

06 June 2023

Mr Simon Titter  
Warkworth Planning Lead  
Te Tupu Ngātahi Supporting Growth Alliance  
Level 5,  
203 Queen Street,  
Auckland  
Via Email:

Dear Simon

**Informal Request for Further Information Regarding the Eight Notices of Requirement for Warkworth by Auckland Transport**

Council has received and reviewed, on a preliminary basis, the eight notices of requirement lodged by Auckland Transport and the Supporting Growth Alliance described above.

After completing a preliminary review of the information lodged, it is considered that some further information is required to enable a better analysis of the notices of requirement and their effects, management and mitigation. The information sought is listed in **Table 1**, attached to this letter.

This information is sought on an informal basis as it is not considered to impact on a person's understanding of the notices of requirement in a manner that would affect notification. However, your responses to the information requested will better inform the consideration of, and reporting on, the notices of requirement.

A copy of this letter and Table 1 will be included on Council's website as part of the notification of the eight notices of requirement. Any responses you provide will also be uploaded to the Council's website as the responses are received.

The information should be provided within 15 working days (i.e. by Tuesday, 27 June 2023). If you are unable to provide the information within 15 working days, then please contact me so that an alternative timeframe can be mutually agreed.

If you have any queries regarding the above, please do not hesitate to contact me.

Yours sincerely,



**Warren Maclennan**  
Manager, Planning Regional, North West and Islands

**Table 1 – Information Requested  
Notices of Requirement - NoR 1 – NoR 8 – Warkworth**

Item	NoR #	Material Reference	Item of Concern	Information Request	Reason for Request
<b>TRAFFIC</b>					
TR1.	All	Assessment of Transport Effects Appendix 2 – Existing Crash Records		Review the date range that the crash data has been provided for so that the data is representative of network conditions that had typical traffic movements not influenced by COVID19 restrictions (i.e. pre-2020).	The crash data includes records during 2020 and 2021 during COVID. As noted in the appendix traffic volumes were reduced for extended periods during these years and may have had an influence on the number of crashes occurring.
TR2.		General Comment – Road Cross-sections		For all NoRs, the key dimensions for the cross-sections should be provided to demonstrate that the anticipated corridor width (24m or 30m depending on the NoR) is able to accommodate all the proposed elements. Provide details of how the designation would take into account changes in design standards that may result in greater road reserve widths.	The cross-sections shown do not include key dimensions of the various elements. Dimensions should be provided to demonstrate that the proposed road reserve widths are sufficient for all the proposed design elements. The NoRs are anticipated to be provided over a period of up to 25 years. Standards may change over that time, and this could affect the width of various elements of the road cross-section. The assessment does not consider how the designation may address changes in design standards should a greater road reserve width be required.

TR3.	All	General Comment – Medians on bridges		<p>Provide reasoning for the removal of the medians on the bridge decks in relation to the Safe System approach that has been adopted.</p> <p>Provide an assessment of the effects on the designation of retaining the medians in order to provide flexibility in future design.</p>	<p>The designation drawings generally show that where a road bridge is provided and there is a median, the median is removed at the bridge, presumably to reduce the width of the bridge deck. The removal of the median may result in increased safety risks as there is no separation between opposing traffic flows at those locations.</p> <p>Furthermore, as design standards and requirements change over time, retaining the medians on the bridges for the purposes of setting the designation would appear appropriate unless there are other constraints that restrict the width of the bridges.</p>
TR4.	All	General Comment – Access to adjacent land		<p>Provide details of how access to adjacent land that is either FUZ or likely to be developed will be enabled from the proposed NoRs.</p>	<p>It is not clear for a number of the proposed NoRs how access to adjacent land to be developed will be provided. For instance, the Western Link Road (South) and for Sandspit Link Road, these only appear to allow for through traffic movements; opportunities for new intersections to provide access to adjacent land appear extremely limited due to cut and fill.</p>
TR5.	All	Assessment of Transport Effects 3.2.2 Transport		<p>Confirm that the corridor typology and modal split of each corridor has been approved by</p>	<p>The typology and modal priority derived from the Auckland Transport Roads and Streets Framework (RASf)</p>

		Guidance and Documents		the Auckland Transport RASF Committee as outlined in Section 3.2.2	is required to be approved by Auckland Transport. If the typologies assumed in the analysis have not been approved by Auckland Transport this poses a risk that the NoR may not provide sufficient corridor width.
TR6.	NoR3	Assessment of Transport Effects 8.3 Project Interdependencies (NoR 3)		Provide details of traffic volumes on SH1 within the NoR 3 corridor between the SH1 / Wider Western Link Road intersection with and without the southern interchange.	The table in this section presents traffic volumes on SH1 south of the Future Urban Area with and without the southern interchange. These flows will be outside of the NoR corridor (or at least in the southern extent of the corridor where flows are likely to be lowest). Details of traffic volumes on SH1 within the corridor north of the SH1 / Wider Western Link Road intersection should be provided so that the effects of the southern interchange are better understood.
TR7.	NoR4	Assessment of Transport Effects Layout for NoR 4		Review the indicative design where it ties into the Matakana Link Road roundabout to confirm that the designation is sufficient in this location.	The indicative alignments for the NoR do not tie in with the underlying alignments on the approaches to the Matakana Link Road roundabout. This may affect the extent of the designation in the vicinity of the Matakana Link Road roundabout.
TR8.	All	Assessment of Transport Effects 5.2.3 Recommended measures to avoid, remedy or mitigate		Confirm that the condition recommended in Section 5.2.3 of the Transport Effects Report will be included in the conditions for each NoR.	A CTMP condition is recommended within the report. However, the conditions provided for each NoR do not reflect this recommended condition. Therefore, the identified

		construction effects (Wider Network Effects)			effects may not be adequately mitigated.
TR9.	NoR1	Assessment of Transport Effects 6.6 Recommended measures to avoid, remedy or mitigate construction effects (NoR 1)		Please provide details as to how the positive benefit of improved access to the cemetery adjacent to NoR will be achieved or protected by the conditions for NoR 1.	Improved access to the cemetery is identified as a positive benefit of the NoR. The proposed conditions do not make reference to the cemetery access and therefore, there is no certainty that this benefit will be realised. A condition that refers to cemetery access being provided or at least not precluded by the design should be included.
TR10.	NoR7	Assessment of Transport Effects 12.2.3 Property Access (NoR 7)		Please provide plans that show how alternative access routes would be achieved within the designation to provide access to the properties that are affected by the Sandspit Link during the operation of the project	The report states that there are options to provide access to properties that are affected by the alignment of the Sandspit Link which follows the existing driveway / access. These options include construction staging from the north or provision of an access route adjacent to the corridor. It states that the designation is sufficiently wide to provide for this. However, the plans provided show extensive batters that extend for much of the designation width and it is not clear whether it is practical to provide adjacent access routes.
TR11.	NoR7	Assessment of Transport Effects 12.4 Recommended		Please provide details as to how the conditions specifically address the effects of the construction of the NoR on access to the	The Assessment of Transport Effects specifically references the need to give consideration to the quarry and the

		measures to avoid, remedy or mitigate construction effects (NoR 7)		Quarry and the recycling plant as recommended in the Assessment of Transport Effects report Section 12.4.	recycling plant in the CTMP. These activities are not included in the condition. There is a risk that these activities may not be appropriately considered for mitigation.
TR12.		Assessment of Transport Effects Appendix 3 - Traffic Modelling		Please provide further modelling output in the form of SIDRA Model layouts, modelled traffic signal phasing (where applicable) and Summary Lane Outputs should be provided.	Summary SIDRA modelling output has been provided in Appendix 3. To assist in reviewing the modelling output the SIDRA Model layouts, modelled traffic signal phasing (where applicable) and Summary Lane Outputs should be provided.
TR13.	NoR2	Assessment of Environmental Effects Table 12.1 (NoR 2)		<p>Please provide confirmation as to whether the access to 101 Woodcocks Road is able to be reinstated and whether the property is to be included within the designation.</p> <p>If the access is unable to be reinstated, provide details as to why this cannot be achieved and an assessment of the effects in the Assessment of Transport Effects report.</p>	Table 12.1 of the AEE states that the access to 101 Woodcocks Road is not feasible to reinstate and that the designation will include this property. However, the Assessment of Transport Effects states that all property accesses are able to be reinstated. Furthermore, the plans for the designation do not show that the whole property is included in the designation. It is therefore unclear whether this property access is able to be reinstated.
TR14.	NoR5	Assessment of Environmental Effects Table 12.1 (NoR 5)		Table 12.1 refers to accesses to properties at 34 and 36 Sandspit Road. There is no reference to the effects on access to these properties in the Assessment of Transport Effects. There is uncertainty around the development of this site and thus how the site	An assessment of the effects on the access to 34 and 36 Sandspit Road, and on access to 325 Sandspit Road should be included in the Assessment of Transportation Effects, including

				<p>may be accessed in the future (depending on lodged consents and / or plan changes for the site). Therefore, there is a risk that the NoR may not adequately address access to these properties.</p> <p>It is noted that the AEE also refers to the access to 325 Sandspit Road, but this is not mentioned in the Assessment of Transportation Effects.</p>	<p>any recommendations to mitigate the effects on access to these properties.</p>
<b>ECOLOGY</b>					
EC1	All	EclA Section 16.2 & 16.3	Wetland/ Stream reclamation	<p>Please provide information to demonstrate that the designations boundaries have sufficient capacity to provide potential required offsetting for wetland and stream reclamation.</p>	<p>The EclA estimates that approximately 14,863 m<sup>2</sup> of wetland and 868 m of stream habitat will be reclaimed across the 8 NoRs as part of the works.</p> <p>The EclA states that both streams and wetlands “<i>have been modified and degraded to varying degrees, and there is opportunity to restore riparian habitat along these features.</i>”</p> <p>Whilst it is recognised that these are preliminary figures, requiring additional analysis; no further information has been provided to demonstrate how any freshwater offsetting can be provided for within the designation boundaries.</p> <p>Although any activities requiring an offset are likely regional consenting</p>

					matters, the NoR process would impact on any future assessments.
EC2	2, 4, 7	EclA Section 16.1.4	Vulnerable terrestrial invertebrates	Please amend condition 21, or include a new condition, for a pre-vegetation clearance inspection for the identified terrestrial invertebrates.	Due to the potential presence of threatened native terrestrial invertebrates, the EclA recommends a pre-clearance inspection is undertaken prior to vegetation removal within NoRs 2, 4, and 7. No provision for such an inspection has thus far been included within the proposed conditions.
EC3	All	Proposed Conditions	Pre-construction Survey Condition	<p>Please amend the pre-construction ecological survey condition (21) on the designation to include the entire footprint and to include a survey of all native fauna. Survey findings should also be provided to Council for certification.</p> <p><i>Note that this would also require amendments to the EMP conditions (22-24).</i></p> <p>Due to the presence of at-risk herpetofauna and absence of any required management within the proposed conditions, it is recommended to include an advice note stating the need to comply with the Wildlife Act, such as the below.</p> <p><b>Advice Note:</b>  <i>All native birds, bats, and lizards are protected under the Wildlife Act 1953 (unless specifically excluded), under which it is an</i></p>	<p>It is considered the lapse period of the designations means that native species not previously identified could colonise the area; particularly for non-wetland birds within the designation boundaries for new roads (current rural land, NoRs 1, 6, 7, 8).</p> <p>Additionally, habitat values could significantly improve, or the threat status of the native fauna present could be altered over the lapse period (which would affect the ecological value, and level of effect).</p> <p>The relief sought is to include the entire designation footprint for the survey, rather than being specific to 'confirmed biodiversity areas'.</p> <p>Furthermore, although the EclA has determined no mitigation is required for native herpetofauna, it does note</p>



				<i>offence to disturb, harm, or remove them without a permit from the Minister of Conservation.</i>	the likely presence of at-risk species across all NoRs and the potential for individual effects.
EC4	All	Proposed Conditions	Conditions definition	Update the definition to include potential future revisions of the EIANZ Guidelines.	Concern is expressed with the definition as proposed, referring to the 2018 EIANZ Guidelines, which could be substantially out of date when the designation is given effect to.
<b>NOISE</b>					
CNV1.	All	Construction Noise and Vibration	Executive Summary and NoR Sections	The executive summary and NoR sections appear to downplay the potential effects description for a number of the instances where predicted levels are above 80 dB LAeq, please update and confirm the potential effects relative to those identified as identified in your Table 7-1.	
CNV2.	All	Construction Noise and Vibration		The hours and limits in Table 5-3 don't match those in the AUP for vibration limits (particularly night-time limits for category B), please either update or provide clarification as to how these hours and limits have been identified as appropriate. Noting that 1mm/s PPV night-time limit was adopted for Drury.	
CNV3.	All	Construction Noise and Vibration		Table 6-2 contains free field noise levels at varying distances which don't match the identified sound power levels in the same table (unless they include façade corrections, but they are labelled free-field). This table should checked be updated to ensure it is in accordance with NZS 6803.	

CNV4.	All	Construction Noise and Vibration		Similar to above, the set back distances to comply in Table 6-3 don't make sense as presented (they may not include façade correction). These numbers should be checked and updated to ensure it is in accordance with NZS 6803.	
CNV5.	All	Construction Noise and Vibration		Appendix A and B list the existing properties where exceedances of noise and vibration are expected but does not provide the corresponding predicted noise/vibration levels. This is important in helping to understand the context, i.e., the actual level of exceedance across the receivers.	
CNV6.	All	Construction Noise and Vibration		Please also provide the expected duration of infringements (noise and vibration) to enable understanding of the context.	
CNV7.	All	Construction Noise and Vibration	AUP OP rules	It would be helpful to have confirmation that identification of whether E25.6.29 or E25.6.27 apply (due to future road corridor status) or would take place at detailed design phase.	
CNV8.	All	Construction Noise and Vibration	Vibration measurement	Mention is made of measurement of vibration on other major projects resulting in much lower levels than predicted – given this statement it would be beneficial if these measurements/lessons learned could be used to provide a more accurate prediction of extent of vibration effects for this project.	
CNV9.	All	Construction Noise and Vibration	Construction boundaries	The closest existing receivers to the construction boundary are provided for each NoR. It would be useful to understand (for	

				each of the NoRs) what the closest future buildings potentially could be (acknowledging specifics cannot be known but that future zones and non-fanciful developments can be assumed) at the time of works taking place. This would enable appreciation of future effects when the works take place given the references are provided to the distance from works at which certain limits would be met.	
CNV10.	All	Construction Noise and Vibration	Vibration measurement	Vibration is referred to as exceeding certain categories but no specific levels are provided, so the magnitude is difficult to understand (cosmetic damage only or greater potential effects). Provision of the upper levels of vibration based on distances as already predicted, as has been provided for noise, would be useful in informing this.	
CNV11.	All	Construction Noise and Vibration	Vibration Limits	Where Category A vibration limits (AUP amenity limits) are likely to be exceeded it would be useful to understand the potential anticipated durations of these exceedances based on experience on other similar projects.	
OPNV12.	All	Operational Noise/Vibration	Altered Road	It would be helpful if the evidence/more information were provided for each NoR identified as not meeting the definition of Altered Road explaining how this position has been arrived at rather than just a statement that it is the case. Not a repeat of the definition but a short statement clearly noting	

				predicted levels/changes within the report body text to make it clear.	
OPNV13.	All	Operational Noise/Vibration	Consideration of likely effects	Whilst NZS 6806 limits its scope to existing and consented PPFs, given the future anticipated environment is noted as likely to change significantly in a number of scenarios (to include large increases in dwelling density and types, some of which may have been built ahead of the proposed projects) it would be beneficial to see more of likely effects at future 'non-fanciful' development along the NoRs in those scenarios. This may be already partly considered for example if there existing dwellings which can be taken to be indicative of likely future developments in terms of location/distance from roads etc.	
OPNV14.	All	Operational Noise/Vibration	Uncertainties	The uncertainties section should be expanded to indicate where the true value is expected to be within X dB of the estimates provided for 95% of all observations – this is commonly provided using the ISO Guide to Measurement Uncertainty.	
<b>URBAN DESIGN</b>					
UD1.	All	Urban Design	Conditions	Please provide an explanation as to how the urban design recommendations have been incorporated into the conditions, particularly those relating to the development of qualitative outcomes.	Each notice of requirement (NoR) references Section 12-21 of the AEE, which is focused on route protection, rather than implementation and development of specific outline plans. However, protecting a route and drawing boundary or designation lines

					<p>on a cadastral map does throw up some potential aspects of any future project which need to be guided to avoid adverse effects on our urban and landscape environments.</p> <p>Warkworth Urban Design Evaluation, Section 17 Urban Design Matters to all NORs is based around a series of 'principles' and description of what they mean, further information and descriptions are provided and some intentions which read very much like policies example (2.4 <i>To enable equitable local connectivity and cross corridor access to commercial centres and areas of high density...</i>)</p> <p>'Policy commitments' is a means of managing effects of the designation, as they are able to create more certainty for outcomes and inform the development of the outline plan of works. I consider these aspects of the recommendations importance to the development of the outline plan of works, however the conditions relating to the individual NoR's appear to dispense with these matters, and the urban design recommendations more specific to each NOR are not referenced in any way in Condition 9 relating to the ULDMP.</p>
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UD2.	All			<p>Please provide the reference within these documents, that support the policy type intent recommendations contained in the Urban Design Evaluation; and where there is no support in these documents, appropriate additional notation in 9. (d) of the conditions. This would provide a level of confidence that the UDDMP will incorporate the relevant guidance and weighting appropriate for the development of the outline plan of works relating to each NoR.</p>	<p>Reference has been made to the ULDDMP being prepared in general accordance with several documents which influence design outcomes. Many documents of this type provide for a pick and mix selection which still enable poor outcomes and effects on the environment depending on the mix chosen.</p>
UD3.	All			<p>Please notate the recommendations contained in the Warkworth Urban Design Evaluation to illustrate their inclusion within condition 9 (d) (i) through to (iv), and where they have not been covered suggest changes to part (d) of the condition.</p>	<p>It may be considered that the recommendations of the Warkworth Urban Design Evaluation are covered by condition 9 (d) (i) through to (iv) however please confirm if this is the case.</p>
UD4.	All		<p>Conditions 7 and 9</p>	<p>Please advise if there is any consistency issue, and what is the difference or advantage of 9 (a).</p>	<p>Consistency between Condition 7 and 9. Condition 7 Management Plans, of which Urban and Landscape Design Management Plan (ULDMP) is one, states that it is to be submitted as part of the Outline Plan (v) (either in whole or in stages (b) (i)). But, as part of a full or staged outline plan. Condition 9 (a) however, requires the ULDDMP to be prepared prior to the start of construction for a stage of work.</p>

UD5.	NoR1		Building works for bus station etc	Please confirm whether it is the intention that the design of the buildings associated with the busway station be managed through a resource consent process (assuming it is not a permitted activity), or outline plan of works?	
UD6.	NoR1		Building works for bus station etc	Please provide a solution to ensure that the design quality and consequent effects of these buildings can be considered at either the resource consent stage (needs to be included in the condition) or outline plan or works in relation to NoR 1.	The ULDMPP offers no guidance to the design quality of the busway stations buildings, and (d) deals mainly with the functionality aspects of design and not the qualitative design of its appearance or relationship to the existing busway station buildings.
UD7.			Conditions	Please provide an assessment and approach to managing the affects of acoustic fencing on the environment	Condition 24 and 25. Traffic noise is significantly generated by the sound of vehicles rolling over a surface and passing through the air, noting that stop and starts, inclines and speed also contribute to the traffic noise environment.  There is concern that it would be unacceptable to have acoustic fencing adopted either in future urban zonings and rural zones to mitigate noise on dwellings and places subject to high pedestrian use as a first line of mitigation. In these situations, low noise road surface needs to be applied, and the use of double glazing to protect the internal environment of affected dwellings and potentially the repositioning of dwellings. Acoustic

					fencing will impact on amenity, overlook and street frontage conditions, and it would be rarely acceptable to create significant lengths within a rural context without undermining landscape amenity.
<b>LANDSCAPE</b>					
LS1	All	Proposed conditions requiring ULDMPs	Too generic	For each proposed ULDMP conditions, provide bespoke design principles and localised requirements to avoid, remedy and/or mitigate adverse landscape and visual effects that are specific to the context and issues of each NoR corridor / area.	While the approach and intent of each ULDMP condition for the NoR corridor / areas is understood, with design detail to be provided at Outline Plan stage, these conditions should be informed by the findings of the assessment of landscape effects that has occurred when assessing each of the NoRs. This request is similar to the urban design request at UD1 above.
LS2	All	Assessment of the effects on the natural character of rivers and their margins	Lack of any assessment	The assessment of landscape effects provides very little consideration of the potential adverse effects on natural character that may arise for each of the NoR corridors / areas that are in close proximity to existing waterbodies – for the reason that these issues are to be addressed as part of future applications for regional resource consents.	Once a designated corridor has been confirmed, it may make it difficult to meaningfully avoid, remedy or mitigate adverse effects on the natural character of rivers and their margins, particularly given spatial constraints of designated land. Any potential effects should be raised at the time of NoR.
LS3	All	Mapping analysis	Mapping scale is too large at 1:30,000	Please provide GIS elevation and hydrology mapping that is specific for each NoR spatial corridor / area and includes the general arrangement plan information, at a closer	The GIS elevation and hydrology maps that are included within and support the assessment of landscape effects are at too large a scale to allow for an understanding of the proposal within



				scale (minimum 1:10,000) than has currently been provided within the assessment.	context of the local landform, such that it is difficult to assess potential effects.
LS4	All	Structure Plan overlay map	Consistency check	Please provide a map at the same scale as the Warkworth Structure Plan map, with an overlay that illustrates the location and extents of the corridors / areas for each NoR.	In order to understand whether or not the proposed NoR corridors / areas are consistent in location and extent as the roading infrastructure anticipated in the Warkworth Structure Plan.
LS5	All	Consideration of Māori cultural landscape values	Lack of detail	Please provide further consideration of the actual and potential effects on identified Māori cultural landscape values as part of the assessment of landscape effects, taking into account the Cultural Values Assessment(s).	The assessment of landscape effects is not entirely consistent with the Tuia Pito Ora, New Zealand Institute of Landscape Architects, 2022 Te Tangi a te Manu Aotearoa New Zealand landscape assessment guidelines.
LS6	All	Assessment of landscape effects document	General observations	<ul style="list-style-type: none"> <li>a. Parts of the assessment have been written in the 'first person' rather than being consistently in the 'third person';</li> <li>b. There is a 'hyperlink' error message / typo within the last sentence before the heading of 'Section 2 Introduction' on page 6; and</li> <li>c. The summary tables on pages 113-115 are somewhat confusing and it is recommended that there is some form of explanatory text associated with each table so that they can be put into context. For example, does the first table (which starts on page 113) record the existing landscape and natural character of the various areas / scales? The first row on each of the second and third tables should be checked against Table 8 on</li> </ul>	A suggestion that these matters be tidied-up or addressed where possible.

				page 35 as there appears to be some discrepancy between these findings.	
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**There are no Arboricultural or Archaeological Information Requests.**