

17 December 2024

Civix Ltd
c/- Lance Hessell
PO Box 5204
Victoria Street West
Auckland 1141

Attention: Lance Hessell - lance@civix.co.nz

Dear Lance,

Receipt of a Private Plan Change Request at 40 Mahi Road, Helensville and a Request for Further Information Pursuant to Clause 23 of the Resource Management Act 1991

Thank you for the lodgement of the private plan change request to the Auckland Unitary Plan (Operative in Part). An electronic copy of the documentation was received on 15 November 2024, and the application fee of \$30,000.00 was received on 18 November 2024.

For the purpose of calculating statutory time frames Council has adopted the date of 19 November 2024 as the basis for determining when receipt of the private plan change occurred. This is the first full working day after the full application was received by Council.

The application fee is a deposit only and additional fees will be charged where the council's costs to process the application exceed the original \$30,000.00 deposit. Where costs beyond the deposit are incurred, the council will invoice Hounslow Holdings Ltd on a regular basis.

The application will be considered under the provisions of Schedule 1 to the Resource Management Act 1991, including whether there is sufficient information to enable the council to better understand the nature of the request and its effects.

The council has now completed an assessment of the information supplied and pursuant to Clause 23 of the Resource Management Act 1991 the council requires further information to continue processing the private plan change request.

The Council requests further information under Clause 23(1) on the following matters:

- Ecology
- Landscape
- Regulatory Engineering
- Transportation
- Urban Design
- Watercare

The table in Appendix A of this letter highlights the matters for which further information is sought, pursuant to RMA Clause 23. Please respond by completing the fields in the right side column of the table in Appendix A.

In addition, and although not part of the Clause 23 request for information, Appendix B contains some additional high level feedback on the plan change request. This is feedback that has been received from specialists during the course of reviewing the request under Clause 23, or is considered appropriate to raise at this early stage. Please respond by completing the fields in the right side column of the table in Appendix B.

That contained in Appendix B is for information, but is not a formal assessment of the plan change request. Such a full formal assessment of the plan change would still take place should the request be accepted, after a Clause 25 assessment is carried out following receipt of the information requested in Appendix A. I hope this feedback in Appendix B is of use, noting that nothing in Appendix B precludes other issues being raised at a later date during the plan change process.

Should you wish to discuss or clarify the points in this letter please do not hesitate to contact either Peter Vari Team Leader (peter.vari@aucklandcouncil.govt.nz) or Austin Fox Senior Policy Planner (austin.fox@aucklandcouncil.govt.nz).

Your sincerely,



Celia Davison
Manager Planning – Central/South

Appendix A

#	Specific Request	Reasons for request	Applicant response
Ecology			
E1	Please provide an updated vegetation map for the site.	The vegetation assessment described in the Ecological Assessment report prepared by Thomas Consultants was carried out 21 months ago, and the report indicates that some changes to the vegetation cover have occurred since that time, particularly through the clearance of exotic scrub vegetation (Photo 1 in the Thomas Consultants report). Given how much time has elapsed, the fact that some vegetation has been removed, and how quickly regenerating mānuka and kānuka can establish, an updated vegetation assessment should be carried out either on foot or using high-resolution drone photography.	
E2	Please provide an updated watercourse map for the site that clearly illustrates the appropriate classification for each stream.	There is some ambiguity regarding the stream classifications. The Ecological Assessment report indicates that “Stream 3” and “Stream 6” are both ephemeral, and therefore would not be subject to riparian margin/yard restrictions. However, the Proposed Precinct Plan prepared by Civix indicates “potential riparian areas” along these streams where they extend into the proposed SHZ. Clarity should be provided regarding the status of these streams. Also, if some gorse has now been removed, areas of stream that were previously inaccessible may now be able to be assessed in more detail.	
E3	Please provide a map that shows both the updated vegetation type extents and the updated watercourse classifications.	There is some ambiguity regarding the vegetation currently present in the riparian margins of the streams. For example, Photo 10 in the Thomas Consultants report shows Stream 1 flowing through open grassland, but the map appears to indicate that it flows through a mix of mānuka/kānuka scrub and gorse shrubland. The vegetation present in the riparian margins is also relevant as it will influence an assessment of the potential ecological benefits associated with the proposed riparian margin planting.	
E4	Please update Figure 5 of the Ecological Assessment to correct an error in the legend.	The hatched area in this figure seems to reflect the “Existing Countryside Living Zone”, not the “existing Future Urban Zone” as currently stated in the legend.	
E5	Please justify the reduction of the riparian margin/yard from 20 metres to 10 metres adjacent to Stream 1.	Stream 1 will still be within the CLZ, which means it should continue to be subject to 20-metre-wide riparian margin protections. However, the proposed boundary with the SHZ is <10 metres from the stream edge, substantially reducing the protected riparian margin width in this area. While 10 metres is consistent with other urban zoning provisions, the stream itself will still be in a Rural Zone and the proposal will result in a reduction from the level of protection provided currently. This rezoning process provides an opportunity to maintain the existing riparian margin protections. A 20-metre-wide vegetated margin is more likely to establish as a self-sustaining indigenous ecosystem, which requires less maintenance than a narrower margin that is vulnerable to continuous pest plant invasion. Given the substantial increase in impervious surfaces at the site, retaining the 20-metre-wide setback requirement would be appropriate and would impinge little on the developable area. I also note that: 1. The issue of the reduced riparian margin/yard widths will also be relevant to any other streams that are classified as intermittent or permanent following the reassessment requested in Question 2 above. 2. The proposed 10-metre-wide ‘planting’ to mitigate the effects of the reduced margin adjacent to Stream 1 is likely to provide little ecological benefit as this area appears to already be largely vegetated in mānuka/kānuka scrub. Also see Question 3, which seeks clarification of this point.	
E6	Please clarify what is anticipated to occur to meet Policy I55X.3(5) in the proposed precinct provisions.	Policy I55X.3(5) states that all riparian margins across both zones will be planted with indigenous vegetation, and that buffers will also be planted around the edge of the existing indigenous vegetation at the site. However, there is no further mention of this requirement in the rest of the document, or in the Ecological Assessment. The planting requirements proposed elsewhere in the precinct provisions are also somewhat contradictory as Standard I55X.6.4.2(1) restricts planting to “the riparian margins of any permanent or intermittent stream <i>within the SHZ</i> ”, while the matters of discretion of restricted discretionary activities state that “any development or subdivision adjacent to intermittent or permanent watercourses as shown on the Precinct Plan must provide 10m riparian planting either side of the watercourse” (implying that this requirement also applies to streams outside the SHZ).	

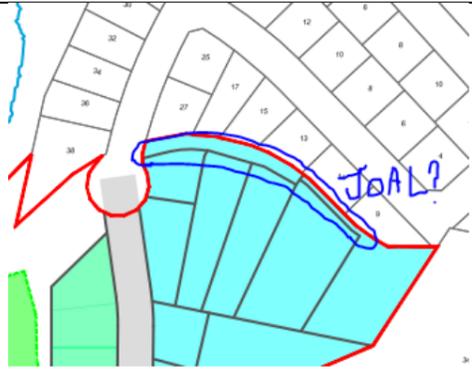
		The Ecological Assessment indicates that no intermittent or permanent streams occur within the SHZ, meaning that no riparian planting would be required under Standard I55X.6.4.2(1) (see Question 2 above seeking clarification on this point), so it is not clear how the requirement in the matters of discretions would be triggered. The Ecological Assessment states that planting would be required in the CLZ where the SHZ extends within the 20-metre-wide margin that would usually be required adjacent to Stream 1, but this is not clearly provided for in the precinct provisions.	
E7	Please provide an assessment of the potential ongoing effects on indigenous fauna of the urban development that will result from the proposed plan change.	The Ecological Assessment focuses on potential direct effects on indigenous fauna that may result from the proposed rezoning (such as harm to lizards resulting from vegetation removal and earthworks activities). However, there is no discussion of the potential ongoing effect of the resulting urban development on indigenous fauna. Such an assessment should be provided and should include (but not be limited to): <ul style="list-style-type: none"> • Effects of lighting disturbance to long-tailed bats using the area for commuting, foraging, and roosting. • Effects of domestic pets (particularly cats) on indigenous fauna residing in the indigenous vegetation to be retained at the site. Precinct provisions to manage on-going effects of nearby urban development on indigenous fauna should be provided.	
E8	Please clarify if removal of VS3 (mānuka/kānuka scrub) vegetation is anticipated to allow for access to the CLZ or SHZ sites.	There is some ambiguity in the proposed precinct provisions regarding whether the removal of VS3 vegetation will be required. Policy I55X.3(4) requires the development to “ensure that subdivision and development of the SHZ and CLZ provides suitable access options to both zones and avoids development and subdivision requiring removal of ecological vegetation or works within watercourses in the ecological VS3 areas shown on the Precinct Plan.” However, Standard I55X.6.4.3(3) states that “The areas shown in the Precinct Plan as “VS3 – Ecological Area” must be avoided with respect to any vegetation clearance or earthworks for future subdivision and development in the SHZ or CLZ areas – <i>except where necessary to obtain reasonable access to any future CLZ subdivided lot</i> ”. If policy I55X.3(4) is met, then the exception stated in Standard I55X.6.4.3(3) should not be required. It is also not clear if removal of VS3 vegetation will be required to install stormwater outfall structures.	
E9	Please clarify if whitehead (<i>Mohoua albicilla</i>) are considered likely to be present at the site (as stated in Table 4 of the Ecological Assessment).	It would be unusual to find whitehead in the Helensville area. There are no records of this species recorded in iNaturalist and the NZ Birds Online website states “its mainland distribution is south of a line connecting the Pirongia Forest, Hamilton and Te Aroha. It is locally common though patchily distributed south of this line”.	
E10	Please clarify where weed control is proposed to be carried out at the site and how this will be enforced.	Table 7 in the Ecological Assessment states that weed control will be carried out “throughout the site” to remediate ecological effects. However, section 7.2 states that this is only proposed “in the riparian yard” and does not specify whether this includes all riparian yard areas on the property, or just in the area where the proposed development adjoins the stream.	
#	Specific Request	Reasons for request	Applicant response
Landscape			
L1	Please describe/identify the extent of earthworks and retaining that is likely to be required, and in what areas, to enable the development sought through the proposed zones and provisions. Please provide an assessment of the effects that earthworks and retaining will have on landscape character and amenity. Please consider how these effects could be mitigated through the proposed provisions.	This assessment is requested to understand if the proposal meets the Auckland Unitary Plan: Operative in Part (AUP:OP) objective of a quality built environment that responds to the intrinsic qualities and physical characteristics of the site and area, including its setting (Objective B2.3.1.(1)(a)).	
L2	Please assess whether restoring or enhancing the ecological area, rather than only protecting it from development, could help to integrate the proposal into the landscape character and amenity.	This assessment is requested to understand the biophysical landscape values of the site and potential for the ecological values to be restored and enhanced (Objective E15.2.(2)), and whether this potential could respond to the intrinsic qualities and physical characteristics (Objective B2.3.1.(1)(a)).	
L3	Please assess whether retaining the existing Rural – CLZ areas within the site would have less adverse landscape effects,	This assessment is requested to understand if the proposal meets the objective of a quality built environment that responds to the intrinsic qualities and physical characteristics of the site and area, including its setting (Objective B2.3.1.(1)(a)).	

	considering the topographical characteristics, the integration of housing into the landform and effects on neighbours.		
L4	Please assess the effects of introducing three-storey MHU zone provisions on the existing low density suburban character of Helensville.	This assessment is requested to understand the effects on the existing low density suburban character of Helensville in regard to Policy B.2.4.2.(4).	
L5	Please assess if additional provisions could assist with a place-based neighbourhood character through the integration of the proposal into the rural landscape. For example, consider whether specific landscaping provisions, building materials and colours, fence and retaining walls materials and colours could assist with this integration and neighbourhood character.	This assessment is requested to understand whether place-based planning tools could be used to recognise and provide for existing and planned neighbourhood character (Policy B2.4.2.(8)). This request acknowledges that the neighbourhood character will be significantly influenced by the surrounding rural character.	
L6	Please identify how the proposed riparian buffers and the ecological areas will be managed where they overlap with single house zoning.	The riparian buffers and the ecological area overlap the SHZ in areas and would appear to limit the development potential of those zones as indicated in the concept plan. In consideration of these development constraints, as well as the intent to protect the ecological area and provide riparian buffers, further explanation is required to understand how these conflicts would be managed. Please give consideration to the option for the underlying zoning of the ecological area and riparian buffers (in their entirety) to be Rural – CLZ.	
#	Specific Request	Reasons for request	Applicant response
Regulatory Engineering			
RE1	Please provide natural hazards risk assessment (including risk categorisation based on likelihood and consequences and proposed geotechnical control) for the site in a table form.	This is to better understand the potential impacts and risk level of the future development on the site due to nature hazard.	
RE2	On visiting the site it is noted that the land immediately adjacent to the Mahi Road intersection is very steep. While the applicant has advised that some 50% of the entire area will be earth worked/ recontoured, there does not seem to be anything to demonstrate compliance with required grades, are there any long sections available?	Demonstration that compliant grades can be achieved both for roads and verify if there are any Privateways.	
RE3	It looks as though there are only proposed public roads, i.e. no ROW's. on the proposed concept masterplan there is a strip at the rear of two blocks of lots. As the sites already have road frontage what are these?	Demonstration that compliant grades can be achieved both for roads and verify if there are any Privateways.	
#	Specific Request	Reasons for request	Applicant response
Transportation			
T1	Please update the Transport Assessment to provide details of the total trip generation of the site (including person trips), details of the accessibility of the site to the wider network / amenities for active modes and assessment against relevant national and regional plans and policies.	The Transport Assessment Report has been prepared as though it is supporting a resource or sub-division consent and not a Plan Change. An Integrated Transport Assessment would typically be prepared to assess the transport effects of the proposed re-zoning of the land. Whilst it is acknowledged that the scale of the development enabled by the rezoning may be relatively limited, the transport assessment should include details of the total trip generation of the site (not just vehicle trips), details of the accessibility of the site to the wider transport network and amenities for active modes and public transport and should include an assessment of the plan change against relevant plans and policies. This information is required to understand the traffic and transport effects of the proposed change to the zoning of the land.	
T2	Please provide an assessment of the accessibility of key attractions (such as	The TIA Section 5 provides details of nearby attractions that residents may travel to. However, there is no assessment of the accessibility of these for pedestrians or cyclists (travel distance or time). This	

	schools, bus stops, Helensville town centre, employment areas) for pedestrians and cyclists, including the travel distance and travel time, to these attractions and the provision of isochrones that show the available catchment from the Plan Change for walking and cycling.	information is required to assess how accessible the site is to these attractions for active mode users.	
T3	<p>i) Please provide separate AM and PM peak hourly traffic flow figures for each of the intersections which include separately:</p> <p>a) Background traffic (see request T4);</p> <p>b) Development traffic.</p> <p>ii) Please provide details of the assumptions used to derive the background traffic volumes.</p> <p>iii) Please provide clarification as to whether the traffic flows presented in the figures are the total traffic volumes on each approach or whether they apply to only specific turning movements. Full traffic turning movement figures should be provided which would assist in evaluating the potential traffic effects on the intersections.</p>	The TIA Section 7 – Rooding (Intersection) Network Review presents the trip generation in a series of figures that are stated to represent the hourly background flows and forecast trip rates. There is no detail as to how the background peak hour flows have been derived and the development flows exceed the trip generation in Tables 2 and 3 of the report. It would appear that the development flows have been presented for both the AM and PM peak periods. From the data provided it is not possible to understand the quantum of development traffic in each peak period. Furthermore, there is uncertainty as to the validity of the base traffic volumes. This information is required to be able to assess the traffic effects of the proposed development.	
T4	<p>Please provide an assessment of the total background traffic that will utilise Mahi Road once the whole of the residential area accessed from Mahi Road (excluding the Plan Change) is fully developed. This should include development access from Kanono Way, Urumaraki Heights and development of empty lots that would utilise Mahi Road.</p> <p>Please ensure that this background traffic is assigned to the wider network e.g. at the key intersections identified in Section 5 of the TIA such as. Garfield Road / Rautawhiri Road intersection and other key intersections.</p>	TIA Figure 7 shows development flows on Mahi Road but there are no background flows. There is existing development and future development that is accessed from Mahi Road in addition to the proposed Plan Change. Future development accessed from Kanono Way has been included, but there are numerous empty lots within the residential area access from Mahi Road and there is another subdivision, Urumaraki Heights which consists of 26 dwellings. To understand the effects of the plan change on the operation of Mahi Road including the Mahi Road / Rautawhiri Road intersection the existing traffic volume and anticipated future traffic volume from all development from Mahi Road is established is required.	
T5	Please provide details as to how the distribution of traffic from the development has been determined within Helensville and to the wider transport network such as longer distance trips (such as commuters to Auckland).	TIA Section 7 briefly discusses the distribution of traffic from the development and states that the 99% of traffic will travel towards the town centre. There are no further details on the assumptions of the traffic distribution within the town centre or to the wider road network. Further detail of the distribution of traffic is required to understand the potential wider network effects of the development, including longer distance trips.	
T6	Please provide supporting analysis, such as traffic modelling, to justify the statements made on the operational performance of the key intersections, particularly the Garfield Road / Rautawhiri Road intersection, to demonstrate that they would operate at an acceptable level of performance with the Plan Change.	TIA Section 7 provides statements on the operational performance of the key intersections identified as being affected by the Plan Change. For instance, the report states that the Rautawhiri Road intersection would have additional delay “and this should be no more than an additional few minutes”. A few minutes of additional delay would result in a poor level of service. However, there is no analysis to support the statements made in relation to the operational effects of the generated traffic. Further analysis is required to justify the statements and to understand the actual or potential effects of the plan change.	
T7	Please provide an evaluation as to how the Plan Change meets or aligns with the relevant National and Regional Plans and	The TIA does not provide any analysis of how the Plan Change aligns with the key National and Regional Plans and Policies. The AEE provides a limit assessment in this regard. Plan changes should	

	Policies as they relate to transport including the Auckland Wide Auckland Unitary Plan (AUP) transport objectives and policies and how the plan change aligns with the TERP.	be assessed against Auckland's Transport Emissions Reduction Plan (TERP) to demonstrate how the Plan Change will align with the TERP.	
T8	Please demonstrate that the proposed extension of Mahi Road and other roads within the Plan Change area would be able to comply with Auckland Transport's standards (e.g. with the provision of a long sections of the proposed roads), particularly in relation to gradients for both vehicles and pedestrians. Please provide details of how the turning head on Mahi Road will be treated when the road is extended into the Plan Change area.	There is a turning head at the southern end of Mahi Road where the road is to be extended into the Plan Change area and there is a steep hill beyond this turning head where the road is proposed to be provided. It is unclear whether Mahi Road can be extended and meet appropriate Auckland Transport standards with the existing topography e.g. whether gradients would comply with Auckland Transport standards for public roads. The Infrastructure Report indicates earthworks in the area, but no details are provided as to the gradients of the proposed roads. This information is required to understand whether roads are able to be provided that can meet Auckland Transport standards.	
T9	Please provide details of the key design elements to be provided on the roads within the Plan Change area, including a Road Function and Design Elements table in the Precinct Provisions.	The infrastructure report provides an indication of the likely cross-section of the extended Mahi Road. It has become standard practice within Precincts Provisions to provide a Road Function and Design Elements table that sets out the function and key design elements of roads.	
T10	Please assess the maximum potential yield permissible within the proposed Single House Zone with respect to the precinct provisions which enable a higher yield in specific areas than typically anticipated in a Single House Zone.	To better understand the potential traffic effects on the surrounding network that may result from a higher yield enable by the plan change.	
#	Specific Request	Reasons for request	Applicant response
Urban Design			
UD1	Please assess the effects of introducing the Mixed Housing Urban zone for sites ranging from 200-400m ² within areas characterized by low-density suburban development. Please include in the assessment, justification of: <ul style="list-style-type: none"> - allocating approximately 41% of the Single house zone to compact housing (i.e. subjected to MHU zone); - not providing a neighbourhood centre; - not providing useable open spaces; - bordering compact housing to a permanent stream and an ecological protection zone. 	<p>While the intention to provide a diverse range of housing typologies is supported, the proposed extent of compact housing within the precinct plan raises significant concerns. The plan indicates that nearly half of the residential zoning area is allocated to the Mixed Housing Urban zone. Although the concept masterplan suggests medium-density housing (200–400m² lots) for only two or three blocks, the zoning allows for potentially higher-density development across the entire minimum 200m² lot area.</p> <p>If higher-density housing is realized, the inclusion of a neighbourhood centre and accessible public open space—such as a pocket park or community garden—becomes critical. Currently, the nearest grocery store, Woolworths, is 1.8 km from the existing end of Mahi Road. This distance is not considered walkable. Given the number of dwellings proposed, under construction, and already built in Helensville East, establishing a neighbourhood centre could serve residents without access to private transportation.</p> <p>Rautawhiri Park is within a walkable distance of the proposed PPC area. However, the intensity of medium-density housing could lead to inadequate private outdoor living spaces for residents, reinforcing the need for additional communal spaces such as pocket parks or community gardens. Furthermore, accessing Rautawhiri Park on foot requires crossing Rautawhiri Road, which lacks zebra crossings and transitions abruptly from a 100 km/h to a 50 km/h speed limit near Parkview Preschool. This presents safety risks, particularly for children and elderly residents.</p> <p>Additionally, compact housing lots face developmental constraints due to their limited sizes, high maximum building coverage, and proximity to riparian buffers and ecological areas. Therefore, further information is needed to understand how these conflicting factors will be managed, as outlined also in the Landscape Architect's memo.</p>	

		Due to the above reasons, it is recommended for more intense medium density housing (MHU zoning) to be located nearer to the Town Centre and not on the fringes of Helensville.	
UD2	<p>Please provide clarification on the intent of the provisions for the 200-400m2 sites (Standard I55X.6.5.3(3)). This could include:</p> <ul style="list-style-type: none"> - justification on whether the objectives and policies of a SHZ will be robust enough to provide for the onsite amenity of 'compact housing' (under the MHU standards); - confirm whether both the SHZ and MHU zone standards apply to activities which trigger Standard I55X.6.5.3(3). <i>[Note: it appears that potentially both sets of standards may apply as it is unclear if those of the underlying SHZ are explicitly precluded].</i> - justification on how the matters of discretion and assessment criteria under the proposed provisions would provide assistance with RD activities on matters outlined in the MHU zone. The matters of discretion I55x.7.1.(1) is triggered for activities which do not comply with Standard I55X.6.5.3(3), which would presumably include the MHU standards in Appendix 2. These matters of discretion only include an assessment of buildings and fences against reserves rather than the assessment of the matters that are listed in the MHU zone. It is unclear if any other MoD would apply to infringements of the adopted MHU standards. 	<p>It is unclear how only MHU standards can be adopted to a certain area within the PPC without the MHU objectives, policies and assessment criteria to support it.</p> <p>SHZ does not require accommodation to be designed to meet the day to day needs of residents under its policies. Hence, Restricted Discretionary activities cannot be assessed for its inadequate sunlight access, the extent of overlooking and privacy and the attractiveness and safety of the street etc. These matters will be important for the onsite amenity of the 200-400m2 sites that were not intended for in a SHZ.</p>	
UD3	<p>Please provide rationale behind the design of the minimum 600m2 lots located in the North (Image below).</p> <p>Include in this rationale justification of:</p> <ul style="list-style-type: none"> - the length of the highlighted JOAL; - the extent of proposed earthworks and retaining for this area including reference to ground conditions as outlined in the sites Geotech report; - whether the design of rear lots can be avoided within this area. 	<p>The number of rear lots proposed and the access to these lots raises concern. The distance of the JOAL is approximately over 150 meters, which creates several challenges. A lengthy JOAL can lead to accessibility issues, such as difficulties with routine tasks like bringing rubbish bins to the curb. It also isolates these developments from the street, reducing eyes on the street, and may feature inadequate widths or insufficient lighting, further exacerbating safety and usability concerns. The request is to understand whether the form and design of the subdivision contributes to the safety of the site, street, neighbourhood and pedestrians (B2.3.2.(1)), and whether the subdivision is providing access for people of all ages and abilities (B2.3.2.(1)).</p> <p>Rear lots are best to be avoided due to access issues mentioned above, and as they lack direct frontages to the street. The request of information is to understand whether the proposal promotes the urban design outcome that enhances the visual quality, safety and accessibility of areas (B2.2.2(5)).</p> <p>From the Geotech report, this part of the land is not recommended for residential use and subdivision would result in massive earthworks and retaining walls. The request is to understand if the quality-built environment responds to the intrinsic qualities and physical characteristics of the site and area, including its setting (Objective B2.3.1.(1)(a)). Please refer to the Landscape Architect memo for further details.</p>	



UD4 Please provide a scaled concept masterplan and precinct plan. It is noted that the concept masterplan and the precinct plan are not to scale. A scaled map will provide a better understanding of the individual subdivision lot size and widths of proposed JOALS.

Specific Request **Reasons for request**

Applicant response

Watercare

WC1 **Area of proposed SHZ vs existing FUZ**
Please clarify the existing area of the Future Urban Zone (hectares) and the area proposed to be zoned SHZ (hectares).
To better understand the water supply and wastewater effects of the proposal in relation to any increased demand generated by the proposed rezoning that was not anticipated under the AUP.

WC2 **Precinct Provisions related to Minor Dwellings**
The activities in Table I55X.4.1 propose a Permitted activity status for “any activity” complying with the water and wastewater standard I55X.6.3.1 (A2) and a Restricted Discretionary activity status for “any activity” not complying with standard I55X.6.3.1 (A3). It is unclear how standard I55X.6.3.1 is intended to apply to the activity of Minor Dwellings which has its own rules at A4 and A5. Please clarify whether standard I55X.6.3.1 Water and Wastewater Infrastructure is intended to apply to the activity of Minor Dwellings and if not, please clarify how water supply and wastewater servicing for minor dwellings will be assessed under the proposed Precinct provisions.
To better understand the water supply and wastewater effects of the proposal in relation to the development of Minor Dwellings and the ways in which any adverse effects will be assessed and mitigated.

WC3 **Precinct Provisions related to activities complying with standard I55X.6.1- I55X.6.5**
Table I55X.4.1 proposes a Permitted activity status for “any activity” complying with the standards under I55X.6.1-I55X.6.5. Please clarify whether rule I55X.4.1(A2) would make those activities listed as restricted discretionary, discretionary or non-complying in the underlying SHZ and CLZ permitted activities subject to compliance with standards I55X.6.1- I55X.6.5.
To better understand the water supply and wastewater effects of the proposal in relation to use and development and the ways in which any adverse effects will be assessed and mitigated.

Appendix B

The advisory comments and recommendations below are provided in relation to Watercare’s concerns for the proposed Precinct provisions insofar as they relate to managing the effects on the public water supply and wastewater networks.

#	Provisions	Comment / recommendation	Applicant response
Watercare			
WCX1	I55X.1. Precinct Description	<p>The following amendments (in <u>underline</u> and striketrough) are recommended to recognise the current constraints in the public water supply network, and to acknowledge that public water supply and wastewater servicing is only intended to be provided to the SHZ.</p> <p>The 40 Mahi Road Precinct (“The Precinct”) covers approximately 17.37 hectares of land located approximately 1.40km to the south-east of the Helensville town centre. Access is via Mahi Road, a relatively new subdivision located off Rautawhiri Road. The precinct is bounded to the north by both developed and developing Residential - Single House Zoned (SHZ) land with Rural - Countryside Living Zoned (CLZ) land around all other precinct boundaries.</p> <p>The purpose of the precinct is to ensure comprehensively planned residential development occurs with an efficient yield and a range of lot sizes – recognising this is one of the few areas of suitable undeveloped residential land in a desirable elevated location outside of existing flood plains and on geotechnically stable land. A range of lot sizes <u>applicable to the SHZ</u> is reflected on the Precinct Plan as these can be readily serviced and accessed and will deliver a high level of residential amenity for future occupants. The Precinct Plan is included in Appendix 1.</p> <p>Specific precinct provisions are required to ensure quality development outcomes, and to enable flexibility in lot sizes which deviate from the standard SHZ provisions. The provisions also recognize existing ecological areas and provide suitable mitigation measures including provisions relating to riparian planting and vegetation protection. Any required stormwater drainage reserves are also identified and set out for use to accommodate future development. <u>An interim water supply solution for the SHZ has been identified due to uncertainties related to the timing of public water supply. Initial lots will be connected to rainwater re-use tanks until such time that the public water supply is available. The CLZ within the Precinct provides for self-sufficient water supply and wastewater servicing through the use of septic tanks and water tanks.</u></p> <p>The zoning of land within this precinct is the SHZ and CLZ, with provisions enabling flexibility for smaller lots in the SHZ with appropriate development standards applicable. Some areas of existing CLZ are proposed to be rezoned for SHZ purposes to more efficiently develop the land in accordance with the Concept Masterplan for the site. The provisions of the MDRS are not intended to apply.</p>	
WCX2	I55X.3. Policies [rp/dp]	<p>There is no policy to support Objective (9) which states “<i>Subdivision and development is coordinated with the supply of sufficient water, wastewater and stormwater infrastructure provision to service the Precinct</i>”. The following policy is recommended to be added to the Precinct provisions.</p> <p><u>(11) Require subdivision and development in the precinct to be coordinated with the provision of sufficient wastewater and water supply infrastructure.</u></p>	
WCX3	I55X.6. Standards	<p>A number of amendments to standard I55X.6.3 are recommended to address concerns, including but not limited to the following:</p> <ul style="list-style-type: none"> - The proposed rule framework in Table I55X.4.1 and Standard I55X.6.3 appears to require connection of the CLZ to the public wastewater network. Watercare does not provide connections to rural zoned land. - As land use consents may be sought separately to subdivision consents, both subdivision and development will need to consider water supply and wastewater infrastructure. 	

	<p>- Future connections to the public water supply network will need to be confirmed during the Engineering Plan Approval process.</p> <p>The following amendments to standard I55X.6.3 are recommended.</p> <p>I55X.6.3 Water and Wastewater I55X.6.3.1 Water and Wastewater Infrastructure - SHZ Purpose: To ensure bulk water supply and wastewater infrastructure with sufficient capacity is available to support subdivision and development within the SHZ within the Precinct. (1) New lots and development must be serviced by a public wastewater connection, and subdivision and development applications must demonstrate that suitable wastewater infrastructure and with sufficient capacity is available. (2) Water supply to all proposed new lots and dwellings can be either by way of; a) on-site tank potable roof collection and storage, with sufficient capacity for fire fighting capability, or b) connection to the public water supply network water main located in Rautawhiri Road, or c) Any combination of the above.</p>	
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The advisory comments and recommendations below are provided in relation to concerns regarding the requests proposed imagery.

#	Provisions	Comment / recommendation	Applicant response
Precinct Plan			
PP1	Precinct Plan	The precinct plan contained within the proposed provisions does not follow Council's style guide for imagery within the AUP. Appendix C contains the style guide. I would suggest you ensure the proposed precinct plan, along with all other images, conforms to this style guide. I would suggest a review is carried out of existing precinct plans within the AUP for reference on the appropriate style.	

The advisory comments and recommendations below are provided in relation to concerns regarding the requests proposed zoning and precinct relationship.

#	Provisions	Comment / recommendation	Applicant response
Zone and Precinct			
ZP1	Proposed zoning	It appears there are more relevant zones for the proposed higher intensity parts of the request, such as Mixed Housing Urban over the proposed Single House Zone. Could you please explain the rationale for the use of Single House Zone with precinct provisions reducing lot sizes down, in places to 200m2 over the use of a varied zoning pattern, such as Mixed Housing Urban for the highest density areas and Single House only for those areas that would develop in a suburban character.	

Appendix C: - Basic Style Guide for all imagery including maps within the Unitary Plan text

Please follow this Style Guide to ensure image consistency, interpretation and software compatibility. Note a map template is available from GIS for private plan changes.

Technical Specifications

File format: all final files must be supplied as a JPEG, but layered working files must be kept in case alterations are required. Text maps should be created and exported from GIS as JPEG and PDF

Resolution: must be 300dpi

Pixel ratio: max of 600 x 600 pixels

Colour space: sRGB

Max file size: 2MB

File name: the first part of the name should clearly indicate what the image is of and the second part of the name must have the date the file was last saved

e.g. Height in relation to boundary 2012-06-25

Other Specifications

Font

All text must be in Arial and must be readable when viewed online at 100% and when printed at 100%

Line Weight

All line weights must be able to be seen when viewed online or printed at 100% and printable at 100%

Colours

- All colours should be printable and distinguishable when printed in colour and black and white, except when unavoidable in maps showing zones and overlays.
- Do not use pastel shades of red and green, or blue and yellow, especially where small areas of these colours adjoin each other (from style guide), except when unavoidable in maps showing zones and overlays.

Orientation

If compass orientation is relevant, north must always be at the top. **All** maps must be north orientated.

Captions, figure or diagram numbers and titles

- All figures & diagrams must have a title and a number
- All captions, numbers & titles must be in a separate file to the image. These are to be in the accompanying word document as they will be input into the ICON software as a separate but linked piece of content.
- Captions should be short and adequately describe the associated picture or diagram.
- You do not need to identify the media in the caption
e.g. don't say "*Photograph showing the north facing...*", instead say "*North facing...*"
- Captions should always have a full stop.
- Depending on the material used, it may be necessary to acknowledge the source in either the caption or the media.

Written content in images

Written content should follow the basic plain English principles. It may be appropriate to use acronyms or abbreviations. These should be clearly acknowledged in a legend. Try not to clutter maps or graphics with too much content as this can be difficult to interpret. Your information may be better presented if it is broken down into a series of maps or graphics rather than all being put into one.

Style

- Simple

- Clear lines
- Use shading when appropriate e.g. to give a sense of 3D
- White space around image

Tables

There is a template/snippet within the ICON software.