

APPENDIX 1

Te Auaunga PPC Application – Auckland Council RMA Clause 23 Requests and Response

Applicant: Ministry of Housing and Urban Development

Address: 1 – 139 Carrington Road Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
URBAN DESIGN (Specialist: ALISTAIR RAY Jasmox 021 621707 Alistair.ray@jasmox.com)				
UD1	Urban Design Assessment methodology	Please clarify what methodology has been used for the urban design assessment.	<p>Chapter 2.0 – Methodology lists 3 elements that have informed the assessment but does not provide a clear methodology for assessment. What recognised good practice urban design principles have been used to make an assessment?</p> <p>The NZ Urban Design Protocol is quoted, but the UD Assessment then makes no further mention of any of the qualities listed in the Protocol and does not use recognised urban design principles to make the assessment.</p> <p>In the absence of a clear assessment methodology, the UD Assessment focusses on matters more related to planning such as shading, privacy etc, but fails to address bigger picture urban design principles such as how to create a neighbourhood with a clear character and its own identity; creating a place where public and private spaces are distinguished; a place with attractive and successful outdoor areas; creating a place that is easy to get to, and move</p>	

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			<p>through and that is easy to understand; a place that is adaptable over time; a place that is sustainable and enduring; and a place that has variety and choice etc.</p> <p>The assessment should demonstrate how the proposal (and the Precinct Plan) meets these urban design objectives.</p>	
UD2	Taller Buildings – Methodology for Assessment	Please provide details of the design rationale and design principles used to inform the location of the taller buildings.	<p>In many places throughout the application documentation, the argument is made that taller buildings are suitable in the north-west part of the site due the presence of the motorway interchange.</p> <p>For instance, p.103 of the Planning Report states:</p> <p><i>It provides a range of housing typologies with high rise residential development in a part of the isthmus, because of the motorway interchange, that is well suited for more intensive forms of development.</i></p> <p>It would be helpful to understand why the presence of the motorway interchange is used to justify additional height.</p> <p>There is actually no access to the motorway in this location (the nearest access point is Western Springs over 2km away) and in any case, access to a motorway system is not typically regarded as a design principle for justifying intensive residential development and taller buildings. Tall buildings policies around the world use proximity to important public transit (not just transport infrastructure), important nodes or centres, access to employment and other amenities (retail etc).</p>	

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			<p>Whilst there may be a case for taller buildings, it is unclear why the presence of the interchange is used as a justification.</p>	
UD3	<p><i>Taller Buildings - Dimension</i></p>	<p>Please clarify how the maximum dimension has been derived and how building form will otherwise be controlled.</p> <p>NB: The response to this RFI can be combined with the response to L10</p>	<p>The control of taller buildings is recognised as important, but it is unclear what building forms may be possible using the suggested method of maximum dimension. The concept of tall, slender towers is quoted, which are widely accepted as more appropriate forms than squat or slab-type buildings.</p> <p>Yet if a residential building of 18m depth is provided (quite reasonable for double-loaded apartments) the maximum dimension of 50m would allow a 46m long building up to a height of 54m. Even the tallest tower at 72m high could be 38m long. These forms would not be considered slender "towers" and could result in building forms not entirely suitable. Indeed, the Visual Simulations show buildings that are more slabs than towers.</p> <p>It would be helpful to understand how these dimensions have been derived and the range of building shapes that could be produced, together with a commentary on how the building shape will be controlled. The design quality of such buildings will be crucial, and it would be helpful to understand what additional design controls / assessment criteria could be used to ensure these taller buildings are of exemplary design quality.</p>	
UD4	<p><i>Building Heights - 35m height</i></p>	<p>Please clarify how good quality design outcomes can be delivered with the heights proposed across the site.</p>	<p>The UD Assessment and Planning Report focus on the increased yield that additional height will bring, but with little discussion on the impact on the quality of the urban environment. There is discussion around the effects on property outside of the site, but little</p>	

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			<p>discussion around the impact that having many 35m buildings (which could be 11 storeys) would have on the quality of the urban environment, the spaces between the buildings and amenity of residents (privacy, outlook, access to sunlight). If the Precinct Plan is relying on the AUP for standards, then these 11 storey high buildings could be just 12m apart. Also the character of the precinct and the quality of the environment is partly informed by the massing of the buildings as much as the height. Many slender buildings, with plenty of space around them, and variation in height, will produce one type of environment. A few slab-type buildings with less space, and consistency in height could produce quite a different outcome.</p> <p>It would be helpful to understand how potentially adverse effects can be managed through the application of the proposed plan change provisions. Some precedents of neighbourhoods of predominantly 35m buildings would be helpful to understand the impact and how any adverse effects could be managed.</p>	
UD5	<i>Building Heights - 27m height limit</i>	Please provide a more detailed assessment of what effects 27m buildings will have on the streetscape.	Much of the assessment focusses on the effects of the increased height on the properties on the east side of Carrington Road, but there is little discussion on the impact on the streetscape itself. Whilst it is acknowledged that the character of this street will change to urban, there is quite a difference between 5/6 storeys (18m) to 8/9 storeys (27m) in terms of the potential over-bearing / over-shadowing of the street and the impact on all the users of the street. Jan Gehl in particular talks about the connections and	

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			<p>relationship of occupiers of upper floors to people within the street.</p> <p>The intended character of the street is unclear. 8/9 storey buildings with active (non-residential) uses on the ground floor will result in a different character than one where residential is used along the ground floor, and the intended character will help to inform the debate about the appropriate height.</p> <p>It would be helpful to add some commentary on these issues and understand some precedents for this scale of building in a non-central city location.</p> <p>Furthermore, the cross-sections provided suggest the land is flat either side of Carrington Road. In reality there are changes in levels (both rising up and falling away), which could have further impact on the relationship of buildings to the street and it would be helpful to understand these impacts.</p>	
UD6	<i>Retail and other non-residential facilities</i>	<p>Please provide clarification as to how retail and community facilities will be appropriately provided, sized and located to serve the needs of the scale of community enabled by the proposed provisions.</p> <p>NB: The response to this question may be combined with the RFI in EA1.</p>	<p>The Precinct Plans do not show the proposed location of retail or other community facilities within the Precinct.</p> <p>With a potential population of 10,000+ residents and with parts of the site not within easy walking distance of Pt Chev or Mt Albert centres, the role of retail and supporting uses (such as early childhood education, medical / healthcare) will become critical to the success of this community.</p> <p>Acknowledging that the Business Mixed Use Zone provides some enabling provision it is difficult to understand the amount and location of such uses, how people will be able to access them (noting car ownership is intended to be low and walking will be</p>	

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			<p>promoted) and how these will be successfully integrated into the neighbourhood. The provision of these facilities could help to create a heart / gathering place for this new community and be the centre-piece of the neighbourhood. But there is little to no discussion around the amount, location and design principles that will need to be employed to ensure a successful "centre" is created.</p> <p>Related to this is the issue of walkability. The centres of Pt Chev and Mt Albert are relatively close, but not necessarily accessible by walking. There is no analysis around the actual walking catchment from these centres, how much of Te Auaunga precinct falls within these catchments and the safety, efficiency and quality of connections required / to be provided. This will help determine the amount of services required on the site as well as the provision of pedestrian / cycle routes within and to / from the site.</p> <p>The above assessment should make comment about the EPA applications currently being processed include provision for retail. They should be assessed as to their appropriateness in meeting, or partly meeting, the ultimate needs of the precinct as a whole.</p> <p>(see also EA1 and P9)</p>	
UD7	<i>Housing mix</i>	Please clarify how a range of housing typologies can be secured.	Successful neighbourhoods rely on a range of typologies, sizes and tenures. A precinct dominated by one typology could create unwanted social and design outcomes, especially if dominated by small one-bedroom apartments. It is not clear what mechanisms / controls will be employed to manage /	

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			deliver a range of typologies, particularly if buildings are being provided by different parties.	
UD8	<i>Precinct plan maps</i>	Please provide up to date maps.	The Precinct Plan maps are all based on old cadastral maps that do not show SH16. This makes it difficult to fully assess the spatial relationships at the northern part of the site. The maps should be updated to reflect the current environment.	
Non CI23(1) request matter/other comments				
UD9	<p>It is a concern that the plan change is not based on an explicit vision for the type of community envisaged. There is no master plan provided and thus little confidence that each part of the site will be developed within an overall plan that ensures adequate provision of facilities for all of the community and recognition of the local and wider context within which each development should be assessed.</p> <p>Whilst it is acknowledged that this proposed Precinct Plan is an amendment of an existing plan, the current precinct does not anticipate the levels of (predominantly) residential development now proposed.</p> <p>A new community is proposed of 4,000+ dwellings / 10,000+ people. This is a significant development (a medium sized town in New Zealand terms) and delivering such a community in a well-functioning urban environment is a complex process.</p> <p>A masterplan would typically be expected for such a project to demonstrate how all the elements are expected to come together to produce good urban outcomes.</p> <p>It is not clear at what point the overall / high-level design approach to this site can be assessed by Council.</p> <p>It is assumed that if successful, this Precinct Plan will then allow for individual consents to be submitted. At that point, assessment of the bigger picture will not be possible, which means that this stage of the process is the only time to assess the design qualities of the intended approach.</p> <p>The two most successful large-scale urban environments in Auckland in recent times have both been guided by comprehensive masterplans and associated design quality controls and processes – Wynyard Quarter and Hobsonville Point.</p>			

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			<p>Yet for this Precinct, no masterplan is supplied and the provisions within the Precinct Plan and the AUP are being relied upon to deliver quality design outcomes.</p> <p>For clarity, a “masterplan” is not simply a pretty illustration showing the intended buildings, streets, landscape etc. It is understood such a picture is hard to produce for multiple landowners and represents just one potential scenario at a point in time.</p> <p>On the contrary, a masterplan is a complex document with many parts, including a framework to guide development over a long time that allows for flexibility and adaptability to changes in market demand.</p> <p>But a masterplan should provide:</p> <ul style="list-style-type: none"> - A clear vision and design principles, against which all subsequent developments are assessed. - A three-dimensional framework to guide the location of open space, uses, movement and buildings, including identifying development parcels in the form of words and plans / images. - An implementation plan defining the delivery strategy and staging as well as the design quality control process – e.g., the use of design guides or design panels. <p>Without this information it is difficult to assess the proposed urban design qualities of the Precinct.</p> <p>It is hard to understand if this Precinct is intended to function as a new community in its own right, or whether it is simply new (predominantly) residential development that is intended to support and rely on existing neighbouring services and amenities. Although this may be a subtle point, it is vital in understanding how the Precinct will be designed and what ancillary services will be required, where they will be located and how they will be integrated.</p> <p>The assessments provided are unclear on this point. In parts, it suggests this is intended to function as a new community in its own right.</p> <p><i>“A complete community, providing the opportunity for people to live, work and learn within the precinct, while benefiting from access to public transport and a well-connected walking and cycling network.” P.16 UD Assessment</i></p> <p>Yet there is little discussion on the provision of ancillary services to support a community such as schools, early childcare education, medical / healthcare, employment and what is the appropriate level of retail. It is understood there is a tension between providing competition to nearby local centres and providing sufficient on-site facilities to avoid excessive vehicle movements. A retail demand study would help to assess the appropriate levels.</p> <p>It would also be helpful to understand the proposed design quality control process. As stated above, successful new precincts often rely on a combination of design guides and design panels. With such a large precinct, reliance on the AUP and basic</p>	

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			<p>consenting process alone is unlikely to result in consistently high-quality design outcomes and an urban environment that is more than just a collection of buildings.</p> <p>See also P9 and P10.</p>	

Open Space / Parks / Community Facilities (Specialist: ROJA TAFAROJI 021 937084 Roja.tafaroji@aucklandcouncil.govt.nz			
OS1	Community Open Space and Community Facilities	<p>Please provide an analysis, utilising a methodology appropriate to the scale and density of built environment proposed, of the community infrastructure, including for example publicly accessible open spaces, sports facilities, pools, libraries, halls and educational facilities necessary to provide for the local community that will be enabled by the plan change.</p>	<p>The open space analysis in the application focuses on explaining what <i>is to be provided</i> rather than what <i>is required to be provided</i> to meet the needs of the community. The community enabled by the changes proposed is a substantial one and, by the very nature of what is proposed, well beyond that envisaged by the current AUP provisions. The demographic nature and scale of that community requires a bespoke analysis of its community open space and community facility needs.</p> <p>Reliance should not be placed on Council's Parks and Open Space Acquisition Policy 2013 and Open Space Provision Policy 2016. This is a scale and density of development not envisaged by those policies.</p> <p>Note, however, that reference should be made to the Albert-Eden Sport and Recreation Facility Plan (2021) which provides a picture of the current provision and future demand for sport and active recreation facilities in the Albert-Eden area and identifies need for future facility provision. This report identifies a clear sport field shortfall in the Albert-Eden area. Also, one indoor facility has been closed down at Unitec campus due to the developments on the site.</p> <p>The analysis requested should be expressed in quantitative and qualitative terms – for instance the amount of land as well as the type of land and how it could / should be developed.</p> <p>The analysis should also detail where in the precinct needs will arise. For instance, the needs are likely to vary according to where varying densities of</p>

			<p>development are enabled, and whether the expected demographics within those areas may vary. Note that this geographically-specific analysis also relates to yield and location of yield RFIs under Planning - P1 below.</p> <p>This analysis will then inform what the plan change should contain as a management framework to ensure the analysis of needs can be met (see OS2). As an example, the analysis may show what the appropriate sizing is of a neighbourhood park, and whether more than one such park should be provided.</p> <p>The analysis would be assisted, in more "real world" terms by reference to the recent three EPA resource consent applications, what typologies are being proposed there, what provision those applications make for community facilities and what they may rely on being provided in the wider precinct.</p>	
OS2	Community Open Space and Community Facilities	<p>Please provide an analysis of how the community open space and community facility needs identified from RFI request OS1 above will be able to be satisfied under the precinct plan and other provisions proposed in the plan change.</p> <p>The analysis should relate to the possible needs identified under the RFI in OS1, including in relation to various development types, expected demographics and locations.</p>	<p>It is noted that NPS UD Policy 2.2 requires urban environments to have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport. Under Policy 3.5 Availability of additional infrastructure local authorities must be satisfied that the additional infrastructure (including public open space) to service the development capacity is likely to be available.</p> <p>The following provisions under the AUP RPS B2.7 Open space and recreation facilities are also particularly relevant:</p> <p>B2.7.1. Objectives</p>	

			<p>(1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.</p> <p>B2.7.2. Policies</p> <p>(1) Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions.</p> <p>(2)</p> <p>(3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.</p> <p>(4) Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.</p> <p>Part 6.11 of the AEE refers to “The need to reflect the expanded scope of the residential development has prompted a reconfiguration of open space.” Depending on what the analysis sought under OS1 above concludes, a simple reconfiguration of space may be shown as not being sufficient.</p> <p>If the intention is to provide a mix of public and privately owned and managed community open space and recreational facilities there needs to be an indication of what that mix may be. The public (or wider precinct / community) needs should be committed on the precinct plan, with other needs clearly specified in the provisions.</p> <p>The application documents refer to private open space, and communal open space, however do not specify standards or any other explanation or provisions as to how this should be provided. For instance, Appendix 3 to Boffa Miskell's Landscape</p>	
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			<p>Assessment refers to Pocket Parks, however also to these being "Voluntarily provided".</p> <p>The proposed provisions refer to satisfying open space needs, however it is not certain what the targeted provisions for community open space and recreational facilities should be, including within the different parts of the precinct. As an example, the tower developments in the north-western part of the site are more than 400m from the proposed neighbourhood park. Reliance appears to be placed on the northern park next to the Oakley Hospital but there is a question as to whether that park would or could function as satisfying the needs of the community in that part of the precinct.</p>	
OS3	<i>Open Space Type</i>	<i>Please provide a clear delineation showing which areas of proposed open spaces are required / proposed for stormwater purposes and which areas are proposed for recreation purposes (neighbourhood, suburb and sports park).</i>	<p>A clear distinction needs to be made in respect of the types of open space to be provided. For instance, drainage reserves should be shown as such on the precinct plan and should take into account existing or potential flood areas (reference the Wairaka Precinct SMP). Note, in that respect, that Figure 8.1 in the Applicant's Wairaka Precinct: Stormwater Management Plan prepared by MPS Ltd (part of the lodgement document bundle) shows a considerable reduction in flooding-affected areas. As part of the response to this RFI confirmation is sought that this accurately reflects the potential for flooding on proposed open space land that is identified as subject to flooding on the council's GIS so that the council can objectively assess its suitability for potential acquisition for open space purposes.</p>	
OS4	<i>Receiving environment</i>	Please demonstrate how the principles of the council's Open Space Provision Policy will be met with regards to preferred characteristics of neighbourhood parks including road frontage and visibility, flat areas, area for play and landscaping.	<p>The provided information will contribute into shaping a better understanding of the existing open space network and the necessity for it to expand or transform (change in number, size, and function). This will then enable a determination as to whether the capacity</p>	

			and the quality of the open spaces will be sufficient in the changing character of the area.	
OS5	<i>Adverse effects on open spaces</i>	The proposed increase in height of the buildings is beyond the permitted baseline of AUP. Please provide an assessment of the potential effects of adjoining development (including shading effects) and confirm how the effects on adjacent open spaces could be mitigated.	The adverse effect of the infringed height of the building on the open spaces including shadowing and visual dominance should be clarified, and mitigation possibilities outlined.	
OS6	<i>Open space relocation agreement under PC75</i>	Please clarify where the relocation of the key open space(private) from Mason Clinic Plan Change area (PC75) has been provided within Te Auaunga PC area.	During the processing of PC75, the applicant (ADHB) provided Auckland Council with a letter (dated 11 May 2021) of intentions relating to the loss of the identified key open space (private) land as a result of PC 75 (this letter has been provided to the applicant and should be included in the application documentation). A clear indication is sought as to where and how the area and qualities of the area lost (including the amenity and ecological values) are to be replaced, mitigated or compensated.	
OS7	<i>Open space acquisition</i>	Please provide information as to how the applicant will mitigate for the additional height and population density that will be created as part of the proposed precinct. Please clarify whether the applicant intends to mitigate for adverse effects created by proposing to vest some or all of the proposed open space at no capital cost or whether it expects financial compensation for some or all of the land.	According to precinct rules ... "financial contributions will be taken in accordance with the precinct rules in order to avoid, remedy or mitigate adverse effects of an activity on the environment. The precinct rules set out the purpose for which land may be required as a financial contribution, and the manner in which the level of contribution (i.e. the amount of land required) is determined". No information has been provided by the Applicant of its expectations for compensation for the proposed open space areas. This information is essential to help determine the feasibility of proposed open spaces being acquired by the council (noting that – apart from drainage reserve	

			that vest at no capital cost through the resource consenting process – all open space acquisitions are subject to political approval whether being proposed to vest at no capital cost or purchased).	
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Non CI23(1) Matters – Proposed Plan Change Provisions

OS8 It would be helpful to provide an area comparison of the open space (private and public) indicated in the current Wairaka Precinct Plan with the area proposed in the revised precinct plan. Ideally, this comparison would be broken down into drainage, ecological, passive and active open space categories.

LANDSCAPE (Specialist: **STEPHEN BROWN** 021 646181 stephen@brown.co.nz)

<p>L1</p>	<p><i>Assessment of Visual & Landscape Effects: Visual Effects Assessment Methodology</i></p>	<p>Please provide an analysis of the existing character and values associated with each viewpoint (including the additional viewpoints as requested below) - taking into account the context afforded by the AUP, PC78 and other statutory instruments - before assessing the effects of the Plan Change on them. This should be a clear two-stage process.</p>	<p>BML's assessment addresses effects on individual receiving environments and audiences via its assessment for individual viewpoints but intermixes its description of the current situation with that anticipated under the Plan Change and related effects. It is very difficult to decipher what the proposed visual changes would mean in terms of effects on both the public and (neighbouring) private domain. Furthermore, Te Tangi a te Manu (para.s 6.12 to 6.16) states that "<i>Landscape Effects are to be assessed against existing landscape values and relevant provisions, exploring existing character and values as precursor to identifying effects - at the relevant spatial scale and in the context of relevant statutory provisions and other matters</i>". It also states (para.s 6.08-6.09) that:</p> <ul style="list-style-type: none"> • visual effects are a sub-set of landscape effects, • that landscape values take into account physical, associative and perceptual dimensions, and • visual values include the interpretation of how views and outlook are understood, interpreted and what is associated with it. <p>It is further stated that (para.6.09) "<i>A pitfall is to superficially treat visual effects as mere visibility or changes to a view rather than the implications for the landscape values experienced in the view.</i>"</p> <p>BML's assessment appears to fall into the 'pitfall' just described, with little real analysis of what the changed heights would mean in terms of effects on the characteristics and values of the various urban landscapes found around the Plan Change site. As such, it is important to provide an assessment of those existing characteristics and values – for each</p>	
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			viewpoint – before than assessing the effects that the Plan Change would have on them.	
L2	<i>Additional Landscape / Visual Viewpoint Assessments - Woodward Road</i>	Please provide an additional assessment Viewpoint and related photo simulations that address views across the Plan Change site from closer to Woodward Road (see <i>Figure 1 below</i>).	<p>Figure 1 and VS1-7 address only the lower end of Carrington Rd, not development to increased heights down most of its length. Although VS7 addresses the relationship of MHU development to Height Area 4 (in particular) the relationship of that same Height Area to the (proposed) THAB Zone further south along Carrington Rd is still relevant to the assessment of effects.</p> <p>The elevated and 'introductory' nature of views across the site from near Woodward Road mean that this part of Carrington Rd is particularly important in terms of public interaction with future development across it.</p>	



Figure 1. Carrington Rd Near Woodward Avenue

L3	<i>Additional Landscape / Visual Viewpoint</i>	Please provide an assessment of effects which addresses this additional viewpoint(s): on Carrington Road.	The fuller range of landscape and visual effects experienced by those living on Carrington Road and travelling down it still need to be assessed – as described above.	
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	Assessments – Carrington Road			
L4	Additional Landscape / Visual Viewpoint Assessments - Great North Road / Te Auaunga Shared Path	Please provide additional assessment Viewpoints and related photo simulations and an assessment of effects that address views across Te Auaunga towards the Plan Change site from Great North Road, the Te Auaunga Cycleway / Walkway and the cycleway / bridge over Oakley Creek (see Figures 2 and 3 below).	Although VS3 and VS4 address views from Great North Road and the cycleway overbridge near the motorway interchange towards the Plan Change site, they both focus, almost exclusively, on development within Height Areas 1 and 2. There is no assessment in respect of views from Great North Road and the Te Auaunga cycleway / walkway to the east – towards development within Height Areas 2 and 4 beyond Oakley Creek. The fuller range of landscape and visual effects potentially visited on Te Auaunga and the Oakley Creek Reserve still need to be addressed – relative to those using the cycleway / walkway and Great North Road, as well as the large catchment of Waterview residents who live near these thoroughfares and open space.	



Figure 2. Te Auaunga Walkway / Cycleway Looking to the East

L5	<p><i>Additional Landscape / Visual Viewpoint Assessments - Pt Chevalier Town Centre</i></p>	<p>Please provide a new visual simulation that captures views from the Pt Chevalier Town Centre towards Oakley Hospital and Building Height Areas 1 and 2 (see <i>Figures 4 and 5 below</i>).</p> <p>Please also provide an assessment of effects that addresses the interaction between the Town Centre and Plan Change development via a viewpoint as described above.</p> <p>NB: The response to this RFI may be combined with the RFI in H1.</p>	<p>The photos and simulations provided for Viewpoints 5 and 6 are not from the core town centre area and don't capture the interrelationship of potential future development with that which exists within the Town Centre. Furthermore, the images prepared for Viewpoint 6 are truncated, both vertically and horizontally. A revised Viewpoint 6 – located within the Town Centre – would more appropriately capture the interplay of Pt Chevalier's centre with the development proposed in Height Areas 1 and 2), as well as the interaction between that development and the historic Oakley Hospital Building.</p> <p>The fuller range of landscape and visual effects associated with the interaction between Pt Chevalier's Town Centre and development within the Plan Change site still need to be assessed. This could be achieved via relocation of BML's Viewpoint 6, as described above.</p>	
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Figure 4. The Pt Chevalier Town Centre on Great North Road



Figure 5. The Pt Chevalier Town Centre at the Intersection of Great North Road and Pt Chevalier Road

L6	Assessment of Visual & Landscape	Please provide an assessment of the effects associated with overlooking on the Mason Clinic.	It is stated at p.14 that "The taller buildings in this location (Height Area 1) will look out and well over the top of the Mason Clinic ..." and refers to "the avoidance of dominance and / or amenity effects	
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	<i>Effects: Landscape Effects</i>		particularly on direct neighbours". Height Areas 1 and 2 are located directly adjacent to the Mason Clinic and its internal courtyards, it is unclear if the taller development within those areas (especially Height Area 1) could / would impact on the Mason Clinic and its occupants – including on their privacy.	
L7	<i>Assessment of Visual & Landscape Effects: Landscape Effects</i>	<p>Please provide an analysis of those factors, within Height Area 1 (in particular, that that would render development at the additional height sought being either appropriate or conceivably inappropriate in landscape terms – in terms of:</p> <ul style="list-style-type: none"> • its location, • surrounding landforms, vegetation patterns and development, • surrounding zoning and • the relationship with the Oakley Hospital Building? 	<p>At p.15 of BML's assessment, it is stated that "<i>there is nothing inherently inappropriate, in urban landscape terms, about the additional height sought above that already enabled ...</i>" – focusing on Height Area 1. However this begs the questions, are there any factors that make it inherently appropriate from a landscape standpoint? Without such evaluation, there is a possible implication that the higher development within Height Area 1 (in particular) has been 'pre-judged' to some degree.</p>	
L8	<i>Heritage Impact Assessment: Outline of Plan Change</i>	<p>Please provide details about the RDA Assessment Criteria referred to in p.4 of the RDA Architects' assessment: "<i>Detailed assessment criteria are proposed to ensure the buildings attain a design standard of high quality. These are found in section 1334.8 Assessment – Restricted Discretionary Activities.</i>"</p>	<p>DPA Architects' heritage assessment appears to rely on these criteria to ensure a degree of compatibility between the Oakley Hospital Building and future development within Height Area 1 (especially). However, at present those Assessment Criteria only go so far as to include:</p> <ul style="list-style-type: none"> (k) <i>the effects of the design, appearance and impact of all buildings and structures including elements of height, architectural treatment of building façade and overall scale on the amenity values of the natural and physical landscape;</i> (l) <i>long building frontages are visually broken up by façade design and roofline, recesses, awnings, balconies and other projections, materials and colours;</i> 	

			Neither these, nor any other, criteria within section 1334.8 appear to address the relationship between development within Height Area 1 and the Oakley Hospital Building. Although proposed Policy 1334.3(4)(i) also requires <i>"the identification and protection of significant landscape features, the adaptation of the scheduled historic buildings, identified trees and integrated open space network"</i> , this also fails to address the relationship between heritage buildings and new development.	
L9	<i>Plan Change: Policies 1334.3 Integrated Development</i>	Please explain how a 10m setback against Te Auaunga would achieve effective integration of new development within Height Area 1 and the adjacent Te Auaunga / Oakley Creek Reserve.	Given that development within Height Area 1 could attain 72m and would sit on land elevated above most of Te Auaunga, it is important to know how the 10m setback would provide effective mediation between that Height Area and the reserve land.	
L10	<i>Plan Change Standards: 1334.6.11.1 Maximum Tower Dimensions:</i>	Please explain why no maximum tower dimension is stipulated for development up to 35m high, given that this still comprises development up to 13 storeys high within Height Area 2 and effectively controls development across most of the PC site.	Height Areas 2 and 4 cover most of the PC site, so that the future streetscapes and built form landscape of the site will be largely determined by development within those areas. In effect, the more qualitative outcomes across the precinct will be reliant on the controls applicable to those two Height Areas. In addition, there could be significant height and building coverage variations across the Precinct, so that controls over the form of lower towers may still be required. Consequently, some justification for the absence of any Maximum Tower Dimension standard for development up to 35m high is considered necessary.	
L11	<i>Plan Change: 1334.8.1(1B) RDA Matters of Discretion</i>	Please explain how over-height development would be assessed under Criteria (1B)(b)(i) in terms of Tamaki Makaurau's "cityscape"?	The term "cityscape" is so wide-ranging that it could be meaningless. It could conceivably relate to everything from the landforms and cones of the Auckland Isthmus to the mantle of bush and landforms focused on Te Auaunga, or the cluster of structures around the Great North Rd / North-western	

			<p>Motorway interchange and Pt Chevalier centre. It could also refer to the mixture of MHS, MHU and Town Centre Zones found around the PC site.</p> <p>Consequently, the outcome of such assessment would entirely depend on the scale and scope of the context identified and evaluated. Notably, however, there is no reference to the Pt Chevalier Town Centre or the Oakley Hospital Building – which are both important in terms of public perception of the Pt Chevalier / Te Auaunga area.</p>	
L12	Plan Change: I334.8.1(1B) RDA Matters of Discretion	Please explain why a new landmark is required under Matter of Assessment (1B)(b)(i), next to Pt Chevalier and Te Auaunga, when the Oakley Hospital Building is already a long established 'landmark' that is significant in relation to Pt Chevalier's identity and sense of place.	Given that the Oakley Hospital Building is already a public landmark, is there any need for a (potentially) competing landmark that might degrade the very same values associated with the current heritage building.	
L13	Plan Change: I334.8.1(5) RDA Matters of Discretion	<p>Please explain why Matter of Assessment (5)(d)(iv) addressing buildings that are over-height limits the assessment of effects to effects on the "amenity values of open spaces and adjoining residential areas." This does not consider effects on:</p> <ul style="list-style-type: none"> • Local streetscape values; • The natural values of Te Auaunga; • The Town Centre character and identity of Pt Chevalier; or • The heritage values of the Oakley Hospital Building. 	Excessive height has the potential to affect far more than just adjoining open spaces and residential properties. However, the current Matters of Assessment are very limited in this regard. They should address a range of matters that impact on both the public and private domains.	
Non CI23(1) Matters – Proposed Plan Change Provisions				
L14	Plan Change: Policies I334.3 Built	It is noted that Policy (14) under Built Form does not address the issue of a sympathetic relationship between new development and the scheduled, Oakley Hospital Building.	Providing some form of sympathetic relationship between the Oakley Hospital Building and new development within Height Area 1 (especially) appears to be fundamental to the findings in the	

	<i>Form and Character</i>		DPA Architects' heritage assessment and also appears to influence – to a lesser degree – the findings in BML's report. However, it will be difficult to achieve such positive engagement without directly applicable policies.	
L15	<i>Plan Change: Policies I334.3 Built Form and Character</i>	The heights and built forms proposed within Height Area 1 are exceptional in all respects. It is noted that Policies (11) to (14B) under Built Form do not reflect this 'exceptionality' in terms of the built form outcomes to be achieved within that Height Area.	Given the prominence of the 'towers' anticipated within Height Area 1 and their very significant deviation from the height standards associated with the Town Centre, MHU and THAB Zones nearby, they should ideally be of a design standard that reflects their 'exceptionality'. In effect, their design qualities should be more than just of a 'high quality' (14) to justify the increased heights that can be achieved within Height Area 1. However, the current policies do not appear to reflect such an approach.	
L16	<i>Plan Change: Policies I334.3 Built Form and Character</i>	It is noted that Policies (11) to (14B) under Built Form do not address the issue of achieving high quality built forms within Height Area 2 near Carrington Road and visual sympathy or compatibility with development in the MHU and THAB Zones across that road corridor.	There are likely to be significant built form disparities between the 10-11 storey development anticipated within Height Area 2 and that which can occur (as of right) in the THAB and MHU Zones across Carrington Road. Consequently, the achievement of high quality design and built forms that are sympathetic to that within the 'lower' THAB and MHU Zones would seem central to achieving high quality streetscapes and a high quality urban landscape. However, this important relationship is not addressed in the current Built Form policies.	
L17	<i>Plan Change: Policies I334.3 Pedestrian & Cycle Access, Street Quality & Safety</i>	It is noted that Policies (17) to (19) do not address integration of the Plan Change site's streets, pedestrian thoroughfares and cycleways with the North-western Cycleway, the Great North Rd / Te Auaunga Cycleway / walkway, Carrington Rd and Phyllis Street Reserve.	The Plan Change site is highly connected to a range of walkways, cycleways, reserves and key roads at present. These connections contribute very appreciably to both local and regional use of the local area, and the local area's amenity. Consequently, these connections need to be maintained and this should be reflected in the relevant PC provisions.	
L18	<i>Plan Change: Policies I334.3</i>	It is noted that Policies (17) to (19) do not address streetscape values, both within the	The provision of high quality streetscapes is fundamental to the increased development intensity	

	<i>Pedestrian & Cycle Access, Street Quality & Safety</i>	Precinct and on its margins – notably down Carrington Road.	and more elevated building heights proposed – both in terms of urban character / aesthetics and functionality. However, the achievement of such qualities is not addressed at present. In my view, this matter is fundamental to achieving a high quality urban environment and should be addressed in this section.	
L19	<i>Plan Change: I334.8.1(1B) RDA Matters of Discretion</i>	<p>It is noted that the Matters of Assessment for over-height buildings do not address such matters as:</p> <ul style="list-style-type: none"> • Effects on the A13 Volcanic Viewshaft; • Visual over-dominance; • Over-shadowing outside the Equinox periods; • Effects on privacy; • The streetscapes of Great North Road, Carrington Rd and the Pt Chevalier centre; • Effects on the MHS and MHU Zones south and east of the PC site; • Effects on Te Auaunga; and • Effects on the heritage values of the Oakley Hospital Building. 	The assessment criteria for breaches of the Height Controls are effectively the same as for those that comply with the proposed height controls. As such, they mostly address matters applicable to the internal qualities of the PC site and fail to address potential effects that are fundamental to the manner (and degree) to which development across the PC site would 'fit into' its wider surrounds and landscape setting.	
L20	<i>Plan Change: I334.8.1(5) RDA Matters of Discretion</i>	It is noted that Matter of Assessment (5)(d)(vi) addressing buildings that fail to meet the precinct boundary set back control limits the assessment of effects to "neighbouring sites, building scale and dominance (bulk and location), and outlook and privacy." This does not consider effects on the wider public domain, including local streetscapes, the town centre and Te Auaunga.	Breaches of the precinct boundary set back have the potential to affect far more than just adjoining open spaces and residential properties. However, the current Matters of Assessment are very limited in this regard. They should address a range of matters that impact on both the public and private domains.	

L21	Plan Change: I334.8.2(1B) RDA Assessment Criteria	It is noted that over-height development is proposed to be assessed against Policies I334.3 (14A) & (14B) which actively support 'taller buildings', rather than providing a foundation for critical evaluation of such structures.	Policies I334.3 (14A) & (14B) provide clear support for exceptionally tall built forms. However, they do not address the degree of 'fit' that such proposals would have in relation to their surrounds (and existing development, such as the Oakley Hospital Building) or the effects that they might generate.	
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ECOLOGY (Specialists: Biosearches - CHRIS WEDDING (terrestrial) 027 4795418 Chris.wedding@biosearches.co.nz TREFF BARNET (freshwater and coastal) 021 2854330 Treff.barnett@biosearches.co.nz)			
E1	Terrestrial ecosystems	Please provide a map identifying the spatial extent and area (m ²) of vegetation types, streams and wetlands.	Ecological values are not clearly identified.
E2	Terrestrial ecosystems	Please provide fuller descriptions of the diversity (flora and fauna communities) and structure (canopy, subcanopy, ground cover) of identified areas of ecological value and categorise, where appropriate, in accordance with Auckland Council's indigenous ecosystem types (e.g e.g. WF4, WF8, Singers et al. 2017).	We consider the values assessment is currently incomplete. We support the use of EIANZ (2018) guidelines to assess ecological values as referenced in the Morphem Ecological Impact Assessment (EclA). However, the EclA only provides a brief summary of all vegetation communities combined, as aggregated in Table 1 of the EclA. Without an assessment of the value of individual areas or ecosystem types, the EclA potentially conceals higher values that may be present within the proposed Plan Change area.
E3	Terrestrial ecosystems	Further to E2 (above), please provide commentary on the potential presence of rock forest with descriptions of substrate where vegetation cover is mapped in RFI E1 (above).	Rock forest is a rare ecosystem type and is known to occur within the immediately surrounding landscape, including at the mouth of Te Auaunga / Oakley Creek.
E4	Terrestrial fauna	Please provide an updated database review of indigenous bird species to account for potential and intermittent presence of At Risk or Threatened species, particularly aquatic species around the wetland, where vegetation will have matured since the Boffa Miskell assessment. Please also provide commentary on the effects of the proposed plan change on any additionally identified species, with respect to urban intensification, increased building height and reduction in extent of open space.	Potential values are not clearly identified.

E5	<i>Terrestrial fauna</i>	Please justify why the likelihood of bat roosting habitat is considered 'negligible' if potential roost habitat along Te Auaunga is considered to hold potential and given that native bats have very large home ranges. Further, if potential bat habitat is acknowledged as possible within the precinct, please comment on the potential effects of the plan change, including urban intensification (including increased light levels, building height) and reduction in open space on access by bats to potential foraging, flight and roost habitat (e.g. mature tree groves), noting that bats use open spaces and wetlands and other water bodies.	Potential values and effects are unclear.	
E6	<i>Wetlands</i>	Please provide evidence to illustrate that both of these wetlands individually are classified as "a deliberately constructed wetland", and therefore are excluded from the definition of "natural inland wetland" as defined in the NPS-FM. Update Map in Appendix 1 of the Ecological Report accordingly.	The 'central wetland' and upper wetland to the 'central wetland' form part of the natural stream system and appear to be natural inland wetlands. Policy 6 of the National Policy Statement for Freshwater Management 2020 (NPS-FM) states that "There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted".	
E7	<i>Wetlands</i>	Map and describe the natural wetland referred to in the ecological report at the confluence with Te Auaunga. Please update Map in Appendix 1 of the Ecological Report accordingly.	Location of the wetland is not mapped or delineated. Insufficient information with regard to Policy 6 (as above).	
E8	<i>Wetlands</i>	Please provide a description of the habitat immediately above the Coastal Marine Area (CMA), with an assessment against the	Insufficient information with regard to Policy 6 (as above).	

		criteria of a natural inland wetland (as set out in the NPS-FM).		
E9	Streams	<p>Please provide a map of the section of Wairaka Stream that has been / is proposed for daylighting.</p> <p>Update Map in Appendix 1 of the Ecological Report accordingly.</p>	New consented stream length (daylighted) should be clearly shown to ensure the plan change retains the full protection of the Wairaka Stream and its environs, including providing for appropriate riparian yard setbacks as stated in the planning report.	
E10	New Zealand Coastal Policy Statement 2010	Please provide an assessment of the Plan Change Request against the NZCPS, including an assessment of effects on the Significant Ecological Area – Marine, immediately adjacent to the site.	Section 75 of the RMA states that a district plan must give effect to the New Zealand Coastal Policy Statement (NZCPS). As the Plan Change area is located within the coastal environment, the provisions of the NZCPS are relevant matters for consideration for a Plan Change Request.	

ECONOMIC EFFECTS (Specialist: **SUSAN FAIRGRAY** Fairgray Economics 027 633 2970 susan@me.co.nz)

EA1	<i>Retail assessment</i>	<p>Please provide an expert's assessment of the appropriate level of retail space and distribution within the precinct, including the proposed supermarket.</p> <p>NB: The response to this question may be combined with the RFI in UD6.</p>	<p>There has been a sizeable increase in the proposed number of dwellings (and their location) since the earlier retail assessment that informs the existing retail caps. It is important to understand what level of retail activity would adequately serve the likely future residents (and other retail demand arising within the precinct) and be appropriate within the context of the surrounding urban centres hierarchy. It is important this takes account of any updated yield information (see Planning P1 below). Changes to the appropriate spatial distribution of retail within the precinct (from the previous assessment) may occur as a result of both changes to the proposed distribution of land uses within the precinct as well as increases to the overall dwelling scale (and consequent retail demand).</p>	
EA2	<i>Other Commercial Activity Assessment</i>	<p>Please provide an expert's assessment of the likely level and take up of other commercial activity within the precinct and its alignment with Auckland's intended pattern of business growth.</p>	<p>This is important to understand the likely level of other (non-retail) business development within the precinct and how this aligns with Auckland's intended patterns of business growth. This includes understanding the projected uptake of business capacity provided within the precinct. Other business activity enabled within the precinct may also overlap with the types of activities locating within the surrounding urban centres hierarchy. Employees and businesses within the other (non-retail) business activity will also generate additional demand for retail, hospitality and services within the precinct.</p>	

TRANSPORT (Specialist: ANDREW TEMPERLEY Traffic Planning Consultants 021 0221 3469 andrew@trafficplanning.co.nz)			
T1	Trip Generation	<p>With reference to ITA Section 5.8 and Appendix E please provide evidence to confirm consistency of the new heights proposed under the PC with trip generation assumptions in the ITA, including correlation between building height and gross floor area / development yield, and in turn, trip generation.</p> <p>Please also provide an alternative higher trip generation scenario, in the event that higher development yields could be achieved under the new permitted height limits (see Planning P1 below).</p>	<p>The AEE / Section 32 Report refers to areas within the precinct where increased height is to be permitted, to in turn enable additional growth. However, it is not clear as to how this has informed the assessment of trip generation potential within the ITA, in Section 5.8 and Appendix E, with regards to correlating increased building heights with corresponding increases in gross floor area, numbers of residential apartments and other related land-use metrics.</p> <p>Further analysis of the correlation between building heights, development yield and consequent trip generation potential is therefore considered appropriate in order to understand the full potential longer-term transport effects of the proposal.</p> <p>Please note that this analysis should be informed by any updated yield information as a result if RFI P1 below.</p>
T2	Trip Generation	<p>Please provide further clarity for the choice of trip rate reductions cited in section 5.8.2.1 of the ITA, namely:</p> <ul style="list-style-type: none"> • 10% reduction in tertiary education Trip Rates, based on 'likelihood of remote learning' • 30% reduction in tertiary education trips), due to behavioural change influenced by network congestion <p>And similarly for the choice of trip rate reduction cited in section 5.8.3.3:</p>	<p>In the absence of reasonable evidence to support the proposed reductions, and confirmation of their agreed use with the Road Controlling Authority (AT), it is not possible to verify that a fair and robust assessment of trip generation and transport network performance has been undertaken.</p>

		<ul style="list-style-type: none"> • 25% reduction in residential trip rates in the North-west, northern and Carrington Zones, due to congestion driving a stronger mode shift (compared to 20% agreed with AT) <p>The above percentage reductions should be supported by appropriate quantitative evidence, for example, in relation to the impacts of remote learning on education trip generation, or the influence of severe congestion on encouraging modal shift.</p> <p>Please also confirm whether these percentage reductions been agreed with AT.</p>		
T3	<i>Southern Road Connections to Precinct</i>	<p>Please assess options for southern connections to the Precinct (via Laurel Street / Renton Road / Rhodes Avenue), but with access limited to walking and cycling and potential public transport use.</p>	<p>While any vehicular access via Laurel Street, Renton Road and Rhodes Avenue would require a change to Wairaka Precinct Rule I334.3(26), which currently precludes direct vehicle access to and from the south, an arrangement allowing for access limited to use by sustainable modes of travel could contribute toward strategic aims to achieve modal shift.</p> <p>The ITA references a previously considered 'back route' bus service following the north-south spine and looping via Carrington Road at both ends of the Precinct, which AT previously did not support due to slow service speeds compared to Carrington Road.</p> <p>However, a potential variation to this proposal could include a re-routing of such a bus service via a new bus-only link to the south of the Precinct, which would provide buses with the advantage of a shorter-distance route compared to general traffic.</p> <p>The ITA acknowledges previous consideration towards additional access to the Precinct from the south, and while it confirms that the arterial road network to the southeast of the precinct is currently not forecast to experience significant congestion</p>	

			issues which would warrant new road connections, a bus service serving the main spine road through the Precinct could have wider-spread benefits for trips generated within the Precinct.	
T4	<i>Railway Level Crossing (Woodward Road)</i>	Please provide an assessment based on the Woodward Road Level Crossing not being removed.	<p>The Table in Section 4.9 'Summary of Transport Assumptions' assumes completion of the Level Crossing Removal in all modelled scenarios. It is uncertain at this stage what the timing of those works would be (updates from KiwiRail / AT would be beneficial in that respect).</p> <p>In the event that this work does not take place by the time of completion of Plan Change development and other transport proposals, an analysis should be provided of the level of operational effects on the adjoining road network.</p> <p>Further detail on this proposal would be beneficial for background context and understanding the timing and nature of adverse effects on the adjoining road network. Possible considerations could include development staging to align with the Rail Crossing works being completed and construction works being timed to avoid the construction phase of Carrington Road corridor improvements.</p>	
T5	<i>Triggers for Transport Improvements and Interventions</i>	Please provide a schedule of transport improvements and interventions with 'trigger points' in the form of development milestones (e.g. nos. dwellings, completion of other land use activities), at which particular improvements are deemed to be required. Please also include anticipated timescales based on latest information available.	<p>While Section 4.9 of the ITA lists Transport Assumptions and interventions included in the traffic modelling scenarios, many of these are notably dependent on other parties for funding and delivery, such as the Carrington Road upgrade works to be delivered by AT.</p> <p>Following recent discussions with AT, it is understood that the timeline for delivery of the Carrington Road improvements is subject to ongoing uncertainty and may extend beyond the horizons assumed for the traffic modelling scenarios (of 2024 and 2028 for Scenarios A and B respectively).</p>	

			<p>Trigger points for individual transport improvements according to levels of development completed may ultimately be seen as more appropriate, to ensure that transport effects will be mitigated in a timely manner.</p> <p>It is also appropriate to revisit the traffic modelling scenarios with regard to the assessment years and particular improvements assumed in each scenario, in the event that the full package of Carrington Road improvements cannot be delivered by the respective time horizons.</p>	
T6	<i>Shared Path Connection</i>	Please update the proposed Precinct Plan to show a shared path connection in the northern part of the precinct, to replace the linkage lost through proposed PC75.	It is understood that consideration has been given to an alternative shared path route. This should be illustrated on the Precinct Plan for consideration. Note that the intention to replace this path was referred to in the 11 May 2021 MHUD letter (see also OS6 above).	

H1	Oakley Hospital Main Building	<p>Boffa Miskell Assessment of Landscape and Visual Effects: Graphic Supplement - Visualisations - Please provide further visual simulation viewpoints that show the (full extent) of the proposed and operative enabled new development within the context of the Oakley Hospital Main Building from:</p> <ul style="list-style-type: none"> • the Point Chevalier Town Centre (Figure 1); and • Carrington Road (south of the motorway bridge) (Figure 2). 	<p>These are additional key views of the Oakley Hospital Main Building as experienced in the local landscape. The request has also been guided by the following statements in the HIA (p.5):</p> <p><i>"A distant view of the Former Oakley Hospital Building can still be had from the Point Chevalier shops and the building is also visible from Carrington Road. These views of the buildings and the landscaped area in front of the building will not be affected by the Plan Change."</i></p> <p>From the western edge of Point Chevalier Town Centre, the symmetrical frontage of the scheduled building is captured (compared to existing viewpoints VS5 and VS6); and from Carrington Road (heading south), views of the building within its immediate garden setting (EOP) are experienced.</p>	
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Figure 1: The Oakley Hospital Main Building viewed from the western edge of Point Chevalier Town Centre.



Figure 2: The Oakley Hospital Main Building and front garden viewed from Carrington Road.

H2	Oakley Hospital Main Building	Boffa Miskell Assessment of Landscape and Visual Effects: Graphic Supplement - Visualisations - Please provide further (or annotated) visual simulations that show the height of new buildings as enabled in the operative precinct plan.	To assist in determining the potential visual/dominance impacts generated by the proposed new development relative to that currently enabled in the operative precinct plan.	
H3	Oakley Hospital Main Building	<p>Please provide a detailed assessment of effects (including cumulative effects) of the entire PPC on the historic heritage values of the Oakley Hospital Main Building.</p> <p>Heritage-related AUP RPS objectives and policies, including B2.3.2.(1)(a); B5.2.1.; and B5.2.2.(6-8), are relevant to this assessment. Please also consider within the context of the building's conservation plan¹ and heritage assessment².</p>	<p>The HIA acknowledges that:</p> <p><i>"...the enabled development will potentially impact the heritage values of the former hospital." (p.4) and "...any new buildings, and particularly those of additional height, will have an impact on the heritage values of the Former Oakley Hospital." (p.6) (emphasis added).</i></p> <p>However, the level and extent of this impact on the historic heritage values (particularly aesthetic (incl. landmark) and context values) of the Oakley Hospital</p>	

¹ Former Carrington Psychiatric Hospital: A Conservation Plan, prepared by Salmond (now Salmond Reed) Architects, 1995.

² Unitec Institute of Technology Former Carrington Psychiatric Hospital: A Heritage Assessment, prepared by DPA Architects, May 2014.

			<p>Main Building and on its overall significance as a Category A historic heritage place, is unclear.</p> <p>Furthermore, focus is currently placed on the impact generated by development in Height Area 1, with less mention of impacts (including cumulative impacts) of increased building heights across the precinct, particularly in Height Areas 2 and 4, which are in similarly close proximity to the scheduled place.</p>	
H4	Oakley Hospital Main Building	<p>The HIA states (p.5):</p> <p><i>"...locating buildings of additional height in an area in the north west...will result in the least impact on the heritage values to the scheduled building."</i></p> <p>Please explain why this is considered to be the case.</p>	<p>The location of the buildings of additional height in the site's northwest corner (Height Area 1) means that they will be located adjacent to and viewed within the immediate context of the Oakley Hospital Main Building. Given the proximity of Height Area 1 and the considerable increase in building height sought, it would seem that this location has the potential to result in the greatest (rather than the least) visual impact on the scheduled building's historic heritage values.</p> <p>It is therefore important to understand what has informed this critical statement.</p>	
H5	Oakley Hospital Main Building	<p>Please clarify what aspects of the PC are considered mitigating factors from a built heritage perspective.</p>	<p>The HIA incorporates a section titled 'Mitigating Factors' (p.5), however, it is not entirely clear what these factors are considered to be.</p> <p>Given the significant changes envisioned by the PPC and the resultant potential for visual dominance effects, it is important to understand what measures are considered to mitigate effects on both the scheduled Oakley Hospital Main Building and the precinct's broader historic landscape.</p>	
H6	Plan Change Provisions	<p>The HIA states (p.4):</p> <p><i>"Detailed assessment criteria are proposed to ensure the buildings attain a design standard of high quality. These are found in</i></p>	<p>Section I334.8.1.(1A)(b) Assessment – RDA, Matters of Discretion – 'Building form and character' provides several assessment criteria, none of which appear to have regard to the effects of the new development on the historic heritage values of the Oakley Hospital</p>	

		<p><i>section 1334.8 Assessment – Restricted Discretionary Activities.” and</i></p> <p><i>“Any new buildings within Height Area 1 should be positioned and orientated having regard to their impact on the heritage values of the Former Oakley Hospital Building.”</i></p> <p>Please clarify which assessment criteria have been relied on and if (or how) the provision sought in the HIA has been meet.</p>	<p>Main Building. It is therefore unclear what assessment criteria have been relied upon in the HIA and if they are considered to appropriately safeguard and manage the heritage values of the scheduled building.</p> <p>It is noted that the HIA seeks that new buildings be ‘positioned’ and ‘orientated’ to have regard to their impact on the heritage values of the Oakley Hospital Main building, but this does not appear to have been incorporated into the new precinct provisions. It would be beneficial to understand whether this has a bearing on the HIA findings.</p> <p>Note: See also issue raised below in relation to the sufficiency of the provisions proposed.</p>	
H7	Plan Change Provisions	<p>Please explain why reference to the scheduled building has been removed altogether from existing provision I334.3.(14).</p>	<p>It is not clear why this reference has been deleted.</p> <p>Note: See also issue raised below in relation to the sufficiency of the provisions proposed.</p>	
H8	Plan Change Provisions	<p>Proposed policy 30A states:</p> <p><i>“Encourage the adaptive re-use of the existing buildings with historic value for retail activity.”</i></p> <p>Also relevant is existing Policy 11, which states:</p> <p><i>“Encourage the retention and adaptation of the heritage and character buildings, and elements identified within the precinct.”</i></p> <p>Please provide further details about which existing buildings are being referred to here and (in relation to Policy 30A) how their historic value has been/will be determined.</p>	<p>There are several existing (late nineteenth and early twentieth century) buildings within the Te Auaunga Precinct that have a strong association with the historical development of the hospital site, contribute to its sense of place, and have potential (or known) historic heritage values. This includes the Pump House (which is understood will be protected via restrictive covenant). These buildings are both broadly and more specifically acknowledged in a number of the PPC supporting and background documentation.</p> <p>DPA’s HIA positively references how “policies are included [in the precinct provisions] to encourage the retention and adaptation of heritage buildings on the site including the Former Oakley Hospital.” (p.6)</p>	

		<p>Once identified, please advise what further provisions will be put in place to ensure appropriate outcomes for these buildings (including the Pump House) in the context of the PPC.</p>	<p>Boffa Miskell's Assessment of Landscape and Visual Effects goes further by identifying 'key buildings and features' on the site (Figure 4, p.7).</p> <p>CFG Heritage's Archaeological Assessment (Carrington Backbone Works project) also identifies several historic buildings associated with the early hospital site.</p> <p>At this stage, the identity of the 'heritage and character buildings' and 'existing buildings with historic value' referred to in the policies are uncertain. To provide greater clarity and avoid confusion in the application of the policies, it would be helpful to have these buildings clearly set out in the precinct plan (in a similar way to trees). There is also the question of whether the objectives, policies and assessment criteria should go further in acknowledging these key features in the precinct's landscape – e.g. Objective (I334.2.(6); Policy I334.3(4)(i).</p>	
<p>Non CI23(1) request matter/other comments</p>				
<p>H9</p>	<p>It is noted with concern that the proposed plan change provisions give little weight to historic heritage and do not enable greater consideration and assessment to be given to the effects of new development on the historic heritage values of the Oakley Hospital Main Building. – see, for instance I334.3.(14) Policies – Built Form and Character; I334.8.1.(1B) Assessment RDA - Matters of Discretion; I334.8.1.(5)(d)(iv) Assessment RDA - Matters of Discretion; I334.8.2.(1A)(b)(i) Assessment RDA – Assessment criteria and I334.8.2.(1B)(a) Assessment RDA – Assessment criteria.</p> <p>The Oakley Hospital Main Building is a Category A historic heritage place of outstanding significance well beyond its immediate environs (AUP) and a Category 1 heritage place of special or outstanding historical or cultural significance (HNZPT). It has stood as a distinctive and recognisable landmark in the local landscape for over 150 years. Its landscape qualities are noted in its conservation plan as such:</p> <p>“The former hospital building is a major local landmark and dominates its immediate setting. It is of regional importance that existing views and the landmark significance of the building remain unaffected by external changes and internal developments.”</p> <p>Ensuring that the PPC is considered within the context of this significant heritage place and enabling its heritage values to be appropriately protected and managed (as directed in RPS B5. objectives and policies) is therefore considered to be imperative. This cannot be achieved if the precinct provisions neglect to require proposals to be sympathetic to adjacent</p>			

<p>historic heritage and fail to enable greater consideration and assessment to be given to the relationship between the new development and the Oakley Hospital Main Building.</p> <p>It is noted that more targeted historic heritage policies and criteria, together with tailored design guidelines, are included in other precincts that enable/have enabled the large-scale (residential) development of sites with heritage values (e.g. Hobsonville Point, Kingseat).</p> <p>The applicant is encouraged to propose more appropriate provisions to recognise this issue.</p>		
H10	<p>As the Oakley Hospital Main Building is included on Heritage New Zealand Pouhere Taonga's List as a Category I place (and the precinct likely determined a pre-1900 site), it is considered beneficial to engage with HNZPT (if not already done so) and seek their views at this early stage of the PPC process.</p>	
H12	<p>It is noted that the scheduled Oakley Hospital Main Building is currently unoccupied and due to the lengthy timeframes anticipated for the staged redevelopment of the precinct, there is concern that the building is at risk of vandalism and/or falling into a state of disrepair. Whilst it is acknowledged that the PC has the potential to positively enable new opportunities to support adaptive reuse (including earthquake strengthening), there is no clear understanding of when this might occur. From a good practice conservation standpoint, understanding what commitment has been made to utilise this significant heritage place and safeguard its historic fabric in the short to medium term is important.</p>	
<p>HISTORIC HERITAGE (Archaeology) (Specialist: REBECCA RAMSAY 021 848 721 rebecca.ramsay@aucklandcouncil.govt.nz)</p>		
HH1	Heritage	<p>Please provide a historic heritage assessment that addresses the full plan change area and the actual or potential effects of all forms of development, in particular activities involving land disturbance such as building platforms, roads and tracks, utility connections, retaining structures, fencing and planting.</p>
		<p>The archaeological assessment provided has been prepared in support of previous applications for backbone infrastructure works. This assessment does not assess the full plan change area or proposal.</p> <p>The assessment should specifically refer to the criteria in the AUP's RPS, part B5 (historic heritage) and identify how any adverse effects on any significant historic heritage place/s identified within the proposed plan change area will be managed in accordance with the B5 objectives and policies.</p> <p>Recent reporting should also be drawn from in any updated assessment – i.e.:</p> <p>Shakles, R., Burnett, Z. and Farley, G. September 2022. Proposed Residential Subdivision, Wairaka Precinct, Carrington Road, Mt Alert, Auckland: Archaeological</p>

			<p>Assessment. Prepared for Ngāti Whātua Ōrākei – Whai Rawa by Clough and Associates Ltd.</p> <p>Usher, E. August 2022. Carrington Stormwater Outfall 06: Final Report (HNZPTA Authority 2021/777). CFG Heritage report to Heritage New Zealand Pouhere Taonga, BECA Ltd, The Ministry of Housing and Urban Development and Marutūāhu and Waiohua-Tāmaki Rōpū.</p> <p>Further, the 1879 field book supporting cadastral plan SO 1992 may also be of use to determine other heritage buildings, features and areas of archaeological potential associated to the Whau Lunatic Asylum (later Carrington Psychiatric Hospital) and Farm (LINZ Recollect – Field Book 0312 pages 0312-039 to 0312-046).</p>	
HH2	<i>Pre-1900 stone wall</i>	Please provide details of how it is proposed to identify / protect the pre-1900 stone wall (NZAA R11/2979) located along the southern boundary of the plan change area.	The protection of this feature should be provided for in the plan change.	
HH3	<i>Precinct Heritage Resources</i>	Please provide a copy of the memorandum of understanding between Heritage New Zealand and Wairaka Lang Company Ltd. (as agent for Unitec Institute of Technology) regarding the identification, protection and management of cultural and heritage resources within the Wairaka Precinct.	A copy of this document should be provided to council and where relevant evidence also provided outlining any effects arising from the the plan change.	
Non CI23(1) request matter/other comments				
Early engagement with Heritage New Zealand Pouhere Taonga is encouraged.				

PLANNING, STATUTORY AND OTHER MATTERS (Specialist – **PETER REABURN** Cato Bolam – peter@catobolam.co.nz, 0274479248)

P1	Enabled Residential Yield	Please clarify the calculation made for potential yield.	<p>Assumed yield enabled by the plan change is important as a basis to then analyse potential effects arising from future development. This includes effects on infrastructure, including transport, open space and community facilities, as well as other community needs such as access to retail and employment. While assumptions for calculating yield have been given (8.1 of the AEE) there is uncertainty about how those assumptions have then been used to arrive at assumed yield.</p> <p>Please include details of:</p> <ol style="list-style-type: none"> 1. Total site area over which the analysis has been undertaken 2. What areas have been excluded (m² of spine roading, m² of open space, anything else) 3. Define "land efficiency" – what, comprises the 25% excluded. 4. Detail what housing typology mix has been used for the assumptions. 5. Describe, using the areas enabled for housing and the heights proposed, where the assumed housing typology numbers could be applied across the precinct (i.e. breakdown of possible numbers around the precinct). <p>We would like to see the assessment clearly showing the geographic areas over which the calculations have been applied, ideally corresponding to some sort of table that shows the different ratios and assumptions that have been applied to each stage of the calculation to produce the final dwelling yield. Sufficient information is required to be able to replicate the same calculations on the identified mapped areas and therefore be able to test the</p>	
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			<p>sensitivity of the final dwelling yields to the assumptions applied.</p> <p>An example table is below (containing dummy information) that demonstrates the type of information sought. It should contain a separate row for each area within the precinct which has a different height limit or built height and dwelling typology assumed so that the calculations can be replicated. For example, block A has been split into two areas developed at different densities. Therefore, there it is shown as two separate rows in the table to be able to demonstrate the different densities and yields within each sub-area. I note that this information may be provided slightly differently for horizontally-attached dwellings (e.g. 2-3 level walk-up terraced housing) where individual sections may be first established and then dwellings constructed. This is fine, as long as it contains all of the information to be able to replicate and test the assumptions applied.</p>	
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Map Area Reference	Typology	Gross Zoned Area (ha)	Developable Area (1) (ha)	Ratio to Parcelled Area (2)	Net Parcelled Area (ha)	Site Cover Ratio (3)	Site Cover (m2)	Height Limit (storeys)	Built Height (storeys)	Total Floorspace (m2)	Av. Dwelling Size (m2)	Est. Dwellings	Av. Land Per Dwelling (net) (m2)
A	Terraced	100	75	80%	60	50%	300,000	3	2	600,000	120	5,000	120
A	Vertically-Attached	20	18	75%	13.5	60%	81,000	6	6	486,000	80	6,075	22
B	Terraced	25	15	80%	12	50%	60,000	3	3	180,000	110	1,636	73
B	Vertically-Attached	30	15	75%	11.25	60%	67,500	8	6	405,000	80	5,062	22
B	Vertically-Attached	35	25	75%	18.75	60%	112,500	8	8	900,000	75	12,000	16
<p>(1) This is the area which has undevelopable areas removed such as larger areas of open space (i.e. those areas that would often have an Open Space zoning in other situations), wetlands, etc.</p> <p>(2) This is a separate ratio, applied subsequently to (1). It is the ratio applied to estimate the share of the developable area that would result in actual privately-owned parcelled area once public roads, reserves, etc have been removed. It is the usual 68%-70% ratio applied to greenfield areas, but realise this will be lower in this case due to the existence of main roads, etc.</p> <p>(3) This is the % of the final parcelled area that is covered by floorspace.</p>													
P2	Consultation	Please provide information on the outcomes of local community consultation.				It is understood the Applicant is undertaking local community consultation. It will be helpful to have information on the outcomes of that consultation.							
P3	Regional Policy Statement	Please provide an analysis of the proposed plan change in relation to AUP RPS chapters B3 – Infrastructure, Transport and Energy; B4 - Natural heritage; B5 – Built heritage and character; B6 Mana Whenua; B7 Natural Resources; B8 Coastal Environment and B10 Environmental Risk.				Required for a full understanding of the proposed plan change under the RPS.							
P4	Mana Whenua	Please provide an analysis of the proposed plan change in relation to any applicable iwi management plan.				Required for a full understanding of the proposed plan change in relation to any relevant iwi management plan.							

P5	<i>Funding</i>	Please provide an analysis of the proposed plan change in relation to the Auckland Council Ten Year Budget / Long Term Plan 2018-2028	Required for a full understanding of the proposed plan change in relation to the demands of development enabled by the plan change and what is / what is not provided for in Council's LTP.	
P6	<i>Local Board</i>	Please provide an analysis of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020	Required for a full understanding of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020	
P7	<i>Land Contamination</i>	Please provide an analysis of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011	Required for a full understanding of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011	
P8	<i>Plan Change Provisions - Height</i>	Please explain why the applicant has elected not to use the height variation control in the B-MU zone in conjunction with the precinct provisions.	Council's preference is not to introduce bespoke provisions in precincts when other tools are already available.	
Non CI23(1) request matter/other comments				
P8	<p>In relation to residential yield it would be helpful to have a comparison with a calculation of what yield is considered reasonably enabled by the current precinct provisions. This will better enable a comparison between current and future assumed needs for, for instance, retail and open space. In that respect it is of concern that the plan change appears to propose maintenance of current levels of retail and open space which may not address the extra demands arising from a significantly higher population. This is not included as an RFI, as it relates to the current rather than proposed provisions. However the applicant is encouraged to provide this information.</p>			
P9	<p>Spatial Distribution of future land use activities. It will be noted that a number of the Council's specialists (including under UD9 and EA1) have raised concern that the plan change, while identifying the location of some activities (e.g. open space on the precinct plan and retail in the provisions) and limitations on where industrial activities may be located) does not provide clarity on whether the location of non-residential activities in particular may be located in respect of the needs of the future community, and effects on the residential community. It is also difficult to appreciate how various land use activities may be connected to each other and to places beyond the precinct. Further, the retail activity locations are similar to those in the current precinct and may not be best located for the nodes of new development enabled by the proposed provisions. The Applicant is invited to reconsider whether what is proposed provides sufficient clarity in relation to these concerns. In that respect, while a master plan may not be a requirement of the plan change itself, it can nevertheless illustrate the vision sought for the site. There has clearly been much consideration of this already, and perhaps further planning that is underway. The</p>			

Applicant is invited to share as much of that planning as possible, as it may alleviate some of the concerns that are and could still be expressed about how the Precinct could develop, particularly in a way that does not address context and the needs of the community as a whole.

P10 The approach that has been taken in the plan change is to amend the current precinct provisions, rather than take a fresh look at how it is intended this future community will look (the vision) and what better way there may be to plan, through the AUP, for that future community. As an example, Objective 1 still refers to provision of a tertiary institution. While that will still be a major presence in the future community, what is intended to be enabled is more a higher density residential community – of 10,000 or more residents. Whether that ultimate urban outcome is adequately portrayed in the objectives and policy framework proposed is questionable. The Applicant is invited to reconsider whether the proposed provisions provide sufficient clarity in relation to these concerns.