p> <p>From a practical perspective, we note that any road widening works will require work across the whole arterial corridor in any event.</p>

Ref	Request	Response
	<p><i>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:</i></p> <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><i>...</i></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><i>Form 18 for NoR 2, NoR 3 and NoR 4 contains a similar statement that the purpose of the NoR includes 'corridor widening'.</i></p> <p><i>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></i></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><i>It is also not clear what this advice note will mean for the eventual proximity of new 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.</i></p>	
P11	<p>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> <p><i>Rationale: The rationale for the lapse period for NoR2 states:</i></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><i>How the integration with other projects affects the requested lapse period needs further explanation.</i></p>	<p>As noted, the three adjacent projects referenced are designated and largely consented through under the New Zealand Upgrade Programme. They are expected to be completed in the mid-to-late 2020s and there is greater certainty of the implementation timeframes for these projects (i.e., within the next 10 years). The works to be enabled within NoR 2 interfaces with these projects. The lapse period sought for NoR 2 (10 years) reflects this specific context and to align with the timing of the adjacent works. As such, minimising the risk of a part of the network not being sufficiently upgraded within similar timeframes. Notwithstanding this, the lapse period ensures protection of the land required for the works from inappropriate development until the works can commence when funding is allocated.</p>
P12	<p>Please provide further information regarding the positive transport effects of each of the four separate NoR.</p>	<p>The approach to the transport assessment (including positive effects) has been discussed in Section 3.2.2.2 of the Transport Assessment Report. Overall, assessment has been undertaken for the whole route treatments as the outcomes sought for improved public transport and walking and cycling would not be realised if implemented solely within those NoR sections.</p>

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	<p><i>Rationale: 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.</i></p>	<p>Notwithstanding this, how the positive effects identified in Table 10.2 of the AEE relate to the NoRs is generally mapped in the table below.</p> <table border="1" data-bbox="1199 306 2724 1799"> <thead> <tr> <th colspan="2" data-bbox="1199 306 2101 352">Positive Effects</th> <th data-bbox="2110 306 2724 352">Relevant NoR(s)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1199 359 1368 457" rowspan="7">Walking and cycling</td> <td data-bbox="1377 359 2101 457">Enables improved walking and cycling facilities along the corridors, resulting in improved protection for vulnerable road users; and consequentially, a reduction in deaths and serious injuries (DSIs).</td> <td data-bbox="2110 359 2724 457">All NoRs and overall network</td> </tr> <tr> <td data-bbox="1377 464 2101 533">Improved integration with existing and planned facilities on the network, resulting in improved connectivity.</td> <td data-bbox="2110 464 2724 533">All NoRs and overall network</td> </tr> <tr> <td data-bbox="1377 539 2101 585">Environmental and health benefits due to the uptake of active modes.</td> <td data-bbox="2110 539 2724 585">All NoRs and overall network</td> </tr> <tr> <td data-bbox="1377 592 2101 661">Removal of several left turn slip lanes across the corridors, improving safety for walking and cycling.</td> <td data-bbox="2110 592 2724 661">NoR 1, NoR 3 and NoR 4 (and overall network)</td> </tr> <tr> <td data-bbox="1377 667 2101 714">Supporting growth in a sustainable manner.</td> <td data-bbox="2110 667 2724 714"></td> </tr> <tr> <td data-bbox="1377 720 2101 789">Improved choice of travel modes, both to local destinations and to the public transport network.</td> <td data-bbox="2110 720 2724 789">All NoRs and overall network</td> </tr> <tr> <td data-bbox="1377 795 2101 865">Improved road crossing facilities due to traffic signal control at key intersections.</td> <td data-bbox="2110 795 2724 865">All NoRs and overall network</td> </tr> <tr> <td data-bbox="1199 871 1368 940" rowspan="6">Public transport</td> <td data-bbox="1377 871 2101 940">Better quality, frequency and reliability for public transport along the FTN routes, improving its attractiveness.</td> <td data-bbox="2110 871 2724 940">NoR 1, NoR 3 and NoR 4 (and overall network)</td> </tr> <tr> <td data-bbox="1377 947 2101 1016">Better access to the wider public transport (rail) network.</td> <td data-bbox="2110 947 2724 1016">All NoRs (noted that NoR 2 interfaces with the future Drury Station)</td> </tr> <tr> <td data-bbox="1377 1022 2101 1092">Improved access to employment and social amenities via public transport.</td> <td data-bbox="2110 1022 2724 1092">All NoRs</td> </tr> <tr> <td data-bbox="1377 1098 2101 1205">Increase in public transport choice and resilience for the community especially in the event the rail line is full or closed.</td> <td data-bbox="2110 1098 2724 1205">NoR 1, NoR 3 and NoR 4 (and overall network) Noting however that NoR 2 will provide for safer active mode accessibility to the adjacent Drury Station.</td> </tr> <tr> <td data-bbox="1377 1211 2101 1281">Reduced conflicts between buses and cars with provision of bus lanes.</td> <td data-bbox="2110 1211 2724 1281">NoR 1 and NoR 3</td> </tr> <tr> <td data-bbox="1377 1287 2101 1333">Supporting growth in a sustainable manner.</td> <td data-bbox="2110 1287 2724 1333">Overall network</td> </tr> <tr> <td data-bbox="1199 1339 1368 1409" rowspan="4">General traffic</td> <td data-bbox="1377 1339 2101 1446">Supporting wider network outcomes such as improved public transport provision and reduced vehicle kilometres travelled (VKT) relative to future without the project (2048+).</td> <td data-bbox="2110 1339 2724 1446">Overall network</td> </tr> <tr> <td data-bbox="1377 1453 2101 1522">Improved driver safety with the conversion of priority-controlled intersections to either roundabouts or signals.</td> <td data-bbox="2110 1453 2724 1522">All NoRs</td> </tr> <tr> <td data-bbox="1377 1528 2101 1635">Provision of more effective and reliable travel on Great South Road near the Drury interchange due to provision of additional lanes between adjacent traffic signals.</td> <td data-bbox="2110 1528 2724 1635">NoR 2</td> </tr> <tr> <td data-bbox="1377 1642 2101 1728">Increased flood resilience of stream bridges as they are upgraded to 1 in 100-year flood resilience, thereby minimising traffic disruptions in the event bridges are damaged in a flooding event.</td> <td data-bbox="2110 1642 2724 1728">NoR 1 and NoR 2</td> </tr> <tr> <td data-bbox="1199 1734 1368 1803">Freight</td> <td data-bbox="1377 1734 2101 1803">Improved operations along Popes Road West; 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All NoRs (noted that NoR 2 interfaces with the future Drury Station)	Improved access to employment and social amenities via public transport.	All NoRs	Increase in public transport choice and resilience for the community especially in the event the rail line is full or closed.	NoR 1, NoR 3 and NoR 4 (and overall network) Noting however that NoR 2 will provide for safer active mode accessibility to the adjacent Drury Station.	Reduced conflicts between buses and cars with provision of bus lanes.	NoR 1 and NoR 3	Supporting growth in a sustainable manner.	Overall network	General traffic	Supporting wider network outcomes such as improved public transport provision and reduced vehicle kilometres travelled (VKT) relative to future without the project (2048+).	Overall network	Improved driver safety with the conversion of priority-controlled intersections to either roundabouts or signals.	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	Improved road crossing facilities due to traffic signal control at key intersections.	All NoRs and overall network																																											
Public transport	Better quality, frequency and reliability for public transport along the FTN routes, improving its attractiveness.	NoR 1, NoR 3 and NoR 4 (and overall network)																																											
	Better access to the wider public transport (rail) network.	All NoRs (noted that NoR 2 interfaces with the future Drury Station)																																											
	Improved access to employment and social amenities via public transport.	All NoRs																																											
	Increase in public transport choice and resilience for the community especially in the event the rail line is full or closed.	NoR 1, NoR 3 and NoR 4 (and overall network) Noting however that NoR 2 will provide for safer active mode accessibility to the adjacent Drury Station.																																											
	Reduced conflicts between buses and cars with provision of bus lanes.	NoR 1 and NoR 3																																											
	Supporting growth in a sustainable manner.	Overall network																																											
General traffic	Supporting wider network outcomes such as improved public transport provision and reduced vehicle kilometres travelled (VKT) relative to future without the project (2048+).	Overall network																																											
	Improved driver safety with the conversion of priority-controlled intersections to either roundabouts or signals.	All NoRs																																											
	Provision of more effective and reliable travel on Great South Road near the Drury interchange due to provision of additional lanes between adjacent traffic signals.	NoR 2																																											
	Increased flood resilience of stream bridges as they are upgraded to 1 in 100-year flood resilience, thereby minimising traffic disruptions in the event bridges are damaged in a flooding event.	NoR 1 and NoR 2																																											
Freight	Improved operations along Popes Road West; and on Great South Road.	NoR 1 and NoR 4																																											

Ref	Request	Response
P13	<p>Please provide further information as to how the NoR – specific matters recommended in the AEE (page 74) are addressed in the Proposed Conditions contained in Attachment C to the Form 18s for the four NoR.</p> <p><i>Rationale: A Construction Traffic Management Plan (CTMP) is recommended in the AEE and proposed Condition 19 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:</i></p> <p><i>In relation to NoR-specific effects, it is recommended that the CTMP considers:</i></p> <ul style="list-style-type: none"> <li>• <i>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;</i></li> <li>• <i>For NoR 1: How active mode connectivity is maintained across Slippery Creek during construction;</i></li> <li>• <i>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</i></li> <li>• <i>For NoR 3: How a connection may be maintained for all modes across Alfriston Road bridge.</i></li> </ul>	<p>The proposed conditions including the Construction Traffic Management Plan (CTMP) condition are intentionally phrased to be outcomes focused, recognising the longer implementation timeframes. The outcomes sought by the prescriptive and specific recommendations made in the TAR are provided for and addressed in the proposed conditions as a whole.</p> <p>For example, the specific recommendations on construction timing and network capacity can be considered through the following clauses of the CTMP condition which requires details that include the following to achieve the objective of the CTMP:</p> <ul style="list-style-type: none"> <li>- <b>Clause (a)(i)</b> - <i>methods to manage the effects of temporary traffic management activities on the traffic;</i></li> <li>- <b>Clause (a)(ii)</b> - <i>measures to ensure the safety of all transport users;</i></li> <li>- <b>Clause (a)(iii)</b> - <i>the estimate numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours to manage vehicular and pedestrian traffic near schools or to manage traffic congestion;</i></li> <li>- <b>Clause (a)(v)</b> - <i>identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, including pedestrians and cyclists;</i></li> <li>- <b>Clause (a)(x)</b> - <i>details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</i></li> <li>- <b>Clause (a)(xi)</b> - <i>details of any measures proposed to be implemented in the event thresholds identified in (x) being exceeded.</i></li> </ul> <p>It is noted that the Construction Environmental Management Plan (CEMP) also requires details of the "Construction Works programmes and the staging approach..." (refer to Clause (a)(iii)).</p>
P14	<p>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 development).</p> <p><i>Rationale: The Landscape Effects Assessment states (page 23):</i></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><i>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 land not being able to be reintegrated.</i></p>	<p>All areas within the proposed designation are reasonably necessary and required to implement the Project (whether it is for the construction phase and/or operational phase/permanent parts of the Project).</p> <p>Land used for construction (i.e., construction yards, works areas) may also be used for the on-going operation, maintenance and mitigation of effects (i.e., operational phases of the project). This land will be subject to consideration as part of the Urban and Landscape Design Management Plan condition to ensure they achieve integration with the receiving environment (refer to ULDM Clause (f)(i)) and the Project achieves the objective of the ULDM. As such, land that may be identified as "too small or have insufficient access to enable housing or business development" (as noted in this s92 request) would be considered as part of the detailed design stage/Outline Plan process and subject to the ULDM. A suitable design response to this land will be determined at this stage.</p> <p>The purpose of the proposed Designation Review condition is for the Requiring Authority to review the designation post Completion of Construction so land that may no longer be required for the on-going operation, maintenance and mitigation of effects can be removed from the designation. It is anticipated that any land that would be subject to review by the Requiring Authority at this part of the process and subject to this condition would be land that presents a likelihood of being reintegrated by others (i.e., for future development).</p>
P15	<p>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.</p> <p><i>Rationale: 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</i></p>	<p>The noise contours constitute "information requested that could assist with land use integration" by a developer or development agency in accordance with condition 3(b)(i). We consider this is an appropriate approach as the noise contours are generally only relevant to those looking to redevelop within proximity of the designation.</p>

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	<p>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.</p>	
P16	<p>Please provide further information to clarify whether the Schedule required by proposed Condition 23 will identify a hierarchy of mitigation measures.</p> <p><i>Rationale:</i> 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>A hierarchy of mitigation measures will be adopted through the CNVMP and Schedules (where produced), as follows:</p> <ul style="list-style-type: none"> <li>• Managing times of activities to avoid night works and other sensitive times;</li> <li>• Liaising with neighbours so they can work around specific activities;</li> <li>• Selecting equipment and methodologies to restrict noise;</li> <li>• Using screening/enclosures/barriers; and</li> <li>• Offering neighbours temporary relocation.</li> </ul> <p>By following this hierarchy, the best practicable option (BPO) for mitigation will be implemented, whilst avoiding undue disruption to the community.</p>	<p>The Construction Noise and Vibration Assessment Report states that a hierarchy of mitigation measures will be adopted through the CNVMP and Schedules. The Schedules will not set out a hierarchy of mitigation measures as that is not their purpose. The purpose of the Schedule is to identify specific mitigation measures, where site specific or activity specific mitigation measures are required to manage effects on certain identified receivers. This is typically where noise and vibration levels cannot be managed via the range of tools provided for in the CNVMP and a more tailored approach is required. The mitigation measures set out in the Schedule will achieve BPO for the individual receivers or activity which can be assisted through direct consultation.</p>
P17	<p>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> <p><i>Rationale:</i> 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>“(b) The objective of the ULDMP(s) is to:</p> <p>(i) Enable integration of the Project’s permanent works into the surrounding landscape and urban context; and</p> <p>(ii) Ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment”.</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>	<p>The phrasing of the condition is intentionally phrased to be outcomes focused. Ensuring that the Project “manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment” is an overall outcome sought by the ULDMP. This could be achieved by implementing various measures that may inherently avoid, remedy, or mitigate adverse landscape and visual effects. The measures will be identified through the details required by the ULDMP condition under Clause (f) and (g).</p>
P18	<p>Please provide further information regarding public and community inputs to the ULDMP.</p> <p><i>Rationale:</i> 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>	<p>The process for identifying Stakeholders and methods to engage with Stakeholders will be confirmed through the preparation of the SCEMP and prior to commencing detailed design. As per the ULDMP condition, key stakeholders will be invited (along with Mana Whenua to participate in the development of the ULDMP.</p> <p>This is consistent with the statutory outline plan process that does not anticipate public participation regarding project design details. In any event, it is noted that the ULDMP as a management plan will need to be prepared by a Suitably Qualified Person(s) with specific objectives and outcomes. Input and views of the wider/general public will be generally represented through the list of stakeholders that will be identified through the process/provisions identified above relating to the SCEMP (e.g., community groups business owners etc, government bodies etc.). Those stakeholders can provide feedback as you note. AT regularly engages with local boards and other community groups to ensure public and community views are represented and feedback on project development.</p>

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	<p>stakeholders' does not appear to be inclusive of 'community groups, organisations and businesses or landowner and occupiers').</p>	
P19	<p>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> <p><i>Rationale: 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:</i></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><i>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.</i></p> <p><i>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.</i></p>	<p>A CNVMP shall be prepared prior to the start of construction for a stage of work and shall be provided to Council as part of the Outline Plan process. The objective of the CNVMP is "to provide a framework... to achieve the construction noise and vibration standards to the extent practicable".</p> <p>A Schedule to the CNVMP shall be prepared prior to the start of construction if required. A Schedule will be provided to Council for certification at least 5 working days in advance of construction works. The objective of a schedule is to set out the BPO measures to manage noise and/or vibration effects beyond those measures set out in the CNVMP.</p>
P20	<p>Please provide further information as to whether a Tree Management Plan proposed in proposed Condition 27 would include assessment and identification of trees for transplanting.</p> <p><i>Rationale: 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:</i></p> <p style="padding-left: 40px;"><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 transplantation will form part of the plan.</i></p> <p><i>However, this matter is not listed in proposed Condition 27 in Form 18 as a requirement for a TMP to identify.</i></p>	<p>The conditions including the proposed Tree Management Plan are phrased to be outcomes-focused, recognising the longer implementation timeframes. This specific recommendation is provided for through the Tree Management Plan through Clause (b)(ii) - "demonstrate how the design and location of project works has avoided, remedied or mitigated any effects on any tree listed [in the Schedule]...". There are various ways that this requirement could be achieved which could include tree transplanting as appropriate. While not explicitly specified, this is not precluded as an option. This is appropriate as it will ensure mitigation is developed that reflects the status and condition of the trees at the time of Project implementation.</p>
P21	<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><i>Rationale: 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:</i></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> </ul>	<p>The proposed conditions including the Construction Environmental Management Plan (CEMP) are intentionally phrased to be outcomes focused, recognising the longer implementation timeframes. The outcomes sought by the specific recommendations made in the Flooding Assessment are provided for and addressed in the proposed conditions, specifically the CEMP.</p> <p>For example these specific recommendations related to these flooding matters can be considered through the following clauses of the CEMP which requires the CEMP to include:</p> <ul style="list-style-type: none"> <li>- <b>Clause (a)(iii)</b> - the Construction Works programmes and the staging approach, and the proposed hours of work;</li> <li>- <b>Clause (a)(vii)</b> - measures to mitigate flood hazard effects such as siting stockpiles out of floodplains, minimising obstructions to flood flows, actions to respond heavy rain.</li> </ul>

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	<p>- <i>Managing the overland flow paths to make sure flows are not diverted toward existing buildings or properties.</i></p>	<p>Clause (a)(vii) above specifically covers mitigation of flood hazard effects and specifies potential examples (i.e., "such as...") of mitigation, but does not preclude or limit other measures that may be identified by the Suitably Qualified Person(s) who will prepare this plan (in accordance with the Management Plan condition requirements).</p>
P22	<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 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.</p> <p><i>Rationale: 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 project, particularly in relation to bus lanes, would be beneficial.</i></p>	<p>The recommended allocation of road space is linked to an assumed level of service for buses – AT guidance identifies where bus lanes are likely to be justified, and this guidance relates both to bus volumes; and the extent to which buses are impeded by other traffic. The consideration of these matters is guided by AT's future network planning which identifies future bus routes and likely bus volumes; and traffic modelling data which identifies where buses are likely to be impeded without priority measures. Given that the recommended form of the project/allocation of road space is linked to achieving a level of service for specific bus services, the rationale for the additional road space would not exist if the bus services did not eventuate/were not funded (because the volume of buses would not exist and buses would not be impeded by traffic).</p>
P23	<p>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.</p> <p><i>Rationale: 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.</i></p>	<p>The flood hazard condition is framed as outcomes to be achieved to reflect the longer implementation timeframes - i.e. the condition describes the flood risk outcomes that need to be achieved by the final design, while the recommended and specific measures in the report are potential ways in which the outcomes may be achieved. Specific design measures are not specified so as to not limit future design responses to achieve the outcomes sought by the condition.</p>
P24	<p>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 Way road connection to Weymouth Road. If it has been considered and dismissed please provide reasons.</p> <p><i>Rationale: 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:</i></p> <p style="padding-left: 40px;"><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 activities, however delays are considered to be <b>low</b> overall.</i></p> <p><i>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</i></p>	<p>Clarification and consideration of this active mode connection is provided in the assessment/responses in <b>Attachment A</b> of this s92 response package.</p> <p>An active mode connection from Beaumonts Way to Weymouth Road is provided for/not precluded by the designation boundaries, and is shown indicatively in the General Arrangement plans. The respective concept plans included in Schedule 1 of the proposed condition set also indicate this active mode connection (with the concept plans derived from the General Arrangement Plans). The ULDM condition also requires that the means by which the project provides for active mode connectivity to adjacent urban form/land use is set out in the ULDM at the OPW stage (refer to Clause (f)(ii) and (iii) - this condition would capture any final recommendations re a connection between Beaumonts Way and Weymouth Road.</p>

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	<p><i>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.</i></p>	
P25	<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), CHI (AUP:OP), "Modifications to edges of memorial structure".</i></p> <p><u>Rationale:</u> <i>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.</i></p> <p><i>The assessment in Table 11-4 Matters of national importance states:</i></p> <p style="padding-left: 40px;"><i>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).</i></p> <p><i>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.</i></p>	<p>The indicative design as shown in the General Arrangement Plans and concept plans has considered these heritage sites and avoids proposing any direct works on these identified heritage sites. Works adjacent to these sites are anticipated to be active mode improvements / upgrades to existing impervious area. The proposed 'Activity in General Accordance with Plans and Information' condition specifies in Clause (a) that <i>"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) The Project Description; and (ii) Concept Plan)".</i></p> <p>The proposed Historic Heritage Management Plan (HHMP) condition also addresses the concerns related to the identified historic heritage sites. The HHMP shall be prepared in consultation with Council, Heritage New Zealand Pouhere Taonga (HNZPT) and Mana Whenua. The objective of the HHMP as specified in Clause (b) <i>is to protect historic heritage and to remedy and mitigate any residual effects as far as practicable.</i> To achieve this objective the HHMP shall identify the following (which are of particular relevance to the identified heritage sites):</p> <ul style="list-style-type: none"> <li>- Clause (b)(i) - <i>Any adverse direct and indirect effects on historic heritage sites and measures to appropriately avoid, remedy or mitigate any such effects, including a tabulated summary of these effects and measures;</i></li> <li>- Clause (b)(ii) - <i>Methods for the identification and assessment of potential historic heritage places within the Designation to inform detailed design;</i></li> <li>- Clause (b)(iii) - <i>Known historic heritage places and potential archaeological sites within the Designation...</i></li> <li>- Clause (b)(ix) <i>Methods for avoiding, remedying or mitigation adverse effects on historic heritage places and sites within the Designation during Construction Works as far as practicable...</i> These methods shall include but not limited to: (a) security fencing or hoardings around historic heritage places to protect them from damage during construction or unauthorised access;... (c) <i>Training requirements and inductions for contractors and subcontractors on historic heritage places within the Designation...</i></li> </ul>
P26	<p>Please provide further information as to what is intended to be included in the 'Ecological Management Plan' listed in proposed Condition 7.</p> <p><u>Rationale:</u> <i>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.</i></p> <p><i>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.</i></p>	<p>The reference to the 'Ecological Management Plan' in this condition will be updated to refer to a 'Lizard Management Plan' instead. The only mitigation recommended in the EclA considering the potential adverse effects identified is for lizard management (in specific areas). An Ecological Management Plan is therefore not considered necessary.</p>
P27	<p>Please provide a Word version of the all of NoR documents (not in protected formatting).</p> <p><u>Rationale:</u> <i>A Word version will assist in the subsequent phases of the assessment of the NoR, including preparation of assessment reports.</i></p>	<p>Noted - this will be arranged and provided to Council separately.</p>
<p><b>Historic Heritage Effects</b></p>		

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HH1	<p>Please provide a built heritage assessment which assesses the 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.</p> <p><i>Rationale:</i> 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 the NoR, and does not adequately identify measures to ensure that potential adverse effects on historic heritage values are avoided, remedied or mitigated.</p>	<p>The concept design has been prepared to inform the designation boundaries and an envelope of potential effects at this NoR phase. The Assessment of Archaeological and Heritage Effect provides a baseline assessment / survey to support the NoR phase. Detailed design will be undertaken closer to the time of implementation subject to the Outline Plan process and conditions including the proposed Historic Heritage Management Plan (HHMP).</p> <p>As noted in response to P25 above, the HHMP provides a mechanism for further considering how the Project will "protect historic heritage and to remedy and mitigate any residual effects as far as practicable" (refer to Clause (b)). The HHMP shall identify "Any adverse direct and indirect effects on historic heritage sites and measures to appropriately avoid, remedy or mitigate any such effects, including a tabulated summary of these effects and measures". There are various measures that may be identified by a Suitably Qualified Person(s) (SQP) preparing the HHMP in order to achieve the objective of the HHMP. This may include a Built Heritage Assessment if considered appropriate / relevant by the SQP, as further details on the Project is determined.</p> <p>We note that inclusion of some of the identified buildings within the designation boundaries that may have Built Heritage value also provides opportunity for the Project to further consider and appropriately respond to it in accordance with the HHMP.</p>
HH2	<p>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.</p> <p><i>Rationale:</i> 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:</p> <p>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".</p> <p>WWI Memorial, 12924 (02801), CHI (AUP:OP), which is stated as having "Modifications to edges of memorial structure".</p>	<p>As set out in Table 4-5 of the Construction Noise and Vibration Assessment Report, if the following equipment is used within the identified distances then the Historic/ Sensitive vibration criterion, that would be applicable to the identified heritage structures, may be exceeded:</p> <ul style="list-style-type: none"> <li>- Roller compactor 17m</li> <li>- Bored piling rig 2m</li> <li>- Excavator 10m</li> <li>- Tipper truck 2m</li> <li>- Vibratory plate compactor 2m</li> </ul> <p>If any of the activities listed above occur within the identified distance to the heritage structures, the proposed CNVMP condition will set out the mitigation and management measures required to meet the criterion. Should it be found that the vibration criterion cannot be met by utilising standard mitigation measures, a construction vibration Schedule (refer to the proposed Schedule to a CNVMP condition) will be prepared to set out further specific mitigation measures.</p>
<b>Construction Noise and Vibration and Operational Noise</b>		
CNV 1	<p>Vibration is referred to as exceeding certain categories, but no specific levels are 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> <p><i>Rationale:</i> Understanding magnitude of potential vibration construction effects.</p>	<p>We do not calculate exact vibration levels at this stage. We do not know a number of factors such as the future receiving environment, ground conditions, transfer function through the ground, foundations and into the buildings. We use the emission radii to determine where exceedances could potentially occur based on a conservative assumption about the ground conditions. This is standard practice. Vibration measurements will be carried out when works start on site to determine the transfer function through the ground and into any buildings of concern. It is noted that we have not provided specific vibration levels for the other Te Tupu Ngātahi projects/packages and has not been raised as an issue.</p>
CNV 2	<p>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> <p><i>Rationale:</i> The noise effects for levels over 80 dB <math>L_{Aeq}</math> are described in Table 6-1 as "Untenable for both office and residential environments. Unlikely to be tolerated for any extent of time." However, in the NoR assessment sections the description for those levels is "effects are likely to include loss of concentration, annoyance, and a reduction in speech intelligibility." This is potentially misleading to parties reading understanding of effects and should be made clearer.</p>	<p>The effects we have described in the executive summary and NoR sections of the Construction Noise and Vibration Assessment Report are valid based on the noise level and expected durations of exposure, however, we note that external noise levels above 85 dBA could also result in internal noise levels that are unlikely to be tolerated for any extent of time. It is anticipated that (as required) this will be addressed through the CNVMP .</p>
ONV 1	<p>Please clarify how has noise from the proposed bus lane(s) been incorporated into the model.</p>	<p>Bus numbers are included in the AADT and %HV data that has been used in the noise model.</p>

Ref	Request	Response
	<i>Rationale: There is limited information describing the model input details with regard to this aspect.</i>	
ONV 2	<p>What mechanisms (i.e., existing designation conditions) exist in relation to noise performance of road sections between the NoR1 designations?</p> <p><i>Rationale: 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.</i></p>	<p>As discussed in Section 1.2 of the AEE, the NoRs are seeking to authorise works solely within the proposed designation boundaries. As such, the road surfacing in the areas outside the designation boundaries are not relevant at this stage.</p> <p>Notwithstanding this, asphalt surface is generally used and anticipated on Urban Roads with &gt; 10,000 ADT.</p>
ONV 3	<p>Please provide greater clarity on why a condition to ensure vibration effects are maintained as assumed in the assessment has not been included.</p> <p><i>Rationale: 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.</i></p>	<p>We do not consider it necessary to include a condition as any new or upgraded road will be designed to have a smooth surface and as long as the surface is well maintained vibration will not be an issue. It is noted that the roads will also be designed to meet the relevant AT standards.</p>
ONV 4	<p>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.</p> <p><i>Rationale: Inform understanding of the proposal and effects.</i></p>	<p>There are a number of locations along the proposed alignment where live traffic lanes move closer to PPFs when compared to the existing situation. The resulting change in noise level depends on how far the PPF is from the existing road and can range from 0 to 3 dB. Changes in noise level also occur due to a change in traffic volume, mix of HVs and removal of buildings that were previously providing shielding from the road.</p>
<b>Ecological Effects</b>		
ENZL 1	<p>Please provide further information to specifically address highly mobile fauna, and show that adverse effects have been avoided, minimised, or remedied.</p> <p><i>Rationale: 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.</i></p> <p><i>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.</i></p>	<p>Wording has been added into the EclA around the NPS-IB on this policy. As above, we don't believe any further effects management is required for highly mobile fauna.</p>
ENZL 2	<p>Please provide further information on effects on the receiving environment, including freshwater, riparian, and wetlands. With regards to bridge upgrades, and stormwater management. Including which effects can be avoided. Please consider including ecological input during design phase.</p> <p><i>Rationale: 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.</i></p> <p><i>NPS:FM and NPS:IB require an assessment to look more broadly and consider site selection and alignment at a finer scale and take a precautionary approach.</i></p>	<p>The EclA has provided an assessment on the receiving environment, including freshwater, riparian, and wetlands at a level appropriate to support this NoR phase and the relevant District Plan matters.</p> <p>The Project has also considered ecological features (e.g., streams, wetlands, significant ecological areas) as part of the optioneering process and has sought to avoid these features in the first instance and minimise potential impacts as much as practicable (refer to the Assessment of Alternatives). Ecology input has been part of this process including the Multi-Criteria Assessment.</p> <p>The concept level of design has been undertaken to inform the designation boundaries and route protection. As acknowledged in the EclA, further consideration of ecological matters and input will be required for the Project (as relevant) as part of the future Regional consenting phase. The proposed designation boundaries provide for specific bridge design and stormwater management to be determined as part of the detailed design process and subject to Regional consent requirements.</p>
ENZL 3	<p>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.</p>	<p>Operational lighting effects have been considered as part of our operational disturbance effects assessment. The magnitude was assessed as <b>Negligible</b> and the overall effect on bats and TAR birds was assessed as <b>Low</b>.</p> <p>Lighting design will be developed during future phases of the project and will be subject to current best practice, including minimising light spill etc.</p>

Ref	Request	Response
	<p><i>Rationale: 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.</i></p>	
ENZL 4	<p>Please consider including ecological input during the design development and detail design phase specifically for bridge design in relation to fish passage.</p> <p><i>Rationale: 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.</i></p>	<p>As per the response to Request ENZL2 above, a concept level of design has been undertaken to inform the designation boundaries and route protection. Further consideration of ecological matters and input will be required for the Project (as relevant) as part of the future Regional consenting phase. The proposed designation boundaries provide for specific bridge design to be determined as part of the detailed design process and subject to Regional consent requirements.</p> <p>We note that the proposed bridges are not anticipated to include structures / piles into the existing streams.</p>
ENZL 5	<p>Please consider including ecological input during the design development and detail design phase specifically for bridge design in relation to bats.</p> <p><i>Rationale: 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.</i></p> <p><i>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.</i></p>	<p>As per response to Request ENZL2 above, concept level of design has been undertaken to inform the designation boundaries and route protection. The proposed designation boundaries provide for specific bridge design to be determined as part of the detailed design process and subject to Regional consent requirements.</p>
ENZL 6	<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 consent conditions (and the Wildlife Act 1953) that may be required for regional compliance.</p> <p><i>Rationale: Disturbance and displacement of individuals (existing).</i></p> <p><i>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.</i></p>	<p>We have assessed the construction and operational effects on long-tailed bats (assumed to be transient visitors based on desk top records) within NoR 1, 2 and 4. The magnitude of effects was assessed as Negligible for all effects. As such, a Bat Management Plan is not considered necessary. We have based this assessment on the following:</p> <ul style="list-style-type: none"> <li>extensive bat surveys were undertaken as part of the Drury Arterials project in 2020 (within the vicinity of FTN) and no bats were detected during those surveys. We consider that bats are likely transient visitors only to the FTN Project area only i.e. likelihood of effects are very low.</li> <li>district plan trees have been reviewed and the majority are considered to have no bat roost potential. Only exception is tree Group 115 (willows) where previous bat surveys detected nothing. Wildlife Act provisions should pick up any outlying residual risk.</li> <li>the project scope is upgrades to existing transport corridors and as such noise/lighting/fragmentation is pre-existing.</li> </ul>
ENZL 7	<p>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.</p> <p><i>Rationale: 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</i></p>	<p>We have assessed the construction and operational effects on long-tailed bats (assumed to be transient visitors based on desk top records) within NoR 1, 2 and 4. The magnitude of effects was assessed as Negligible for all effects. We have based this assessment on the following:</p> <ul style="list-style-type: none"> <li>extensive bat surveys were undertaken as part of the Drury Arterials project in 2020 (within the vicinity of FTN) and no bats were detected during those surveys. We consider that bats are likely transient visitors only to the FTN Project area only i.e. likelihood of effects are very low.</li> <li>district plan trees have been reviewed and the majority are considered to have no bat roost potential. Only exception is tree Group 115 (willows) where previous bat surveys detected nothing. Wildlife Act provisions should pick up any outlying residual risk</li> </ul>

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	<i>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>	<ul style="list-style-type: none"> <li>the project scope is upgrades to existing transport corridors and as such noise/lighting/fragmentation is pre-existing.</li> </ul>
ENZL 8	Please include the requirement for a Lizard management Plan for NoR 4.  <i>Rationale: 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.</i>	The EclA has provided an assessment on herpetofauna mainly focusing on the District Plan matters relevant at this NoR phase (i.e., effects on habitat removal on lizard as a result of District Plan vegetation removal). The only locations of District Plan vegetation removal identified as having potential for lizard habitat are at specific locations within NoR 1, 2 and NoR 3. A Lizard Management Plan is therefore recommended to manage the effects at these specific locations only.
ENZL 9	Please consider including the requirement for an Avifauna management plan for all NoRs for all TAR birds. Using the latest version of Native bird nesting protocols.  <i>Rationale: 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.</i>	All locations with the potential for TAR bird species have been assessed in detail within Section 8.3. The magnitude is assessed as Negligible based on a number of factors including project scope, bird ecology and habitat type within project area.  In relation to the wetlands at Slippery Creek... the adjacent SEA-M1_29b Upper reaches Drury Creek is approximately 160m from the project construction site and is also separated by State Highway 1. SEA-M1_29b provides suitable breeding habitat (jointed rush-dominated saltmarsh) for breeding banded rail. However the narrow strip of Oioi, restiad rushland/reedland (WL10), identified within the designation boundary is highly unlikely to be utilised by breeding TAR birds due to its limited extent, available cover and surrounding disturbance from existing roads including SH1 and surrounding urbanisation. However it is likely that banded rail may travel through the project area for foraging within the designation boundary. As such any potential impact on breeding TAR birds has been avoided as far as possible and the construction area is likely to be +160m from potential breeding habitat. Additional mitigation such as visual screening, noise barriers or restrictions on construction timing is considered unnecessary due to the distance (+160m) to potential breeding habitat and the existing background levels of disturbance (noise / vibration) already present due to SH1, the existing GSR bridge and surrounding urban / industrial areas.

### Landscape and Visual Effects

LA1	<p>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> <p><i>Rationale: 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.</i></p> <p><i>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.</i></p> <p><i>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).</i></p> <p><i>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.</i></p>	<p><b>Otūwairoa stream</b></p> <p><b>Public open spaces:</b></p> <p>Near the location of the proposed bridge replacement over the Otūwairoa stream / Slippery Creek is a series of open spaces. These include the Slippery Creek reserve (public open space), a number of smaller 'informal recreation zone' open spaces and a 'conservation zone' open space. Each of these spaces is located on the edge of the stream.</p> <p>The one open space which is most publicly accessible is Slippery Creek reserve, which is accessed off the western side of Great South Road (south of the existing bridge). This space includes open grass areas, established trees and a park bench. From this location views of the new bridge will be afforded. There will be a change to the character of the area through the provision of the larger bridge structure.</p> <p>During the construction phase, the Slippery Creek reserve will be inaccessible given the extent of the designation proposed, which extends across part of this open space. This phase will be temporary and is necessary in order to allow for the construction of the new bridge. Post construction (for the operation of the bridge and road upgrade) although there will be a larger structure, any effects on the character of the area and visual amenity from the open spaces will be limited and are assessed to be low. This is due to the proposed bridge spanning the same part of the stream and the future design is to integrate with the surrounding landscape context. This relates to the integration of topography of the area (including stream edge), planting provisions, responding to the urban environment (where applicable) and reinstating the public open space – as per the ULDMP.</p> <p><b>Private property assessment:</b></p> <p>In relation to the private properties, there is a run of residential properties near the proposed road upgrade and bridge works along Great South Road. These include to the west (north of the Otūwairoa stream) and to the east (south of the stream). There are also light industrial properties on the southwestern side of the road.</p> <p>Given the additional height of the proposed bridge, the bridge span will increase and extend along Great South Road and a limited number of properties may be affected. During the construction phase, the character of the area will change from an active road to a construction site. However, although a change, this is necessary to enable the new bridge to be constructed.</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>	<p>From a number of the properties (both residential and industrial) views will be afforded of the works. These include those which front Great South Road and the stream. However, from other properties views are screened by impeding buildings. Although a change in the view and character of the area any potential effects are assessed to be acceptable (low-moderate) and will be temporary.</p> <p>During the operational phase, through the ULDMP the design is to integrate with the localised landscape and surrounding context. As such, it will become an integrated part of this environment, which is subject to urban intensification under the AUP:OP, particularly the properties to the east across the Otūwairoa stream.</p> <p><b>Hingaia stream</b></p> <p><b>Public open space:</b></p> <p>To the south of the proposed bridge upgrade is the Karaka Reserve. A description of the reserve and an assessment was provided with the landscape assessment. Within that report (section 5.2.2.1) it states that Karaka reserve "has low landscape amenity due to its degraded state (overgrown weed species), its limited accessibility and current use as a laydown area for the nearby road works. The proposal provides the opportunity to enhance this stream margin and open space. During construction this area will be cleared associated with the construction works which will provide the opportunity to remove the weed species and also the rubbish and debris in the area. The construction works will change the character of the area, but this will be temporary with opportunities to enhance natural character values long term". The proposal presents the opportunity to enhance the character of the area (both the stream and the reserve) given that part of the area will need to be cleared for construction works. It is anticipated that the Karaka reserve will be inaccessible during the construction phase.</p> <p>During the operational phase, through the ULDMP the design is to have integrated with the localised landscape and surrounding context. As such, it will become an integrated part of this urban environment, which includes the adjacent industrial and mixed use zoned properties, the Karaka reserve to the south, and the anticipated urban intensification under the AUP:OP to the east (across the NIMT rail line) which is zoned Metropolitan Centre. This part of Drury will change in the future. This will ensure any potential character and visual amenity effects are minimised (assessed to be low).</p> <p><b>Private property assessment:</b></p> <p>In relation to the assessment of potential visual amenity effects on private properties, these have been addressed within section 5.2.2.2 (construction) and 5.2.3 (operation) within the landscape assessment report.</p>
LA2	<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 / Slippery Creek and Hingaia Stream bridges, earthworks and land formation required for the addition of the retaining walls.</p> <p><i>Rationale: The Landscape Effects Assessment recommends that the preparation of an Urban and Landscape Design Management Plan (ULDMP) 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.</i></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>	<p>The proposed conditions including the Urban and Landscape Design Management Plan (ULDMP) are intentionally phrased to be outcomes focused, recognising the longer implementation timeframes. The outcomes sought by the site-specific recommendations made in the Landscape and Visual Assessment are provided for and addressed in the proposed conditions as a whole.</p> <p>For example, the specific recommendations relating to bridges, earthworks and land formation can be considered through the following clauses of the ULDMP condition which require details that demonstrate the Project:</p> <ul style="list-style-type: none"> <li>- <b>Clause (f)(i)</b> - "Is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e., centres and density of built form), natural environment, landscape character and open space zones."</li> <li>- <b>Clause (f)(iv)</b> - "promotes a sense of personal safety by aligning with best practice guidelines such as (a) Crime Prevention Through Environmental Design (CPTED) principles; (b) Safety in Design (SID) requirements; and (c) Maintenance in Design (MID) requirements and anti-vandalism/anti-graffiti measures"</li> </ul> <p>The ULDMP shall also include:</p> <ul style="list-style-type: none"> <li>- <b>Clause(g)(iii)</b> - "Landscape and urban design details - that cover the following: (a) Road design - elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses.... (c) architectural and landscape treatment of all major structures, including bridges and retaining walls..."</li> </ul>

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LA3	<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><i>Rationale: 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.</i></p> <p><i>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.</i></p> <p><i>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).</i></p>	<p><b>NIMT</b></p> <p><b>Private property assessment:</b></p> <p>The proposed designation (NoR3) in the context of the NIMT bridge extends along Weymouth Road and into a number of existing properties which include THAB, Local Centre and Light Industrial zoning. An overall assessment of the potential landscape character effects is provided within section 5.3.2.1 and visual amenity in 5.3.2.2 of the original landscape assessment.</p> <p>Specifically related to the NIMT bridge, the front yards of the residential properties at 2a Rogers Road, and 18a – 24 Weymouth Road (even numbers only) and the entire property at 18 Weymouth Road are included in the designation area. The area also includes the Light Industrial properties at 2 – 16 Weymouth Road and the Local Centre properties north of Weymouth Road.</p> <p>During the <i>construction</i> phase the area will change from the aforementioned land uses and an active road to a construction site with machinery, materials, structures and activities. The construction works will result in a temporary change to the land use and activities within the designation area. However, modification and development in this urban environment can be anticipated through the associated AUP-OP planning provisions. In this instance, the Project provides for the improvement of transport infrastructure (specifically the new bridge) to support urban growth. Although a change to the character of the area, potential effects on landscape character during construction will be temporary and are assessed to be moderate for the proposed bridge.</p> <p>The visibility of the proposed works will be limited to those properties on close proximity to the bridge. Views of larger machinery (e.g. cranes) will be afforded from greater distances, however they will be impeded by existing houses and vegetation.</p> <p>Although visible, the construction works will be temporary and present activities which are not common (although not unanticipated), changing the outlook from these locations. There will be greater adverse effects on localised areas and some parties will be more affected than others given the works required, e.g. outlooks direct toward the construction site. However hoarding screens are anticipated through the ULDMP. The rising nature of the bridge (arching over the rail line) is a replacement of the existing landform. Given the proximity, the nature of the views and works required any adverse visual amenity effects are assessed to be moderate overall during the construction phase.</p> <p>During the <i>operational</i> phase any adverse effects on landscape character are assessed to be low-moderate and low on visual amenity for the reasons outlined within section 5.3.3 of the original landscape assessment. Under the requirements of the ULDMP, the proposed bridge is to be designed to integrate into the urban landscape context, including the design of the retaining etc. This part of Manurewa is also subject to urban intensification enabled by the AUP:OP and PC78 provisions.</p> <p>No public open spaces are affected by the proposed bridge over the NIMT.</p> <p><b>State Highway 1</b></p> <p><b>Public space assessment:</b></p> <p>Near the location of the proposed bridge replacement over SH1 are two open spaces, the 'unnamed' informal recreation reserve on the northern side of Alfriston Road (between 25 Index Place and 92 Alfriston Road) and Alfriston Reserve, also on the northern side between 124 and 128 Alfriston Road. A description of each open space is provided within the original landscape assessment. Both open spaces are publicly accessible, however the informal reserve serves as a stormwater management area. Notably, Alfriston Reserve is approximately 300m from the existing bridge over SH1.</p> <p>During the construction phase of the bridge potential effects on landscape character in these open spaces are assessed to be moderate-high, overall. This is due to the extent of earthworks required for the bridge (particularly into the informal open space) and the introduction of a stormwater treatment device within Alfriston Park. However, the change to Alfriston Park is not directly related to the requirement of the bridge, but more an overall requirement for this designation. For the operational phase of the bridge any effects on landscape character of the open spaces are assessed to be low-moderate as a result of their long-term modification – particularly to Alfriston Reserve. Noting, that under the requirements of the ULDMP, the proposed bridge is to be designed to integrate into the urban landscape context.</p> <p>In relation to potential visual amenity effects resulting from the construction phase, these are assessed to be moderate from the informal open space. This is due to the proximity of the open space and its outlook toward the bridge construction area. Any visual effects of the bridge from Alfriston Park are assessed to be minimal given the distance between the park and the bridge itself. Any adverse visual effects on the operation phase are assessed to be low with the bridge</p>

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		<p>to be designed under the requirements of the ULDMP.</p> <p><b>Private property assessment:</b></p> <p>The proposed designation (NoR3) in the context of the SH1 bridge replacement extends along Alfriston Road and into a number of existing properties which include existing Mixed Housing Suburban zoning (amended to Mixed Housing Urban under PC78). An overall assessment of the potential landscape character effects is provided within section 5.3.2.1 and visual amenity in 5.3.2.2 of the original landscape assessment.</p> <p>Specifically related to the SH1 bridge the residential properties at 75, 77, 79, 81, 84, 86, 88 and 90 Alfriston Road (west of SH1), 1 Shifnel Drive, 125 – 141a Alfriston Road (odd numbers) and 92, 100, 106, 110 Alfriston Road are affected by the designation area proximate to the extent of the proposed replacement bridge.</p> <p>During the <i>construction</i> phase the area will change from the road corridor, bridge and residential land uses to a construction site with machinery, materials, structures and activities. The construction works will result in a temporary change to the activities and character within the designation area. However, modification and development in this urban environment can be anticipated through the associated AUP:OP planning provisions. In this instance, the Project provides for the improvement of transport infrastructure (specifically the new bridge) to support urban growth. Although a change to the character of the area, potential effects on landscape character during construction will be temporary and are assessed to be moderate for the proposed bridge.</p> <p>The visibility of the proposed works will be limited to those properties in close proximity to the bridge. Views of larger machinery (e.g. cranes) will be afforded from greater distances, however they will be impeded by existing houses and vegetation.</p> <p>Although visible, the construction works will be temporary and present activities which are not common (although not unanticipated), changing the outlook from these locations. There will be greater adverse effects on localised areas and some parties will be more affected than others given the works required, e.g. outlooks direct toward the construction site. However hoarding screens are anticipated through the ULDMP. The rising nature of the bridge (arching over SH1) is a replacement of the existing landform. Given the proximity, the nature of the views and works required any adverse visual amenity effects are assessed to be moderate overall during the construction phase.</p> <p>During the <i>operational</i> phase any adverse effects on landscape character are assessed to be low and also low on visual amenity for the reasons outlined within section 5.3.3 of the original landscape assessment. Under the requirements of the ULDMP, the proposed bridge is to be designed to integrate into the urban landscape context. This part of Manurewa is subject to urban intensification enabled by the AUP:OP and PC78 provisions.</p>
LA4	<p>Please provide incorporation of more site specific and prescriptive mitigation measures into proposed Designation Condition 12 – Urban and Landscape Design Management Plan.</p> <p><i>Rationale: The Landscape Effects Assessment recommends that the preparation of an Urban and Landscape Design Management Plan (ULDMP) 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.</i></p> <p><i>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.</i></p>	<p>As per response to Request LA2 - The proposed conditions including the Urban and Landscape Design Management Plan (ULDMP) are intentionally phrased to be outcomes focused, recognising the longer implementation timeframes. The outcomes sought by the prescriptive and site-specific recommendations made in the Landscape and Visual Assessment are provided for and addressed in the proposed conditions as a whole.</p>
LA5	<p>Please provide incorporation of more site specific and prescriptive mitigation measures into proposed Designation Condition 12 – Urban and Landscape Design Management Plan.</p> <p><i>Rationale: The Landscape Effects Assessment under Section 4.2.2 notes:</i></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 previously been screened. This is particularly the case for properties along NoR 3 and to a lesser extent for NoR 1.'</i></p>	<p>The proposed conditions including the Urban and Landscape Design Management Plan (ULDMP) are intentionally phrased to be outcomes focused, recognising the longer implementation timeframes. The outcomes sought by the prescriptive and site-specific recommendations made in the Landscape and Visual Assessment are provided for and addressed in the proposed conditions as a whole.</p> <p>For example, the specific recommendations relating to addressing visual amenity and replacement planting can be considered through the following clauses of the ULDMP condition which require details that demonstrate the Project:</p> <p>- <b>Clause (f)(i)</b> - "Is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e., centres and density of built form), natural environment, landscape character and open space zones."</p> <p>The ULDMP shall also include the following planting details and maintenance requirements:</p>

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	<p><i>And in Section 5.4 notes:</i></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 ULDMMP'.</i></p> <p><i>This mitigation recommendation is not contained within the proposed conditions and needs to be included.</i></p>	<ul style="list-style-type: none"> <li>- <b>Clause (h)(i)(a)</b> - Identification of existing trees and vegetation that will be retained with reference to the Tree Management Plan. Where practicable, mature trees and native vegetation should be retained;</li> <li>- <b>Clause (h)(i)(e)</b> - Identification of vegetation to be retained and any planting requirements under the Tree Management Plan;</li> <li>- <b>Clause (h)(i)(g)</b> - Re-instatement planting of construction and site compound areas as appropriate.</li> </ul> <p>It is noted for clarity that the phrase "like-for-like" does not appear in the ULDMMP in relation to vegetation replacement, and indeed in many cases "like-for-like" may not be a good outcome.</p>
<b>Traffic and Transport Effects</b>		
T1	<p>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> <p><i>Rationale: The Transport Assessment notes "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><i>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.</i></p> <p><i>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 location could affect several properties on Alfriston Road, Fleming St and Hyde St.</i></p> <p><i>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.</i></p> <p><i>The assessment should consider detour distances and travel times, and the crash risks associated with U-turn movements.</i></p> <p><i>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.</i></p>	<p>The assessment has assumed that these are flush medians unless it has been identified a solid median/ traffic island is required for safety / operational reasons. No location has been identified where a solid median/traffic island is required that may impact property access.</p>
T2	<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><i>Rationale: 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.</i></p> <p><i>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.</i></p>	<p>The extent of bus lanes recommended for the full South FTN network is shown in the Urban Design Evaluation (UDE) plans (appended to the UDE). It should be noted that some of the bus lanes shown in these plans fit within the existing road reserve and accordingly are not within an NoR. Bus lanes in one or both directions are provided for much of the length of Great South Road within the project extent (both within NoR 1 and the existing road reserve), and bus lanes in both directions are provided for along much of Weymouth and Alfriston Roads (NoR 3). The only sections of widened corridor not explicitly providing for bus lanes are NoR 2 (GSR Drury section) and NoR 4 (Porchester / Popes).</p> <p>See also response to P22 above.</p>

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T3	<p>Please confirm if the existing indented parking bays on Alfriston Road are to be removed, and if so, please provide an assessment of the effects of those spaces being removed.</p> <p><i>Rationale:</i> 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 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.</p>	<p>The indicative design and proposed designation boundaries anticipate the removal of the noted indented parking bays on Alfriston Road. The assessment of carparking undertaken in Section 4.1.7 of the Transport Assessment Report is applicable to this case.</p>
T4	<p>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.</p> <p><i>Rationale:</i> 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.</p>	<p>The concept level of design has been prepared to inform the designation boundaries and the NoR phase. Generally, unless constrained, 1V:3H slopes have been adopted as the default batter for cut and fill slopes. The 1:3 design provides a practicable and stable slope that meets the relevant standards and maintenance requirements while minimising the impact on properties.</p> <p>The design approach is to provide cut and fill embankments, with retaining walls provided in constrained locations. Given the limited geotechnical information available, where required, retaining walls have not been designed. Final wall types will be confirmed during subsequent design phases. As the construction of the Project is not expected for some time, the use of batter slopes to inform the proposed designation will enable greater opportunity to integrate with adjacent land and achieve optimal outcomes for a future environment that is likely to change.</p> <p>The proposed Urban and Landscape Design Plan (ULDMP) condition provides a mechanism to consider the edge treatment and interfaces. For example, these concerns can be addressed through the following ULDMP clauses:</p> <ul style="list-style-type: none"> <li>• Clause (f) - to achieve the objective of the ULDMP(s), the ULDMP shall provide details of how the project (i) Is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), natural environment, landscape character and open space zones;</li> <li>• Clause (g) - The ULDMP(s) shall include: (iii) Landscape and urban details - that cover the following: (a) Road design - elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses and existing roads (including slip lanes)... (c) architectural and landscape treatment of all major structures, including bridges and retaining walls...</li> </ul> <p>The ULDMP shall be prepared prior to the Start of Construction for a Stage of Work and submitted as part of an Outline Plan of Works (following the processes of s176A of the RMA).</p>
<b>Flooding Effects</b>		
F1	<p>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 conservative than 3.8 degrees).</p> <p><i>Rationale:</i> Information is required in order to better understand future climate change risk for the proposed works enabled by the NoR.</p>	<p>A range of sensitivity assessments can be carried out not limited to rainfall but also to surface roughness, percentage culvert blockage, tailwater conditions, impervious surface/ soil infiltration changes. These sensitivity assessments would be more beneficial at the resource consent phase in understanding the performance of the model and the sensitivity of the design effects. At this stage, (NoR for the designation of a road) assessing a higher flood depth would not lead to the identification of any new properties at risk or any change in condition. Therefore, additional sensitivity assessments should not be undertaken until resource consent phase.</p>
F2	<p>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.</p> <p><i>Rationale:</i> Information is required in order to better understand the use of land/designation extent.</p>	<p>The land requirement for attenuation is an intrinsically space requiring activity so the volume of water can be stored at the elevation where it is collected. We have gone to significant lengths to avoid locating these management areas where houses exist currently – i.e. locating in parks and right-to-drain easements. The floodplains and overland flowpaths, coincidentally are also in these areas, they can both be managed by balancing flowpath conveyance with the new wetland features through detailed design with the designation conditions as the guide on an acceptable outcome.</p> <p>Alternative devices are an option to achieve the water quality, retention and detention are available and have been used where a park is not available and designation of a house is not considered reasonable. In these cases, water quality, retention and detention can be achieved in a raingarden with attenuation achieved in an underground storage tank with a throttled outlet.</p> <p>The general process used to consider the appropriateness of alternative stormwater management devices is set out in section 3.2 of the Alternatives Assessment.</p>

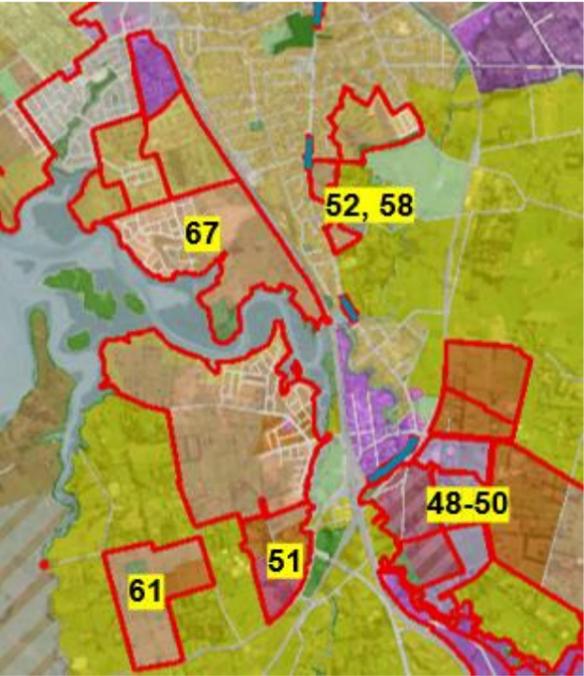
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F3	<p>Please provide further information as to whether the proposed NoR conditions been implemented elsewhere in the region such that you are able to comment on any issues that have arisen in meeting the mitigation outcomes.</p> <p><i>Rationale: Information is required in order to better understand condition implementation.</i></p>	<p>We are unaware of any issues associated with the implementation of this condition.</p>
F4	<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><i>Rationale: Information is required in order to better understand the outcomes of the proposed NoR Conditions.</i></p>	<p>The condition has the potential to reduce the freeboard of an existing dwelling by 10% provided the existing freeboard is currently above 500mm we consider that from an effects perspective, this potential change would result in less than minor adverse effects.</p>
<b>Social Impact Assessment</b>		
SIA1	<p>Please clarify the methodological scope of the Social Impact Assessment in relation to the Phases of the Project.</p> <p><i>Rationale: There are inconsistencies within the Social Impact Assessment (SIA) and between AEE describing the methodological scope of the assessment. The SIA Introduction (p.i) states "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 it relates to social impacts and recommends measures that may be implemented to avoid, remedy and/or mitigate these effects." (my bold). In Section 3 of the SIA (p.viii) it states, "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". On p.98 of the AEE states "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: "This Report considers the actual and potential social impacts associated with the following project stages:</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><i>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:</i></p> <ol style="list-style-type: none"> <li>1) <i>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 designation for route protection requires.</i></li> </ol>	<p>Clarification and consideration of this request has been undertaken in the SIA response in <b>Attachment A</b> of the s92 response package. We note that the paragraphs under Section 10.8 on Page 98 of the AEE is a summary of the SIA approach. As such, this description/paragraph is intended to align with the SIA report/assessment.</p>

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	<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	<p>Please provide further information regarding engagement and consultation with landowners, stakeholders and affected businesses and residents, in particular who has been engaged, whether they are directly and indirectly impacted and what their feedback was.</p> <p><i>Rationale:</i> 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 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.</p>	Clarification and consideration of this request has been undertaken in the SIA response in <b>Attachment A</b> of the s92 response package.
SIA3	<p>Please provide further information regarding the process by which the SIA has informed the matters assessed by other technical specialists.</p> <p><i>Rationale:</i> 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</p>	Clarification and consideration of this request has been undertaken in the SIA response in <b>Attachment A</b> of the s92 response package.

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	<p><i>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.</i></p>	
SIA4	<p>Please provide further 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> <p><i>Rationale: Appendix E provides a summary of the assessment of social impacts (positive and negative) and mitigation proposed by SIA theme. For ease of reading and cross-referencing, these would benefit from identifying:</i></p> <p><i>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;</i></p> <p><i>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);</i></p> <p><i>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).</i></p> <p><i>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.</i></p>	<p>Clarification and consideration of this request has been undertaken in the SIA response in <b>Attachment A</b> of the s92 response package.</p>
SIA5	<p>Please provide further information regarding the role of SIA as the Project phases progress. In particular, please specify the role of SIA in site 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><i>Rationale: 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 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.</i></p>	<p>We consider that the SCEMP condition as drafted provides for a process of identifying relevant property owners, stakeholders, community groups, organisations, and businesses to be engaged over the course of the implementation of the Project. The process for identifying Stakeholders and methods to engage with Stakeholders will be confirmed through the preparation of the SCEMP and prior to commencing detailed design.</p>

Ref	Request	Response
	<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	<p>Please provide a comprehensive list of all directly affected and in-proximity businesses and residential properties that will be impacted by designation and construction phases in each NoR (Project Area level).</p> <p><i>Rationale:</i> 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. 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</p>	<p>Further information regarding engagement and consultation with landowners, stakeholders and affected businesses and residents (as per Request SIA2) has been considered in the SIA response in <b>Attachment A</b> of the s92 lodgement package.</p> <p>It is noted that the proposed conditions include a Stakeholder Communication and Engagement Management Plan (SCEMP). The objective of the SCEMP is to identify how the public and stakeholders (including directly affected and adjacent owners and occupiers of land, businesses and community facilities) will be engaged. The SIA and engagement undertaken to date provides a baseline for understanding the nature and envelope of potential effects. However, the list of parties (i.e., tenants) potentially impacted will change over time.</p> <p>The full list of directly affected properties is included in the Form 18 for each NoR.</p>

Ref	Request	Response
	<p><i>business 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.</i></p>	
SIA7	<p>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> <p><i>Rationale: 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.</i></p> <p><i>For example, a cursory look at the NoR Project areas, the following require further information:</i></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><i>(Also Nanaksar Educare Centre is spelt wrongly throughout the SIA)</i></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 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>	<p>Clarification and consideration of this request has been undertaken in the SIA response in <b>Attachment A</b> of the s92 response package.</p>
SIA8	<p>Please explain why the Franklin Local Board area is not included as part of the 'wider community' – social area of influence.</p> <p><i>Rationale: 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.</i></p>	<p>Clarification and consideration of this request has been undertaken in the SIA response in <b>Attachment A</b> of the s92 response package.</p>

Ref	Request	Response
SIA9	<p>Please provide further information regarding job creation, education and training opportunities during construction.</p> <p><i>Rationale: 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.</i></p>	<p>The Notice of Requirement focuses on authorising those District Plan effects and activities under the RMA-regulatory framework. It is noted that there are potential other impacts (including positive opportunities associated with the Project) that do not necessarily fall under the RMA-regulatory framework and need to be conditioned as part of the Designation requirements.</p> <p>Other methods outside the RMA framework can be used to support these opportunities. For example, Auckland Transport has a Sustainable Procurement Action Plan which is embedded into the implementation of AT projects/practice. The Plan can be read here: <a href="https://at.govt.nz/media/1986415/at-sustainable-procurement-action-plan-2021-2024.pdf">https://at.govt.nz/media/1986415/at-sustainable-procurement-action-plan-2021-2024.pdf</a></p>
<b>Urban Design Evaluation</b>		
UD1	<p>Please update Appendix A (Parts 1 – 6) to the UDE to clearly reference the relevant NoR in the titles of these sheets.</p> <p><i>Rationale: 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.</i></p>	<p>The relevant NoR references are already included in the key for each of the sheets included in the UDE appendices - i.e. sheets showing boundaries for NoR 1 have 'Proposed Designation (NoR 1)' and so-on. The information is already provided.</p>
UD2	<p>Please update Figure 2-3 within the UDE to clearly show the NoR reference.</p> <p><i>Rationale: 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.</i></p>	<p>The NoR extents in Figure 2-3 can be readily reconciled with Figure 2-2 which provides the NoR numbering. The information is already provided.</p>
UD3	<p>Please include illustrations of operative and proposed plan changes referenced within the AEE for clarity and completeness.</p> <p><i>Rationale: 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.</i></p>	<p>The Plan Changes referred to in the Alternatives Assessment are all located at the southern end of NoR 1 and south of NoR 2 - see figure below.</p> 

Ref	Request	Response
UD4	<p>Please provide urban design assessment of the impacts of the proposed closure of the Beaumonts Way/Weymouth Rd intersection.</p> <p><i>Rationale: 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).</i></p>	<p>The recommended network and Project has resulted from an optioneering process discussed in the Assessment of Alternatives which includes Urban Design input (appended to the AEE at lodgement). To summarise, the closure of Beaumonts Way at the intersection with Weymouth Road is a result of various considerations including:</p> <ul style="list-style-type: none"> <li>• The clearance requirements of the upgraded bridge over the North Island Main Trunk line (NIMT) - particularly with the four-tracking of the NIMT;</li> <li>• The anticipated ground levels at this location;</li> <li>• Space requirements to accommodate a continued vehicle connection; and</li> <li>• The function of Beaumonts Way in the network and the catchment it serves.</li> </ul> <p>In relation Urban Design - The proposed cul-de-sac of Beaumonts way affects a small residential catchment. Vehicular traffic will still have existing access to Weymouth Road through the adjacent Rogers Road intersection, approximately 100m to the west. Both the General Arrangement drawings and UDE Appendix A sheet 13 show an anticipated active modes path as part of the Project to be put in at the end of the cul-de-sac in order to maintain active mode connectivity. The executive summary of the UDE under Movement addresses this as specific outcome to be addressed under the ULDMP which is covered under Condition 13.d.ii</p> <p>It is noted that both the Social Impact Assessment and Transport Assessment Report also considers the closure of Beaumonts Way.</p>
UD5	<p>Please provide urban design assessment of the proposed permanent constructed wetlands shown in the General Arrangement Drawings.</p> <p><i>Rationale: 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.</i></p>	<p>The proposed design response to proposed wetlands/water quality treatment/stormwater devices is identified as outcomes under UDE Appendix A, Principle 1.2 under each evaluation table of the UDE, and in the executive summary under Environment. The outcomes outlined here are considered under the proposed Urban and Landscape Design Management Plan condition, specifically Clause (f)(i), (f)(iv) and (g)(iii)(e).</p>
UD6	<p>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> <p><i>Rationale: 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:</i></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> </ul> <p><i>Provide a landscape response to form an appropriate interface with existing open space edges including Alfriston Park (UDE Appendix A sheet 14).</i></p>	<p>The proposed conditions including the Urban and Landscape Design Management Plan (ULDMP) and Tree Management Plan are intentionally phrased to be outcomes focused, recognising the longer implementation timeframes. The outcomes sought by the site-specific recommendations made in the Urban Design Evaluation (UDE) are provided for and addressed in the proposed conditions as a whole.</p> <p>For example, the specific recommendations listed in this s92 request (UD6) can be considered through the following clauses of the conditions:</p> <p><b>ULDMP</b></p> <p>To achieve the objective of the ULDMP, the ULDMP shall provide details of how the project:</p> <ul style="list-style-type: none"> <li>• Clause (f)(i) - Is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), natural environment, landscape character and open space zones;</li> <li>• Clause (f)(ii) Provides appropriate walking and cycling connectivity to, and interfaces with, existing or proposed adjacent land uses, public transport infrastructure and walking and cycling connections;</li> <li>• Clause (f)(iii) - Promotes inclusive access (where appropriate); and</li> <li>• Clause (f)(iv) - Promotes a sense of personal safety by aligning with best practice guidelines such as...CPTED principles.. Safety in Design... Maintenance in Design..</li> </ul> <p>The ULDMP shall include:</p> <ul style="list-style-type: none"> <li>• Clause (g)(i) - A concept plan – which depicts the overall landscape and urban design concept, and explain the rationale for the landscape and urban design proposals</li> <li>• Clause (g)(ii) - Developed design concepts, including principles for walking and cycling facilities and public transport; and</li> <li>• Clause (g)(iii) - Landscape and urban design details - that cover the following (a) Road Design - elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses and existing roads (including slip lanes), benching, spoil disposal sites, median width and treatment, roadside width and treatment;(b) Roadside elements – such as lighting, fencing, wayfinding and signage;... (f) Integration of passenger transport; (g) Pedestrian and cycle facilities including paths, road crossings and dedicated pedestrian/ cycle bridges or underpasses;</li> </ul>

Ref	Request	Response																																				
		<ul style="list-style-type: none"> <li>Clause (h)(i) - Planting design details including: (a) Identification of existing trees and vegetation that will be retained with reference to the Tree Management Plan. Where practicable, mature trees and native vegetation should be retained... (e) Identification of vegetation to be retained and any planting requirements under the Tree Management Plan (Condition 27).</li> </ul> <p><b>Tree Management Plan</b></p> <ul style="list-style-type: none"> <li>Clause (a) - Prior to the Start of Construction for a Stage of Work, a Tree Management Plan shall be prepared. The objective of the Tree Management Plan is to avoid, remedy or mitigate effects of construction activities on trees identified in Schedule 3.</li> <li>Clause (b)(ii) - demonstrate how the design and location of project works has avoided, remedied or mitigated any effects on any tree listed in Schedule 3. This may include:</li> </ul>																																				
<b>Open Space (Parks)</b>																																						
PP1	<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>A detailed description of the physical work required or potentially required within each affected site, including construction and permanent changes post-construction.</li> <li>Assessment of potential environmental effects specific to the park or reserve area.</li> <li>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 be impacted by changes.</li> <li>A review of service impacts caused by the designation and works.</li> <li>An evaluation of the impact on the remaining public open space, including any changes to the accessibility and usability of the space.</li> <li>Proposed mitigation or compensation measures, with reference to greenway plans and local board plans for the area.</li> <li>Any other relevant factors you may deem critical to the parks planning assessment of the project.</li> </ol> <p><i>Rationale: 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.</i></p>	<p>A summary of the physical extent and works proposed within each affected open space is set out below, along with a brief summary of anticipated effects.</p> <table border="1" data-bbox="1196 709 2772 1915"> <thead> <tr> <th data-bbox="1196 709 1302 787">Relevant NoR</th> <th data-bbox="1302 709 1537 787">Affected open space</th> <th data-bbox="1537 709 1783 787">Physical extent within NoR</th> <th data-bbox="1783 709 2772 787">Anticipated effects</th> </tr> </thead> <tbody> <tr> <td data-bbox="1196 787 1302 1535">NoR 1</td> <td data-bbox="1302 787 1537 968">Anderson Park</td> <td data-bbox="1537 787 1783 968">Approx. 760m<sup>2</sup></td> <td data-bbox="1783 787 2772 968">Permanent effects limited to provision for an upgraded active mode facility utilising existing paths within the south-western corner of the park. 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Over 50 further carparks remain unaffected by the project.</td> </tr> </tbody> </table>	Relevant NoR	Affected open space	Physical extent within NoR	Anticipated effects	NoR 1	Anderson Park	Approx. 760m <sup>2</sup>	Permanent effects limited to provision for an upgraded active mode facility utilising existing paths within the south-western corner of the park. The remainder of the extent is intended as temporary construction area offset. It is intended that the interface with mature trees (to be retained) is managed via the Tree Management Plan and Open Space Management Plan condition, while construction impacts are intended to be managed through a Construction Environmental Management Plan (CEMP).		Central Park	Approx. 350m <sup>2</sup>	Permanent effects limited to earthworks and a short section of the active mode paths in the north-western extremity of the park – other than this, the permanent works are within existing road reserve in this area. 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Slippery Creek Reserve	Approx. 250m <sup>2</sup> (open space zoned extent)	Permanent effects limited to earthworks – remainder of the extent is intended as temporary construction area offset for the proposed replacement of the Slippery Creek bridge, and will be reinstated in accordance with design outcomes identified through the Urban and Landscape Design Management Plan (ULDMP) condition. Construction impacts are intended to be managed through a Construction Environmental Management Plan (CEMP).	NoR 2	Karaka Reserve	Approx. 5,490m <sup>2</sup>	Permanent effects limited to provision of active mode paths and earthworks. The remainder of the extent is intended as temporary construction area offset and a construction laydown area. Construction impacts are intended to be managed through a Construction Environmental Management Plan (CEMP).	NoR 3	Tadmor Park	Approx. 1,130m <sup>2</sup>	Permanent effects limited to provision for active mode facilities and associated earthworks batters, and will result in vegetation loss. The permanent works will also impact on access to the existing carpark which will be reinstated. No carparks will be impacted by permanent works.		Gallaher Park	Approx. 540m <sup>2</sup> (excluding Gallaher Court at 29 Alfriston Road)	Permanent effects limited to provision for active mode facilities and associated earthworks batters, and will result in vegetation loss. The works will also impact temporarily on access to the existing carpark, and temporary loss of approximately eight carparks which we understand are utilised by the Alfriston Road Kindergarten, Manurewa Scout Hall, and All Seasons Touch. Over 50 further carparks remain unaffected by the project.
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			Unnamed informal recreation reserve (understood to be Index Place Reserve)	Approx. 1,025m <sup>2</sup>	Permanent effects limited to allowance for earthworks batters.
			Alfriston Park	Approx. 4,160m <sup>2</sup>	Designation required to accommodate stormwater management wetland. Affects 4,160m <sup>2</sup> extent of the park (<60% of overall area), including impacts on existing path access and informal grassed park space fronting Alfriston Road. The playground is not within the designation extent.
PP2	<p>Please explain why Karaka Reserve and the Hingaia Stream Esplanade Reserve are not included as part of the NoR 2 Receiving Environment description.</p> <p><i>Rationale:</i> To understand the exclusion of these spaces despite being within the proposed work areas / designation boundaries.</p>	Noted – both Karaka Reserve and Hingaia Stream Esplanade Reserve were intended to be included in the description, and we acknowledge these form a part of the receiving environment for NoR 2.			
PP3	<p>Please explain why Tadmore Park, Index Place Reserve, and Alfriston Park are not included as part of the NoR 3 Receiving Environment description.</p> <p><i>Rationale:</i> To understand the exclusion of these spaces despite being within the proposed work areas / designation boundaries.</p>	Noted – Tadmore Park, Index Place Reserve, and Alfriston Park were intended to be included in the description, and we acknowledge these form a part of the receiving environment for NoR 3.			
PP4	<p>Please explain why Addison Reserve is not included as part of the NoR 3 Receiving Environment description.</p> <p><i>Rationale:</i> To understand the exclusion of this space despite being within the proposed work areas / designation boundaries.</p>	Noted – This open space was intended to be included in the description and we acknowledge it forms part of the receiving environment for NoR 4. We note however that it is not referred to as 'Addison Reserve' and appears to be unnamed in the Auckland Council GIS viewer.			
PP5	<p>Please explain, how was it 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?</p> <p><i>Rationale:</i> 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.</p>	In these cases, the magnitude of construction impacts on these parks was assessed based on the relative physical extent of the proposed works, and the type of works required (i.e. in the case of Alfriston Park the construction of a stormwater wetland).			
PP6	<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><i>Rationale:</i> 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>	<p>The proposed conditions including the Urban and Landscape Design Management Plan (ULDMP) and Tree Management Plan are intentionally drafted to be outcomes focused. These plans will address matters relating to planting, managing the effects of existing trees and the ongoing maintenance of planting/design responses (including where they are implemented in parks and open spaces), and will be undertaken at the Outline Plan stage recognising the longer implementation timeframes anticipated. The specific mitigation measures to achieve the outcomes sought through these conditions/plans will be the subject of further consideration and detail to be provided as part of the requirements of these management plans during the Outline Plan documents.</p> <p>Notwithstanding the above, the design as lodged has sought to avoid tree removal where practicable. The anticipated effects on trees resulting from the lodged design are set out comprehensively in the Arboricultural Assessment.</p> <p>The consideration of Local Board Plans, Area Plans, and the recreation-related plans is set out in section 11.2 of the AEE.</p>			
PP7	<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</p>	This recommendation is reflected through the proposed conditions, specifically the Urban and Landscape Design Management Plan (ULDMP) condition and the Tree Management Plan. For example Clause (h)(i) requires the ULDMP to include planting design details including "(a) Identification of existing trees and vegetation that will be retained with reference to the Tree Management Plan. Where practicable, mature trees and native vegetation should be retained...."			

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	<p>open spaces and reserves? How will these criteria be reflected and managed through the proposed designation conditions?</p> <p><i>Rationale: The phrase 'practicable and appropriate' is subjective and requires clarification to ensure its appropriate application.</i></p>	<p>The objectives of the ULDMP and TMP, provide a framework for the development and implementation of design and mitigation that appropriately responds to the receiving environment and best practice standards closer to the time of implementation. They will be prepared by a Suitably Qualified Person(s) (as defined in the definitions in the condition set) who will consider what is "practicable" and/or "appropriate" in the respective context. It is noted that the Management Plans will be provided for consideration by the territorial authority as part of the Outline Plan of Works process.</p>
PP8	<p>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?</p> <p><i>Rationale: The term 'generous open space' is not clearly defined in the application, leaving room for multiple interpretations.</i></p>	<p>For clarity, it is noted that the term "generous open space" does not appear in the ULDMP condition, but is used in the Landscape Assessment and corresponding summary in the AEE.</p> <p>The objective of the ULDMP provides a framework for the development and implementation of design and mitigation that appropriately responds to the receiving environment and best practice standards closer to the time of implementation. There are various ways in which the outcomes could potentially be achieved. From discussions with Auckland Council Community Facilities, we understand there is a general preference to enhance existing open spaces in the first instance. However, other options such as enlargement or enhancement of existing open spaces or creation of new spaces within the designation boundaries (if appropriate) are not precluded.</p>
PP9	<p>Provide specific details on the potential increase in flood risks to each of the areas identified in PP1 (above).</p> <p><i>Rationale: 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.</i></p>	<p>The parks in immediate vicinity of the Project are shown in the maps included in the existing Flood Assessment (refer to Volume 4)</p> <p>The existing Flood Hazard condition requires the Project to be designed so that it does not result in new flood prone areas. As such, increased flooding effects are not anticipated on existing parks. The flood hazard outcomes specified in the conditions will ensure mitigation measures are developed so that flood risk is neutral or less than minor for all adjacent properties, including parks</p>
PP10	<p>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 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 conflicting outcomes and the like?</p> <p><i>Rationale: 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.</i></p>	<p>The ULDMP has a wider remit, with an objective to "enable integration of the Project's permanent works into the surrounding landscape and urban context" and "ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment". The OSMP objective is narrower – "to minimise as far as practicable the adverse effects on the recreational amenity of the open spaces listed in Schedule 5 resulting from the Project". The details to be included in the OSMP are tailored more specifically to that end, and include a specific requirement to consult with Auckland Council Parks. This requirement does not appear in the ULDMP.</p> <p>Practically speaking there are some areas of overlap between the matters covered by the two plans. Both are intended to be submitted to Council as part of Outline Plan processes for a Stage of Work, with invitation of key stakeholders (Auckland Council Parks in the case of the OSMP) to participate from six months prior to the start of detailed design.</p> <p>We can delete the OSMP if that is preferable.</p>
PP11	<p>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).</p> <p><i>Rationale: 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.</i></p>	<p>Schedule 5 limits the application of the OSMP to four open spaces that fall within NoRs 1 and 3. The main criterion was whether there are significant permanent works proposed within the park in question - the identified parks contain permanent works for active modes, earthworks, and stormwater wetlands. Additional matters considered were impacts on interfaces with mature trees, impacts on access and parking. Each of the parks identified in Schedule 5 are affected by one or a combination of these.</p>
PP12	<p>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</p>	<p>Non-recreational functions of these spaces are appropriately captured and intended to be addressed through other management plan conditions - for instance the Urban and Landscape Design Management Plan covers matters relating to integration and interface; Lizard Management Plan applies to relevant</p>

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	<p>beyond recreation. Is this condition too limiting in scope, and if so, will there be adjustments to accommodate non-recreational functions?</p> <p><i>Rationale: 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.</i></p>	<p>vegetation, some of which is in open space (see NoR 2 for example); cultural matters are captured under the Cultural Monitoring Plan and Cultural Advisory Plan conditions.</p>
PP13	<p>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"?</p> <p><i>Rationale: 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.</i></p>	<p>As per response to Request PP8 above, the conditions are outcomes-focused recognising the longer implementation timeframes. The objective of the OSMP provides a framework for the development and implementation of measures that appropriately responds to the receiving environment closer to the time of implementation. There are various ways in which the outcome to "reasonably maintain the existing level of service" could be achieved and defined. The OSMP fundamentally provides a condition mechanism to ensure that discussions with Auckland Council Parks continue and they can input into the process for defining the specific measures to achieve the outcomes.</p>
PP14	<p>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.</p> <p><i>Rationale: 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.</i></p>	<p>The ULDMP requires details of planting throughout the project and is required at the Outline Plan for a stage of work - it is considered that this the appropriate time/mechanism to provide this detail.</p>
PP15	<p>The proposed raingardens are directly adjacent to the cycleway. Will there be any form of safety measures between the rain garden and the cycleway?</p> <p><i>Rationale: 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.</i></p>	<p>The ULDMP requires details of planting throughout the project and is required at the Outline Plan for a stage of work - it is considered that this the appropriate time/mechanism to provide this detail.</p>
PP16	<p>Access to the cenotaph appears to be lost with the proposed active mode path detouring 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</p> <p><i>Rationale: To ensure that the design modifications don't compromise safe and accessible pedestrian access to a site of heritage significance located within open space.</i></p>	<p>The concept level of design has been undertaken to inform the designation boundaries. Clause (f) of the ULDMP requires the Project to demonstrate how it:</p> <ul style="list-style-type: none"> <li>(i) "is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), natural environment, landscape character and open space zones;</li> <li>(ii) Provides appropriate walking and cycling connectivity to, and interfaces with, existing or proposed adjacent land uses, public transport infrastructure and walking and cycling connections;</li> <li>(iii) Promotes inclusive access.</li> </ul> <p>These outcomes can be further considered as part of the detailed design phase, closer to the time of implementation. It is anticipated that as with any shared-use pathway within an open space zone, common courtesy and spatial awareness of users will also ensure safe use of the space.</p>
PP17	<p>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.</p> <p><i>Rationale: To confirm that whether what may be interpreted as a distinctive landmark will be altered in a way that lessens its significance or recognisability.</i></p>	<p>The general arrangement plans show a cut batter in this location. Accordingly, the shape of the mound is likely to change. The reinstatement of the site is to be in accordance with the design outcomes identified through the Urban and Landscape Design Management Plan (ULDMP) condition, which may identify outcomes relating to this landmark.</p>
PP18	<p>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?</p>	<p>Specific mitigation for the loss of these parking spaces has not been identified at this stage. The proposed Open Space Management Plan (OSMP) requires demonstration of measures to reasonably maintain the existing level of service to the affected open space, and how ongoing access and operation will be provided for during construction.</p>

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	<p><i>Rationale: To ascertain the implications for park users due to the proposed reduction in parking spaces and to understand any mitigation plans.</i></p>	<p>As noted above in PP1, the effect is on approximately eight carparks. A number of these are likely to be reinstated as the full extent of designation is not required permanently in this location. The remaining carparks on the site (over 50 spaces) are not within the NoR. We understand these are utilised by the Alfriston Road Kindergarten, Manurewa Scout Hall, and All Seasons Touch.</p>
PP19	<p>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.</p> <p><i>Rationale: To resolve discrepancies between plans, ensuring that any proposed works in Bruce Pulman Park are accounted for in our assessment if necessary.</i></p>	<p>The Sheet 18 Urban Design Evaluation plans focus on the outcomes and opportunities of the proposed South FTN network as identified in the preceding Detailed Business Case, some of which is not proposed to be designated. As shown on Sheet 18, the extent of NoR4 does not pass Bruce Pulman Park down Walters Road, and therefore no works within Bruce Pulman Park are proposed as part of the NoR.</p>

# Attachment A – Social Impact response

See separate document