

19 September 2025

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

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

Dear Lance,

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

The council has completed an assessment of the additional information supplied on 21 August 2025, in response to the council's request for additional further information pursuant to Clause 23(1) of the Resource Management Act 1991 sent on 9 April 2025, under Clause 23(2) of the Resource Management Act 1991, in relation to the above private plan change request. To continue processing the private plan change request the council requires additional information.

The Council requests additional information under Clause 23(2) on the following matters:

- Healthy Waters
- Landscape
- Transportation
- Urban Design
- Watercare

The table in Appendix A of this letter highlights the matters for which additional information is sought, pursuant to RMA Clause 23(2). Please respond by completing the fields in the right side column of the table in Appendix A for those matters labelled as Partially Satisfied or Not Satisfied as well as the new matters provided as a result of the removal of the precinct.

In addition, and although not part of the Clause 23 request for information, Appendix B contains some additional 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 Manager (peter.vari@aucklandcouncil.govt.nz) or Austin Fox Senior Policy Planner (austin.fox@aucklandcouncil.govt.nz).

Your sincerely,

P Vari

Peter Vari

Manager Planning – Regional, North, West, and Islands (Acting)

Appendix A – Zoning Only Version 21/08/25 version for out of scope consideration by the Council.

Green highlighted items are agreed with Plans and Places as out of scope¹ under CI23 RMA, or now not relevant being precinct related queries.

Yellow highlights are Precinct related and now not relevant under the zoning only approach.

Blue highlights are addressed items.

Purple highlights are new items following the removal of the precinct

#	Specific Request	Reasons for request	Applicant response	1 st Clause 23 Request: Satisfied/ Not Satisfied	If 1st clause 23 Request Not Satisfied – outstanding information and / or Additional Clause 23(2) Request	Applicant response to Clause 23(2) Requests for original Clause 23(1) requests either Partially Satisfied or Not Satisfied	2 nd Clause 23 Request: Satisfied/ Not Satisfied	If 2nd clause 23 Request is still relevant after the changes made to request and is Not Satisfied – outstanding information and / or Additional Clause 23(2) Request	Applicants response to 3 rd request
Ecology – Thomas Consultants			Refer to the Memo “40 Mahi Road: Ecologists92 Comment” dated 17/02/2025 and associated updated ecological report. Comments also set out below.						
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.	Our ecologists conducted a site visit 14 March 2023 and our soil contamination team went to site on 3 September 2024. Upon our request, the soils team took photos of the vegetation and some of the streams, noting the gorse clearance (Photo 1 on page 19 of the Ecology Assessment). In response to this Clause 23 further information request, our survey team conducted a drone survey on 4 February 2025 which I used to revisit the ecosystem types/ vegetation on site. In addition to verifying the two mapped ecosystem types (VS3 and ES), I have also mapped the Exotic Grassland (EG) areas on site. An updated map is attached as Appendix A of the updated Ecological Assessment.	Satisfied	Revised map is satisfactory	N/A	N/A	N/A	
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.	Refer to Section 5.4.1 and Appendix A of the updated Ecology Assessment for a description of all watercourses on site and a map of all watercourses and their classification. I am confident that Stream 6 is ephemeral, and that Stream 3, where it flows through the more ‘open’, proposed Single House Zone (SHZ) areas, is also ephemeral. Watercourses were classified and delineated (where accessible) on site in general accordance with criteria outlined in the Auckland Unitary Plan (AUP:OP) Chapter J Definitions. Stream 3 and Stream 6, where they flow through proposed Single House Zone (SHZ), were both classified as ephemeral (and not intermittent) due to their small catchment size1 (1.08 ha for Stream 3 and	Satisfied	Revised map is satisfactory.	N/A	N/A	N/A	

¹ Refer to email from Austin Fox dated 05/05.2025

1.1 ha for Stream 6), and because they did not contain flowing water and/or natural pools, did not have well-defined channels with the bed and banks easily distinguished, rooted terrestrial vegetation were established across the entire cross-sectional width of the channels, no organic debris was seen on the floodplains, and no evidence of substrate sorting or scour was visible. These streams therefore did not meet at least three of the of the intermittent stream criteria, which are:

- it has natural pools;
- it has a well-defined channel, such that the bed and banks can be distinguished;
- it contains surface water more than 48 hours after a rain event which results in stream flow;
- rooted terrestrial vegetation is not established across the entire cross-sectional width of the channel;
- organic debris resulting from flood can be seen on the floodplain; or
- there is evidence of substrate sorting process, including scour and deposition.”

Stream 3

Due to steep slopes and dense vegetation, the lower reaches of Stream 3, where it flows into the proposed Countryside Living Zone (CLZ) could not be accessed during the site visits. High resolution drone imagery taken on 4 February 2025 confirms that Stream 3 originates in an area of exotic grassland (ES) (Figure 2) transitioning into exotic scrub and ultimately VS3 manuka/ kanuka scrub towards the northwest. This vegetation was still intact at the time of the drone survey (see Fig 1 below). Classification for the lower reaches of Stream 3, could therefore not be confirmed (even with drone imagery) and it is possible (although unlikely) that part of the stream flowing through the CLZ is intermittent. It is worth noting that a comprehensive topographical survey, confirming the exact location of any watercourses, would be completed when any future land use consent is applied for.



Figure 1: Within the proposed Single House Zone, Stream 3 flows through exotic grassland/exotic scrub. From there, it flows into VS3 manuka/kanuka scrub within the Country

Stream 6

The headwaters of Stream 6 originate in exotic scrub (ES) transitioning into VS3 manuka/kanuka scrub (Figure 3), where the dense vegetation and steep slopes made it difficult to assess during the site visits. Further north in the proposed CLZ, the stream flows into a wider gully with wetland vegetation visible along its margins, mostly outside the site boundary (as seen in Figure 4).



Figure 3: Stream 6 originates in an exotic grassland/scrub mix in the proposed SHZ, and then flows into an area of VS3 manuka/kanuka scrub in the CLZ.



Photo 15: View of Stream 6, at the northern property boundary looking

The Precinct Plan's legend has been amended to "Potential Riparian Areas (if the stream is classified as intermittent under any resource consent application)". See Figure 5 next page.

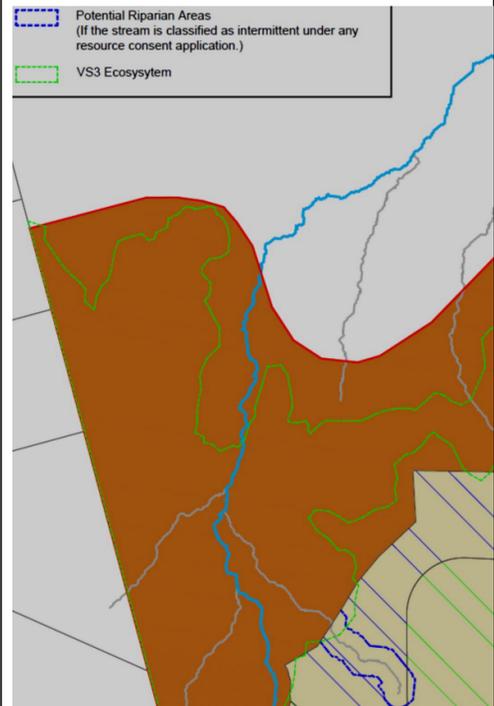
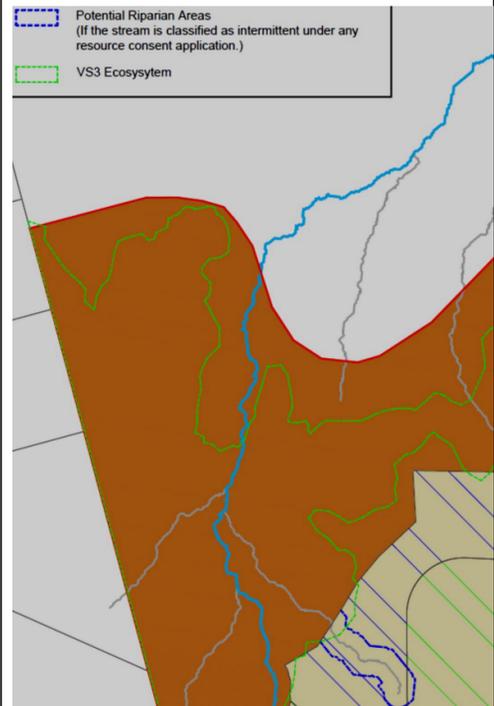


Figure 5: A snip from amended precinct plan (Civix Ltd.) showing amended legend and "Potential Riparian Areas"

			<p>Photo 15: View of Stream 6, at the northern property boundary looking</p> <p>The Precinct Plan's legend has been amended to "Potential Riparian Areas (if the stream is classified as intermittent under any resource consent application)". See Figure 5 next page.</p>  <p>Figure 5: A snip from amended precinct plan (Civix Ltd.) showing amended legend and "Potential Riparian Areas"</p>						
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.	After careful, detailed analysis of the high-resolution drone imagery, vegetation along Stream 1 was remapped, with a small area of exotic grassland (EG) in the southwestern corner of the site where Stream 1 enters the site. For the most part, Stream 1 flows through VS3 manuka/kanuka scrub which changes to a grassland / exotic scrub mix further north (refer to updated vegetation map in Appendix A of the updated ecology assessment attached).	Satisfied	Revised map is satisfactory.	N/A	N/A	N/A	

		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.	 <p>Figure 6: Indicative riparian planting area (1,300m²) (if required at resource consent stage) showing existing part of Stream 1, comprising of exotic scrub and grassland adjacent to kanuka/manuka scrub.</p>					
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.	I have updated Figure 5 in the updated Ecology Assessment attached to this memo.	Satisfied	Update is satisfactory.	N/A	N/A	N/A
E5	Please justify the reduction of the riparian margin/yard from 20 metres to 10 metres adjacent to Stream 1.	<p>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.</p> <p>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.</p> <p>I also note that:</p> <ol style="list-style-type: none"> 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. 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 	<p>From our understanding, a 10m riparian yard applies, as the proposed future development area will be located in the SHZ. H3.6.8(1) in the AUP:OP states that “a building or parts of a building must be set back from the relevant boundary by the minimum depth listed in Table H3.6.8.1 Yards”. Which, for riparian yards, is 10m from the edge of all other permanent and intermittent streams. Should any vegetation removal be required within 20m of Stream 1 (a rural stream) - for any future proposed buildings or structures within the SHZ - activity A162 in table E15.4.1 will apply. I agree that a 20m planted riparian margin will provide a better ecological outcome than a 10m planted margin.</p> <p>However, specific to this application and the applicable proposed SHZ, a 10m riparian yard measured from the edge of Stream 1 adjacent to the VS3 manuka/ kanuka scrub (with parts of it extending into exotic grassland and scrub) any planting, (including any required riparian planting where assessed as being required at resource consent stage) will also provide ecological benefits to the VS3 manuka/ kanuka scrub as it will provide protection to the bush against edge effects. As set out in the latest version of the Precinct provisions, assessment of any required 10m riparian margins can be provided under detailed assessments at the time of resource consent application, to assure the correct scope of riparian planting (if required) is provided in relation to the relevant provisions under E15 Vegetation management and biodiversity - and H3- Single House Zone.</p> <p>Lastly, Streams 3 and 6 where they flow through the SHZ, are ephemeral and therefore the riparian yard rules do not apply.</p>	Not satisfied	<p><u>Ecologist response:</u></p> <p>The argument put forward for the inclusion of a 10-metre-wide riparian margin adjacent to Stream 1 is not ecological in nature. Rather, it is based on the fact that other urban zoned areas have protected riparian widths of 10 metres.</p> <p>As previously mentioned, this rezoning process provides an opportunity to require a wider riparian yard than other urban areas, which would result in improved ecological benefits. The appropriate width of the protected riparian area should therefore be considered and decided upon based on the specifics of this site, rather than simply defaulting to what is required in other urban zoned areas.</p> <p>In this case a 20-metre-wide margin would provide improved ecological outcomes and would make very little difference to the ability to develop the site (likely reduction in lot yield of up to five lots). The boundary of the SHZ should therefore be adjusted to be 20 metres from the top of the bank of Stream 1 so that the full 20 metre margin of this rural zoned stream is protected.</p> <p>If a riparian width of 10 metres is considered appropriate (based on other non-ecological considerations), then the SHZ boundary should be moved so that it is a minimum of 10 metres from the top of the bank of Stream 1. Currently the edge of the SHZ encroaches into this area.</p> <p>Also note the comments below under E6 and E10 relating to the restoration of the 10-metre-wide riparian areas between the SHZ and Stream 1.</p>	<p><u>Response</u></p> <p>Refer to the RFI response of Thomas Consultants provided with the updated Ecological Assessment dated 24/07/2025. This includes the following response regarding the amendment to the CLZ boundary and riparian yard.</p> <p>The proposed zoning plan has been amended to increase the Countryside Living Zone boundary to capture the 20m riparian margin, with no urban zoning located within this. The Concept Master Plan has also been amended to remove five lots adjacent to Stream 1 which encroached into the 20m riparian yard. All plans and reports have been revised to include a 20m riparian margin as enabled under the Countryside Living Zone provisions, instead of the 10m riparian margin previously referred to. The ecology report has been updated accordingly.</p> <p>Healthy Waters Assessment Response</p> <p>This can be addressed in detail at resource consent stage. The requirement for a fluvial geomorphic assessment at this stage seems to require a detailed proposal to model this against. Needs push back as all can be addressed at RC</p> <p>Comment on the SMAF1 controls can be made however and Civix engineers are responding in that regard.</p>	<p>Ecologist: Satisfied</p> <p>Healthy waters: Not satisfied</p>	<p>Ecologist: N/A</p> <p>Healthy Waters response:</p> <p>The 20m riparian margin proposed for Stream 1 is acknowledged. However, as no precinct plan or precinct provisions are being proposed, it is unclear how the 20m riparian margin is intended to be implemented and achieved?</p> <p>There is no / limited assessment of Stream 2 – 6 in terms of stream erosion effects associated with the potential stormwater discharge. Therefore, stream erosion risk assessment, including new stormwater outlet impact, will need to be provided at the resource consent stage.</p> <p>Where is the comment from Civix on how the SMAF1 controls have been determined as the BPO?</p>

vegetated in mānuka/kānuka scrub. Also see Question 3, which seeks clarification of this point.

Healthy Waters response:

The Stormwater Management Plan (SMP) submitted as part of the plan change request notes that the streams have not been modified from their original condition and there is no sign of erosion or channelization. The SMP also notes that bank vegetation is still relatively intact.

Most of the soil type in this area are alluvial soils and Cornwallis Formation. They are very weak to weak in cohesion with high erosion risk (refer to Section 3.1, 3.2 and 6.2, 6.3 of Appendix 8 Original Geotechnical Memo).

The proposed greenfield development will be located upstream in a generally steep, high-energy stormwater catchment. Based on Geomaps (AC's data), the current bank-full flow (2-yr ARI) is 0.92 m³/s, which would increase to 2.2 m³/s with a 44.4% impervious increase and increase erosion risk. Since this SMP proposes up to 60% impervious cover, flows could exceed 2.2 m³/s. While it is noted that 95th percentile detention (i.e. Stormwater Management Area Control Flow 1 (SMAF1)) is proposed (refer to Table 1, Appendix 3 of the SMP), the proposed measures appear insufficient to mitigate this increased erosion risk.

The mainstream (Stream 1) in the catchment is generally narrow and shallow, and combined with aerial photos (refer to Section 5.4.1 of Appendix 6 Ecological Assessment) suggest it is mostly unconfined. While there is no visible erosion currently, the combined effect of increased flows (volume and velocity) (as noted earlier) and the unconfined nature of the stream could further increase significant erosion risk post-development.

Please provide a fluvial-geomorphic assessment to evaluate these potential impacts. This should also address the current state of the stream and its susceptibility to the effects of development in the catchment.

Please also provide further details on how the SMAF1 controls have been determined as the BPO for this site.

Given the above, consideration should be given as part of this PPC to providing a wider riparian margin beyond the minimum of 10m requirements (refer to Section 6.1.2 and Table 8 of Appendix 6 Ecological Assessment) to ensure that any future development impacts can be avoided or mitigated.

E6	Please clarify what is anticipated to occur to meet Policy I55X.3(5) in the proposed precinct provisions.	<p>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.</p> <p>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).</p> <p>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 discretion 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.</p>	<p>Refer to amended map at Appendix A of the Ecological Assessment and responses to E1 – E3 above.</p> <p>Furthermore, the Precinct provisions are amended to require further detailed assessment of the streams adjacent to the proposed development areas within the SHZ at the time of resource consent, and if the stream classification is deemed such that riparian planting is required, this can be addressed at that stage.</p>	Not satisfied	<p>The precinct provisions still do not explicitly require planting or restoration of the riparian area adjacent to Stream 1 where the SHZ extends within 20 metres. All riparian protection provisions relate to intermittent or permanent streams “within the Single House Zone” or “adjoining any new residential or roading development boundaries”. As Stream 1 flows through the part of the site that will be zoned as Countryside Living and does not “adjoin” the development boundary, there is no provision to require the restoration of the “Riparian Planting” area shown in Appendix A of the ecological assessment.</p> <p>The restoration of this area should be a requirement of the rezoning. As it is currently proposed, it allows for development to occur within the 20-metre-wide riparian area of this rural stream. The riparian planting standards in I55X.6.4.2 should be updated to make this clear.</p>	<p>Response</p> <p>Refer to the RFI response of Thomas Consultants provided with the updated Ecological Assessment dated 24/07/2025. This includes the following response:</p> <p><i>This matter is no longer relevant to the proposal as the precinct provisions and plan are no longer proposed, with the approach now adopted to rely solely on the provisions applicable to the relevant zones and areas under the Countryside Living Zone, Single House Zone, and Mixed Housing Suburban Zone.</i></p> <p><i>Noting that there are now no riparian margins applicable to the urban zones (ephemeral streams 3 and 6 are the only features in these zones), the only applicable consideration relates to the 20m riparian margin adjacent to Stream 1 located within the Countryside Living Zone. In this respect, any future subdivision and development resource consent application involving this area of land including Stream 1 will be required to address the protection and maintenance of that at that time, with the Countryside Living Zone provisions relating to ecological assessments and management ensuring appropriate consideration is applied to Stream 1.</i></p>	N/A	N/A
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.	<p>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):</p> <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. 	<p>Additional information regarding the potential future effects on fauna, resulting from subdivision and subsequent development of the site is included in Section 6.1.3 of the Ecology Assessment, with fauna management proposed in Section 7.5.</p> <p>In summary, residential development can also lead to an increase in the number of domestic cats and thus their impacts on local wildlife. However, given that the site is already immediately next to residential development it is likely that the impact of local cats on native wildlife will already be reasonably high, and the effect of more cats is not likely to be significant. In terms of light impacts, best practice measures, like ensuring wildlife sensitive lighting, can minimise any adverse effects on native fauna.</p>	Satisfied	The information provided is satisfactory.	N/A	N/A	N/A

		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 – except where necessary to obtain reasonable access to any future CLZ subdivided lot”. 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.	Civix has amended the Precinct provisions as provided in CI23 responses to exclude the establishment of stormwater outfall structures to Policy I55X.3(4) and reference is also included in Standard I55X.6.4.2(3).	Not satisfied	By providing for the removal of VS3 vegetation for “reasonable access” and stormwater outfall structures in standard I55X.6.4.2(3), there is no way to ensure that the effects of this vegetation removal (including effects on associated fauna) are managed, and that appropriate ecological compensation is provided for. Such vegetation removal should not be excluded from the standard, and as such should be considered a restricted discretionary activity. The assessment criteria provided in the precinct provisions already ensure that “the location of the stormwater device or structure” is considered with regard to “the extent to which the location is able to be well-integrated into the design and enhancement of the riparian and any open space areas”. It is also noted that the current precinct plan creates at least one lot that would require the removal of VS3 vegetation to develop (see snip below). As it is intended that VS3 vegetation will be retained, the SHZ boundary should be adjusted to exclude this vegetation type. As the avoidance of VS3 vegetation applies outside the riparian areas, standards I55X.6.4.2(3) and I55X.6.4.2(4) should be moved so that they are placed under the “Ecological Habitats” section of the provisions.		Response Refer to the RFI response of Thomas Consultants provided with the updated Ecological Assessment dated 24/07/2025. This includes the following response: This matter is no longer relevant as the precinct provisions are no longer proposed. The applicable provisions relating to the Countryside Living Zone include consideration and protection of ecological features, and the effects and management of this area of VS3 bush will be considered under any future subdivision and development resource consent application.	Satisfied	N/A
E9	Please clarify if whitehead (Mohoua albicilla) is 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”.	This was an oversight in the ecology report and has been removed from the table.	Satisfied	Update is satisfactory.		N/A	N/A	N/A

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.	Section 7.2 in the Ecology Assessment states that "in areas where proposed development adjoins the stream (six lots within proposed subdivision Area 2 and part of Area 5), riparian planting is required under the Precinct Provisions". This refers to the 10m riparian margin along Stream 1 within the SHZ extent, if required at the time of resource consent application. As per the ecology report, weed control is only proposed in these riparian planting areas along Stream 1 if required at the time of resource consent. I have added the indicative riparian planting and weed control area to the watercourse and riparian areas map in Appendix A of the updated Ecological Assessment attached. Table 7 in the updated ecology report has been corrected to refer to riparian areas only and not the entire site. Refer to Figure 6 under E3 showing proposed riparian planting area.	Not satisfied	As discussed above, the boundary of the SHZ does not "adjoin" Stream 1 and therefore the riparian planting provisions, as they are currently worded, would not require the restoration of the "Riparian Planting" area marked in the updated "watercourse and riparian areas map" (Appendix A of the updated ecological assessment). If the proposal goes ahead as currently designed (noting the comments under E5 above recommending that the SHZ be set back 20 metres from Stream 1), the precinct provisions should be updated to ensure that this area is restored at the time of development.	Response Refer to the RFI response of Thomas Consultants provided with the updated Ecological Assessment dated 24/07/2025. This includes the following response: The proposed SHZ and Mixed Housing Suburban Zone have been set back 20m from Stream 1, as recommended. Five lots have been removed from the indicative Concept Master Plan where these were closest to the stream to demonstrate no urban development will occur in this margin. Further, Stream 1 and its 20m riparian margin are now located wholly within the Countryside Living Zone, so any proposed subdivision and development resource consent application related to this location will be required to address the protection and management of the Stream and margins as required under the Zone provisions.	Satisfied	N/A	
#	Specific Request	Reasons for request	Applicant response (Rob Pryor)						
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)).	No earthworks are proposed, this is a zone change that includes information including an analytical test of what types of issues development and subdivision might give rise to and inform what precinct provisions (if any) over and above the underlying AUP: OP are required. A high-level concept cut fill analysis has been carried out (Drawing Series 30000 included with the infrastructure report) to identify the typical earthworks required to enable a complying road network and provide suitably graded building platforms considering the existing site topography. This in general comprises a combination of cut and fill to achieve suitable gradients. The extent of retaining will be dependent on the urban design layout and housing typologies selected during detailed design at resource consent stage.	Not satisfied	<u>Landscape Architect response:</u> There is a risk with the level of proposed earthworks significantly modifying the overall landscape and hence its character in detrimental ways, creating adverse effects given the uncertain nature of the details that have currently been provided (or lack thereof) around subdivision, earthworks, and retaining walls. As per clause 23(1)(b) of the RMA, information is required to obtain a better understanding of how/and what mitigation will be done to manage these potential adverse effects on the landscape. Hence, a landscape assessment is required of the cut fill analysis in terms of the changes to the site and landscape this would create. Please provide commentary on the extent of retaining that would be required to create the indicative subdivision layout included with the application and provide landscape assessment of the effects of this. Please provide a contour map (including numbered levels) showing the proposed topography as a consequence of the cut fill analysis. Rationale: The sloping landform within the site contributes to the intrinsic qualities and physical characteristics of the site. The impacts of enabling the intensity proposed in this site needs to be understood. <u>Healthy Waters response:</u>	This is beyond the scope for a Plan Change application and would be addressed in detail at the resource consent stage. There are a suite of landscape mitigation options available including materiality – timber retaining walls, stained black with planting in front; retaining structures located behind dwellings rather than in front; use of recessive materials amongst others which can be conditioned at the RC stage. Finished contours cannot be provided with certainty as no specific design is proposed. The landscape expert seems to consider the concept plan provide is an actual development plan – and that's the wrong approach to take for this. The Healthy Waters request also assumes the cut and fill plans are what will be occurring and these are also indicative. Such considerations can be assessed and responded to under a resource consent application.	Not Satisfied	As it currently stands, there is still a high level of uncertainty as to what level of impacts can be anticipated by development as a result of this plan change – that is, whether the proposal will keep with the current topography of the landforms. The LVA report (July 2025) states "construction stage included impacts on the physical landscape, including vegetation removal and landform modification" (paragraph 6.52), these modifications as a result of construction need to be better understood to gauge a sense of how sensitively they respond to the existing landscape and landform patterns. It is appreciated that the design shown is indicative, however it is presumed that this is a close indication to what the future intentions are of the land as a result of this plan change. As such, and as per clause 23(1)(b) of the RMA, further information is necessary, in the way of mapping of contours, levels of retaining walls to better understand any adverse affects and how they may be mitigated as a consequence of the PPC.	

					<i>The cut and fill plan provided indicates a refill area within the single-house zone, adjacent to the proposed 10m riparian setback. Approximately 10m of earth materials are proposed to be placed here, which could exert significant pressure on the steep stream bank and destabilize it. Please explain how this risk will be addressed.</i>			
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)).	The ecological area is to be maintained without enhancement. While there is potential for the ecological values to be enhanced, this would be onerous and very costly for the expanse of the ecological area. Further explanation is outlined in the ecological responses.	Not satisfied	Consider if bespoke provisions could assist with the enhancement of ecological and riparian areas at the interface of future development, and assist in the integration of development with the natural qualities.	<u>Response (Lance Hessel)</u> The proposal has been amended to remove precinct provisions and adopt a zoning only approach after discussions with Plans and Places, and on consideration of comments in the Appendix B CL23 schedule from Plans and Places. Accordingly, no bespoke provisions are able to be provided for this PPC application. As referred in the ecological responses, the CLZ has been expanded to capture all ecological features of significance and the associated provisions in the CLZ will ensure appropriate assessment and conditions of consent in relation to these will be required under any detailed subdivision or land use resource consent application in relation to these areas.	Not Satisfied	With provisions now removed, there is no guarantee, or understanding of how this plan change will have measures in place to protect and enhance the VS3 kanuka scrub and forest ecosystem, despite protection and enhancement being mentioned in paragraph 5.9(vii) and 6.24(iii) of the LVA (July 2025). As such, Please provide evidence on how the natural character and landscape values of the VS3 ecosystem will be protected and enhanced through this PPC. Please give consideration whether CLZ is the most appropriate zone to ensure the natural character and values of the VS3 ecosystem area is protected and enhanced in comparison to other zoning options such as open space-conservation.
L3	Please assess whether retaining the existing Rural – CLZ areas within the site would have less adverse landscape effects, considering the topographical characteristics, the integration of housing into the landform and effects on neighbours.	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)).	Retaining the existing Rural – Countryside Living zone (CLZ) areas within the site would naturally have less adverse effects. However, the changes to the CLZ are minimal, comprising a small area adjacent to the Residential – Single House zone (SHZ) in Panui Avenue, and small areas surrounded mostly by the Future Urban Zone (FUZ) at the southern boundary (refer to the proposed and existing zoning plans in Appendices 5 and 6 of the application documents). Most of the intensity lies within the FUZ and the proposed amendments to the CLZ and FUZ enable one complete SHZ accessed off Mahi Road, rationalising the zoning pattern of this location and addressing what is otherwise spot zoning of pockets of CLZ land. The proposed SHZ with specific development and intensity standards manages effects such that the interface with the surrounding SHZ and CLZ areas can maintain an acceptable character complementing the surrounds.	Not satisfied	Appendix 13: Section 32 evaluation of proposed rules and methods does not include an analysis of the CLZ, and how this would compare to the proposed SHZ zone and its proposed provisions. As per clause 23(1)(c), please determine the level of adverse effects on an effects scale and consider whether the retention of the CLZ would enable a better integration of a future enabled subdivision into the rural landscape, for example, by minimising straight lines of suburban form against a rural backdrop. Please describe how the SHZ and intensity standards will manage these effects.	<u>Response (Lance Hessel)</u> The S32 Analysis addresses retention of the CLZ under Option 1. The CLZ is being adjusted to better provide protection of ecological areas as well as enabling a more practical urban zoned area for comprehensive development and subdivision. The effects to the east and south site boundaries remain similar to what could occur once the current area of FUZ is live zoned for residential. The northern CLZ amendment is adjacent to existing urban development where urban character will be continued in the vicinity of Mahi Road and Panui Avenue. Edge effects at the south-western boundary are improved by the relocation of CLZ adjacent to that – which also captures the stream to enable riparian protection as well as areas of ecological vegetation. This ability to manage edge effects is demonstrated in the Concept Master Plan with SHZ lots at the periphery to the adjacent land to the south and east, with CLZ to the west and north except in the vicinity of existing residential intensity.		

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).	<p>The FUZ zoning of the site provides a clear indication that the land is intended to be urbanised in the future and redeveloped for urban purposes, so such a change to the physical locality is clearly contemplated in the AUP planning framework. The proposed concept masterplan has taken into consideration an appropriate interface with the adjoining properties through the provision of larger lots (minimum 600m²) and single level dwellings (Subdivision Area 4). The smaller lots (Subdivision Area 1 (200m² to 600m²) are located internally and will be buffered by the larger lots.</p> <p>The proposal has been designed to respond to the effects of the more intensive smaller lots in terms of the SHZ outcomes intended. The more intensive lots are largely internalised so that the peripheral effects in terms of the wider adjoining areas maintain those effects similar to a SHZ development.</p> <p>However, through considering the comments within the CI23 requests, it is apparent that there is concern with density and MHUZ standards, so the application provisions are being amended to include a maximum building height of 9m, similar to that provided under the SHZ standard of 8m plus 1m for roof form. Further, it is proposed to include a density restriction of 1 house per 200m² to avoid higher density terrace housing typologies and lot sizes. This is set out in the planning response to the Appendix B CI23 request for information. These amendments further assure that the peripheral buffering of landscape effects from the internal intensive areas will further be managed to acceptable levels.</p> <p>Finally, it is noted that the adjacent Parkview subdivision recently developed includes many lots in the order of 200m² and this proposal is not out of character with that – however, the proposed provisions seek to manage the effects of these established lot sizes in this location to assure acceptable visual and amenity outcomes are achieved.</p>	Satisfied		N/A	N/A	N/A	
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.	The application is for a Plan Change and this level of detail is typically required at the resource consent stage. Again here, the FUZ zoning of the site provides a clear indication that the land is intended to be urbanised in the future and redeveloped for urban purposes and therefore significant change is anticipated.	Not satisfied	Further information on what effects anticipated through the proposed zoning and provisions are required in order to understand potential effects on the landscape. Whilst it is acknowledged that the FUZ is anticipated to be developed as residential, the proposed residential zoning and provisions will influence the landscape character and amenity. The information provided does not sufficiently address how the specific provisions proposed will influence the landscape character and amenity or give options as to how different provisions would contribute to different landscape effects.	<u>Response (Lance Hessel)</u>	Not satisfied	<p>With no provisions in place, the questions around how the proposal can be integrated into the rural landscape remain.</p> <p>Please consider whether the inclusion of bespoke provisions to respond to the specific landscape character and values of this area will create outcomes that better meet objective B2.3.1(2), and policy B2.4.2(8) and create an “innovative and environmentally sustainable urban development” as referred to under paragraph 7.5 of the LVA.</p>	

					<p>There are precedent examples of precincts where bespoke provisions are implemented to ensure landscape character and amenity is managed in accordance with the specific context (e.g. Birdwood Precinct). Without such provisions for consents to be assessed, it is more difficult to provide for context specific character.</p> <p>Rationale: The landscape is strongly influenced by the dominant rural character and it is important, in my view, that an enabled future subdivision integrates with this rural character.</p>		Such bespoke provisions to consider may include an 'intermediate vegetated buffer zone' offering a transition from CLZ to MHS	
L6	<p>Please identify how the proposed riparian buffers and the ecological areas will be managed where they overlap with single house zoning.</p>	<p>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.</p>	<p>The proposed riparian areas (if required as set out in the ecological responses) could be managed through Incorporated Society rules noting the small areas of these (in terms of maintenance). The ecological areas are not within the SHZ.</p>	Not satisfied	<p>With the proposed SHZ overlapping the riparian areas, there is potential for adverse landscape effects. As per clause 23(1)(b) and (c), please provide an assessment of options on how the landscape values of these riparian areas can be managed under different zoning (including SHZ, rural – CLZ, or open space - conservation zone).</p>	<p><u>Response (Lance Hessel)</u></p> <p>This is addressed in several responses including ecological responses, noting that the CLZ boundaries are now amended to ensure a 20m riparian margin can be provided for any development in the CLZ adjacent to Stream 1, and the significant ecological areas are located within the proposed CLZ boundaries. This requires appropriate consideration of ecological effects on these features under any future proposal in the CLZ.</p>	Not Satisfied	<p>Though it is appreciated that stream 1 is included in the CLZ, 'stream 3' identified from the ecology report appears to enter into the proposed residential areas of the PPC.</p> <p>With no identification or protection measures, and given the topography of the site that feeds into stream 1 (identified in the ecology report), questions arise as to what will be the overall impact on the natural character and landscape values (including biophysical) as a result of development from this plan change, noting increases in impervious surface will increase run off, potentially causing adverse effects on the biophysical aspects, and therefore overall values of the streams. As such, how could these streams - ephemeral and permanent - be integrated and celebrated by this development and reflect an "innovative and environmentally sustainable urban development" as referred to under paragraph 7.5 of the LVA.</p>
L7	<p>Please reconsider the landscape values associated with the stream and its tributaries located in the site; the impact of development as a consequence of this proposal on the natural character and landscape values of the stream; and what measures can assure these natural character and landscape values associated with the stream are retained and enhanced.</p>	<p>The LVA (July, 2025) does not identify the stream nor its tributaries as contributing to the overall natural character and landscape values of the site. Furthermore, the proposed development as anticipated by this plan change will likely have flow on effects that can adversely impact the natural character and landscape values associated with the stream.</p> <p>As such, and to better understand how the PPC meets objective 2, and policy 15 of the E3 lakes, rivers and streams chapter of the AUP, please assess the level of these impacts and what measures can be put in place to ensure the natural character and landscape values of the stream and its tributaries are retained and enhanced.</p>						

L8	Please demonstrate how the vegetated area (identified as CLZ under the PPC) will interact and integrate with the proposed urban fabric, and what measures may be needed to ensure there is a sensible transition that lends both areas being treated sensitively to one another at their edge.	How will the riparian edges and other vegetated edges interact with the sites urban edges? Are there provisions to ensure the quality vegetation from these more natural areas continue to extend and spill into the more urban areas to create a smoother blend that positively contributes to the overall landscape natural character and values of the site (as per objective 8 & policy 14 of E38 subdivision - urban, and objective 8 & 15 of E39 subdivision – rural of the AUP) ?							
#	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.	<p>Soil and Rock</p> <p>The natural hazard considered are as follows:</p> <ul style="list-style-type: none"> Falling debris – The site is elevated, hence the risk for falling debris is low. Subsidence – Based on geology maps, the site is underlain by Waitemata Group deposits hence weak subgrade potentially prone to subsidence is not anticipated. The site is low risk subsidence-wise. Earthquake – no known active fault lines are present within 40km of the site. Waikopua Fault, potentially active, is more than 40km southeast of the site. In any case seismic stability analysis will be carried out where platforms are in proximity to slopes steeper than 14° at Resource/Building Consent stage. Landslip – As discussed in our report titled <i>Geotechnical Review for Proposed Plan Change</i> (ref 230108, dated 24 September 2024): <ul style="list-style-type: none"> Zone A is “land with little geotechnical constraints, including the land that is potentially suitable for residential development” Zone B is “generally suitable for residential development, however, will require specific geotechnical investigation, specific design for building foundations, and potential design for remedial slope stability works”. Zone C “will require specific geotechnical investigation, analysis, and assessment prior to application for Resource Consent. That assessment is expected to result in the establishment of Building Restriction Lines (BRL’s) specific to the observed hazards, and associated recommendations/requirements 	Not Satisfied	<p>The response does not fully address our query. Please present the natural hazard risk assessment in a table format, considering both likelihood and consequences, along with any residual risk rating following the implementation of remedial measures. For further guidance, refer to Section 2.4.3 of the Auckland Council Code of Practice for Land Development and Subdivision – Chapter 2 (version 2.0, May 2023) (https://www.aucklanddesignmanual.co.nz/content/dam/adm/adm-website/developing-infrastructure/infrastructure-codes-of-practice/chapter-2-earthworks-and-geotechnical-requirements/CoP_Chapter_2_v2.pdf).</p> <p>The soil and rock natural hazards risk assessment concludes overall the proposal is suitable for development. However, the land on Zone A, B and C is subjected to some geotechnical restrictions and underlain by Waitemata group deposits. A further Geotech investigation is required if all this plan change proceeds to resource consent and building consent stages. The natural hazards risk assessment concludes geotechnical modifications to the land are required. Further assessment will be required by Geotech specialist once more information becomes available out of this concept stage.</p>	<p>Some of these requirements and analyses may not be possible unless related to a specific development and subdivision plan. This level of detail at this stage is onerous, noting that development is possible and areas of hazard for specific proposals can be assessed in detail then.</p> <p>This Natural Hazards Risk assessment guideline in the link provided relates to what is required to obtain Engineering Plan Approval, and can be required in relation to a resource consent application.</p> <p>2.2.1 Objectives</p> <p>Auckland Council requires that any new assets created by Council which are to be vested in Council ownership, are safe to build and decommission. Auckland Council also needs to ensure that throughout their design life without onerous maintenance requirements the environment and climate change are minimised and have resilience and adaptation.</p> <p>This document sets out the minimum requirements that will be required when followed correctly, should result in Engineering Approval for the project.</p> <p>The response previously provided is considered suitable for this Plan Change application.</p>	N/A	N/A	

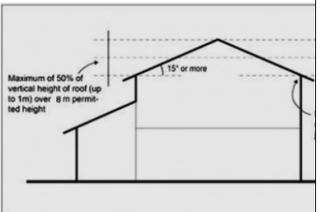
			<p>regarding potential remedial works to mitigate or limit the risk/effects of the hazard".</p> <p>We understand that the proposed work is at concept development stage. Based on the drawings (presented on <i>Mahi Road 40, Helensville, Infrastructure Report – Private Plan Change</i>, dated 15/10/2024 by Civix), some of the Lots will be in Zone B and few rear lots appear to be within Zone C.</p> <p>Earthworks will be carried out within the general area. In general, ground slope will be gentle to moderate (less than 10°).</p> <p><u>Lots within Zone B.</u> Geotechnical investigation will be required to assess the lots prior to application for Resource Consent to determine any requirements to ensure the geotechnical stability.</p> <p><u>Lots within Zone C.</u> Provided there is sufficient space to establish a building platform on each Lot (as per Council requirements) and a geotechnical investigation, analysis, and assessment are completed prior to application for Resource Consent to confirm the requirement for each Lot be geotechnically acceptable (e.g. setback to steep slopes, barrier piles, etc), we have no undue concern at this stage.</p> <p>In addition, prior to Building Consent application site specific geotechnical assessment specific to each lot-development will be required.</p> <p>We concur with the current concept design geotechnical-wise.</p>					
RE2	<p>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?</p>	<p>Demonstration that compliant grades can be achieved both for roads and verify if there are any Privateways.</p>	<p>As this is at plan change stage, a high-level concept model has been undertaken including concept public and private road modelling to test gradients against the Auckland Transport – Transport Design Manual (TDM) Urban and Rural Roadway Design and the Auckland Council – Guideline Document 2022/GD12 respectively. The concept public spine road up the development site (Mahi Road extension) is the critical grade constrained alignment. Although the preferred longitudinal gradient of 5% cannot be met due to existing topography, continuation of the existing Mahi Road gradient prior to the turning head at 12.5% (Possible departure from standards required) achieves suitable levels up through the development site and complies with the AT TDM maximum 12.5% for vesting as a public road. Please refer to concept plan and longitudinal sections on drawings 40000, 45000-45001 and 46000 included in the link:</p>	Satisfied	<p>A departure from standards will be required for the footpath gradient, not for the road gradient. The topography does not permit a reduced gradient, so this is expected. This will be assessed at resource consent stage as 12.5% centreline gradient leads to difficulties in detailed design at intersection corners. Early work on detailed design of this intersection is desirable and the applicant should be aware of this. Furthermore, the Applicant should be aware that approval at plan change does not constitute an approval of the departure from standard.</p>	N/A	N/A	N/A

			40 Mahi Road Engineering CL23 supporting information					
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.	As highlighted above this is a concept masterplan to test a typical earthworks design which suits the existing topography. The concept masterplan identifies these as private accessways. Please refer to drawing 46000 showing spot gradients which indicate that compliant gradients are achievable. These private accessways would typically follow the gradient of the adjacent public roads	Satisfied	Acceptance of responses at this stage is conditional. Auckland transport needs to be consulted at resource consent stage to provide assessment on design gradients, visibility gradients and stormwater control.	N/A	N/A	N/A
#	Specific Request	Reasons for request	Applicant response					
Transportation – LANDEV Refer to the updated Traffic Assessment Report Revision D for detail.								
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.	The responses to this are within the updated traffic assessment in Section 6.0 of the Traffic Assessment Reference 24240 Rev as attached. Further assessment of relevant objectives and policies is included in Section 13.0 of the Traffic Assessment.	Partially Satisfied	Please provide details of the forecast person trips.	<u>Response</u> Refer to the updated Traffic Assessment Report of Landev Rev E dated 4/08/2025. Section 5 assesses the existing network – noting Section 5.1 includes traffic counts at Ruatawhiri Road, Garfield Road, and Rata Street. Section 7 addresses traffic generation. The scope of responses required as discussed with Martin Peake.	Satisfied	Comment: Person trips are not assessed, but a discussion is provided on the different modes from the site.
T2	Please provide an assessment of the accessibility of key attractions (such as 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.	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 information is required to assess how accessible the site is to these attractions for active mode users.	Updated accessibility issues for cyclist and pedestrians is included in Section 5.	Satisfied	Details provided for active modes in Section 5 and 6.3 and for public transport in 6.4 and Section 10.		N/A	N/A
T3	i) Please provide separate AM and PM peak hourly traffic flow figures for each of the intersections which include separately: a) Background traffic (see request T4); b) Development traffic.	The TIA Section 7 – Roading (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	Further details are given within Section 7 to provide how each volume has been generated. Notes: • Traffic counts are based on AADT. • To provide any more detailed counts will not be useful as:	Not Satisfied	It is acknowledged that the traffic volumes shown in figures 7 to 11 have been derived from the AADT. Please provide details of the assumptions used to derive peak traffic volumes from the AADT. Similarly, the assumptions used at each intersection to derive the "current	<u>Response</u> Refer to the updated Traffic Assessment Report of Landev Rev E dated 4/08/2025. Section 5 assesses the existing network – noting Section 5.1 includes traffic counts at Ruatawhiri	Satisfied	N/A

	<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>	<p>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.</p>	<ul style="list-style-type: none"> ▪ Trip generation is based on statistics and is not very detailed ▪ The traffic volume in the area is relatively low, and the number of additional vehicle added to the system is also relatively low even thus the effects will not be seen ▪ The existing road capacity will not be reached by a significant margin 		<p>development currently being constructed” and the “peak volume from proposed development” should be provided.</p> <p>This information is needed to review the appropriateness of the assumed traffic distribution and potential effects of development traffic distributed to the network.</p>	<p>Road, Garfield Road, and Rata Street. Section 7 addresses traffic generation. The scope of responses required as discussed with Martin Peake.</p>		
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>	<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.</p>	<p>Trip generation for the development that is underway has been added within Section 6.2.</p>	Partially Satisfied	<p>Section 6.2 provides details of the trips associated with an additional 145 dwellings (Estimated). It should be clarified what development has been taken into account. This is required to confirm the assessment undertaken.</p>	<p><u>Response</u></p> <p>Refer to the updated Traffic Assessment Report of Landev Rev E dated 4/08/2025. Section 5 assesses the existing network – noting Section 5.1 includes traffic counts at Ruatawhiri Road, Garfield Road, and Rata Street. Section 7 addresses traffic generation. Section 8 assesses effects on intersections. The scope of responses required as discussed with Martin Peake.</p>	Satisfied	N/A
T5	<p>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).</p>	<p>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.</p>	<p>Further explanation is provided within Section 7 to further explain the effects through the town centre.</p> <p>As traffic gets further away from the proposed development, the effects on the wider network and longer distance trips become unpredictable as the number of vehicles making these drop significantly and we are heading into macro traffic modelling space which is very high level and the number of vehicles being added into a macro model from this development will be insignificant.</p>	Not-satisfied	<p>Limited information is provided in Section 7.2 in that most traffic will travel to the town centre, but no information is provided on the assumptions used as to how traffic is distributed once it reaches Garfield Road. Details of the assumptions of how trips have been distributed to the network within Helensville are required.</p> <p>This information is required to confirm the appropriateness of the analysis and anticipated routeing of traffic to the Helensville Road network.</p>	<p><u>Response</u></p> <p>Refer to the updated Traffic Assessment Report of Landev Rev E dated 4/08/2025. Section 5 assesses the existing network – noting Section 5.1 includes traffic counts at Ruatawhiri Road, Garfield Road, and Rata Street. Section 7 addresses traffic generation. Section 8 assesses effects on intersections. The scope of responses required as discussed with Martin Peake</p>	Partially Satisfied	<p>Assumptions on the distribution of traffic have been provided and the assumptions are considered reasonable.</p> <p>The assignment of the site traffic generation has assumed an even distribution of peak trips between inbound and outbound movements. However, peak hour development trips will be tidal as the trips are for residential properties. It is expected that trips</p>

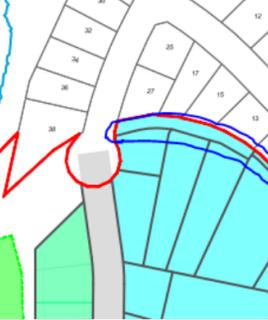
							<p>would be predominantly outbound in the AM peak and inbound in the PM peak. For the interpeak, as assessed (i.e. afternoon school peak), flows will likely be more evenly distributed and the 50/50 assignment between inbound and outbound movements is accepted.</p> <p>The assessment of the afternoon school peak has used the peak flows in the assessment, and therefore, this has assessed the worst case situation, particularly as this time period also considers the time period with the highest traffic volumes at the intersection. However, please refer to T6</p> <p>Please provide an assignment of trips for the AM and PM peaks with trips assigned taking into account the tidal nature of the development (and current development under construction) trips.</p>	
T6	<p>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.</p>	<p>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.</p>	<p>Additional statements are added in response addressing why this additional analysis is not practical for this plan change application.</p>	Not-satisfied	<p>Section 7.3 of the report refers to the delays at the Rautawhiri Road / Garfield Road intersection being high, with and without the development and with increased activity due to school drop offs and use of pedestrian facilities. The proposed development will add both traffic and pedestrians to this intersection. Therefore, more detailed analysis is required of this intersection to quantify the effects of the development on this intersection, particularly the general statements on the likely effects on the performance of the intersection. Some delay already occurs at this intersection in the morning peak period and the effect of additional traffic should be assessed as this would affect the efficient and potentially safe operation of the intersection. Please provide further analysis of the intersection to quantify the effects of the development on this intersection.</p> <p>AT additionally reaffirms the request for a detailed analysis of the potential impact of the proposed development on Rautawhiri / Garfield Road intersection to assess its traffic flow and safety, particularly during peak periods.</p>	<p><u>Response</u></p> <p>Refer to the updated Traffic Assessment Report of Landev Rev E dated 4/08/2025. Section 5 assesses the existing network – noting Section 5.1 includes traffic counts at Ruatawhiri Road, Garfield Road, and Rata Street. Section 7 addresses traffic generation. Section 8 assesses effects on intersections. The scope of responses required as discussed with Martin Peake</p>	Partially Satisfied	<p>Modelling is provided for the mid-afternoon peak which covers the afternoon school peak.</p> <p>Please provide the SIDRA model layout of the intersection. This is required to confirm that the model reflects the actual intersection layout.</p> <p>Please confirm whether the operation of the pedestrian crossing on the northern leg of Garfield Road has been incorporated into the model. If the crossing, has not been included, please update the assessment to include the pedestrian crossing as this will affect the operation of the intersection.</p> <p>Please provide a model for the AM peak period (0830-0930) to understand the effects during the morning school peak period. The development flows should be</p>

												adjusted to allow for the tidal nature of the development flows (and current development currently under construction), as noted in the comments for T5.																																			
T7	Please provide an evaluation as to how the Plan Change meets or aligns with the relevant National and Regional Plans and 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.	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 be assessed against Auckland's Transport Emissions Reduction Plan (TERP) to demonstrate how the Plan Change will align with the TERP.	Refer to Section 13 providing further assessment of National and Regional objectives and policies. This is considered sufficient for this plan change application in the absence of a more detailed resource consent level proposal where defined activity scale and scope can be properly assessed. Further detail is provided in Section 12 re the TERP.	Satisfied							N/A	N/A																																			
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.	As this is at plan change stage, a high-level concept model has been undertaken including concept public and private road modelling to test gradients against the Auckland Transport – Transport Design Manual (TDM) Urban and Rural Roadway Design and the Auckland Council – Guideline Document 2022/GD12 respectively. The concept public spine road up the development site (Mahi Road extension) is the critical grade constrained alignment. Although the preferred longitudinal gradient of 5% cannot be met due to existing topography, continuation of the existing Mahi Road gradient prior to the turning head at 12.5% (Possible departure from standards required) achieves suitable levels up through the development site and complies with the AT TDM maximum 12.5% for vesting as a public road. Please refer to the road layout plan and longitudinal sections on Civix engineering drawings 40000, 45000-45001 and 46000 provided with this response. The proposal would likely be removal of the turning head and continuation of the existing gradient leading up to the existing turning head up into the development site however this level of detail will be confirmed at resource consent stage.	Satisfied	A departure from standards will be required for the footpath gradient, not for the road gradient. The topography does not permit a reduced gradient, so this is expected. This will be assessed at resource consent stage as 12.5% centreline gradient leads to difficulties in detailed design at intersection corners. Early work on detailed design of this intersection is desirable and the applicant should be aware of this. Furthermore the Applicant should be aware that approval at plan change does not constitute an approval of the departure from standard.	N/A	N/A	N/A	N/A																																						
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.		Satisfied	Table should be expanded to include footpaths as is normal practice within the Road Function and Design Elements tables. This can be addressed through the plan change process. No further information required at this stage.	N/A	N/A	N/A																																							
			<table border="1"> <thead> <tr> <th>Name</th> <th>Role and function of road</th> <th>Minimum Road Reserve</th> <th>Total no. of lanes</th> <th>Design Speed</th> <th>Median</th> <th>Cycle provision</th> <th>Pedestrian provision</th> <th>Freight or heavy vehicle route</th> <th>Access restrictions</th> <th>Bus Provision</th> </tr> </thead> <tbody> <tr> <td>Mahi Road (Proposed Extension)</td> <td>Local</td> <td>17m</td> <td>2</td> <td>30km/h</td> <td>No</td> <td>No</td> <td>Yes – Both Sides</td> <td>No</td> <td>No</td> <td>No</td> </tr> <tr> <td>Local Internal Roads</td> <td>Local</td> <td>17m</td> <td>2</td> <td>30km/h</td> <td>No</td> <td>No</td> <td>Yes – Both Sides</td> <td>No</td> <td>No</td> <td>No</td> </tr> </tbody> </table>	Name	Role and function of road	Minimum Road Reserve	Total no. of lanes	Design Speed	Median	Cycle provision	Pedestrian provision	Freight or heavy vehicle route	Access restrictions	Bus Provision	Mahi Road (Proposed Extension)	Local	17m	2	30km/h	No	No	Yes – Both Sides	No	No	No	Local Internal Roads	Local	17m	2	30km/h	No	No	Yes – Both Sides	No	No	No											
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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.	The Traffic Impact Assessment sets out the proposal anticipates in the order of 110 dwellings and the assessments are based around this.	Not-satisfied	Please provide details as to how the potential yield has been derived. AT also requests further clarification to confirm the maximum permissible yield within the proposed zone.		Not satisfied	Please confirm whether there are any dwellings envisaged to occur within the Countryside Living Zone.
T11	New Request as a result of the removal of the Precinct. Please explain how road connections to the Countryside Living Zone south of the plan change area would be future proofed with the removal of the precinct.	The surrounding land is live zoned. The original precinct included a precinct plan with a road connection through the site to the southern boundary. With the removal of the precinct there is now no certainty of the road connection being provided. Further information is required to understand how access to the adjacent Countryside Living Zone will not be prejudiced or prevented if development occurs within the subject land.						
#	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: - 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.	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 (200–400m ² lots) for only two or three blocks, the zoning allows for potentially higher-density development across the entire minimum 200m ² lot area. 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.	Ian Munro – I refer to the clarifications provided by CIVIX Ltd in Appendix B, including of note that: <ul style="list-style-type: none">There is no MHU zone proposed.The higher-density area is proposed to be amended so it is limited to a minimum lot size of 200m² and a 9m height limit.However it is proposed that MHU levels of impervious surface, landscaped area, and building coverage apply here. In my opinion these are very important, for the reasons set out below.I note that amendments to the Precinct Provisions remove references to the MHUZ standards to avoid confusion around what is proposed. I have extensive experience in medium density housing and respectfully there is a tension within the AUP when the outcomes for streets and pedestrian priority / safety are overlain with the impervious surface, landscaped area and building coverage standards. In summary compact affordable housing can create a frequency of dwelling frontages whereby front-loading vehicle access can compromise the quality of the street. This is exactly why subdivision policy E38.3(15) is in place. As an urban designer, the emphasis of design should always be on public space outcomes	Not satisfied	1. Building height Purpose: to manage the height of buildings to: <ul style="list-style-type: none">achieve the planned urban built character of predominantminimise visual dominance effects;maintain a reasonable standard of residential amenity for flexibility to enable variety in roof forms. <p>(1) Buildings must not exceed 8m in height, except that 50 per cent elevation, measured vertically from the junction between wall and roof, may exceed 8m, where the entire roof slopes 15 degrees or more, as height below.</p> <p>Figure 1: Building height</p>  <p>As indicated in the image above, please clarify whether the 8m+1m height limit will enable three storeys as stated in the Appendix 2 standards.</p> <p>Further information is requested on how the precinct provisions address the potential urban design and amenity effects of front-loaded vehicle access on minimum lot sizes of 200m².</p>		N/A	N/A

		<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> <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.</p>	<p>(i.e., the street) and for this reason rear lanes would be an excellent and desirable outcome. The concept plan shows rear lane JOALs for this reason.</p> <p>However rear lanes require significant areas of private space to be impervious surface and not landscaped area (which the land would be used for if vehicle access was taken from a street). There is no getting around this – providing rear lane JOALs directly reduces landscaped area and increases impervious surfaces. Unfortunately the AUP provides no distinction in its standards for impervious surface or landscaped area when, to provide for an important outcome at the street, alternative vehicle access solutions are provided. I do regard this as a shortcoming of the AUP.</p> <p>In almost every application I have reviewed that includes a rear lane JOAL, the proposal has not complied with impervious surface and landscaped area standards. Those proposals have also never in my recollection been refused on the basis of impervious surface or landscaped area issues, but nevertheless it is in my opinion more desirable that the plan sets a framework that does not effectively encourage applicants to diminish the quality of the street to achieve rule compliance in the first instance.</p> <p>Having said all of the above, it is important to note that at the level of the overall site, even with the greater impervious surface area / lesser landscaped area proposed within the intensification area, the Site's SHZ area as a whole will very likely still comply with the SHZ zone standards noting that many lots will be larger than the zone minimums and provide much more landscaped area and less impervious surface area.</p> <p>In terms of centres, I refer to my urban design report where it was considered. There is in my opinion zero credible way a centre would make sense or be realistic on the Site (even if MHU zone were proposed). I have worked on over a dozen new centres in my project work and the minimum dwelling yield I have seen a centre provided for is 1,200 houses. Even then the location of the centre has had to be positioned at the busiest and most visually exposed junction to cater to through-traffic because the customer generation rates are so low from walk-ups. I refer to my assessment where I consider previous Council decisions in the area seem to have foreclosed on a workable centre location at Rautawhiri Road, which I do agree would have made some sense for the wider neighbourhood. That could be taken up with the personnel who did not consider the matter at the time for some explanation.</p>		<p>While the applicant acknowledges the tension between good street design and AUP standards, and strongly supports and encourages rear lane JOALs, it remains unclear how the proposed provisions enable this outcome. Please provide an assessment of how the precinct provisions manage this issue for smaller lots, and whether bespoke standards or design responses were considered to better support rear lanes.</p>				
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			<p>In terms of public open spaces, the Council has powers to require public reserves wherever it considers they are needed and its means of doing this is at the subdivision stage of developments. Although I have no reason to consider a public open space necessary, I confirm I would have no urban design objection to a park being provided on the Site and consider several options could be workable.</p>					
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). [Note: it appears that potentially both sets of standards may apply as it is unclear if those of the underlying SHZ are explicitly precluded]. - 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 	<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>	<p>Ian Munro – I refer to the clarifications provided by CIVIX Ltd in Appendix B.</p> <p>In addition:</p> <ul style="list-style-type: none"> • The SHZ policy framework is proposed and should apply, not the MHU policy framework as no MHU zone is proposed. • As explained above, some key specific smaller lot (200m² to 400m²) zone standards are important to help provide high quality streets by facilitating rear lane JOALs, which lots at 200m² in my opinion benefit from. • It is also important to note that in the SHZ, on a 600m² site and where a dwelling existed at 2013, the AUP's own framework allows an effective density of 1:200m² by way of dividing a dwelling into two and providing a minor unit (which can be occupied by an independent household and have its own open space areas / need for privacy, etc.). So on this basis, the principle of a minimum lot size for a dwelling of 200m² (noting the proposal is to not enable minor household units on lots less than 600m²) cannot be offensive to or incompatible with the zone's policy framework. • I would have no urban design reasons to oppose additional Precinct-level policy clarifications however. • Noting that the proposal is to provide lower-density around the site edges and internalise higher density, I disagree that there is any realistic likelihood of the SHZ policy framework being undermined. • I note that in the SHZ the Council has already consented separate subdivisions down to (in fact slightly less than) 200m² at Rongomai Street, finding them acceptable in terms of the SHZ policy framework and I regard the proposal as sitting comfortably alongside that. I note that the Rongomai subdivision did not have the benefit from the additional Precinct provisions proposed, making it less Plan-compatible than the proposal is. 	Not satisfied	<p>Further clarification is requested on how residential amenity effects will be assessed where Standard I55X.6.5.3(3) is not met. While the SHZ policy framework applies and references to MHUZ standards have been removed, the amendment to the proposed precinct plan still indicates that MHUZ-level built form outcomes are anticipated (e.g. for impervious surface, building coverage, and landscaping). Please clarify whether the SHZ assessment criteria provide sufficient scope to assess key amenity outcomes (e.g. privacy, outlook, sunlight, internal amenity) for minimum lot sizes of 200m², and if not, whether precinct-specific criteria would be appropriate to address this.</p>	N/A	N/A	

	<p>other MoD would apply to infringements of the adopted MHU standards.</p>								
<p>UD3</p>	<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>	<p>Ian Munro:</p> <p>The general statement of urban design preferences regarding front and rear lots is agreed with and this guided the concept plan.</p> <p>The concept plan is not a proposed subdivision but it does intend to offer a realistic exploration of practical issues that urban development may give rise to (not a superficially 'fudged' 101-level plan unlikely to be achievable but easy to tick boxes with). In the northern corner of the Site there is a crescent of developable land clear of the geotechnical area of concern (see below). The image shows the concept plan overlain with the geotechnical investigations undertaken to date. In summary the green and yellow areas are where buildings could occur without difficulty; the red is where development is not recommended. As can be seen, all but two of the indicative lots are in green or yellow areas (and this influenced the lot pattern. Two lots (red stars on the image) would require site-specific geotechnical design responses in limited areas, or simply be combined with an adjoining allotment if this proved too difficult or cost-prohibitive. The JOAL location was positioned where it would be on the flattest gradient and hence require the least landform modification or retaining walls.</p>  <p>This developable 'crescent' area could in summary generally accommodate building platforms, and these in turn need to link to a feasible and logical means of access. It is not possible to gain access from the north (Panui Avenue), although it may be possible at the time of subdivision to consent</p>	<p>Not satisfied</p>	<p>Further information is requested on the feasibility of developing the red-starred lots within Zone C (red areas) shown in the concept plan. RE1 response indicates that these lots require significant geotechnical investigation and earthworks to establish building platforms due to landslip risks and steep slopes. Please provide evidence that stable building platforms can be created and how adverse effects on the site's stability and landscape will be mitigated. We also request that this evidence be reviewed by relevant geotechnical, landscape and urban design specialists to assess the feasibility of these areas for development.</p> <p>Please provide a scaled version of the full proposed plan change area, including the concept plan overlaid with the geotechnical investigations, as shown in the response image.</p>	<p>We have provided the updated Precinct Plan with the scale bar as requested.</p> <p>These are RC level requests for designs that may never eventuate. Any RC will need to address Geotech matters once detailed application plans are prepared and submitted with associated geotechnical assessments.</p> <p>The concept plan is not a requirement of the AUP for re-zoning. Many PPCs have been approved without one and the Council did not provide one as part of its own PCS at Whenuapai (since withdrawn but not for lack of master plan).</p> <p>The master plan has been provided in good faith as an analytical aide to help explain the issues that may arise and need to be addressed at the time of consent. We think it is good practice but needs to be understood as nothing more than one test that tries to representatively draw out the issues that a RC might need to address, not to then invite the Council to assess the application is for that RC.</p> <p>If the concept plan is instead confusing Council experts resulting in these RC levels of requests, it might be best to formally withdraw the concept plan from the material, and just show the precinct and/or zoning plans depending on the final approach for the application.</p> <p>Note also that the Precinct Plan is now not proposed, and the Concept Master Plan enables some assessment of the proposal similar to comparison with a Structure Plan as recommended in Regional Objectives and Policies. It is important this is acknowledged as a demonstrative tool only.</p>	<p>N/A</p>	<p>N/A</p>	

access at 2.7m wide for the eastern most 'end' lot – as there is a very small wedge of the Site east of 9 Panui Avenue that has frontage to that road (in the 'constrained' geotechnical area however). I did not take this option further because it is under-width; but it may be a solution to the end lot subject to the longest JOAL distance shown on the concept plan.

The land is too steep at this part of the Site to accommodate a public road in place of the JOAL (which can in summary be steeper than a road), and in any event it would be highly inefficient to propose a full road serving only 4 lots. I would not agree one was warranted purely on the basis of one urban design ideal, set against the very high level of street frontage that the concept plan shows can be achieved on the Site (noting that the AUP provisions only expect a public road to be required for 11 or more rear lots (E38.8.1.2).

Following on from the above, the AUP: OP does not seek to avoid rear lots but does acknowledge via policy E38.3(12): *Limiting rear sites to places where the site topography, existing boundaries, natural features, or scheduled places will prevent the creation of front sites*. These are exactly the circumstances that apply on this part of the Site, and the contemplation of rear sites tested "limits" them across the whole concept master plan area as per the above policy. It is therefore not agreed that the concept plan raises any conflict with how the AUP seeks undulated and sloped land to be developed including the provision of rear lots where it is sensible and practical to do so.

Having 4 lots sharing a ROW is not unusual in Auckland, and respectfully the 150m length stated by the Council is a substantial overstatement of the issue – if the concept plan was reflected in a subdivision proposal, one lot would have a ROW length of 120m maximum; another of 79m; a third 55m; and the 4th lot of 31m. Although it is agreed that in an ideal world there would be no sloped land and frontage for all lots to streets, the above is not inappropriate or of any concern. Reference is made to elsewhere in Helensville where JOALs much longer than the concept plan shows have been approved by the Council – such as at 198 / 200 Rautawhiri Road (143m); and the 315m maximum length (to access 42 Urumaraki Avenue), directly east of the Site. A combination of ROWs serve 97-107 Rautawhiri Road, with a maximum length of over 280m to the parking area of 99C Rautawhiri Road. In terms of rubbish and waste collection, there are many examples where Council collection using a JOAL has been agreed, or where a private contractor has been required (or where residents drive bins to the street) such

			<p>that I disagree the concern expressed is valid or could not otherwise be easily addressed at the time of a subdivision (were something like the concept plan to be proposed).</p> <p>I am also aware of numerous private road JOALs in Helensville longer than the JOAL shown on the concept plan – such as the 270m-long Kawariki Road and the similar total length (to connect to Mill Road) of the adjoining Taupata Lane. In turn, if the issue of concern is in ensuring that any JOAL for rear lots exhibits suitable qualities of a street commensurate with the scale and amount of use likely (a function of lots served), then that is a different matter and I note that for the most part (3 lots) the concept plan JOAL has been drawn at approximately 7m wide, sufficient to allow for lighting, pedestrian / passing facilities and landscaping as and if required at the time that such an outcome was proposed as part of a subdivision. In my opinion the concept plan provides for a superior JOAL outcome than is the norm across Auckland in similar circumstances.</p> <p>The assessment that “massive” earthworks and retaining walls would be required is respectfully a made-up comment and it is not in my opinion at all the case that 4 large residential lots such as has been explored in the concept plan would definitely need retaining walls at all out of the ordinary (for the most part the lots will remain sloped). But if a public road was sought, the lesser maximum gradients allowable would require additional (fill based) retaining structures at the eastern end as the road lifted above the natural fall of the land. That was one other practical consideration that led to a JOAL being favoured in the concept thinking.</p> <p>But in any event, were a subdivision proposal lodged that was not deemed satisfactory, the Council would withhold consent until an acceptable alternative design was arrived at. On this basis the question I have asked myself is whether the Precinct should include additional measures to manage land development and in my opinion it does not; the issue is squarely the focus of existing subdivision policies and assessment matters.</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.	<p>Ian Munro</p> <p>I have no urban design objection to scaled plans being provided although I would reiterate that the proposal does not include a subdivision proposal and any difference of opinion on what the concept plan could have shown will not as I see it address the merits of the proposed zone or planning provisions that would apply to development. That</p>	Satisfied	Scaled precinct plan has been provided.	N/A	N/A	N/A	

1453.9. Pukekohe East-Central: Precinct Plan 1



would seem better-placed to occur at the time of subdivision.

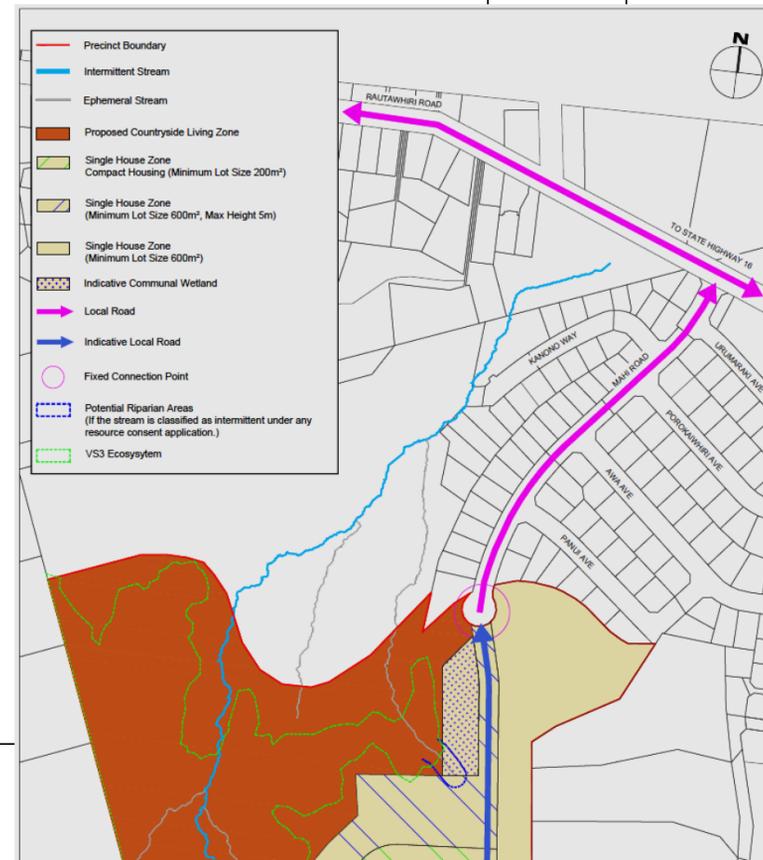
I have also worked on several new Precinct Plans in Auckland and am familiar with many within the AUP already – the bar-scale included in the proposed Precinct Plan was used precisely because it is the Council’s established convention. An example of a recently approved Precinct Plan is shown in the left column for the Pukekohe – East Central Precinct.

I note that the Precinct Plan has now been amended to better reflect the Council’s style guide, and this is included in the email supplying this response and also illustrated below. It is noted that the style guide enables some degree of complexity where there are different zones and overlays proposed as stated below:

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.**

The information shown is required by virtue of being referred in the Precinct Provisions.



UD5	Please provide an assessment of the interface between the proposed MHSZ and the CLZ.	<p>The UDA states “how commonly” the interface between SHZ and CLZ occurs around Helensville. The MHSZ is to be internalised however, directly interfaces the CLZ, and this interface cannot be seen in Helensville. Please demonstrate how amenity and character will be maintained across this sensitive boundary, and how reverse-sensitivity effects are avoided/mitigated.</p> <p>This information is required to better understand the nature and effect the plan change will have on the environment, in respect of your provided assessment on urban design.</p>							
UD6	Please provide a further urban design rationale for the conversion of CLZ to SHZ on the north-eastern corner of the site.	<p>The UDA report stated that the proposal of parts of the CLZ to be converted SHZ is more “site-responsive” and “reflects the site topography and contours”. However, the northeastern corner of the site has been identified as geotechnically unstable and not recommended for development leading to potentially poor development feasibility [B2.2.2.(7)(e)] and poor urban design outcomes such as accessibility [B2.2.2.(7)(caa)] and the potential for dominant retaining walls that may adversely affect streetscape character. The Warkworth Clayden Road Precinct illustrates how special yard standards, including vegetated buffers, can manage reverse sensitivity effects and provide a smoother transition from urban to rural. Similar approaches could be considered here, particularly for terrain that may require retaining and for responding to request UD1.</p> <p>Further, while the AEE and Section 32 report state that the CLZ in this area offer no ecological protection or enhancement, its retention would maintain consistency with the adjoining CLZ along the site’s eastern boundary and better reflect the existing character of this edge. Moreover, retaining CLZ would also protect the existing landform, thereby “responding to the intrinsic qualities and physical characteristic of the site” (B2.3.1.(1)(a)).</p> <p>This information is required to better understand the nature and effect the plan change will have on the environment, in respect of your provided assessment on urban design.</p>							
UD7	Please clarify how the following urban design outcomes described below in the UDA will be achieved through existing AUP provisions:	<p>The UDA analysis refers to the non-statutory concept plan, however it is unclear how these outcomes will be realised through existing provisions alone.</p> <p>This information is requested to understand how the urban design</p>							

	<ul style="list-style-type: none"> • "...a predominant positioning of the back of future allotments around the Site's boundaries", • "...can also provide for a quite well-connected series of short blocks..." and • "... (given that the block structure is similar to the concept plan) provide good sightlines and a number of pleasant walking routes for pedestrians..." 	principles envisioned in the concept plan will be realised through existing provisions, or whether additional precinct-specific provisions are required.						
UD8	<p>Please clarify how existing AUP provisions, without precinct-specific provisions, will effectively manage stormwater runoff from the proposed increase in impervious surfaces. Further information is required to assess whether specific design considerations need to be made (for example, street-based water sensitive design solutions) to mitigate these effects.</p> <p>Also please provide a cost benefit analysis of zoning the possible drainage reserve as SHZ versus as open space.</p>	<p>The UDA and Section 32 report both acknowledge that stormwater facilities may be required, and the concept plan identifies a potential drainage reserve. However, this area is zoned as SHZ rather than Open Space, with the UDA stating that its function should be determined later at the subdivision stage. This approach creates uncertainty about the long-term role of the land and how stormwater management will be integrated into the urban form. Policy B2.2.2(7)(c) requires that rezoning of Future Urban land contributes to a well-functioning urban environment and integrates with the provision of infrastructure. Ensuring the drainage reserve is appropriately zoned at this stage would provide greater clarity and enable integrated design/water sensitive design to be embedded, giving effect to this policy.</p> <p>This information is required to better understand the nature and effect the plan change will have on the environment, in respect of your provided assessment on urban design.</p>						
UD9	Please provide a cost and benefit analysis of an option of only providing SHZ.	This information is requested to better understand the benefit and costs of alternative approaches to the plan change proposal.						
#	Specific Request	Reasons for request	Applicant response					
Watercare								
WC1	<p>Area of proposed SHZ vs existing FUZ</p> <p>Please clarify the existing area of the Future Urban Zone (hectares) and the area proposed to be zoned SHZ (hectares).</p>	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.	<p>Existing area of Future Urban Zone (FUZ) land = ±7.79Ha</p> <p>Proposed Area of Single House Zone (SHZ) = ±9.12Ha</p>	Not satisfied	Under the proposed zone and precinct provisions how many additional lots (as a maximum that is enabled through the precinct) does the additional 1.33ha add?	<p><u>Response (Lance Hessel)</u></p> <p>The proposal is no longer to include a precinct with provisions but to include a zoning only approach. The urban areas of the site are now to be the Residential Single House Zone (SHZ) and Residential Mixed Housing Suburban Zone (MHSZ). These zoned areas correspond to the conceptual areas of intensification possible (but not specifically proposed under this PPC application). Based on what is possible under these zones and as demonstrated</p>	Not Satisfied	<p>Please clarify the areas proposed to be zoned SHZ, MHS and Countryside Living (hectares).</p> <p>Please confirm what the anticipated water supply and wastewater demand DUE 1 from each proposed zone area.</p>

						under the Concept Master Plan, there could be in the order of 105 to 110 dwellings on the site.			
WC2	<p>Precinct Provisions related to Minor Dwellings</p> <p>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.</p>	<p>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.</p>	<p>Yes, I55X.6.3.1 Water and Wastewater Infrastructure is intended to apply to the activity of Minor Dwellings.</p> <p>Rule I55X.6.6 – Minor Dwellings, refers to “..appropriately sized lots where suitable servicing and on-site amenity can be provided”.</p> <p>We will amend RD assessment criteria in Precinct provision I55X.7.2 to include (b) whether wastewater and water supply can be appropriately provided for the minor dwelling located on a site of 600m2 or greater as referred in Rule I55X.6.6 – Minor Dwellings.</p>	Satisfied		N/A	N/A	N/A	
WC3	<p>Precinct Provisions related to activities complying with standard I55X.6.1-I55X.6.5</p> <p>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.</p>	<p>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.</p>	<p>The Precinct provisions apply unless not specified whereby the underlying AUP provisions apply. If there are activities other than those specified under Standards I55X.6.1 to I55X.6.5 then the underlying AUP provisions and activity status will apply to that.</p>	Not satisfied	<p>Section C1.6(4) of the AUP(OP) sets out the hierarchy of rules stating that the precinct rule and activity status takes precedence over the activity status of a zone or Auckland-wide rule. Given this approach in terms of the planning hierarchy in the AUP(OP) the activities as listed in Table I55X.4.1 need to be revisited.</p> <p>Applying the hierarchy, it would mean that under Rule I55X.4.1(A2) any activity complying with Standards I55X.6.1 – I55X.6.5 is a permitted activity regardless of whether they are listed as restricted discretionary, discretionary or non-complying under the Residential – Single House Zone in Chapter H3. It is assumed that this was not the intention however the way that the provisions in Table I55X.4.1 are currently drafted is confusing in this regard.</p> <p>The current drafting makes it unclear how Rule I55X.4.1(A1) should be applied in relation to</p>		N/A	N/A	

				<p>Rule I55X.4.1(A2), and as drafted is opposed by Watercare unless changes are made to the wording in the table to clarify that this is not intended.</p> <p>Rule I55X.4.1(A8) has the same issue because as drafted, if the standards are complied with the activity status is Restricted Discretionary and will trump any activities listed as Discretionary or Non-complying in the Subdivision – Urban chapter.</p> <p>Please redraft the activities to make it clear that the activity status under the Residential – Single House Zone for dwellings in particular is not changed by Rule I55X.4.1(A2) and that the activity status of subdivisions is not changed by Rule I55X.4.1(A8) and provide an updated provision set.</p> <p>Watercare is concerned that the way the precinct provisions are currently drafted will be confusing for Council planners trying to interpret the activity status of activities in the future and they may enable a higher yield of lots and dwellings than anticipated by this Plan Change.</p> <p>The provisions in the precinct are currently silent on activities within the Rural – Countryside Living Zone and it is unclear what rules should apply to these activities. Do the provisions of the Countryside Living Zone in Chapter H19 apply with no precinct provisions or is it intended that Rule I55X.4.1(A2) and (A3) would apply to activities within the Countryside Living Zone as well?</p> <p>If the first option is correct, then adding in a rule similar to Rule I55X.4.1(A1) for the Countryside Living Zone is recommended. Alternatively, please explain if the precinct is meant to cover activities within the Countryside Living Zone or not and provide an updated provision set to clarify this.</p> <p>Watercare is concerned that if the precinct provisions are intended to apply to the Countryside Living Zone then under Standard I55.6.1.3 activities within the Rural – Countryside Living Zone must be serviced by a public wastewater system and may be serviced by a public water system and Watercare does not service development in the Rural Zones.</p>			
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					It is also noted that it may be useful to clarify which rules and standards are considered a regional plan provisions vs those that are district plan provisions.				
WC4	Proposed Countryside Living Zone Please confirm the intended water supply and wastewater servicing of the proposed Countryside Living Zone.	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 Auckland Unitary Plan, noting that Watercare does not provide connections to Rural Zones.							

Appendix B – Zoning Only Version 21/08/25 version for out of scope consideration by the Council.

Green highlighted items are agreed with Plans and Places as out of scope¹ under CI23 RMA, or now not relevant being precinct related queries.

Yellow highlights are Precinct related and now not relevant under the zoning only approach.

Grey highlights are remaining items to be addressed.

Blue highlights are addressed items.

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	1st Clause 23 Request: Satisfied/ Not Satisfied	If 1st clause 23 Request Not Satisfied – outstanding information and / or Additional Clause 23(2) Request	Applicant response to items Not Satisfied
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>	These additions are acceptable.	Not satisfied	The requested and agreed changes have not been made to the amended Precinct provisions. Please incorporate the underlined additions into the I55X.1. Precinct Description.	

¹ Refer to email from Austin Fox dated 05/05.2025

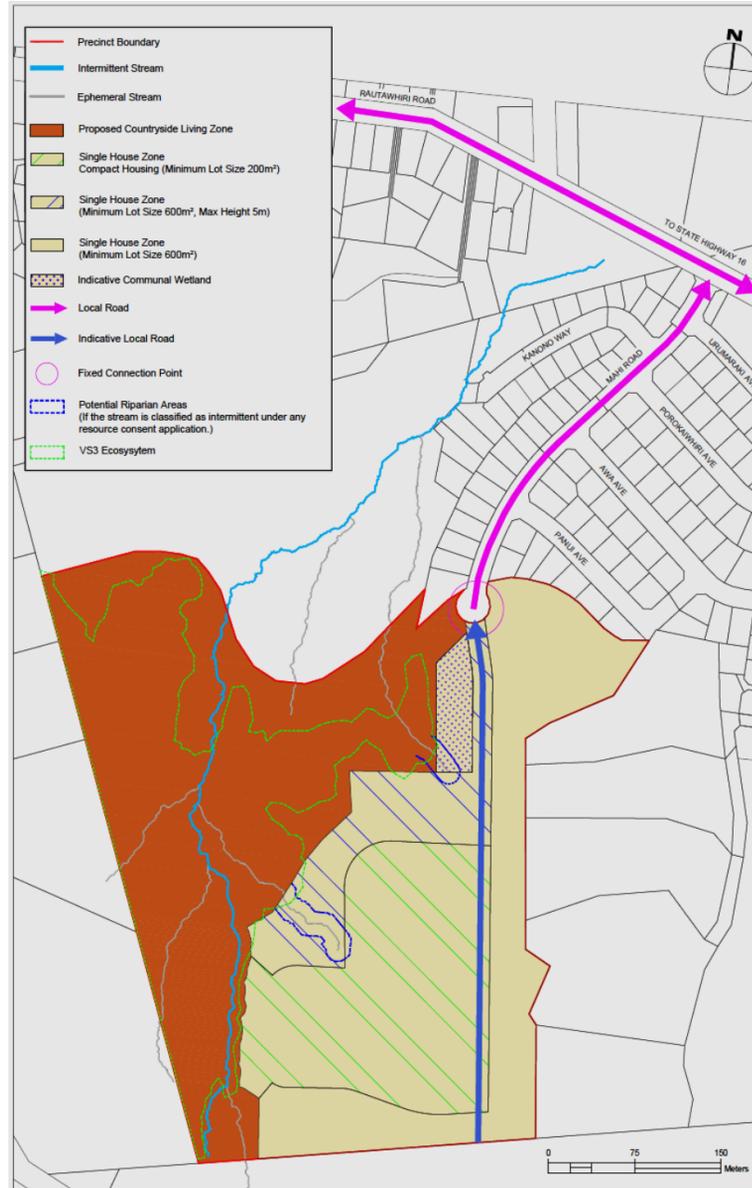
WCX2	I55X.3. Policies [rp/dp]	<p>There is no policy to support Objective (9) which states “Subdivision and development is coordinated with the supply of sufficient water, wastewater and stormwater infrastructure provision to service the Precinct”. The following policy is recommended to be added to the Precinct provisions.</p> <p>(11) Require subdivision and development in the precinct to be coordinated with the provision of sufficient wastewater and water supply infrastructure.</p>	This is agreed.	Not satisfied	The requested and agreed changes have not been made to the amended Precinct provisions. Please incorporate the additional policy (11) into the Precinct Provisions.
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. This can be corrected by adding “...Single House Zone area” at the end of the Purpose of Standard I55X.6.3.1. - As land use consents may be sought separately to subdivision consents, both subdivision and development will need to consider water supply and wastewater infrastructure. - Future connections to the public water supply network will need to be confirmed during the Engineering Plan Approval process. This is not really a Precinct provision matter and more a resource consent and engineering plan approval matter. This would be captured under those processes and is not required here. <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>	<p>Refer to responses to each item in blue to the left.</p> <p>The suggested wording amendments to I55X.6.3.1(1) are agreed.</p>	Not satisfied	<p>The requested and agreed changes have not been made to the amended Precinct provisions. Please incorporate the changes for I55X6.3.1, including those set out below.</p> <p>The following amendment to standard I55X.6.3.1 is recommended to ensure that any connection to the water supply network confirms that the water supply has capacity whilst enabling alternative options.</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 which must demonstrate that suitable water infrastructure and with sufficient capacity is available, or c) Any combination of the above.</p>

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 ensue 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.	<p>This has now been amended as shown below to reflect the requirements of the Style Guide. While there remains some complexity in terms of colours and notations, the Style Guide acknowledged this may be required where there are overlays and different applicable zones.</p> <p>This is also referred in the Appendix A response under “UD 4”.</p>

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.**



#	Provisions	Comment / recommendation	Applicant response
Zone and Precinct			
ZP1	Proposed zoning	<p>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.</p> <p>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.</p>	<p>This is essentially set out in the AEE and the S32 analyses in the application.</p> <p>NOTE: We are changing the entire application approach to remove the Precinct and provisions and simplify with inclusion of the MHSZ and SHZ provisions and relying on the standard provisions for the CLZ and all other relevant provisions of the AUP. This is set out in an email to Austin Fox and Peter Vari of 28th April 2025, and the amendment package provided by COB 22/08/2025. The below responses are amended to reflect this new approach, noting the option of precinct provisions is now added as Option 5 to the S32 RMA Analysis.</p> <ul style="list-style-type: none"> • The S32 analysis regarding Option 3 (this proposal) sets out the benefits and effectiveness and efficiency of the provisions-proposed amendments to the CLZ and the additions of the areas of SHZ and MHSZ, so is referred here for consideration. Included in this is that this is consistent with the Helensville South Structure Plan and the FULSS and FDS. Reference is also made to the Insight Helensville Housing Market Analysis, referring to the benefits of this mix of housing and lot densities. • The S32 Analysis referring to Option 4 (higher intensity zoning such as terraced Housing and Apartments Zone) sets out how this level of intensity in this location is not appropriate in character and effects terms (flooding, traffic, residential amenity, services demand). • The S32 Analysis refers to Option 5 of maintaining the SHZ but with precinct provisions to enable higher intensity within the internal areas of the proposed urban area. This assesses how the resulting complexity of provisions may affect the ability for efficient assessment and processing of subsequent resource consent applications, with the zoning only approach providing a simpler and clearer framework. • If the site was fully proposed as MHUZ there would still need to be precinct provisions to ensure the development complemented the surrounding Single House Zone character of dwellings of up to 2 storeys high. With the peripheral lots closer to the developed and yet to be developed SHZ and CLZ surrounding areas, a standard MHUZ over the full site (including at the outer interfaces of the areas) would not achieve the appropriate levels of amenity and effects in the context of this location where the SHZ is the predominant residential zoning. • The proposed SHZ with specific development and intensity standards manages effects such that the interface with the surrounding SHZ and CLZ areas can maintain an acceptable character complementing the surrounds, while also enabling the best outcomes for supply and market demand as set out in the Insight Helensville Housing Market Analysis. • Noting the predominance of the SHZ in this location, proposing this site as fully MHUZ would be seen as introducing higher intensity spot zoning in this location – likely less acceptable to the Council and the local community. Zoning just the internal more intensive parts of the site as MHUZ would be seen as even worse spot zoning with the associated regulatory complications. • If the site were to be fully MHUZ there would be associated expectations for provision of neighbourhood business centres and additional reserves, noting that reference to a neighbourhood business centre and reserves is raised in the Appendix A CI 23 request at Item UD1. We consider this expectation is unrealistic and onerous for the size and scope of this proposal, but if a full MHUZ was proposed there would be a higher expectation for these aspects, with less chance of a successful outcome. • The proposal recognises the adjoining subdivision to the east (Parkview) already contains many lots down to 200m² or thereabouts, mixed with sites of 500m² - 600m² – all within the SHZ. This character is established, so the proposal is considered appropriate in the context of this location. • The proposed provisions ensure that the complementary SHZ character is achieved by controlling the peripheral interface and also ensuring that useable and well designed smaller

			<p>lots can be established with reference to the MHUZ standards for these to ensure suitable outdoor living and daylight and other amenity outcomes are achieved.</p> <ul style="list-style-type: none"> Noting the Council's concerns with references to MHUZ standards in the application and the apparent perceptions that this could result in greater density and height effects than the SHZ provisions and outcomes envisage, we propose to amend the precinct provisions referring the MHUZ standards in Appendix 2 to the provisions. These changes are to; <ul style="list-style-type: none"> Remove all references to MHUZ standards, and rename these as "Mahi Road Helensville Precinct Smaller Lot Standards—200m² to 400m²" Change Standard H5.6.4 Building Height to that of 9m similar to the SHZ being 8m plus 1m for roof form. Limit the maximum density of development to one dwelling per 200m² within the smaller lots internal areas to address concerns around unwanted terraced housing development and associated effects. It is further noted that minor dwellings are only provided for on the larger sites of 600m² or greater under proposed Rule 15XX.6.6(1), with associated density effects comparable to the SHZ provisions noting these sites are located at the periphery of the development areas closer to external interfaces.
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The comments below are provided in relation to concerns regarding the request from an Urban Design point of view, that are being raised at this early stage to foreshadow potential issues should the plan change request be accepted. It is advised that these issues are resolved sooner rather than later:

#	Provisions	Comment / recommendation	Applicant response
Urban Design			
UDX1	Comprehensive Planned Residential Development	Please provide an agreed definition on what a 'comprehensive planned residential development' means (and its metrics) as stated in the precinct description, and how the anticipated outcomes as a consequence of this plan change will achieve a comprehensive development.	To be addressed under the CI42 stage of assessment.
UDX2	Precinct Provisions	Consider whether additional bespoke precinct provisions could ensure landscape and amenity values are maintained and enhanced where practicable, including in relation to the integration of a predominantly low-density suburban (spacious) character with the surrounding rural character and ecological area	Refer also to the updated s32 Analysis addressing this as Option 5 not to be pursued.
UDX3	Ecological Area Edge	Consider further examination into the different options and responses around the edge of the highlighted ecological area to create a cohesive, functional usable network of spaces for residents (particularly in patches where gorse and other invasives are currently present) in addition to the proposed drainage reserve. This aligns with the issues and opportunities of section 2.3 of the structure plan (n), and its development goals and strategies section 3.1 (vii).	To be addressed under the CI42 stage of assessment.
UDX4	Zoning Shapes/Boundaries	Clarification on how the proposed zoning shapes respond sensitively to the current landscape conditions (in terms of topography, hydrology, catchment quality) compared to the AUP zoning of these parcels.	To be addressed under the CI42 stage of assessment.

The comments below are provided in relation to concerns regarding the request from a Healthy Waters point of view, that are being raised at this early stage to foreshadow potential issues should the plan change request be accepted. It is advised that these issues are resolved sooner rather than later. Should you wish to discuss any of the below issues in detail with the relevant specialist before responding please contact Sammer Vinnakota (Sameer.Vinnakota@jacobs.com) in the first instance.

#	Provisions	Comment / recommendation	Applicant response	Healthy Waters Response 08/09/2025
Healthy Waters				

HWX1	Water Quality	The Infrastructure Report and Plans provide no information in relation to the proposed stormwater layout, or the location of the communal wetland. An interpretation of the wording of Section 6.2.1 suggests that there could be a dual stormwater pipe network to be vested to Council; one network serving the public roads and a second serving the lots areas. This will not be an acceptable solution to Healthy Waters as it will significantly increase the extent of public infrastructure that is required. Please confirm/address these matters.	Taken as advice only at this stage to be considered under a resource consent application.	The proposed treatment method for the different development areas should be confirmed at the plan change stage. How are stormwater runoffs from the proposed roads, residential lots and any private common accessways intended to be treated?
HWX2	Water Quality	For greenfield development, the use of inert materials by themselves does not constitute an appropriate level of treatment to protect the receiving environment. This is because the roof coverage is new to the land use and can act as a pathway for airborne contaminants to enter the stormwater network and to the receiving environment without the opportunity to be filtered as would occur on the existing grassed coverage. It has been noted that the roofs are intended to have 5mm retention provided via non-potable reuse, which Healthy Waters considers as an appropriate alternative to treatment of the roof. This is only considered acceptable if the reuse considers toilet and laundry applications. Reuse tanks used only for garden watering will not be considered as acceptable from a treatment perspective due to the limited opportunities through the year for the retained water to be used. The Applicant will need to confirm that reuse of roof runoff will include toilet flushing and laundry applications. If this is not provided, then it will be considered that the roof runoff will not be receiving treatment and will need to be incorporated into the communal wetland.	Taken as advice only at this stage.	Healthy Waters' advice remains.
HWX3	Water Quality	Section 6.2.1 of the SMP is not particularly descriptive of the water quality to be provided but suggest that only public roads will be serviced by the communal wetland. This conflicts with Section 7, which suggests that sitewide water quality treatment will be provided by a communal wetland. Please clarify this discrepancy and please address how water quality treatment will be addressed for private accessways/COALS. Table 4 of the SMP further states that a communal wetland will provide treatment; however, it does not state what areas will be serviced by the wetland. Please confirm what areas the communal wetland will service.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	The plan change SMP must demonstrate the feasibility of the stormwater approach proposed, including clarity on what areas the communal wetland will service and how private accessways/COALS will be treated (as per HWX1 above). Without this information at the plan change stage, Healthy Waters cannot assess if the proposed stormwater management approach is viable and if adverse effects associated with stormwater discharge can be mitigated. Final engineering design can be resolved at resource consent, but the overall strategy must be confirmed now.
HWX4	Water Quality	The SMP suggests litter traps are to be installed in the catchpits on the public roads. Whilst this will provide gross pollutant removal, the presence of these would need to be agreed with Auckland Transport (AT), for it to be deemed a feasible solution. Please provide approval from AT. The SMP also notes that where geotechnically suitable, permeable paving/porous concrete will be used to enhance retention. Will this include public roads and if so, has AT been consulted? This is critical as the design of the communal wetland will ultimately be affected by its application.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains.
HWX5	Water Quality	There is potential that an end of pipe Gross Pollutant Trap (GPT) immediately upstream of the wetland would be a preferred solution from an ongoing operation and maintenance perspective. Please consider this option in the BPO Assessment.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains.
HWX6	Water Quality	Neither the Master Plan nor the Precinct Plan indicate any stormwater management areas so it is not possible to confirm whether the proposed principles of stormwater management in the SMP can be implemented. The Applicant needs to clearly state the stormwater management that is to be provided for this proposed plan change and provide hydraulic sizing of communal devices to demonstrate that this can be incorporated into the Master Plan layout.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	The plan change SMP must demonstrate the feasibility of the stormwater approach proposed. Indicative location and hydraulic sizing of communal device(s) are necessary to demonstrate that the required stormwater infrastructure can be provided and incorporated into the proposed development layout (i.e. sufficient land can be set aside for the required device(s)).
HWX7	Hydrology Mitigation	Table 5 of the SMP indicates that the only hydrology mitigation for roofs will be via reuse tanks. This is not aligned with the description of hydrology mitigation to be provided in	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains. If permeable pavers are not proposed, the downstream wetland must be sized to cater for all impervious areas. Where are the calculations to demonstrate the hydraulic sizing of proposed wetland with and

		Table 4 of the same SMP as Table 4 states that <i>where geotechnically suitable, permeable paving/porous concrete will be used to enhance retention.</i>		without permeable pavers being proposed? Or else, a geotechnical report is required to confirm infiltration rate in accordance with GD01.
HWX8	Hydrology Mitigation	It should be noted that the Infrastructure Report indicates considerable earthworks across the site, and this will limit the ability for infiltration to be successfully applied. The Applicant needs to clarify how hydrology mitigation will be provided for the development area taking into account the amount of earthworks and the change in soil characteristics this will result in.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains. The plan change SMP must demonstrate the feasibility of the stormwater approach proposed, particularly in relation to hydrology mitigation, the Applicant's Infrastructure Report indicated that extensive earthworks will significantly alter soil conditions and will limit the feasibility of infiltration-based measures, which could also affect the feasibility of the proposed hydrology mitigation.
HWX9	Hydrology Mitigation	Section 6.2.3 of the SMP presents a toolbox of stormwater management devices; however, there is no information provided on how this toolbox could or would be implemented at resource consent stage. Whilst toolboxes provide some use for private device applications, at the resource consent stage of a development they are not helpful for public stormwater infrastructure. The lodged documents do not provide any plans detailing the proposed stormwater infrastructure and it is not possible to confirm whether stormwater can be managed from this application.	This could be commented on by Civix.	Healthy Waters' advice remains.
HWX10	Flooding	There is no design, assessment or analysis of the proposed communal wetland which is stated to be necessary for managing stormwater within the site. Further details are required to understand the feasibility, particularly sizing, layout, location and hydraulic design.	This can be addressed under the CI42 assessment stage.	Healthy Waters' advice remains. What are the intended functions of the proposed communal wetland e.g. water quality treatment, extended detention and peak-attenuation? If the proposed communal wetland is intended to achieve peak-attenuation, sizing calculations for the 2-, 10- and 100-year events and information of spillway and access are required to be provided at the plan change stage to demonstrate feasibility.
HWX11	Flooding	No information is provided for how stormwater will be managed within the site except for the provided flood modelling. There is no conceptual network layout, catchment plans, or hydrological/hydraulic assessments (including of stormwater capacity) to demonstrate feasibility of managing stormwater within the site.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains.
HWX12	Flooding	The flood modelling methodology described in Section 6.2.4 states a curve number of 61 was used for all pervious areas, however, it is noted that the report states that there are a multiple soil geological groups across the site. It is not clear why 61 was used for all pervious areas on this basis. Additionally, it is noted that the flood modelling has allowed for an impervious coverage of 60% for the development area. It is assumed that this value has been applied as the maximum impervious area allowed for the proposed land use in the AUP; however, this assumption does not include road areas that can make up greater than 15% of a development. As such the assumption of 60% impervious will be underestimating the long-term allowable impervious coverage and also the flood effects of the development. The flood model should be updated to reflect the proposed road layouts in the Master Plan with permitted maximum impervious coverages for lots and roads and should also take into account the varying soil geological groups in the PPC area.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains.
HWX13	Flooding	The SMP states that the 100-year post development runoff will be attenuated to no more than pre-development levels; however, there is no detail provided in any of the supplied documents reviewed how this will occur, or the effects on downstream levels and flood risk in Helensville. It is recommended that the applicant assesses further the potential impact of attenuation for this development as there is a risk of coinciding peak flows with the downstream Awaroa Stream.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	A Flood Risk Assessment is required at the plan change stage. There are properties downstream of the PPC affected by floodplains. Assessment of flood effects of the PPC on existing downstream properties is required at the plan change stage. While the document named 'Model Report' states the flood model approach taken, it does not provide sufficient information for Healthy Waters to assess either flood risk or stormwater servicing feasibility. The Model Report is limited to methodology only; it does not include the full model files, results, or verification necessary to confirm that the modelling is robust and that flood effects have been appropriately assessed. To enable the assessment of flood effects of this PPC,

				<p>Healthy Waters requires the full TUFLOW model package (inputs, boundary conditions, GIS layers, calibration/sensitivity checks, and outputs) for review.</p> <p>If onsite attenuation is to be proposed, whether attenuating site flows could alter the timing of runoff such that the site discharges coincide with peak flows in the Awaroa Stream, thereby raising downstream flood levels and risk? This is required to be addressed at the plan change stage to assess the effects of downstream flooding.</p>
HWX14	Flooding	Section 3 of the Flood Modelling report indicates that the TP108 24-hour rainfall depth has been increased by relevant percentages to reflect climate change; however, it does not confirm whether the temporal distribution of the rainfall has also been amended in line with the quoted Code of Practice. The applicant is to confirm that the temporal distribution of rainfall is correct as per v4 of the Code of Practice.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains.
HWX15	Flooding	Table 1 in the Flood Modelling report includes catchment information associated with the inflows to the model extents. It appears that there is no change in the pervious and impervious areas being modelled between the existing and future development states. It is recommended that the applicant is to confirm how these impervious areas have been defined and whether it includes the maximum permitted impervious coverage set out for the relevant land uses in the AUP.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains.
HWX16	Flooding	The modelling results are not contained in the Flood Modelling report, but as a drawing set in the Infrastructure Report. Section 5 of the Flood Modelling report talks about how the pipe network has been included in the TUFLOW model; however, there is no information on what pipe / bridge / culvert information has been included in the model. In addition, the action of lowering levels around manholes to allow for filling prior to spilling to the flowpath suggests that there is no allowance of actual inlet capacity to the network, which could result in more flows being delivered to the pipe network than would actually occur in real life. Please provide details of the Flood Model.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains. Healthy Waters needs to understand the assumptions underpinning the Applicant's flood model in order to assess any actual and/or potential flood effects of the PPC.
HWX17	Flooding	Drawing 58000 of this set indicates that there are at least three overland flowpaths that exit the plan change area's northern boundary; however, if the development is to collect the 100-year runoff from the plan change area; it is not clear in the assessments provided, whether the exit points for these three overland flowpaths will still remain the same in the future state.	This could be commented on by Civix.	Where is the comment from Civix?
HWX18	Flooding	Although drawing 58000 appears to include the proposed earth-worked landform, the flood reporting appears limited to simply this landform and does not include the communal wetland, which will not be presenting the correct floodplain. The Applicant is required to integrate the communal wetland into the model to confirm that it is possible to be constructed as stated in the reporting and also to confirm that the effects of attenuation will not have negative impacts on flood risk beyond the plan change boundaries.	These requests relate to a detailed application design and can only be responded to based on such a detailed plan that can only be provided at resource consent stage.	Healthy Waters' advice remains.