

# **Engineering Memo**

То	Auckland Council	Date	15/10/2024	
From	Peter Lowe	Job#	P23-077	
Ref:	Windsor Park Community private plan change – RFI Engineering responses - 2			

With reference to the RFI letter dated 4<sup>th</sup> October, 2024 ref: "Clause 23 further information request – Private Plan Change Request by Windsor Park Community and Multisport Hub Incorporated", please note the following points:

- 1. This is an application for the rezoning of a land area from Open Space Active Recreation to Mixed Housing Urban and is not an actual land use consent application.
- 2. The rezoning application included a possible development concept plan which was merely an indication of what could be developed and was provided for the following reasons:
  - a. To provide a base for calculating the number of potential dwellings that could be provided and hence available wastewater and stormwater capacities, while providing potential stormwater mitigation solutions.
  - b. Provide a base for assessing access and traffic related matters.
- 3. Once the rezoning is approved, only at that point will an actual land use consent application be made. Such an application will be then accompanied by a specific development proposal with a confirmed layout. Actual stormwater mitigation devices and strategies will be proposed at that stage for implementation.
- 4. Our response to date has been to provide a level of confidence that, should the land be rezoned, that any future land use application can provide realistic mitigation . For example;
  - a. The land use application can explore the use of the playing fields as retention or any other options. In actioning, there will obviously be discussions with Council, Parks and Healthy Waters.
  - b. Options around treatment, retention, capacity and design.
- 5. We can also confirm following discussions with the traffic engineer, that the internal road will be private and not public. Therefore private stormwater treatment and mitigation devices are suggested as possible stormwater options.

Noting the above, we have also responded to the further questions below, please find attached the following responses for engineering and stormwater queries as follows:

P1	Mana Whenua consultation	Please confirm whether any responses from any of the mana whenua groups listed in Section 5.3.2.5 of the AEE has been received since the lodgement of this Private Plan Change (PPC) Request.  If no responses have been provided, please provide the timeframe in which these groups were given to provide a response.  Please also provide a copy of the email referenced in Section 7.5 of the AEE that was sent to mana whenua as part of the applicant's consultation with mana whenua.	Please refer to the Planning Response within Attachment B. It is noted that 11 Iwi groups were notified on 30.11.2023 with no responses to date.  Please Note that reference to sections within the AEE has been updated to correctly correspond with Mana Whenua Consultation. Please refer to the Updated AEE which has been provided as Attachment A.	Satisfied, no further information requested.  NOTE: Healthy Waters have advised that the SMP needs to state whether any further mana whenua consultation has been undertaken in relation to stormwater – see RFI request SW7. If no further consultation has been undertaken (due to the lack of responses), this should be specified in the SMP.
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The applicant has consulted with Iwi groups, and to date there have been no responses received form any of them. Further consultation with Iwi can be undertaken at land use consent stage when a specific design is being proposed. No further consultation with Iwi is proposed as this stage. The SMP has been updated to state this.

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SW3	SMP – Stormwater management	Please provide information on why private stormwater tanks are proposed as the stormwater management device for the proposed plan change.  Please outline how factors such as the plan change area (including the sports field) of 63,805m², the site-specific character, downstream and receiving environment are used when determining the most appropriate stormwater management device for the proposed plan change area.	The site is located in a SMAF zone, which means on site retention and detention is a requirement for any new impervious areas. Private stormwater tanks are an acceptable option for SMAF mitigation for this type of development. If these are not acceptable then they should be removed form the available options in the Auckland Council guidance documents.  Infiltration would not be advisable as the soils do not readily accept infiltrated water in the volumes required. Due to the clay soils, mudstone and sand stone underlying layers, the majority of the water would not infiltrate and only serve to exacerbate downstream flooding.  As the downstream catchment is already developed, there is no spare public land for additional communal publicly owned devices. There is an existing dry detention pond directly down stream of the site known as the Ascension Place Pond, which currently attenuates flood events, however feedback from the recent meeting with Healthy Waters	There is no capacity in the Ascension Place Pond to support new development. As such, private stormwater tanks to meet SMAF2 requirement for roof runoffs with internal reuse are acceptable.  For private carparks, COALs and accessways, it is recommended that a single communal device is used and that this is managed communally by the residents, and located in a private area. Please discuss why this cannot be achieved as part of the proposed arrangement.  Proposed road  Please confirm in the SMP whether the proposed road is public or private – the traffic assessment notes that the road will be public, however the SMP notes that this will be private.  If the proposed road is private:  A single communal device rather than multiple devices in private areas managed by multiple
			considered this dry pond already under designed for its catchment and does not have the ability to be expanded due to onsite topographical constraints and nearby neighbouring property. This dry pond would not typically provide SMAF mitigation for the proposed plan change area as its capacity (already compromised for it's catchment size) is reserved for flood mitigation, not stream protection.  If HW consider there is an opportunity for this dry pond to be modified to include attenuation for smaller SMAF rain events with extended detention incorporated into the pond outlets, (with an agreed contribution for works from any future developer), please advise.  To date we have been led to believe this is not a preferred option for HW	residents is recommended. Please discuss why this cannot be achieved.  If the proposed road is public:  A single communal device rather than multiple devices is also recommended. Please clarify and discuss whether this can be achieved in the SMP.  Please also confirm whether there has been any consultation with AT, to ensure that what is proposed for stormwater management is acceptable by AT. If consultation has been undertaken, please provide details of the matters discussed.  NOTE: Stormfilters, small rain gardens, and catchpit inserts for public roads which will be public assets are unlikely to be accepted by AT and/or HW.  The development site could include an area for a communal device. Please confirm if there are any indicative locations on the site that could be used for a communal device. If not, please provide reasons why.

It is confirmed the road would be private, therefore no consultation with Auckland Transport is required.

Please note this application for re-zoning does not rule out the possibility of using single communal stormwater devices. The detail of which would be provided should a land use consent application be made.

With this in mind, our responses to date have been to provide a level of confidence that, should the land be rezoned, that any future land use application can provide realistic mitigation. When a land use application is submitted, actual mitigation devices will be submitted with the proposed. There is no point in being specific with the device choices at this stage.

SW4	SMP – Stormwater management	Please provide information on what other options of stormwater management devices were explored – i.e. whether a communal stormwater management device, the possibility of utilising the sports field to manage stormwater, or collaboration with Healthy Waters with upgrading existing stormwater management devices were explored.	As above for the previous query regarding other explored options.  For the proposed private roading and other shared private areas, the plan change proposes to utilise communal stormwater attenuation and treatment. The proposed accessway will be treated by privately owned cesspits fitted with litta traps, and stormfilters.  The proposed communal accessway tanks will provide the required mitigation for SMAF and 10% AEP rain events. The devices should be owned and maintained by a residents association which will engage maintenance contractors to carry out the required maintenance. With the communal devices owned by the residents association they are much more likely to be maintained with increased functional lifespan.  Some investigation into using the sports field as a dry detention basin has been carried out and added to the SMP. Depending on the final proposed development, the requirements of healthy waters and the sports club that uses the field this could be an option and it is envisaged that Auckland Council could negotiate with the Windsor Park Community & Multisport Hub INC, as the flood storage potential of this field could	The response provided states that private roads/shared private areas will have communal stormwater management devices that are managed by the residents association. This is acceptable, however please provide further information on how the number of devices proposed was determined.  NOTE: A single rather than multiple devices is recommended.  Three different options were outlined in the SMP to manage stormwater in a 1% AEP event. However, there are no recommendations on which one is the recommended option given the characteristics of the catchment.  If it was determined that the dry detention basin in the sports field is a viable option and the most suitable option for the catchment, please update the SMP to include this, as the recommended option and provide general information on matters such as proposed ownership and maintenance, safe access for maintenance and operation etc.  Please also clarify why 19% impervious area is used for post development impervious area percentage, the impervious area should be the
			benefit the wider catchment area, that is not the responsibility of the sports club.	maximum probable development for the proposed zoned.  Please confirm if there was any input from a geotechnical/dam specialist in relation to using the sports field as a dry detention pond. Are there any potential adverse effects on the surrounding environment?  NOTE: Healthy Waters has offered to have a meeting with both the requestor and Parks Planning, to explore the option of using the sports field as a dry detention to manage the 1% AEP event for the plan change area (and also the possibility to include the wider catchment.  Parks Planning have also sought further clarification in relation to the use of the field as a 'dry detention basin temporary storage area' and how this will impact on its use – see RFI PP6 by Parks Planning below.

When a land use application is submitted, actual mitigation devices will be submitted with the proposed. A recommended option is not given as there is no actual detailed proposal submitted as part of a re-zoning application.

Geotech and dam specialists have not been consulted on the dry detention pond for a plan change application. Nor would they be needed when the ponding depth would be no more than 0.5m deep.

The 19% impervious area section has been updated to only consider the plan change area at MPD (65% impervious)

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SW5	SMP – Geotechnical	Section 2.1 of the SMP (Geotechnical) did not provide any geotechnical information for the proposed plan change area.  Please provide a brief overview of the of the geotechnical characteristics of the site that is relevant to stormwater management, such	The plan change does not propose any infiltration back into the soil due to the underlying layers consisting of sand stone, silt stone as and clay. The geotechnical section of the report has been updated to mention this.	Where retention is not possible for SMAF, please provide further clarification on how this will be addressed.
		as soil type and infiltration rate. The information provided should be consider when proposing the stormwater management for the site to ensure it is feasible.		

Our responses to date have been to provide a level of confidence that, should the land be rezoned, that any future land use application can provide suitable mitigation.

When a land use application is submitted, actual mitigation devices will be proposed. There is no point in being specific with the device choices or specific design at this stage.

However, for information, calculated retention volumes for the private roading and parking areas could be taken up as detention in accordance with point 2 of E10.6.3.1.1 as the water from these areas is non potable and not suitable for onsite reuse and assuming there is no suitable infiltration.

This has been clarified in the SMP section 4.3 Stream Hydrology Stormwater Mitigation.

When an actual land use application is submitted, actual mitigation devices will be submitted with the proposal.

This level of detail is not necessary for a re-zoning application.

SW6	SMP – Receiving environment	Section 2.2 of the SMP (Receiving environment) provided some information about the receiving environment. However, please provide further information and details on the downstream environment, such as the existing hydrology, Oteha Valley catchment, and the Waitemata Harbour.  The information about the receiving environment should be clearly outlined in the SMP.	The recent meeting with HW provided some information about the downstream "Ascension Place Pond" was provided. These details have been added to the SMP and considered in the design.	Please update the SMP to include general information about the Oteha Valley catchment and the Waitemata Harbour, both of which are included in the downstream environment.
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The receiving environment section of the SMP has been updated to include the larger environment and shows the drainage route from the site to the pond, to the Oteha stream and then eventually to the harbour.

SW7	SMP - Stakeholder consultation	Section 7.0 of the AEE provided information about engagement of stakeholders and mana whenua. Please confirm if this engagement included information on how stormwater would be managed for the proposed plan change area.  Section 2.3 of the SMP (Stakeholder consultation) included some information about contacting Healthy Waters. Please update the SMP to include information on	Stakeholders section has been updated to include the meeting with Healthy Waters. Mana Whenua consultation hasn't been undertaken for stormwater.	If the proposed road is public, please provide further information regarding any consultation with AT that has taken place. It is important that the proposed stormwater management option is acceptable by AT.  Please update the SMP to include information about how consultation with mana whenua was carried out for the proposed plan change, and the outcome of that consultation.
		consultation with all relevant stakeholders, and include details and outcomes and stakeholders' concerns are how mana whenua values are addressed in the proposed stormwater management.		NOTE: The AEE outlines the mana whenua consultation that was undertaken in relation to the plan change (in general). Even if no responses were received and/ or further consultation for stormwater was undertaken, this information should also be outlined in the SMP.

Following discussions with the traffic engineer, we can confirm that the internal road will be private and not public.

11 Iwi Groups were notified on the 30.11.2023 and to date there have been no responses from any of the 11 Iwi groups. Further consultation with Iwi should be undertaken at land use consent stage when a specific design is established. No further consultation with Iwi is proposed as this stage. The SMP has been updated to state this.

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SW8	SMP – Asset ownership	Section 2.4 of the SMP (Asset ownership) outlined that the stormwater pipes will be vested in Council and all other stormwater management devices will be private.  Please outline how the devices that are private and the devices that are shared will be maintained, to ensure their ongoing operation and maintenance.	The asset ownership section of the report has been updated to show an indicative breakdown of ownership and maintenance.	The proposed stormwater management in Section 4 Stormwater Management is not consistent with what is written in Section 2.4 Asset Ownership. Please review and update these sections accordingly.  Section 4.2 of the SMP stated that the stormwater runoff from the carparks and accessway will be treated by a communal device on the road. It should be noted that if the road is public, this will not be accepted by AT. Please provide further clarification on this, including whether this was discussed with AT.  Please outline in the SMP how stormwater will be managed for the different possible road ownership, as the stormwater management options may differ.

The proposed road will be private taking AT consultation out of the picture.

At the time of a land use consent application, it is expected that any private stormwater mitigation and treatment devices will be proposed to be owned and maintained by a resident association. This should be specified when the land use consent is applied for. This level of detail is not necessary for a re-zoning application.

SW9 SMP – Water Section 4.1 of the SMP (Water quality) Water quality treatment has been broken down If the road is public, please clarify	rify the
Ouality  outlines the water quality treatment for the accessway. Please clarify what is included in the 'accessway', and whether it includes the car parks, driveway areas and private road.  Please clarify why LittaTraps are proposed to treat the accessway; and whether LittaTraps will be acting as pre-treatment before the Stormfilters for all proposed water treatment.  Please clarify whether roofs will be constructed of inert materials and/ or how water runoff from roofs will be treated.  Please outline clearly how all impervious areas will be treated and where the discharge will be. It may be helpful to provide a diagram summarising the proposed stormwater management for the different impervious areas.	P on whether the

The proposed road will be private.

SW11	SMP – Flooding	Section 4.3 of the SMP (Flooding – Pipe capacity for 10% AEP) outlined that the 10% AEP event will be mitigated via detention tanks.  Please provide further clarification on why the sports field and new facilities on the sports field are not included in the calculations.  Please update the SMP to state that an operation and maintenance plan will be required - this is to ensure the long-term efficacy of the system.  Please provide information on whether there any adverse effects on other property.	The SMP has been updated to clearly state that operation and maintenance plans will be required for the proposed stormwater devices. The 10% mitigation strategy has been updated to only utilise the communal tanks as it is much more likely that these tanks are maintained by a resident's association. The sports fields/new clubrooms are not part of this application.	Please provide further clarification on whether there are any adverse effects on other properties.

The current proposal is for a re-zoning of the land. This application will not have any stormwater effects on neighbouring properties.

At the time of a land use consent application, the confirmed proposal of the site should provide details on how effects on neighbouring properties are avoided. The plans and calculations to date have provided examples of how this could be achieved.

10 year peak flow mitigation is shown that it can be provided through detention tanks.

These are just examples to demonstrate that effects on neighbouring properties can easily be avoided should a land use consent application be made.

SW12	SMP - Flooding	Section 4.4 of the SMP (Flooding – Building for 1% AEP event) discusses the overland flow paths; however no assessment is provided on the stormwater effects in a 1% AEP event with climate change from the proposed plan change.  Please provide further information on the stormwater effects in a 1% AEP event with	1% Peak flows need to be mitigated back to pre-development levels in the plan change area. An increase in peak flows for this area has been calculated and included in the report. The proposed flows can be mitigated back to pre-development levels either by the proposed detention tanks, underground storage chambers (such as Cirtex rain smart systems) or via the	See SW4.  Please provide further clarification on whether there are any adverse effects on other properties, and any effects on the upstream and downstream environment given the proposed stormwater management.
		climate change, and clarify how the effects will be managed for the plan change area. It is required that the 1% AEP peak flow be managed to predevelopment levels.  Please provide further information on whether there any adverse effects on other property and any effects on the downstream environment.	construction of a dry detention basin on the existing sports field. This option has been discussed in the report.	Please also provide further clarification in the SMP on when the implementation of the stormwater management options would need to occur.

The current proposal is for a re-zoning of the land. This application will not have any stormwater effects on neighbouring properties.

At the time of a land use consent application, the confirmed proposal of the site should provide details on how effects on neighbouring properties are avoided. The plans and calculations to date have provided examples of how this could be achieved.

100 year peak flow mitigation is shown that it can be provided through constructing a small earth bund around the sports fields, creating detention storage. The option of creating a dry detention basin on the sports field could provide additional flood storage and further reduce flooding to the downstream environment (and taking further pressure of the Ascension Place detention basin).

These are just examples to demonstrate that effects on neighbouring properties can easily be avoided should a land use consent application be made.

SW14	SMP – General	Section 5 of the SMP (Conclusion) provides information on water quality, stream hydrology, flooding in a 10% and 1% AEP event. However, this needs to clearly state what needs to be done to manage the stormwater effects and not give it as an option. Further information is also required for Flooding for the 1% AEP event.  Please update this section accordingly.	This has been updated.	Depending on response to above questions Section 5 Conclusion may need to be altered. If required, please update accordingly.	
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There was no need to update the conclusions as there are no adverse effects on neighbouring properties from the 10% or 1% rainfall events.

SW15	SMP – Stormwater Pipe Network	Please clarify what is intended for the existing public stormwater pipe network within the plan change area. The pipe location is indicated in the diagram below:	At this stage we have only shown the existing public network as being connected to by the proposed development. An addition section has been added to the SMP – 4.4.1 – building over public infrastructure. In this section we state that it is not recommended to build over the existing or proposed public networks. Please refer to the SMP for more details.	Please provide further clarification in Section 4.4.1 Building Over Public Infrastructure, on how the existing stormwater pipes could be realigned to ensure there is no build over.
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When a specific development proposal with building locations is confirmed, at that stage realignment of stormwater pipes or configuration of the building layout could be examined. It is assumed and land use consent application would consider the Auckland Council Stormwater Code of Practice which gives advice on avoiding building over large diameter stormwater pipes.

Until this plan is available and a specific development proposal prepared, we cannot comment any further apart from stating the build overs should be avoided where possible.

New information received impacting efficier and effective open space provision:  Questions/ further clarifications are sought by Parks Planning in relation to flood storage potential of remaining fields.  These questions are only from a sports park network perspective, and focus on the provisions of sports parks to the community.  With regard to stormwater solutions — these are addressed by Healthy Waters in their assessment. See RFI request SW4 — where this has been reviewed by Healthy Waters and additional information on stormwater matters is sought.	documents:  • ""All current playing fields will not be impacted by the sale. In fact, the proposed investment to floodlight all the playing fields from proceeds from the sale, will provide much greater community availability and utilisation through spreading the loads on the fields and increasing the time the fields are accessible."	From a sports parks perspective, there are fields across the city which act as retention ponds for weather events. These are not the preferred option as;  1. A network view of sport field capacity across the city is taken as it relates to "weekly hours of access" to the community across a given site or catchment. The use of fields as retention areas typically reduces the amount of access the community has, as the fields can be closed for long periods, and/or closed more regularly, taking longer to return to use etc. If the fields are used for weekinght training, including lights, this lost access can be a significant in hours-per-week.  2. Fields serving this purpose typically cannot easily be upgraded to include high quality surfaces & sport field drainage systems due to contamination of raising ground water levels. Future development is limited.  Please provide a response on how the proposed plan change addresses the concerns above.
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From an engineering perspective it must be noted that the fields will be acting as a <u>dry detention</u> <u>basin</u>. This means that the fields will only pond occasionally and only for a short period of time. They are designed to provide detention for the 100 year rain event, meaning it will only be activated

occasionally (perhaps only once in every 10 years). Adding to this, the sports fields have a network of subsoil drains which are designed to drain rapidly whilst still providing peak flow attenuation for the 100 year rain event.

The performance of these privately owned sports fields and the amount of usage they can provide is unlikely to be affected at all, from the proposal.

Regards

Peter Lowe BE (Civil), CPEng

Landworks Ltd

Tena koutou katoa I te iwi,

The Windsor Park Community and Multisport Hub Incorporated are an Incorporated Society and a Registered Charity that own and manage Windsor Park and its associated sporting facilities.

Windsor Park comprises 3 rugby fields and an auxiliary training field in the winter and a Premier cricket field and a Junior cricket playing field in Summer. The fields are also used for Touch Rugby in the Summer thus providing a true multi-purpose facility.

During the winter the fields are at times also used to host Rangitoto College, Westlake Boys High School and Long Bay College rugby games. North Harbour Rugby also use the fields for NPC pre-season games, Harbour B games and training. The fields have also played host to the Black Ferns Women's Rugby team for training and during the recent Women's Rugby World Cup provided a training venue for the Italian team.

In the summer the fields have been used to host cricket games for Auckland A, Rangitoto 1<sup>st</sup> XI and Rosmini College 1<sup>st</sup> XI.

The fields are also used extensively by the local community for leisure and exercise activities.

There is also a Clubrooms facility that services East Coast Bays Cricket in the Summer and East Coast Bays Rugby Club in the winter as well as the Touch Rugby module. The Clubrooms are also used by the community for meetings, training sessions, birthdays and wakes.

There is also a large changing shed facility and a 4-lane outdoor cricket net facility. Once again, the cricket nets are fully open to the wider local community to use.

The facilities at the Park are now of an age where they require substantial upgrading and there is also a desire to add modern facilities that the local community can use for the next 50 plus years.

The Board that governs the Park and its facilities has spent recent years exploring all options for raising the much needed money for these upgrades and to ensure that the land remains as a park shared with the local community.

After much deliberation the Board has reluctantly agreed that, in order to fund for the future and to protect the land as a park, it must sell 1.2Ha of the site in order to raise the necessary funds. The land earmarked for sale is currently used to site the Clubrooms and a training field. All current playing fields will not be impacted by the sale.

The land is currently zoned Active Recreation in the Auckland Unitary Plan. The proposal is to seek Auckland Council consent for the rezoning of the earmarked for sale land (see attachment) as Terraced Housing and Apartments (THAB). Any subsequent development of the land will require a Resource Consent by the purchaser.

This rezoning will allow Windsor Park Community and Multisport Hub Incorporated to sell the referenced land area, with all monies reinvested back into the recreational facilities for the benefit of the local community. Also attached are three plans showing the site location, existing site and the area to be rezoned.

As part of the rezoning process, Windsor Park Community and Multisport Hub Incorporated is required to consult with the Iwi groups who are scheduled on the Auckland Council's website.

Should you seek additional information or have specific comment, please contact the writer.

The risk of not acting is that the East Coast Bays Rugby and Crickets Clubs, will be unable to provide a suitable space for organised sport on the North Shore. This will ultimately result in both clubs dissolving. The aging buildings and unmaintained playing spaces will be left in their current state, reducing the opportunities for organised sport and community recreation within the Northshore / East Coast Bays area.

The risk of acting on this information is less than the risk of not acting.

### 5.3.2.5 Iwi Authorities

As noted within the consultation section of this request, the Mana Whenua groups relevant to this area, as identified by Auckland Council, were consulted and provided with the opportunity to provide input or comment.

The Iwi authorities consulted include:

- Ngai Tai ki Tamaki
- Ngati Manuhuri
- Ngati Maru
- Ngati Paoa
- Ngati Tamatera
- Ngati Te Ata
- Ngati Whanaunga
- Ngati Whatua o Kaipara
- Ngati Whatua Orakei
- Te Akitai Waiohua
- Te Kawerau o Maki

To date, there have been no negative responses received. Refer to section 6.8 for further discussion regarding these responses.

#### 5.3.3 Section 32 Evaluation Conclusion

The evaluation contained within this report has been prepared in accordance with S32 RMA and contains a level of detail that corresponds to the scale and significance of effects.

This section of the Proposed Plan Change Report has concluded that Option 3, the proposal rezoning of the 1.2-hectare open space to Mixed Housing Urban, is the most appropriate solution that serves to benefit

. . . .

The church advised verbally that they would support a Private Plan Change for rezoning based on the THAB zone.

With regards to the wider residential properties, these will be subject of the statutory publicly notified process.

#### 7.5 Mana Whenua

Council have provided the Mana Whenua contact details for the relevant Mana Whenua Groups within the local area.

13 Mana Whenua groups, listed in 5.3.2.5, were consulted on initially via email dated 31 November 2023 prior to lodgement of this plan change request. This contained information about the proposal including plans and an offer to meet onsite or other location if desirable.

No response was received from any of the groups.

Further to this, we understand that Mana Whenua receive a weekly list of all applications lodged and are able to provide comment and feedback for inclusion into the consenting process. We also note that they can participate through the formal submissions process, and we would welcome any additional feedback from interested Mana Whenua groups should they wish to comment any further. Moreover, Mana Whenua can participate in the development process at the resource consent stage.

## 7.6 Consultation Conclusion

Overall, it is considered that initial consultation by Andrew Diver and Windsor Park Community and Multisport Hub Incorporated has made a clear presentation of the proposed plan change, background, and the current context of the site.

Currently it is understood that feedback has been largely positive, and in support of this proposal.

The Board are well aware of the need to continue to maintain clear forms of communication with these interested parties as consultation continues throughout the plan change process.



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