

13 September 2022

Babbage Consultants Limited  
Level 4, 68 Beach Road  
Auckland Central 1010  
Attention: Sukhi Singh

Sent via email: [sukhi.singh@babbage.co.nz](mailto:sukhi.singh@babbage.co.nz)

Dear Sukhi,

**Clause 23 RMA further information: private plan change request – 8 Sparky Road, Ōtara (Highbrook Living Limited)**

Further to the private plan change request by Highbrook Living Limited under Clause 21 to Schedule 1 of the Resource Management Act 1991 (RMA) in relation to part of 8 Sparky Road, Ōtara, Auckland, Council has now completed an assessment of the information supplied.

Pursuant to Clause 23 of the RMA Auckland Council requires further information to continue processing the private plan change request. Table 1 in Appendix 1 to this letter sets out the nature of the further information required and the reasons for the request. This incorporates reviews undertaken by Council appointed specialists.

The further information is requested under section 23(1)(a) – (d) of the RMA to better understand:

- (a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of Schedule 4; or
- (b) the ways in which any adverse effects may be mitigated; or
- (c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or
- (d) the nature of any consultation undertaken or required to be undertaken.

Should you wish to discuss this matter or seek a meeting to clarify points in this letter please do not hesitate to contact me.

Yours faithfully



Tania Richmond  
Consultant Planner on behalf of Plans and Places Department, Chief Planning Office  
[tania@richmondplanning.co.nz](mailto:tania@richmondplanning.co.nz)  
09 521 4639, 027 681 7799

Clause 23 request approved by:



Celia Davison  
Manager Planning – Central south  
Plans and Places Department  
Chief Planning Office

Reference	Category of information	Specific request	Reason for request
Economic – Derek Foy, Formative			
Eco 1	Industrial land occupation 2017-2022	Please provide an assessment of the amount of land that was identified as being vacant in 2017 but which is now no longer vacant.	<p>The Property Economics Limited document titled “Highbrook Proposed Plan Change Economic Overview”, November 2021 (“PEL”) uses Auckland Council’s “Housing and Business Development Capacity Assessment 2017” (“HBCA”) as a base for assessing industrial land demand and supply.</p> <p>The vacant land supply estimates in the HBCA are now at least five years old, and some of the land that was vacant in 2017 will now no longer be vacant, having been developed in the interim. An updated (2022) estimate of vacant land supply would be a better basis for the industrial land demand-supply assessment than the 2017 data. The PEL report refers to “Building Consent Statistics – Statistics New Zealand” data, which would be useful for this assessment, but has not been used.</p>
Eco 2	Ability to accommodate industrial activity	Please provide an assessment of the range of parcel sizes and building sizes in nearby industrial zones such as Highbrook and East Tamaki, and assessment of the range of activities permitted on the site under the operative Business – Light Industry zoning.	The PEL report states that the site is not efficient or practical for light industry activities, however there appear to be many industrial zoned parcels and industrial buildings that are of a size that could be accommodated on the site, including across a wide range of activities that are permitted in the operative Light Industry zone.
Eco 3	Economic efficiency of industrial land within this location	Please provide a discussion of the economic efficiency of this site being used for industrial activities, as compared to those activities being accommodated instead on alternative locations elsewhere in Auckland.	The PEL report and the Planning Report both note the site’s good vehicle accessibility, however the PEL report provides no discussion of the benefits of the site accommodating industrial activity relative to other

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		<p>This discussion should also refer to the likely growth in residential capacity in established parts of Auckland as a result of Plan Change 78 Intensification.</p>	<p>potential locations. Many of the other places where industrial activities might locate if they were unable to establish on the site are located around the Auckland urban periphery, such as in the structure plan areas identified in the PEL report.</p> <p>Plan Change 78 will significantly increase residential capacity, and therefore probably also population growth, in areas closer to central Auckland, requiring for that population employment opportunities that are easy to access.</p>
Eco 4	Employment yield of the site	<p>Please provide an assessment of the potential employment yield of the plan change site under the operative Business - Light Industry zone and the proposed Residential – Terraced Housing and Apartment Building zone. This should discuss the relative merits of providing the assessed quantum of employment on the site compared to some alternative location, such as one of the structure plan areas identified in the PEL assessment.</p>	<p>The number of workers able to be accommodated on the site is a relevant economic impact to consider when evaluating the merits of the proposal.</p>
Eco 5	Industrial sector definition	<p>Please provide detail on the method used to define the industrial ratios adopted in Appendix 1 of the PEL report, and explain the rationale for the inclusion and exclusion of component activities.</p>	<p>The ratios in Appendix 1 are a key input into the PEL report's demand assessment, but they are only described as being based on empirical data. It would assist interpretation of the assessment to understand to what extent the ratios are based on expert opinion.</p> <p>As explained in the economics report, "industrial activities" are those that drive demand for industrial land, but the ratios do not appear to include some activities that are permitted in the Business - Light Industry zone (such as</p>

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			food and beverages and trade suppliers). Nor does it include all of other activities in which only part of their employment occupies industrial land (such as construction).
Eco 6	Viability of retail and office space	Please assess the demand for, and viability and appropriateness of the proposed office, café and retail space on the Site.	The PEL report has not assessed how much retail, café or office space would be sustained on the plan change site by the site's resident households, and to what extent those activities would require an inflow of customers or workers from other places in order to be viable. While the limited pedestrian accessibility from the site to the nearest neighbourhood centre indicates it may be efficient to provide for some convenience retail supply on the plan change site, the application provides no assessment of how much would be appropriate.
Eco 7	Demand for residential land	Please provide some assessment of the demand for additional residential supply on the plan change site, in light of Auckland Council's Plan Change 78 Intensification.	<p>Plan Change 78 responds to the National Policy Statement on Urban Development 2020 and requirements of the Resource Management Act by enabling more development in many parts of Auckland, including by incorporating Medium Density Residential Standards that enable three storey housing in large areas across urban Auckland.</p> <p>Plan Change 78 enables significantly greater residential development capacity than the operative Unitary Plan, and will reduce the need for new residential zones to be created in Auckland in order to meet demand. No assessment of that demand or the implications of Plan Change 78 for demand for dwellings on the plan change site is provided in the application.</p>

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Eco 8	Dwelling yield	Please provide an assessment of the potential dwelling yield of the site if zoned Residential – Terraced Housing and Apartment Building zone, and provide an opinion about the economic effects of the difference in that potential yield from the proposed maximum yield.	The application proposes to limit the number of dwellings on the site to 200 to manage traffic effects, but that number of dwellings appears to be somewhat less than the capacity of the site under a Residential – Terraced Housing and Apartment Building zoning. Limiting the number of dwellings on the site due to traffic concerns therefore represents a constraint, and an opportunity cost in relation to unconstrained development. That constraint may be relevant to assessing the most appropriate zoning of the site.
Eco 9	Negative externalities of residential development	Please provide a discussion of the negative externalities associated with providing residential options on this site, as compared to alternatives in the rest of Auckland.	The PEL report provides no discussion of the costs or benefits of this site in terms of being used for residential activity. The site is adjacent to State Highway 1, Highbrook Drive and land zoned Business - Light Industry zone, is not close to commercial or other services, and may offer constrained options for active modes of transportation. These factors may negatively impact residents that would live in this location, particularly relative to other locations where high density residential activities are enabled.
Geotechnical – James Beaumont, Riley			
Geo 1	Liquefaction	Please comment on the liquefaction potential of these soils and the hazard that they present to future residential development here. Please outline any potential mitigation measures that would be considered (should conditions indicate they are required).	The geotechnical report indicates that liquefaction is considered to be a low risk to the site. We have reviewed the borehole records provided and note that in several of them, loose sandy soils (e.g. potentially liquefiable) are present within the upper 5m of the soil profile, some from

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			almost at the surface. This is potentially indicating a higher liquefaction risk than indicated in the report text.
Geo 2	Lateral spread	Please provide comment on the lateral spread potential and hazard to future site development, plus potential mitigation measures that would be considered for residential development (should conditions indicate they are required).	This request is made in light of the above query and the near surface sands.
Noise – Bin Qiu, Auckland Council, contamination, air and noise			
Noise 1	Acoustic assessment	<p>Please provide a site-specific assessment of the traffic noise levels at the application site and their effects on proposed residential activity. This should be prepared by a person experienced in acoustics.</p> <p>This should include analysis of what mitigation measures are available to achieve the external and internal noise levels recommended in the NZS 6806: 2010 and which best practicable option(s) that could be adopted.</p>	Whilst the internal noise levels proposed in the precinct rule are acceptable with regards to internal noise, the external noise levels recommended in the NZS6806 and in the Waka Kotahi report have not been considered and adopted in the application. The suitable mitigation options that are required to reduce the traffic noise to the guideline levels specific to this site/location also have not been discussed in the application.
Landscape and design – Gabrielle Howdle, Auckland Council, design review			
LS 1	Landscape visual assessment	The applicant is asked to demonstrate how the high-level outcomes relied upon within the Landscape and Visual Effects Report (“LVA”), including providing for an esplanade reserve with comprehensive planting are achieved or could be adopted into the precinct plan.	The LVA refers to the site being “comprehensively <i>planted with trees and riparian planting along the esplanade reserve to enhance its overall amenity and assist in its integration with the surrounding urban and industrial area over time.</i> ” However, no esplanade reserve is shown/provided or standards included within the precinct

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			plan to ensure to achieve the outcome referred to in the LVA.
LS 2	Landscape visual assessment – THAB zone	Please review the LVA in the context of only those mechanisms available i.e. the proposed rezoning objective and policies of the Terrace Housing and Apartment Building (“THAB”) zone and the draft precinct plan. Alternatively recommend how the stated outcomes could be incorporated into the proposed precinct plan.	The LVA refers to and appears to rely on the concept plan to support the change in zoning. For example, to ensure a “high level of visual amenity, comprehensively planted with trees and riparian planting along the Tamaki River corridor to enhance its overall amenity and assist in its integration with the surrounding industrial and coastal area over time”. In addition, the LVA refers to positive outcomes such as providing an open space network. These outcomes, particularly the latter, are only proposed within the concept plan which does not make up part of the plan change.
UD 1	Urban Design Report – outcomes under the THAB zone	Please outline how the proposed adoption of THAB and the draft precinct provisions and standards meet the objectives, policies and design outcomes referenced within the Urban Design Report (“UD Report”).	A large part of the support outlined in the UD Report is a result of certain design outcomes that are not part of the plan change. These are also referenced within the Planning Report provided (Paragraph 4.9). For example, the UD report notes “intensity of development at the widest part of the PC area, with a diminishing scale and intensity to the north.” The Precinct Plan provided does not address how these landscape and urban design outcomes will be achieved at later development stages.  The adoption of the current THAB standards and objectives and policies also do not align with achieving the outcomes sought in the Urban Design and LVA Reports.



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UD 2	Urban Design Report – outcomes under the THAB zone	Please outline how potential acoustic mitigation e.g. potential for large blank walls (on buildings and/or free-standing acoustic walls) to manage noise could be designed in a manner that achieves a quality design outcome in the THAB zone.	This is not managed in the precinct plan, but relies on the objectives, policies and standards of the AUP THAB zoning.
UD 3	Urban Design Report – connectivity	Please demonstrate how the site could achieve connectivity through enabling walking, cycling and public transport and how this can be achieved by the Highbrook Precinct Transportation Plan, or other mechanisms that could be incorporated in the precinct plan.  Note: The Otara – Papatoetoe Draft Greenways Plan includes aspirational long-term pedestrian connectivity for the wider area.	The UD Report refers to the site as being able to provide for a high degree of connectivity and will be able to accommodate the zone change, however the site is somewhat of an island and has restricted vehicle access.
Stormwater – Therese Malcom, Jacobs (for Healthy Waters, Auckland Council)			
SW 1	Stormwater Assets	Auckland Council’s GeoMaps indicates that there is an Auckland Transport sand filter present within the site boundaries. However, it has not been identified in the proposed Stormwater Management Plan (“SMP”). In addition, the existing stormwater pond referenced in the SMP does not appear on GeoMaps as being an Auckland Council asset and its purpose is not clear. Please identify and confirm the ownership of all existing stormwater assets within the site. Please show on plans the catchments that the sand filter and pond treat. Please also confirm how the function of the	The SMP in the plan change process acts as an assessment of stormwater effects and is also part of the Auckland Council Healthy Water’s Regionwide Stormwater NDC authorisation process. An approved SMP is required for the authorisation of stormwater diversion/discharge under the NDC.  This information is required to enable a full assessment of stormwater effects and to meet the requirements of the Auckland Council Healthy Water’s Regionwide Stormwater NDC authorisation process.

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		existing assets will be maintained in the post development scenario and/or how their decommissioning will impact the implementation of the SMP.	
SW 2	SMP Implementation	The SMP identifies a number of options to provide treatment of all impervious areas. However, it is unclear how the options will be incorporated into the proposed stormwater management. It is also noted that no area is shown on the Development Concept Plan (Appendix B) for any of the stormwater treatment devices proposed in the SMP. Please confirm how the options will be incorporated into the proposed stormwater management . Please also show on plan the catchment sizes and proposed treatment devices.	
SW 3	SMP Implementation	Please provide more details and assessment of the proposed storm filter devices in achieving the 75% TSS required under TP10, including type of system and potential size/area.	
SW 4	SMP Implementation	Please provide details on how the proposed requirements outlined in the SMP are intended to be implemented. In particular, please confirm and clarify at what stage of the development the proposed stormwater ponds and wetland are intended to be constructed. If staging of development is proposed, please provide details on how the SMP will be implemented corresponding to each stage of development.	

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SW 5	SMP Implementation	Please confirm if any precinct provisions (including objectives, polices and rules) are proposed to ensure the implementation of the proposed SMP. It is unclear on how the proposed plan change as submitted will require and provide for the implementation of the proposed SMP, and hence it is unclear on how the objectives and outcomes outlined in Schedule 2 of the Regionwide Stormwater Network Discharge Consent (NDC) will be achieved.	
SW 6	SMP Implementation	It is stated in the SMP that the existing stormwater pond onsite which treats runoff from a section of Highbrook Drive will be decommissioned. The treatment of runoff from this section of Highbrook Drive as well as the runoff from the proposed development area is proposed to be provided in the new device(s). Please provide details on how the catchment(s) to the decommissioned device(s) will be incorporated into the stormwater management. Please also provide details on how and when the transition will happen with a residential development, including if staged.	
SW 7	Outlet	It is stated in the SMP that stormwater flows from the site will discharge directly into Tāmaki Estuary after treatment. Please provide information on the design approach of any outfall to minimise the risk of erosion and other potential adverse effects, particularly as the adjoining land will form part of an esplanade reserve on subdivision.	

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SW 8	Water Quality	Please provide an assessment of how the proposed SMP addresses stormwater quality in accordance with the policies under Section E1.3 of the AUP.	
SW 9	Stormwater runoff	Please provide details on how stormwater runoff is proposed to be managed and treated from any communal waste storage areas in apartments and multi-unit developments.	
SW 10	Flood Risk and Hazards	Please confirm and clarify if the proposed stormwater ponds and wetland will be located above the 10-year floodplains.	
SW 11	Coastal inundation	The proposed stormwater ponds and wetland will be located within the coastal inundation 1% AEP overlay. Please confirm the design approach of these devices to minimise the risk of contaminant resuspension and other potential adverse effects.	
Transportation – Andrew Temperley, Traffic Planning Consultants			
TP 1	Accessibility of new THAB Zone by Non-motorised modes of transport	Please provide further assessment of walkability and general accessibility by non-motorised users of the subject site from key services and activities, including employment, education and retail facilities, including expected travel times. An isochrone style plan would be a useful tool and basis for such an assessment.	<p>There is insufficient evidence to demonstrate that accessibility of key services and land use activities from the subject site adequately fulfils the policy objectives of the THAB zone.</p> <p>The Unitary Plan THAB Zone policy states that: <i>The zone is predominantly located around metropolitan, town and local centres and the public transport network to support the highest levels of intensification...</i></p>

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			<p>The geographical context and location of the subject site are considered to present a disadvantage in its ability to fulfil this objective, insofar as it does not immediately adjoin any of the closest town centres or local centres, with main roads and other features creating barriers to transport connectivity. A comparison with other nearby areas zoned as THAB indicates that such zoning is more common within residential areas immediately adjoining local centres such as Otara and Otahuhu.</p> <p>The THAB Zone policy further refers to the need to: <i>ensure that residents have convenient access to services, employment, education facilities, retail and entertainment opportunities, public open space and public transport, and also that This will promote walkable neighbourhoods and increase the vitality of centres.</i></p> <p>While the Integrated Management Plan (“ITA”) refers to nearby employment, education and retail opportunities to the subject site, it does not fully assess their walkability and access by non-motorised modes from the subject site.</p>
TP 2	Scope and Viability of Proposed Shuttle Bus Service	<p>Please provide further assessment in relation to the expected travel functions and routes for a prospective shuttle bus service.</p> <p>Based on the expected travel market size being generated by (approximately) 200 new residential dwellings, would this be expected to sustain services</p>	<p>There is insufficient assessment in relation to the scope and viability of the proposed shuttle bus service and what travel markets it would be likely to cater for (e.g., employment / retail / education related trips, and during what times of the week).</p> <p>This information is needed to better understand the potential contribution which public transport could make towards fulfilling travel demands generated by the new</p>

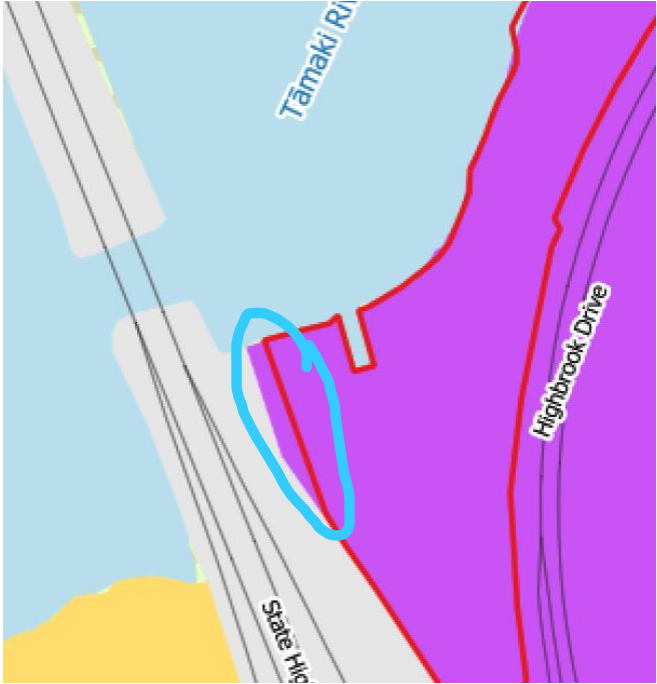
Reference	Category of information	Specific request	Reason for request
		during weekday peak hours only, or would off-peak and weekend services also be expected to be viable?  Does the shuttle bus service require delivery of the full development to be commercially viable?	development. In turn, this underpins the ability of a future residential development on the site to fulfil strategic policy objectives associated with the THAB zone, such as ensuring that residents have convenient access to public transport, employment, education facilities, retail and entertainment opportunities, etc.
TP 3	Traffic Effects of SH1 Southbound / Highbrook Road / Hellaby's Road Roundabout upon Subject Site Intersection	Please provide additional assessment of potential mitigation measures to ensure that vehicular access to and from the subject site is not adversely affected by queueing from the roundabout at the motorway interchange.	The ITA forecasts peak hour queue lengths on Highbrook Drive which would extend northwards beyond the proposed site access intersection. However, it does not propose mitigation to ensure that the subject site access intersection will be able to function safely and efficiently without being adversely affected by traffic effects from the downstream motorway interchange roundabout.  This information is required to confirm that safe and efficient vehicular access to and from the subject site can be achieved, which in turn underpins strategic objectives of the THAB zone, to ensure integration with adjoining land uses and efficient access to activities such as employment, education and retail opportunities and other services.
Planning, statutory and general matters – Tania Richmond, Richmond Planning Consultants			
PL 1	Consultation with Mana Whenua	Please provide an update on the Cultural Values Assessments that are being prepared by Ngati Te Ata and Ngāi Tai Ki Tāmaki.	Pages 91 – 92 refer to Ngati Te Ata and Ngāi Tai Ki Tāmaki providing Cultural Values Assessment and these documents currently in preparation.
PL 2	Road to vest and designation uplifting	Please provide the following information:	The plan change refers to the benefit of residential zoning being the vesting of land for esplanade reserve. This may

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		<ul style="list-style-type: none"> <li>a. If there is a timetable for the vesting of Highbrook Drive.</li> <li>b. What process is proposed for vesting the land for Highbrook Drive with Auckland Transport e.g. by subdivision.</li> <li>c. The timetable for the uplifting of the designation that applies along the western part of the site.</li> <li>d. The extent of the designation that may remain over the land.</li> </ul>	<p>also be required if a subdivision occurs as part of the vesting of Highbrook Drive.</p> <p>The extent of land required for the State Highway may impact on future use of the land for residential purposes and any potential mitigation/standards set out in the precinct plan (s176 of the RMA).</p>
PL 3	National Policy Statement on Electricity Transmission	Please provide an assessment of the National Policy Statement on Electricity Transmission.	While the AUP recognises and provides for electricity transmission through the National Grid Corridor, for completeness this NPS should be addressed in section 8 of the planning report.
PL 4	Recent plan changes/section 32	Please provide an assessment of Plan Changes 78, 79 and 80 as part of the assessment of statutory documents (section 8 of the planning report).	<p>Parts of PC78 have immediate legal effect.</p> <p>Objectives and policies of these plan changes require consideration as part of the assessment. This includes effects of climate change, particularly given the sites coastal location. Coastal erosion and coastal inundation are spatially identified qualifying matters applying to the plan change area.</p>
PL 4	Regional Policy Statement/section 32	Please provide an assessment against RPS Chapters B8 Coastal Environment and B10 Environmental Risk (including PC 80 – also see above).	The plan change is required to give effect to the AUP RPS under s75 of the RMA. Chapters B8 and B10 are relevant. While the assessment required may not be as extensive as Chapters B2 and B3, the relevant provisions should be identified and assessed.

Reference	Category of information	Specific request	Reason for request
PL 5	Section 32/options	Please provide an assessment of why the proposal cannot be achieved by only a residential zoning (i.e. without a precinct plan).	The section 32 considers two zoning options but does not specifically address the benefits and costs of imposing a precinct over the plan change area to deliver the mitigation measures recommended.
PL 6	Section/options	Please comment on whether the preferred outcome of a THAB zone with a permitted activity limit of 200 units is consistent with achieving the greatest density, height and scale of development of all the residential zones.	The THAB zone has the highest intensity of all the residential zones. There is no limit on the number of units in this zone (or the Mixed Housing Urban zone).
The following comments on the precinct plan are provided in advance of the responses to the above requested information. The comments are therefore preliminary and do not incorporate the specialist comments on precinct plan provisions. The comments relate primarily to the efficiency and effectiveness of the proposed provisions.			
PL 7	14.1 Precinct Description	Please consider adding: <ul style="list-style-type: none"> <li>a. The extent of area e.g. 4.4 hectares included in the precinct.</li> <li>b. Reference to protecting activities sensitive to noise as this is one of the precinct plan objectives.</li> </ul>	Clarity of provisions / extent of precinct area.
PL 8	14.2 Objectives – relationship with other parts of the AUP  14.3 Policies - relationship with other parts of the AUP	Please consider moving the following text above the section to which they relate ‘All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified <del>above</del> <u>below</u> .’  ‘All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified <del>above</del> <u>below</u> .’	Consistency with other precinct plans.



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PL 9	14.3 Policies	Please consider re-drafting policy 14.3(3).	The intent is understood, but it currently reads as a method rather than an outcome.
PL 10	Table 14.1.1 Activity table	Please explain the reason for difference in the activity status of (A1) and (A2).	See PL 13
PL 11	Standard 14.6.2 Highbrook Precinct Transportation Plan	Please consider redrafting as this does not read as a standard.	Rules/standards should have a measurable outcome. This standard is worded as an assessment process.
PL 12	Standard 14.6.5 Road noise attenuation 14.8.1 Matters of discretion (1) Non-compliance with Standard 14.6.5 – Road noise attenuation 14.8.2 Assessment criteria (2)	<i>Pending responses for the request for a site-specific acoustic assessment.</i>	
PL 13	14.8.2 Assessment criteria (2) Transport matters	Please refer the relevance of this criterion to activity (A1), or the activity status of (A2).	It appears this criterion is related to activity (A2), which is a discretionary activity. These are relevant matters but are unable to be addressed if the activity status is discretionary.
PL 14	14.9 Special information requirements	Please consider listed the following: a. Precinct Transportation Plan	These documents are referred to in the standards/assessment criteria.

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		b. Acoustic assessment	
PL 15	14.10.1 Highbrook Precinct plan map	<p>Please confirm</p> <ul style="list-style-type: none"> <li>a. The extent of the precinct area relates only to land zoned Business – Light Industry, or if there is a discrepancy between the survey from 2014 and the coastal boundary of the site as shown on planning maps.</li> <li>b. Why a portion of land along the eastern boundary with SH1 is excluded from Highbrook Precinct (indicated in blue).</li> </ul>	<p>It is understood from the Planning report the precinct plan only relates to land zoned Business – Light Industry however, parts of the map appear to include land within Mean High Water Spring Tide.</p> 
PL 16	14.10.1 Highbrook Precinct plan map	<p>Please consider the following amendments to the map:</p> <ul style="list-style-type: none"> <li>a. Indicative location of the bus stop.</li> </ul>	<p>To improve the linkage between the text and the diagram, and clarify parts of the map, aspects could be refined.</p>

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		<ul style="list-style-type: none"> <li>b. The pedestrian barrier to be installed identified in a different colour to the extent of the precinct.</li> <li>c. The shared pedestrian pathway/cycleway to be upgraded identified in different colour to the other features on the map.</li> <li>d. The indicative (or defined) coastal boundary be shown relative to the precinct plan area. This may be assisted by showing the Tāmaki River and Ōtara Creek in blue.</li> <li>e. The motorway be marked.</li> </ul>	