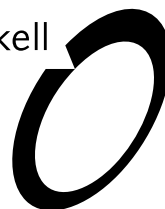


28 May 2025

Christopher Turbott
Auckland Council

By Email: Christopher.Turbott@aucklandcouncil.govt.nz

Boffa Miskell



Dear Christopher

**RE: RESPONSE TO REQUEST FOR FURTHER INFORMATION UNDER
CLAUSE 23(1) RMA ON A PRIVATE PLAN CHANGE REQUEST TO THE
AUCKLAND UNITARY PLAN - FRANKLIN 2 PRECINCT**

On 26 November 2024, Grafton Downs Limited ('GDL') lodged a private plan change request to amend the zoning and provisions applied to the Franklin 2 Precinct ('the Precinct'). Auckland Council has completed an initial review of the application and its documentation with the assistance of its various experts.

On 15 January, the Council provided a consolidated table of its further information requirements, pursuant to clause 23 of the First Schedule to the Resource Management Act 1991 ('RMA'). The response to these requests is provided in the attached link. [Franklin 2 Precinct Plan Change Response to Clause 23](#)

In the process of preparing the Clause 23 response, GDL has made a number of changes to the proposed Precinct provisions both in response to the Council's requests and the ongoing engagement with a number of key stakeholders, namely Transpower.

Since 2014, GDL has had a series of discussions with Transpower representative regarding the possibility of undergrounding or realigning the Transmission Corridor lines that traverse the Precinct. The most recent discussions were held in February this year, where an agreement was reached to realign the corridor to the east, parallel to the rail line, and then follow the alignment of a new collector road, which will run along the southern boundary of the College and connect to Paerātā Road (SH 22).

The Master Plan has been amended to reflect the preferred Transmission Corridor alignment and the changes to the transport network. These changes have also resulted in amendments to the proposed zoning pattern within the Precinct and proposed precinct plans 1 and 2.

In response to the Clause 23 request, we have updated the following appendices that were lodged with the application:

- Appendix 4 Proposed Provisions clean v1.
- Appendix 5 Proposed Provisions marked up v1.
- Appendix 6 Comparison of AUP Zones v1.
- Appendix 9 Urban Design Plan Set May 2025.

- Appendix 10 Urban Design Assessment Report May 2025.
- Appendix 15 Arboricultural Report v1.
- Appendix 16a Consultation v1.
- Appendix 16b Consultation Redacted version v1.

Copies of these replacement appendices are provided in the attached link. [Franklin 2 Precinct Plan Change Updated Appendices to PC Application](#)

Please do not hesitate to contact the writer should you have any queries regarding the attached information.

Yours sincerely

BOFFA MISKELL LTD



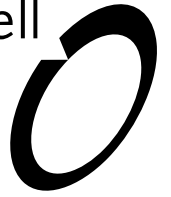
Janine Bell
Partner / Planner

Attachments: Links to:

- (1) Franklin 2 Precinct – Private Plan Change: Response to Request for Further Information under Clause 23(1) of the RMA (May 2025).
- (2) Updated versions of Appendices 4-6, 9, 10, 15, 16a and 16b.

cc: Ross Taylor, Grafton Downs Limited
Andrew An, Auckland Council

Boffa Miskell



Franklin 2 Precinct – Private Plan Change

Response to Request for Further Information under Clause 23(1) RMA
Prepared for Grafton Downs Limited



28 May 2025





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Attachments

Attachment1: Updated Urban Design Plan Set (Masterplan Drawings 2025)

Attachment 2: Updated Urban Design Statement (May 2025)

Attachment 3: Paerātā Train Station Walkable Catchment – Analysis of Zoning and Precinct Options

Attachment 4: Updated Consultation Report (April 2025) – Redacted Version

Attachment 5: Transport Requests (Commute Transportation Consultants)

Attachment 6: Economic Responses (Property Economics May 2025)

Attachment 7: Updated Arboricultural Report

Attachment 8: Open Space Evaluation

Attachment 9: Updated Streams and Wetlands Classification and Delineation

Attachment 10: Risk Information (ENGEO)

1.0 Introduction

On 26 November 2024, Grafton Downs Limited ('GDL') lodged a private plan change request to amend the zoning and provisions applied to the Franklin 2 Precinct ('the Precinct'). Auckland Council has completed an initial review of the application and its documentation with the assistance of its various experts. On 15 January, the Council provided a consolidated table of its further information requirements, pursuant to clause 23 of the First Schedule to the Resource Management Act 1991 ('RMA'). The response to these requests is set out in this report.

In preparing this response, GDL has made a series of changes to the overall masterplan for the Precinct. An Updated Plan Set has been prepared (**Attachment 1**). This Plan Set replaces that lodged with the Council in November 2024 as Appendix 9. The Urban Design Statement has also been updated in response to the changes to the masterplan (see **Attachment 2**). This statement replaces the one lodged with the Council in November 2024 as Appendix 10 to the application.

2.0 Planning, Statutory and General Matters

2.1 P1. Planning – NPS-UD Policy 3 Consistency

Request

Please provide an evaluation of precinct and zone options of defining a walkable RTN catchment and provisions that enable 6 storeys in that walkable catchment in accordance with the NPS-UD in a manner that is self-contained and not reliant on PC 78.

Response

Section 77G(1) of the RMA requires territorial authorities to incorporate the Medium Density Residential Standards (refer to RMA Schedule 3A) ('MDRS') into every relevant residential zone in an urban environment. Every residential zone in a tier 1 urban environment must also give effect to Policy 3 (or Policy 5 in the case of a tier 2 and 3 urban environment) of the National Policy Statement on Urban Development ('NPS-UD'). Likewise, section 77N of the RMA requires all urban non-residential zones to also give effect to Policy 3 (or Policy 5, as required) of the NPS-UD.

Policy 3 of the NPS-UD, as relevant to the land within the Precinct, requires that building heights of at least six storeys are enabled with a walkable catchment of an existing or planned rapid transit stop (Policy 3(c)). Policy 3 also requires that building heights and densities of urban form within and adjacent to Local Centre zones are commensurate with the level of commercial activity and services within the centre (Policy 3(d)).

The operative underlying Residential – Mixed Housing Urban ('MHU') zone of the Precinct falls within the definition of a relevant residential zone in accordance with section 2 of the RMA. In accordance Clause 25(4A) of Schedule 1 of the RMA, the Plan Change request must not be accepted or adopted unless it incorporates the MDRS as required by Section 77G(1). As also

required by Section 77G, the relevant residential zone must give effect to Policy 3 of the NPS-UD.

As outlined in Section 4.0 of the Plan Change report, the Precinct was not prepared under the RMA, rather it was established as part of a plan variation request, pursuant to the Housing Accords and Special Housing Areas Act 2013 ('HASHAA'), to the Proposed Auckland Unitary Plan. The precinct provisions were deemed operative, pursuant to section 73 of the HASHAA, in July 2015. As such, while the operative Residential sub-precinct provisions provide for a variety of housing typologies and building heights, they do not incorporate the MDRS or give effect to Policy 3 of the NPS-UD as required by the RMA. In particular, the operative precinct provisions do not enable building heights of at least six storeys within a walkable catchment of the Paerātā train station.

MDRS

The proposed precinct provisions as lodged with the Plan Change incorporated the MDRS into the underlying MHU and Residential – Terrace Housing and Apartment Buildings zone ('THAB'). Amendments have been made to IXXX.4.1 Activity Table and IXXX.6 Standards to further clarify the MDRS in the Precinct only apply to the underlying MHU and THAB zones and replace the corresponding zone standards for the construction and use of up to three dwellings per site.

No further amendments are required to implement the requirements in Section 77G(1).

Policy 3 of the NPS-UD

To give effect to NPS-UD Policy 3(c), the Plan Change proposes to zone the area within a walkable catchment of the Paerātā train station with zones and a building height standard that is consistent with the policy. This is achieved using a mix of Business – Local Centre zone ('LCZ'), Business – Mixed Use Zone ('MUZ'), and Residential – Terrace Housing and Apartment Buildings zone ('THAB'), and a new height standard has been included that applies within the mapped walkable catchment. The proposed zoning pattern provides for a mixed-use environment with a range of activities, including higher-density residential development in proximity to a rapid transit stop.

The zoning approach has been assessed by Mr Heath and Ms Zhu-Grant and is consistent with enabling sufficient capacity for economic activity and a built form that contributes to a well-functioning urban environment. In summary, the zoning pattern provides for:

- The LCZ enables a range of activities, including retail, food and beverage, commercial services and offices. These activities promote business activity and support the local convenience needs of the Precinct, as well as contribute to the vibrancy and vitality of the Paerātā train station area.
- The MUZ enables a compatible mix of commercial and residential activities and provides for a transition area between the LCZ and surrounding residential zoned land. In comparison to the LCZ, the MUZ provides for residential activities at ground floor level.
- Overall, this proposed pattern of business zones enables more businesses to establish in an area serviced by public transport and provides greater flexibility in

relation to use and development within Precinct. This effectively implements the requirements of Objective 3 as well as contributing to a well-functioning urban environment as sought by Objective 1 and Policy 1 of the NPS-UD.

- The purpose of the THAB zone is to make efficient use of land, increase the capacity of housing choice and ensure that residents have access to services, employment and public transport. The THAB zone also enables the greatest density, height and scale of development of the AUP(OP) residential zones. Given the THAB zone already enables higher-density residential outcomes, this zone is considered the most appropriate option to apply to the remaining area of land within a walkable catchment of the Paerātā train station. This approach is also consistent with Plan Change 78 ('PC78') which proposes to rezone all existing residential land within a walkable catchment to THAB.

In response to #P1, a number of amendments have been made to the proposed precinct provisions to give effect to Policy 3 of NPS-UD. These amendments ensure the precinct itself gives appropriate effect to the requirements of Policy 3 and is not reliant on PC78 having legal effect. The proposed precinct has adopted a consistent approach to PC78 to give effect to Policy 3 of the NPS-UD, which was based on modelling and analysis conducted as part of the Section 32 process for PC78.

These amendments include:

- Inclusion of a new objective, policy and standards, and amendments to the precinct description to enable heights of at least six storeys within a walkable catchment of the Paerātā train station in line with Policy 3(c) requirements.

The proposed Objective IXXX.2(5) and Policy IXXX.3(8) provide the overarching direction, which enables building heights of at least six storeys within a walkable catchment in the Precinct.

The proposed IXXX.6.10 Building Height in Walkable Catchments standard adopts the 21m height metric as proposed by PC78 to enable a six-storey building. Based on a design and modelling analysis, the PC78 Section 32 concluded the operative six-storey Height Variation Control of 19.5m applied to the THAB zone is inefficient for achieving a six-storey building and recommended the metric be increased to 21m¹. Relying on the analysis and conclusions of the PC78 Section 32, a 21m height metric is considered appropriate to enable building heights of at least six storeys while ensuring development provides for a level of amenity.

The proposed IXXX.6.11 Height in Relation to Boundary for Buildings in Walkable Catchments standard adopts the recession planes as proposed by PC78 to enable a six-storey building within a walkable catchment. This includes a 60-degree recession plane as measured at 19m for within 21.5m of a site frontage, and a 60-degree recession plane as measured at 8m for beyond 21.5m of a site frontage. The PC78 Section 32 concludes these recession planes are necessary to enable a six-storey building, while also achieving a high-density urban built character².

¹ Refer to pages 139 – 147 of the Section 32 – Residential and Business Zones Evaluation Report.

² Refer to pages 148 – 156 of the Section 32 – Residential and Business Zones Evaluation Report.

In relation to the proposed MUZ and LCZ within a walkable catchment, the standard adopts the 60-degree recession plane as measured at 19m proposed by PC78. The standard applies the recession plane at the zone boundary of the MUZ and LCZ to the adjacent THAB zone, and Open Space zones. As above, this recession plane is necessary to enable a six-storey building and ensure development provides for a level of amenity.

- Updated precinct plans to include a mapped walkable catchment around the Paerātā train station.

The precinct plans have been amended to include an 800m mapped walkable catchment around the Paerātā train station. The walkable catchment spatial extent is based on the block structure from the consented Phase 4 Framework Plan ('FWP') and takes into account other factors such as route grade and other constraints such as existing waterways. The 800m size is also consistent with the application of walkable catchments around rapid transit stops in PC 78, alongside the Ministry for the Environment's NPS-UD guidance and other tier 1 urban environments around New Zealand³.

The proposed application of the 800m walkable catchment is considered to appropriately give effect to Policy 3(c) of the NPS-UD. The spatial extent and size are consistent with the application of walkable catchments in PC78, and the mapping of the walkable catchment on the precinct plans provides clarity to plan users on where building heights of up to six storeys are enabled.

A table providing an analysis of the zoning and precinct options within a walkable catchment of the Paerātā train station is attached as **Attachment 3** to this report.

2.2 P2. Planning – Business – Mixed Use Zone

Request

Please advise whether the applicant anticipates this area being used for residential or business uses, or a mix. If it is a mix, what would the approximate ratio be.

Please also explain why this zone is considered preferential to centre zoning for the same area.

Response

As outlined in response to #P1, the proposed zoning pattern within a walkable catchment of the Paerātā train station provides for a mixed-use environment with a range of activities, including higher-density residential development in proximity to a rapid transit stop.

The LCZ is proposed to be applied adjacent to the Paerātā train station for the purpose of promoting business activity and supporting the local convenience needs of the Precinct. The LCZ enables a range of commercial activities including retail, food and beverage, commercial services and offices at ground floor, which contribute to the vibrancy and vitality of the train station area. In comparison to the LUZ, the MUZ enables residential activities at ground floor level where the anticipated development pattern includes commercial frontages along Te Rata

³ Section 32 – Implementation of Policy 3 of the National Policy Statement – Urban Development – Evaluation Report.

Boulevard and a central courtyard and higher-density residential development located behind. This proposed pattern of business zones provides greater flexibility in relation to use and development at ground floor level. This allows for sites zoned MUZ in proximity to the Paerātā train station to be fully developed for either commercial or residential purposes in response to present and future demand.

2.3 P3. Planning – Mana Whenua Consultation

Request

Please provide a summary of any consultation with mana whenua that has occurred since lodgement and what active steps the applicant is taking to provide for ongoing consultation with mana whenua.

Response

Since the lodgement of the plan change in November 2024, GDL has continued to engage with Ngāti Te Ata Waiohū (Karl Flavell) and Ngāti Tamaoho (Lucie Rutherford).

Ngāti Te Ata Waiohū

A response has been received from Ngāti Te Ata Waiohū advising that Te Ata iwi have mana whenua customary interests over the application area of Paerātā/ Pukekohe/Drury and surrounds.

On 15 November 2024, GDL was advised by Karl Flavell, Environmental Manager for Ngāti Te Ata Waiohū, that they would like the opportunity to prepare a Cultural Impact Assessment (CIA) for the Plan Change. On 18 November 2024, GDL advised Mr Flavell that they were agreeable to Ngāti Te Ata Waiohū preparing the CIA report and provided a full copy of the plan change application documents.

GDL also contacted Mr Flavell on 12 February 2025 and 27 February 2025 to get a date for an onsite consultation. Subsequently, a meeting was held between Chris Johnstone (GDL) and Karl Flavell on 11 March 2025 to discuss the Plan Change.

On 24 March 2025, in response to a request from Mr Flavell, a full copy of the application documents (as lodged with the Council) were supplied to Mr Flavell. GDL is advised that the CIA report is under preparation and will be delivered shortly.

Following a further email to Mr Flavell on Friday, 2 May 2025, a CIA for Ngāti Te Ata Waiohū was received on Wednesday, 7 May 2025. GDL has acknowledged receipt of the CIA and continuing consultation with Ngāti Te Ata Waiohū to discuss the content in the CIA and how they may respond to the feedback provided.

Ngāti Tamaoho

GDL also sought an onsite meeting with Ngāti Tamaoho representatives (Lucie Rutherford and Edith Tuhimata). On 2 April 2025, Chris Johnston (GDL) met with Lucie Rutherford to discuss the Plan Change application.

Following the meeting, Lucie Rutherford sought copies of the ecology and stormwater infrastructure reports. Lucie was advised that there were no changes proposed to the Precinct provisions related to the restoration of riparian margins and the Stormwater Management provisions currently applying in the Precinct had been retained. The proposed plan change does include a more restrictive maximum impervious area standard of 60% of site area to the proposed THAB zoning being sought in the southern area of the Precinct in the walkable area around the Paerātā train station.

A copy of the infrastructure report (Appendix 13 to the application) was provided to Ngāti Tamaoho. At this stage, no formal feedback has been received from Ngāti Tamaoho.

2.4 P4. Planning – Staging of Development

Request

Please provide a summary of the intended staging plan for development, particularly in the area known as phase four. This should provide intended build out pattern and timing.

Response

The Updated Urban Design Plan set (April 2025) includes the Proposed Staging Plan (**Attachment 1, Drawing No. SK012**). As indicated on the drawing, the Phases shown are not necessarily sequential. GDL is committed to the development of the balance of the land in their ownership occurring over the next 15-20 years. The phasing and timing will be driven by a number of factors, including:

- market demand for housing (both supply and desired typologies) within the Precinct, the southern area and Auckland more generally,
- the completion of the transport interchange facilities works being undertaken by KiwiRail,
- agreements with New Zealand Transport Agency (NZTA) and Auckland Transport in relation to upgrading the fourth access to SH22,
- agreement with Transpower for the realignment of the proposed Transmission Corridor.

GDL anticipates the next stages are likely to commence within Phase 4A. Phases 4B and 4C may be delayed while arrangements are made to relocate the Transmission Corridor and agreement reached on the upgrade to the fourth access to SH 22. GDL is keen to maximise the development opportunities within Phase 4C. It is envisaged that Phase 4C will focus on the development of terraced housing and apartment buildings and commercial activities adjacent to the train station. A significant portion of the land within Phase 4C is owned by others.

The above constraints mean that it is possible that development of stages within Phase 5 may be brought forward, ahead of some areas within Phases 4B and 4C.

2.5 P5. Planning – Policy 7*

Request

What is the term 'structural elements' in policy 7 intended to mean in the context of the precinct plan and why is it considered necessary to include this term in the policy at all.

Response

The term 'structural elements' refers to the infrastructure elements identified on the precinct plans. The policy provides the overarching direction that ensures all subdivision and development achieves the proposed design as outlined in the precinct plans. The use of the term 'structural elements' is consistent with other operative precincts in the AUP, namely Drury 1, Birdwood 2, Hingaia 2 and Whenuapai 1, which also include a similar policy.

In response to #P5, IXXX.3(6) has been amended to expand on what features of the precinct plans are covered by 'structural elements.' This approach is also consistent with the drafting of policies in the other precincts referenced above.

The wording of IXXX.3(6) has been amended as follows:

- (7) Require all subdivision and development to incorporate the structural elements of the Franklin 2 precinct plans to achieve:
- (a) an integrated block pattern which provides for a range of site sizes, minimises rear lots and promotes street activation;
 - (b) a network of connected pedestrian and cycleways which follow the internal road network, riparian reserves and open spaces;
 - (c) a logical north-south local road network which provides the following connections:
 - i. Glenbrook Road roundabout to Paerātā train station;
 - ii. links to Sim Road to the east;
 - iii. links to the identified access points to State Highway 22 to the west; and
 - (d) an open space network which provides for the ecological and recreational needs of the precinct inclusive of neighbourhood parks and riparian reserves.

Note: * As a result of consequential amendments to the precinct provisions, this policy is now referenced as IXXX.3(6).

2.6 P6. Planning – Policy 11

Request

Noting that the precinct plan does not indicate any open space in the transmission corridor – how is this policy intended to be given effect to.

Also lease explain how the requirements of D26 could be given effect to and the consequences on urban form and whether this could require a different open space or roading network than indicated in the precinct plan, and whether there is an expectation that the council will assume ownership of it.

Response

Policy IXXX.3(11) has been amended to delete reference to open space, as this operative direction is no longer required as there is no vested open space to be provided within the Transmission Corridor. The policy as amended provides a more general direction for subdivision and development in the Precinct in relation to the National Grid Corridor Overlay.

2.7 P7. Planning – Precinct Rules

Request

Please confirm whether the zone standards exempted in IXXX.6(2) would continue to apply for four or more dwellings.

Response

The standards exempt in IXXX.6(2) are density standards,⁴ which cannot be applied in addition to the MDRS as included in the precinct provisions (Schedule 3A, Clause 2(2) of the RMA). Clause 2(2) does not apply to developments of four or more dwellings, which are managed by the underlying MHU and THAB zone standards as captured by Rule (A1) in IXXX.4.1 Activity Table.

IXXX.4.1 Activity Table and IXXX.6(2) have been amended to provide further clarity to plan users on where the MDRS have been incorporated into the precinct provisions. This approach is also consistent with a number of existing precincts proposed to be amended by PC78 to give effect to Section 77G(1).

2.8 P8. Planning – Transport Infrastructure Rules

Request

Please provide and evaluation of the appropriate resource consent category for rule Table IXXX.4.1 Activity Table (A11) specifically considering discretionary and non-complying status.

Please explain what precinct rules apply if the information provided in response to Table IXXX.6.13.1 (a) demonstrates that the infrastructure is required, i.e. what rules require the infrastructure to be provided or require a resource consent to be provided.

Please also explain what rules would apply if the information is provided but the outcome is disputed or not agreed on review.

⁴ Defined in Schedule 3A, Part 1, Clause 1(1) of the RMA

Please provide any examples of recent precincts with infrastructure trigger rules of the same type, i.e. provision of information only.

Please provide any technical information relied on to demonstrate that upgrades referred to are not likely to be required as implied by the rules.

Response

As noted above, the precinct provisions have been updated, and it is now proposed that the appropriate resource consent category for rule Table IXXX.4.1 Activity Table (A11) is a discretionary activity application for developments that do not comply with the transport trigger requirements. We have reviewed recent plan changes to the AUP(OP) and note that transport trigger provisions are either discretionary or non-complying activities. In our view, the effects on the surrounding transport network are well understood, and the necessary upgrades are well defined.

The assessment approach as proposed under IXXX.4.1(A10) as a restricted discretionary activity is appropriate, as the effects can be clearly defined and restricted to the matters identified in the matters of discretion at IXXX.8.1(4). The transport assessment would assess the matters set out in Table IXXX.6.14.1, and the application would need to implement them, and conditions could be imposed, i.e., under Condition 1, to ensure the upgrades identified in the assessment are implemented. In the event that measures proposed to address the upgrade requirements were considered insufficient, consent could be refused under section 104 and 104C(2) of the RMA.

We have considered whether non-complying activity or discretionary activity status for infringing the standard would be appropriate and note that:

- The effects can be anticipated but could be significant.
- The effects need to be carefully managed due to the potential to compromise the network.
- By considering an application as a discretionary activity, any uncertainties can be addressed by enabling an assessment across all relevant objectives and policies, and the actual and potential effects on the environment in accordance with section 104B of the RMA.

In the case of Paerātā, the environment is well understood, and there is a high degree of confidence in the anticipated effects of development and limited options that can be relied upon to manage these effects. The site is limited to four intersections on to Paerātā Road, which is managed by NZTA as a State Highway and the assessments will need to identify improvements that are consistent with the requirements of NZTA as the asset owner. In considering other AUP precincts, non-complying activity status is not considered necessary or appropriate, as:

- the assessment process provided for in the provisions identifies known interventions that will need to be implemented when the transportation thresholds are met, and
- there are no unanticipated outcomes that are unable to be satisfactorily managed by the assessment process in the provisions and discretionary activity status.

Further amendments are proposed to Standard IXXX.6.14 Access Upgrades and Timing of Subdivision and Development in response to Auckland Transport's advisory comments on the precinct provisions. The amendments provide further clarity on the purpose and the requirements of standard. These include requiring both subdivision and development to comply with the standard and requiring any access upgrade that is determined to be necessary to service development to be constructed prior to the construction and/or creation of dwellings or residential lots that exceed the threshold.

2.9 P9. Planning – Possible Inconsistencies or Errors

Requests

Please review the following and respond with relevant explanation and amendments:

Response

- i. *Is 'side' missing from IXXX.6.6(1)?*

Response: Discussed with Christopher Turbott – item included in error.

- ii. *The precinct plans to be retained appear different in Appendix 4 and Appendix 5.*

Response: Appendix 5 has been corrected and re-issued. In **Appendix 5**, the Operative Precinct Plans 1-5 are to be deleted and replaced with the following Proposed Precinct Plans:

- Franklin 2 Precinct Plan 1.
- Franklin 2 Precinct Plan 2 Road Hierarchy, Pedestrian and Cycle Network.
- Franklin 2 Precinct Plan 3 Stormwater Management Areas.

Precinct Plans 1 and 2 have been updated to show the proposed rezoning within the Precinct, the consented subdivision pattern, the indicative open space areas (outside the consented areas), the proposed Wesley College sub-precinct, the designated train station and the new designated access road to the station from Paerātā Road (SH 22). The content of Precinct Plan 3 Stormwater Management Areas remains unchanged. The plan has been updated to have the same “look and feel” as the updated precinct plans.

- iii. *Does the reference to schedule 10 item 2084 in Appendices 4 and 5 relate to item 2804 in schedule 10?*

Response: The reference in schedule 10 should be to 2804. Unfortunately, the number has been transposed in the appendices. The references have been corrected in the re-issued documents.

- iv. *Does the reference to IXXX.6.13.1 in (A10) and (A11) refer to IXXX.6.13(1)?*

Response: Yes, the references to IXXX.6.13.1 in (A10) and (A11) refer to IXXX.6.13(1). The proposed provisions have been amended.

2.10 P10. Planning – Show Homes

Request

Please explain how the show home rule Table IXXX.4.1 Activity Table (A4) would apply in the THAB zone to an apartment building with multiple dwellings. For example, would it apply to just one dwelling in an apartment building or potentially all dwellings in an apartment building. Would this proposed rule overrule rules Table H6.4.1 Activity Table (A3A), (A7), and (A35).

Response

GDL has reconsidered the proposed provision for show homes within the THAB zone. The proposed wording in the Activity Table IXXX.4.1 has been amended to remove the provision for show homes in the THAB zone. GDL has retained provision for the development of show homes within the MHU zone.

2.11 P11. Planning – Framework Plan Resource Consents

Request

Please consider and outline any consistency issues that could arise (if any) between the existing framework plan resource consents (particularly the phase 4 LUC 60409177) and the proposed plan change, and if so, how they would be resolved.

Advise whether the framework plan resource consents would be surrendered if the plan change is successful.

Advise whether the proposed plan change provides an equivalent of framework plan LUC 60409177 conditions 4, 6, 7 and 8, in the event that this resource consent is surrendered.

Response

It is not GDL's intention to surrender the approved FWP for Phase 4. The FWP is not an enabling consent and is followed by specific land use consents and stage specific subdivision consents that accord with the FWP. Until the proposed plan change is operative, the FWP forms the basis for the subdivision consents as per the operative Franklin 2 Precinct provisions. When the plan change is fully operative, and reference to the FWP is removed entirely, the approved FWP remains a valuable reference for subdivision design. Subdivisions will be assessed in accordance with amended Precinct provisions and E38 of the AUP.

The conditions referred to (numbers 4, 6, 7, and 8) will be addressed by way of future land use and subdivision consents. There is no need to add further details into the Precinct to address these specific items, as there is adequate discretion in the Operative AUP and Proposed Precinct provisions.

2.12 P12. Planning – Appendix 16

Request

Please provide a revised copy of the consultation report that does not contain the names of private individuals, their contact details or information that could be used to identify them.

Response

The consultation report has been updated to reflect engagement that has occurred since the application was lodged in November 2024. A redacted version of this report is included as **Attachment 4**.

3.0 Transport Matters

Request

A series of requests have been made in relation to the following Transport Matters

- *Land use Assumptions (T1 and T2)*
- *Public Transport peak hour trips (T3)*
- *Vehicle generation effects and safety (T4 -T8)*
- *Cycling (T9 -T10)*
- *Collector Road (T11)*
- *Consultation with NZTA (T12)*
- *Road Function and Design (T13-14)*

Response

A comprehensive response to these matters has been provided by Commute Transportation Consultants (**see Attachment 5**). In relation to the request in T1 Land use Assumptions, the employment assumptions are also addressed in the Economic Responses in **Attachment 6** (pages 6-7).

4.0 Water and Wastewater

4.1 W1. Water and Wastewater – Increase in Plan Enabled Capacity

Request

Please clarify the assumed dwelling density used for each proposed residential zone.

Response

The number of DUEs across the site has been based on the potential density plan. A copy of this plan is provided in **Attachment 1, Drawing No. SK010**. The accompanying Table 1 (below) provides a breakdown of the proposed dwelling typologies and their estimated yields.

The number of DUEs for residential Lots 3 stories or less is:

688+1,033 +505+545+1,046 (completed or consented DUE) = 3,817 DUEs

Number of DUEs for residential Lots 4 stories or more = 248+1,005 = 1,253 DUEs

Total number of DUE = 5,070

Table 1: Franklin 2 Potential Density Plan

Typology	POTENTIAL DENSITY SCENARIO (MAY 2025)	
	Net Area (ha)	Yield (approx.)
Mixed Use Apartments above retail at ground level (Average 120 dw/ha)	2.07	248
High Density Apartments 3-6 Storeys (Average 110 dw/ha)	9.14	1005
Medium Density 3 storey Attached Dwellings and Walk-up Apartments (Average 65 dw/ha)	10.58	688
Medium Density: 2-3 Storey Attached Dwellings (Average 47 dw/ha)	21.98	1033
Low Density Semi-detached and Standalone Typologies (Average 33 dw/ha)	15.29	505
Low Density Standalone Typologies (Average 22 dw/ha)	24.75	545
Potential Total Future Dwellings	83.81	4024
Completed or Consented Dwellings in Phases 1-3	48.15	1046
Total Dwellings in Franklin 2 Precinct	131.96	5070

4.2 W2. Water and Wastewater – School

Request

Please clarify why a different demand scenario has been used for 1000 school students in the 2014 vs 2024 assessment.

Response

The current student roll attending Wesley College is 358 (184 are boarders) with a roll cap of 400 students, which is unlikely to increase in the near future. Therefore, the assumptions made around student numbers and the number of boarders are conservative to ensure that the network has sufficient freeboard in case the number of students or boarding students change.

For the 1000 students, as per the Wastewater Code of Practice, the daily demand flow is calculated based on Table 6.1.4 – Dry industry design wastewater flow allowance and peaking factors, section F (Other facility design wastewater flows and peaking factors). According to this:

- Boarding students require 140 litres per student per day.
- Day students require 20 litres per student per day.

These figures have been incorporated into our calculations, and the flows have been calculated based on the number of students.

To convert this to DUEs, the standard approach assumes 3 people per DUE. Based on this methodology, the 1000 students account for 334 DUEs in the spreadsheet (500/3). The standard approach assumes a wastewater flow allowance of 180l/p/d which is above the boarding allowance of 160l/s and the day student allowance of 20l/p/d.

Although we could have converted the calculated flows to a DUE, this would have halved the number of DUEs and would reduce the resilience in the network should anything change.

Please note we have applied the daily flow figures in accordance with the Wastewater Code of Practice, ensuring consistency with industry standards.

The previous DUE calculation in 2014 was 666, and since the calculations were conducted more than 10 years ago, assumptions may no longer be reflective of current standards. Although the reason behind the 666 DUEs calculated in 2014 is unclear, this is what was anticipated in the previous plan change, and the tables in the report therefore compare what was anticipated previously with what is currently anticipated.

However, for the purposes of this plan change application, we are satisfied with the DUE estimate presented here is conservative and suitable for the comparison to the previous plan change assessment.

5.0 Economics

Request

A series of requests have been made in relation to the Economic Assessment:

- *Population projections (E1)*
- *Affordable housing (E2) and*
- *Business activity*

Response

A comprehensive response to these matters has been provided by Property Economics (**see Attachment 6**). The response also responds to the request made in the Transport section (T1 - Land use Assumptions) related to the employment assumptions.

6.0 Urban Design and Landscape

6.1 UD1. Urban Design – Effect of NZTA Link Road Designation

Request

Please advise whether the indicative drawings contained in the Urban Design Plan set have taken account of the NZTA designation for the Link Road from SH22 and confirm the implications the designed street link will have on the urban structure and development pattern depicted in the drawings.

Response

The urban design plan set has been developed taking into account the designation and design of the Link Road. The urban design approach in the precinct plans and the plan set ties in with the proposed block structure that integrates with the design of the Link Road. This ensures there is an efficient urban layout that maximises development and orientates blocks and local roads to achieve connected and accessible neighbourhoods and minimises rear lots. It can also achieve an appropriate interface to the boulevard type road that will carry traffic from SH 22 and could lead to the future Proposed Drury – Pukekohe Link Road.

It is understood that following the completion of the construction of the Link Road, a review will be undertaken to determine any areas that are no longer required for the long-term development, operation, or maintenance of the Link Road. This is evident in Figure 1 below, which shows the road design for construction with the wider designation boundary extent (shown with a yellow line), the Link Road occupies a significantly smaller area. Once completed, the block/lot boundaries can be adjusted during the detailed design stage, though the overall block structure is already established.

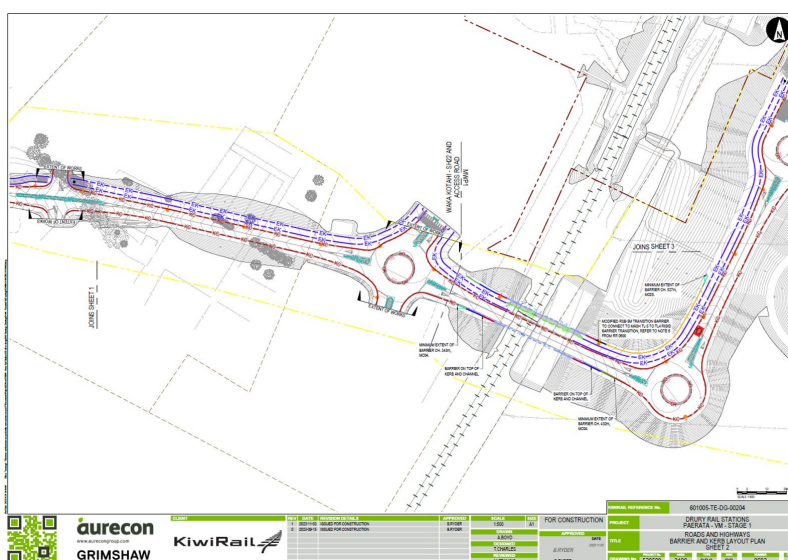


Figure 1: Construction drawing for the Link Road being constructed as part of Designation No. 6311 Paerātā Station Interchange and Accessway

6.2 UD2. Urban Design – Topography

Request

Please provide additional analysis of the topographical constraints within the Precinct on urban form outcomes (particularly in relation to the THAB zone).

Response

The additional topographical constraints information within the Precinct is provided in **Attachment 1, Drawing SK003**.

6.3 UD3. Urban Design – Railway Buffers

Request

Please provide further detail of the extent and form of visual and sound buffers required along the railway corridor.

Response

The buffer along the railway corridor will consist of trees and shrubs to create a visual screen. Due to the natural topography, streams, and wetlands, the landscape buffer between the residential area and railway line will typically range from 50 to over 100 metres wide. Additionally, the significant vertical separation between the railway and the houses will substantially reduce noise levels, making the landscape buffer primarily useful for visual screening rather than acoustic mitigation.

6.4 UD4. Urban Design – Walkable RTN Catchment

Request

Please provide a more detailed analysis of the walkable catchment around the Paerātā Train Stations and an explanation of why the proposed THAB zone does not extend to the north-east beyond Sim Road. Also, with reference to the NPS-UD, confirmation of how the Precinct meets the requirements for density (including 6-storey height) within the walkable catchment is sought.

Response

As shown in the Ped-Shed Drawing in **Attachment 1, Drawing SK006**, only a small area of land to the north-east, beyond Sim Road, falls within the 10-minute walkable catchment and is not zoned THAB. Approximately half of this area is within a riparian reserve, while the remaining portion has a steep contour. Therefore, it was considered logical to place the THAB zone boundary at Te Rata Boulevard.

To the north, the THAB boundary extends up to a local road boundary, providing a logical physical edge to the zone. This area has flatter topography and is within close proximity to the

proposed Central Park open space amenity, enhancing its suitability for increased residential intensity.

6.5 UD5. Urban Design – Central Open Space

Request

Please advise why the central open space is included within the College sub-Precinct.

Response

The suburban central park has been included in the College Precinct to provide additional options for the development of the land should agreement not be reached with Auckland Council (Parks) to acquire the land. If an agreement is reached between GDL and the Council to acquire all or part of the land as open space prior to the plan change submission period closing, a submission could be lodged to amend the boundary of the College Sub-precinct. Alternatively, if the agreement is reached with the Council, post the private plan change becoming operative, the Council would be able to rezone the land Open Space as part of the Council's annual tidy up plan change to rezone land recently vested or acquired by Auckland Council for open space purposes. This plan change could also be used to amend the boundaries of the College Sub-precinct to exclude the area acquired by the Council for public open space.

6.6 UD6. Urban Design – Neighbourhood Park

Request

Please advise why the indicative neighbourhood park shown adjacent to the Sim Road Business: Neighbourhood Centre zone in the various plans contained in the UDA plan set is not identified in Precinct Plan 1.

Response

Precinct Plan 1 in the Proposed Plan Change has been amended to show a neighbourhood park adjacent to the Sim Road Business: Neighbourhood Centre.

6.7 UD7. Urban Design – Aerial Photograph

Request

Please provide an aerial photograph with the proposed Precinct Plan overlaid.

Response

An aerial photograph with the proposed Precinct Plan overlaid is included in the Updated Urban Design Plan Set April 2025 (see **Attachment 1, Drawing No. SK 002**).

6.8 UD8. Urban Design – Design Outcomes

Request

Please identify how a number of the design outcomes outlined in the UDA report (such as design integration with the transmission lines) will be achieved through either the underlying zone provisions or the Precinct Provisions.

Response

The principal design outcomes for the Precinct will continue to be achieved through the subsequent stages and phases of subdivision and development within the Precinct. Each phase and stage of subdivision will be the subject of a subdivision consent application. Prior to lodging any application, there will be discussions with the requisite parts of the Council and Council Controlled Organisations (i.e., Auckland Transport, Parks, Healthy Waters) and, where applicable, central government agencies, including NZTA, KiwiRail and Transpower. The applications will be guided by the provisions of the AUP, including the relevant zoning provisions, the Precinct provisions, the Overlay and the Auckland-wide provisions.

The Precinct provisions in particular address the specific requirements related to transport, stormwater management and subdivision, including the continued restoration of the riparian margins within the Precinct. Applications will be guided not only by the zone and Auckland-wide objectives, policies and standards but also by the Precinct specific provisions, which set out the nature and timing of transport upgrades, the indicative road layout, cycle and pedestrian network and stormwater management requirements.

In relation to the Transmission Corridor, an agreement has been reached between GDL and Transpower to realign the Transmission Corridor within the Precinct from GLN-DEV-A0016 (the most westerly pylon within the precinct) to GLN-DEV-A0019 (the most easterly in the precinct). This realignment of the corridor sees the transmission lines moved to the east, parallel to the rail line and then follow the alignment of the proposed new collector road, which will run along the southern boundary of the College and connect to Paerātā Road (SH 22). The lines will be moved to monopole structures.

The Master Plan and Urban Design Statement have been updated to reflect the realignment of the Transmission Corridor and to demonstrate how the requirements of the National Grid Corridor Overlay (Chapter D26. of the AUP) can be accommodated. The realigned Transmission Corridor will follow the riparian margins or the road reserve with the space utilised by berms, footpaths, and cycleways. Only a small portion of the corridor overlay will cross private lots, and, in these areas, there will be a no-build buffer zone. Further detail is provided in section 3.3 of the Urban Design Assessment (Refer to **Attachment 2**). Ultimately, the final design must comply with the standards of the National Grid Corridor Overlay, which will be assessed during the resource consent stage. To ensure future subdivision appropriately integrates blocks and allotments with the transmission lines and National Grid Corridor Overlay, the assessment matters have been updated in the precinct to include reference to the design solutions included in the Urban Design Statement as options to manage the potential effects.

7.0 Built Heritage

7.1 H1. Built Heritage – Removal of Control

Request

Please provide details of the heritage justification for removing the demolition activity control applying to the water tower, fire shed and Caughey Memorial Hospital.

Response

In the Operative AUP provisions, the land occupied by Wesley College is zoned Business Local Centre zone and included in the Wesley Sub Precinct. The Wesley Sub Precinct includes a concept plan that sets out a broad configuration for the development of the Sub-precinct drawn from the high-level master plan work undertaken in 2014 in support of Plan Variation 3.

With the Wesley College Trust Board's decision to remain within the Precinct, on their existing site, the proposed plan change seeks to rezone the site from Business Local Centre to Residential MHU and to remove the Wesley Sub-precinct Concept Plan, replacing it with a College Sub precinct, which operates largely in the same manner as the operative Precinct Plan 4.

The Concept Plan sets out the proposal to create "Chapel Street", an interface between the commercial centre within the Precinct and the proposed "central 'suburb' park ("Central Park"). The focus of Chapel Street was the W.H. Smith Memorial Chapel, which GDL had included in the Schedule of Historic Heritage (Schedule 14.1) as part of Plan Variation 3. The intention with Chapel Street was to retain some of the older structures and buildings as part of the development of the wider commercial area. Central Park was proposed as the green heart of the Precinct and located on the east facing hill slope beneath the ridge of the local centre/ future 'Chapel Street'. The park is identified in the Operative Precinct Plan 1.

Central Park remains part of GDL's master plan for the Precinct and discussions are underway with the Council's Parks Team regarding the acquisition and development of the area. As a result of these discussions, there have been slight amendments to the size and location of the park, and these are reflected in the updated masterplan. The original intention of the Chapel Street proposal now falls away as the W.H. Smith Memorial Chapel will be retained as part of Wesley College.

While the water tower and fire shed are not scheduled heritage buildings, if the Council wants to retain the demolition activity control provision related to these buildings, GDL would be willing to include the provision in the proposed plan change.

7.2 H2. Built Heritage – Demolition

Request

Please provide a copy of the granted consent documents relating to the demolition of the W.H. Memorial Hospital building. (Building subject to Restricted Discretionary consent for demolition under '6. Sub-precinct: Wesley, 1. Activity table, 1.1 Area A, Development').

Response

The W.H. Caughey Memorial Hospital building is part of Wesley College. The land and buildings are owned and managed by the Wesley College Trust Board. GDL has not been involved with developments on the College grounds, including applying for any resource consents to demolish the former Hospital building.

8.0 Notable Trees

8.1 NT1. – NT7. Notable Trees

Request

Please confirm what the colour coding in the table at Appendix 3 of the arboriculture report identifies.

Please confirm what the 'size' column refers to in the table at Appendix 3 of the arboriculture report identifies. It is presumed to refer to height / canopy spread radius / diameter (all in metres).

Please confirm what the acronyms (BT and ET) refer to in in the table at Appendix 3 of the arboriculture report identifies.

In the header of the Notes column in the table at Appendix 3 of the arboriculture report it identifies the acronyms for WCD and OCD as 'within Council designation' and 'outside Council designation'. What is intended by 'Council designation'?

Why do some of the trees listed in Appendix 3 of the arboriculture report not have STEM scores?

Trees 28 and 29 (in the 2014 numbering format) are identified in Appendix 3 of the arboriculture report as 'WCD Group' in the Feature Type column. Please confirm what is intended. It is understood that these two trees are individual specimens but are part of a group.

Can a column be added to the Table at Appendix 3 of the arboriculture report to identify the 2024 tree number. This would greatly assist in cross-referencing.

Response

The arboricultural report prepared by Peers Brown Miller has been updated to address all the matters referred to above – refer **Attachment 7**.

9.0 Open Space

9.1 OS1. Open Space – Provision

Request

Please provide an analysis of open space requirements for the increased residential density proposed. Please use a methodology appropriate to the scale and density of the built environment proposed. Specifically address the provision of any additional neighbourhood parks necessary to provide for the local community that the plan change will enable.

Response

Overall, the proposed changes in zoning within the Precinct will have a minimal impact on the proposed density. The operative Franklin 2 provisions provide for medium density development, with the densest area of development envisaged in the core of the precinct, due to its proximate location to the proposed local centre, central open space, and proposed passenger transport interchange. The density of residential development reduces towards the northern and southern edges of the precinct. A variety of lot sizes and corresponding housing typologies are envisaged, ranging from 2-3 storey attached developments to 1-2 storey detached dwellings. Lot sizes range from an average of 400m²-450m² to higher intensities of 150m² – 300m². It is envisaged that the Precinct could eventually comprise between 4,500 and 5,000 dwellings.

The proposed plan change involves the redistribution of the business zoned land to the northern and southern parts of the Precinct adjacent to the Glenbrook roundabout and the Paerātā train station, the introduction of THAB zone in the area surrounding the train station and the retention of Wesley College. The net effect of these changes is that the overall residential density remains at around 5,000 dwellings in a broader range of typologies.

The potential density plan for the Precinct is provided in **Attachment 1, Drawing No. SK010**. Table 1 below provides an indicative breakdown of the proposed dwelling typologies and their estimated yields. It envisages a total of 5,070 dwellings.

Table 2: Franklin 2 Precinct Potential Density Plan

Typology	POTENTIAL DENSITY SCENARIO (MAY 2025)	
	Net Area (ha)	Yield (approx.)
Mixed Use Apartments above retail at ground level (Average 120 dw/ha)	2.07	248
High Density Apartments 3-6 Storeys (Average 110 dw/ha)	9.14	1005
Medium Density 3 storey Attached Dwellings and Walk-up Apartments (Average 65 dw/ha)	10.58	688
Medium Density: 2-3 Storey Attached Dwellings (Average 47 dw/ha)	21.98	1033
Low Density Semi-detached and Standalone Typologies (Average 33 dw/ha)	15.29	505
Low Density Standalone Typologies (Average 22 dw/ha)	24.75	545
Potential Total Future Dwellings	83.81	4024
Completed or Consented Dwellings in Phases 1-3	48.15	1046
Total Dwellings in Franklin 2 Precinct	131.96	5070

Therefore, GDL doesn't envisage that there will be a need for the provision of any additional neighbourhood parks. Rather, the potential changes in housing typologies and densities in certain parts of the Precinct may have implications for the size, location and type of facilities provided within the neighbourhood parks. These will be worked through with the Council's Parks Team as part of the subdivision consent process.

9.2 OS2. Open Space – Suburb Park

Request

Please explain the rationale for why the suburb park has been included under the Wesley College sub-precinct.

This includes whether it will be accessible to the wider community and how it will function as a suburb park for the wider community.

Response

In Plan Variation 3 (2015), the proposed central 'suburb' park ("Central Park") was proposed as the green heart of the Precinct. It was located on the east facing hill slope beneath the ridge of the local centre/ future 'Chapel Street'. The park is identified in the Operative Precinct Plan 1.

The intention for Central Park as the green heart of the Precinct remains as part of GDL's vision for the Precinct and has been retained in the updated master plan for the Precinct. Discussions are ongoing with the Council Parks regarding the acquisition and development of the proposed Central Park. As a result of these discussions, there have been slight amendments to the size

and location of the park from what is shown in the Operative Precinct Plan 1. The amended area is included in the Updated Precinct Plan 1 as part of the plan change application.

The park has been included in the College Precinct to provide additional options for the development of the land should agreement not be reached with the Council to acquire Central Park. If an agreement is reached between GDL and the Council to acquire the land as open space prior to the plan change submission period closing, a submission could be lodged to amend the boundary of the College Sub-precinct. Alternatively, if the agreement is reached with the Council, post the private plan change becoming operative, the Council would be able to rezone the land Open Space as part of the Council's annual tidy up plan change to rezone land recently vested or acquired by Auckland Council for open space purposes. This plan change could also be used to amend the boundaries of the College Sub-precinct.

9.3 OS3. Open Space – Deletion of Open Space Objectives and Policies

Request

Clarify how the in the absence of the omitted open space provisions, the intended open space outcomes of the plan change will be achieved, particularly in relation to the open space network. This includes the integration of open space with urban development, taking into consideration the nature and type of open spaces.

Response

The achievement of the open space provisions and its integration with urban development within the Precinct will be achieved through the provisions in Citywide Chapter E38 Subdivision - Urban provisions of the AUP. The following objectives deal specifically with the need for subdivision to be undertaken in a manner that provides for the long-term needs of the community, requires land to be vested and for subdivision to maintain and enhance natural features and landscapes that contribute to the character and amenity.

E38.2 Objectives

- (2) *Land is subdivided in a manner that provides for the long-term needs of the community and minimises adverse effects of future development on the environment.*
- (3) *Land is vested to provide for esplanades reserves, roads, stormwater, infrastructure and other purposes.*
- (8) *Subdivision maintains or enhances the natural features and landscapes that contribute to the character and amenity values of the areas.*

Policy E38.3. (18) deals specifically with open space it states:

Recreation and Amenity Spaces

- (18) *Require subdivision to provide for the recreation and amenity needs of residents by:*

- (a) *providing open spaces which are prominent and accessible by pedestrians;*
- (b) *providing for the number and size of open spaces in proportion to the future density of the neighbourhood; and*
- (c) *providing for pedestrian and/or cycle linkages*

GDL's intention is to continue to develop the Precinct will continue in phases/stages and at each phase/stage to work with the Council to identify the provision of appropriate open space requirements, including the ongoing restoration of the riparian margins.

9.4 OS4. Open Space – Quality of Open Space

Request

Please supply an evaluation of how the principles of the council's Open Space Provision Policy will be met with regards to preferred characteristics of neighbourhood parks specifically referring to the proposed neighbourhood park located under transmission lines and the park located next to the local centre zone in Sim Road that is subject to an overland flow path or potential flooding.

Response

An evaluation of how the principles of the Council's Open Space Provision Policy (2016) will be met with regards to preferred characteristics of neighbourhood parks specifically referring to the proposed neighbourhood park located under transmission lines and the park located next to the local centre zone in Sim Road is provided in **Attachment 8**.

9.5 OS5. Open Space – Types

Request

Please clearly delineate which areas of proposed open spaces are required/proposed for stormwater purposes versus recreation purposes.

Response

At this stage we are unable to be definitive around which areas of proposed open spaces are required for stormwater purposes versus recreation purposes. This will be determined at each phase/stage of subdivision in conjunction with the Council's Healthy Waters and Parks Departments.

10.0 Ecology

10.1 EC1. Ecology – Differences in Riparian Areas

Request

Please include the existing precinct plan riparian areas into the proposal or provide details on any removed along with how the effects of this will be addressed and how the legislative requirements for wetlands are addressed.

Response

The existing Franklin 2 Precinct Plan 1 has provided the planning framework for the Paerātā Rise development.

Objective 12 of the Operative Franklin 2 Precinct provisions (AUP, Chapter I, 6.30) states “*Subdivision of the precinct will facilitate restoration of riparian margins*”. The intention of the riparian corridors is ‘no net loss of stream function,’ which is provided for by utilisation of the SEV and ECR method.

Riparian corridors within the precinct were mapped and identified as appropriate locations to undertake mitigation / compensatory restoration to offset the anticipated loss and potential impact to streams arising from subdivision and development of the Franklin 2 Precinct.

The Franklin 2 Precinct development has (thus far) been progressed in Phases and Stages, with requisite consent approvals obtained for each stage.

In a small number of cases, waterbodies within the Precinct have been reclaimed or culverted (with resource consent approval), notwithstanding their identification on Precinct Plan 1. The SEV and ECR method was utilised to assess stream loss and ensure appropriate compensation for all stream works and stream reclamations.

In addition, a number of mapped watercourses were classified as ephemeral when assessed as part of resource consent applications. Other areas (e.g., the tributary under the transmission line, lower reaches of Sim Road) have been added/ extended.

In particular, features noted in the RFI as excluded from the revised open space network are as follows:

- Stream and wetland complex in the north of the precinct, extending south of Karaka Road: **Reclaimed.**
- Stream parallel to Karaka Road, north of Te Rata Boulevard: **Reclaimed.**
- Stream extending northwest from Sim Road: **Assessed and classified in 2022. Ephemeral (no wetlands) in the upper reaches, wetland complexes delineated in the lower reaches.**
- Stream immediately south of the entrance to Wesley College: **Assessed and classified as ephemeral in 2020.**

- Stream/wetland to the east of property 890 Paerātā Road: **Assessed and classified as ephemeral in 2020.**

Attachment 9 provides an up-to-date classification and delineation of streams and wetlands within the Precinct. All watercourses and wetlands within the Phase 4 area were reassessed in 2020 and 2022, respectively, and in accordance with NPS-FM wetland delineation protocols. Hence, the proposed plan change captures existing features, and its implementation will not result in reduced ecological values, or reduced extent of wetlands or streams (permanent or intermittent).

10.2 EC2. Ecology – Ecological Values

Request

Please detail what and where the natural ecological values that are identified as a significant feature of the precinct in the application material are, and how they will be maintained or enhanced through the plan change.

Please provide evidence that the proposed open spaces will provide the protection of the ecological values identified.

Response

The Paerātā Rise development forms the headwaters of a branch of the Whangapouri Creek, which flows into the Drury Creek and Pāhurehure Inlet. The watercourses and wetlands form a corridor through the Precinct and are a distinctive topographic and ecological feature. The ecological values of the watercourse and riparian corridor have been enhanced through the restoration and enhancement of substantial portions of the stream reach in the currently developed Phases of subdivision. Future Phases of subdivision will extend the restored network of riparian margins and wetlands.

Restoration to date includes the removal of weed species from the riparian margin, planting of riparian buffers, installation of culverts suitable for fish passage and vertebrate pest management. Stormwater infrastructure uses a water sensitive design approach to protect the water quality values of the watercourses on site.

All the watercourses within the precinct have been assessed through visual assessment, stream classification and SEV surveys. All the wetlands within the Phase 4 area have been assessed and mapped in accordance with the NPS-FM wetland delineation protocols.

10.3 EC3. Ecology – Ecological Areas and Wetlands

Request

Please set out areas that are specifically retained for ecological value and enhancement (rather than for other purposes such as stormwater treatment). It is recommended to include wetlands and wetland setbacks.

Response

Open space classifications are not solely for the purpose of ecological restoration and enhancement.

Stormwater treatment wetlands are not proposed as ecological mitigation, though they often do have an ancillary ecological benefit.

Proposed neighbourhood parks are not proposed as ecological mitigation, though they often do have ancillary ecological benefits.

The intent of the Precinct Plan is that all of the riparian planting network will be restored, regardless of whether it is required to mitigate ecological effects. To date, the riparian planting required for mitigation has been calculated using the SEV and ECR method on a Phase/Stage basis, for the purposes of demonstrating no net loss of ecological values. In practice, amenity/ landscape planting and mitigation planting within each phase have been incorporated and implemented at the same time. Ultimately, all the planting is treated as part of the Open Space network.

10.4 EC4. (number not allocated)

10.5 EC5. Ecology – Methods

Request

Please advise what other methods and precinct provisions additional to riparian planting will be used to ensure that the ecological outcomes of the precinct proposed will be realised.

Response

This statement in the application points to the specific policy that will be incorporated into the plan in order to ensure that riparian planting is undertaken.

Other measures that have been implemented through the resource consent process to manage effects include:

- Where required, bank stabilisation has been undertaken prior to planting.
- Water sensitive design has been deployed throughout the development to improve the quality of stormwater runoff and slow down stormwater entering the stream networks.
- Culverts have been replaced and installed to improve fish passage.
- The land-use change has resulted in the removal of cattle from watercourses, wetlands and riparian areas.

11.0 Geotech

11.1 G1. Geotechnical – Risk Information

Request

Please provide an update or addendum to the 2014 BECA geotechnical report addressing the following matters:

- *Proposed rezonings in the Precinct (which now includes 6-storey THAB which may have different foundation requirements).*
- *Updated description of the site and updated geotechnical drawings.*
- *A natural hazard risk assessment (including risk categorization) for the site to better understand the potential impacts and risk level of the future development on the site due to natural hazard.*
- *Confirms whether the severe rainfall event and winds experienced over Auckland Anniversary weekend, Cyclone Gabrielle and subsequent severe weather e.g., 9 May 2023 has resulted in instability on site or potentially affected the site.*
- *Confirms the recommendations and conclusions in the provided geotechnical report remain relevant or have been revised accordingly.*

Response

ENGEO Ltd. are the current providers of geotechnical advice to GDL and have prepared an addendum to the previous Beca report (2014). This addendum report references the additional investigations that have been carried out since the Beca report was prepared and addresses the specific geotechnical risk information request by Auckland Council. This report should be read in conjunction with the Beca report. A copy of the ENGEO report is provided in **Attachment 10**.

Attachment1: Updated Urban Design Plan Set (Masterplan Drawings 2025)

Attachment 2: Updated Urban Design Statement (May 2025)

Attachment 3: Paerātā Train Station Walkable Catchment – Analysis of Zoning and Precinct Options

Attachment 4: Updated Consultation Report (April 2025) – Redacted Version

Attachment 5: Transport Requests (Commute Transportation Consultants)

Attachment 6: Economic Responses (Property Economics May 2025)

Attachment 7: Updated Arboricultural Report

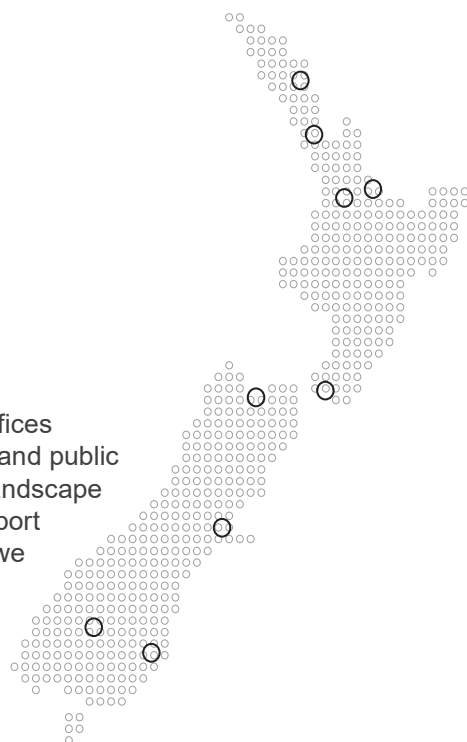
Attachment 8: Open Space Evaluation

Attachment 9: Updated Streams and Wetlands Classification and Delineation

Attachment 10: Risk Information (ENGEO)

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