

20 June 2025

Boffa Miskell
PO Box 91250
Auckland 1142
Attention: Janine Bell

Issued via email: janine.bell@boffamiskell.co.nz

Dear Janine

RE: Clause 23(2) of the First Schedule, Resource Management Act 1991: Second information request for the Franklin 2 Private Plan Change request by Grafton Downs Ltd

Pursuant to Clause 23(2) of the First Schedule of the Resource Management Act 1991, the council requires further information to continue processing the private plan change request.

Appendix 1 attached to this letter sets out the information requested by the council's specialists and the reasons for its requests.

Appendix 2 contains additional comments from Auckland Transport for your information. They are not part of the council's request for information.

Appendix 3 contains additional comments from Watercare for your information. They are not part of the council's request for information.

If you have any other questions, please do not hesitate to contact me at
christopher.turbott@aucklandcouncil.govt.nz.

Kind regards,



**Christopher Turbott | Senior Policy Planner
Plans and Places**

Appendix 1:
Information requested under Clause 23(2) of First Schedule of the Resource Management Act 1991

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Planning, statutory and general matters				
P1	Planning - NPS-UD policy 3 consistency	<p>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.</p> <p>Reason: This plan change proposal appears to rely on the council's separate plan change 78 process to give effect to the NPS-UD requirement for a 6-storey enablement within RTN walkable catchments.</p> <p>However, the notified PC 78 did not include the Franklin 2 precinct generally, nor a walkable catchment for the Paerata station. This was because PC 78 did not include SHA precincts, the location of the station was not certain and there was no indicative or real</p>	<p>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.</p> <p>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)).</p> <p>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</p>	No further information request.

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		<p>road network to assess walkable catchments at the time.</p> <p>PC 78 is still part way through a hearing process and is on hold although it may be resumed in 2024.</p> <p>It is possible the Franklin 2 plan change will be notified before PC 78 has been determined. While the PC 78 hearing panel may make a determination on SHA inclusion in PC 78 (if the PC 78 hearing proceeds) it cannot make a determination on the applicants plan change.</p> <p>Consequently, it is not certain that the PC 78 process can be relied on to give effect to the NPS-UD policy 3 requirements in the Franklin 2 precinct. Therefore, it is appropriate to evaluate options for giving effect to the NPS-UD policy 3 requirements in the Franklin 2 Precinct in a self-contained way via the applicants plan change. This could include using a black line to define a walkable catchment as is used by PC 78 for other RTN stations, or some other option.</p>	<p>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.</p> <p>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.</p> <p><u>MDRS</u></p> <p>The proposed precinct provisions as lodged with the Plan Change incorporated the MDRS into the underlying MU 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 MU and THAB zones and replace the corresponding zone standards for the construction and use of up to three dwellings per site.</p> <p>No further amendments are required to implement the requirements in Section 77G(1).</p> <p><u>Policy 3 of the NPS-UD</u></p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • The LCZ enables a range of activities, including retail, food and beverage, commercial services and offices. These activities promote business 	

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			<p>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.</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>These amendments include:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>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</p>	

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			<p>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.</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • Updated precinct plans to include a mapped walkable catchment around the Paerātā train station. <p>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.</p> <p>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.</p> <p>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.</p>	

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.

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

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P2	Planning - Business – mixed use zone	<p>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.</p> <p>Please also explain why this zone is considered preferential to centre zoning for the same area.</p> <p>Reasons:</p> <p>The Business – mixed use zone can be used for a variety of activities. The Urban Design Statement and indicative density plan are ambiguous as to whether it is intended to have a more commercial or a more residential focus. This assists in understanding the likely land use pattern in the vicinity of the RTN station and the role that the centre will play in the wider community.</p>	<p>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.</p> <p>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 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.</p>	No further information request.
P3	Planning - mana whenua consultation	<p>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.</p> <p>Reasons:</p> <p>The application indicates that responses to proposals to consult have not but received from mana whenua, and that consultation will continue on an ongoing basis.</p> <p>This information is necessary to address statutory obligations with mana whenua and assess potential effects on mana whenua cultural values.</p>	<p>Since the lodgement of the plan change in November 2024, GDL has continued to engage with Ngāti Te Ata Waiohua (Karl Flavell) and Ngāti Tamaoho (Lucie Rutherford).</p> <p><i>Ngāti Te Ata Waiohua</i></p> <p>A response has been received from Ngāti Te Ata Waiohua advising that Te Ata iwi have mana whenua customary interests over the application area of Paerātā/ Pukekohe/Drury and surrounds.</p> <p>On 15 November 2024, GDL was advised by Karl Flavell, Environmental Manager for Ngāti Te Ata Waiohua, 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 Waiohua preparing the CIA report and provided a full copy of the plan change application documents.</p> <p>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.</p> <p>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.</p> <p>Following a further email to Mr Flavell on Friday, 2 May 2025, a CIA for Ngāti Te Ata Waiohua was received on Wednesday, 7 May 2025. GDL has acknowledged</p>	No further information request.

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			<p>receipt of the CIA and continuing consultation with Ngāti Te Ata Waiohua to discuss the content in the CIA and how they may respond to the feedback provided.</p> <p><i>Ngāti Tamaoho</i></p> <p>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.</p> <p>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.</p> <p>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.</p>	
P4	Planning – staging of development	<p>Please provide a summary or the intended staging plan for development, particularly in the area known as phase four. This should provide intended build out pattern and timing.</p> <p>Reasons:</p> <p>This assists in understanding how the remainder of the precinct will be developed over time and integrated with infrastructure.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<p>Thank you for providing the staging information. Drawing SK012 has two '4B' and no '4C' can you please confirm whether this is correct and provide any necessary amendments.</p>

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			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.	
P5	Planning – policy 7	<p>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.</p> <p>Reasons:</p> <p>It is not clear what this term is intended to include on the precinct plan, what might be not included and why subdivision and development shouldn't incorporate the precinct plan generally.</p>	<p>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.</p> <p>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.</p> <p>The wording of IXXX.3(6) has been amended as follows:</p> <p class="list-item-l1">(7) Require all subdivision and development to incorporate the structural elements of the Franklin 2 precinct plans to achieve:</p> <ul style="list-style-type: none"> <li class="list-item-l2">(a) an integrated block pattern which provides for a range of site sizes, minimises rear lots and promotes street activation; <li class="list-item-l2">(b) a network of connected pedestrian and cycleways which follow the internal road network, riparian reserves and open spaces; <li class="list-item-l2">(c) a logical north-south local road network which provides the following connections: <ul style="list-style-type: none"> <li class="list-item-l3">i. Glenbrook Road roundabout to Paerātā train station; <li class="list-item-l3">ii. links to Sim Road to the east; <li class="list-item-l3">iii. links to the identified access points to State Highway 22 to the west; and <li class="list-item-l2">(d) an open space network which provides for the ecological and recreational needs of the precinct inclusive of neighbourhood parks and riparian reserves. <p>Note: * As a result of consequential amendments to the precinct provisions, this policy is now referenced as IXXX.3(6).</p>	<p>Please consider whether wetlands and the national grid corridor should be included in the precinct plans.</p> <p>Reason: IXXX6.18 Subdivision refers 'structure elements' to Figure IXXX.10 Franklin Precinct Plans, as shown below. However, the wetlands and National Grid Corridor are not specified on the precinct plan. Please provide consistent information on the relevant plans.</p> <p><i>IXXX.6.18 Subdivision</i></p> <p><i>Precinct Plans</i></p> <p class="list-item-l1">(1) <i>Vacant site subdivision shall provide for the following structural elements shown on Figure IXXX.10 Franklin 2 precinct plans, unless they are shown on the precinct plans to be within any proposed allotment 4 ha or greater in area or identified as a balance lot:</i></p> <ul style="list-style-type: none"> <li class="list-item-l2">(a) <i>boulevard and collector roads;</i> <li class="list-item-l2">(b) <i>riparian reserve separated cycleway, shared pedestrian/cycleway, and pedestrian walkway;</i> <li class="list-item-l2">(c) <i>indicative Neighbourhood Parks and Open Space Informal Recreation areas in the locations indicated on the precinct plans; and</i> <li class="list-item-l2">(d) <i>riparian margins and wetlands in the locations indicated on the precinct plans.</i> <li class="list-item-l2">(e) <i>National Grid Corridor</i>
P6	Planning policy 11	<p>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.</p> <p>Also please 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</p>	<p>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.</p>	No further information request.

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		<p>plan, and whether there is an expectation that the council will assume ownership of it.</p> <p>Reasons:</p> <p>It's not clear how this policy is intended to be implemented of how the requirements of the grid corridor overlay are to be met. While the provisions of D26 are to some degree independent of the precinct, they do affect the urban landform to be authorised by this plan change.</p> <p>Two common development responses being either roads or reserves under transmission corridor. Both responses result in the council becoming the ultimate owner and manager of the land in the corridor. Neither the concept plan nor the urban plan sets consistently address this matter. It is appropriate to indicate how management of the corridor could alter the land use pattern including any changes to the proposed road networks and open space networks.</p>		
P7	Planning – precinct rules	<p>Please confirm whether the zone standards exempted in IXXX.6(2) would continue to apply for four or more dwellings.</p> <p>Reasons:</p> <p>This is not entirely clear and should be clarified.</p>	<p>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.</p> <p>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).</p>	No further information request.
P8	Planning – transport infrastructure rules	<p>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.</p> <p>Please explain what precinct rules apply if the information provided in response to Table</p>	<p>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</p>	No further request for information.

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

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		<p>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.</p> <p>Please also explain what rules would apply if the information is provided but the outcome is disputed or not agreed on review.</p> <p>Please provide any examples of recent precincts with infrastructure trigger rules of the same type, i.e. provision of information only.</p> <p>Please provide any technical information relied on to demonstrate that upgrades referred to are not likely to be required as implied by the rules.</p> <p>Reasons:</p> <p>Both (A10) and (A11) are restricted discretionary. In this situation, infringement of the standard, i.e. rule (A11) may more logically be discretionary or non-complying. A comparison with other recent south Auckland precincts with Transport infrastructure trigger standards showed that it is common practice for infringement to be either non-complying or discretionary.</p> <p>It is not obvious what if any rules would apply if the information provided demonstrates that the infrastructure is required, and whether there is a consent process that would assess non-provision of the infrastructure.</p> <p>Likewise, it is not clear what rules would apply if the information is provided but the outcome is disputed.</p> <p>It is common practice for infrastructure trigger in AUP precinct rules to specify that particular transport infrastructure is to be provided once the specified threshold is reached, or alternatively a resource consent process is used to assess the effects of non-provision. Usually, the plan change process demonstrates what upgrades are considered</p>	<p>transport network are well understood, and the necessary upgrades are well defined.</p> <p>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.</p> <p>We have considered whether non-complying activity or discretionary activity status for infringing the standard would be appropriate and note that:</p> <ul style="list-style-type: none"> • 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. <p>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:</p> <ul style="list-style-type: none"> • 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 manage by the assessment process in the provisions and discretionary activity status. <p>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.</p>	

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		<p>to be likely to be necessary so that the decision maker has confidence that the land use is supportable. The consent process is then used to assess any departures from that.</p> <p>In contrast, this proposal does not do that and any similar examples from other precincts would be useful.</p>		
P9	Planning – possible inconsistencies or errors	<p>Please review the following and respond with relevant explanation and amendments:</p> <ul style="list-style-type: none"> • Is 'side' missing from IXXX.6.6(1)? • The precinct plans to be retained appear different in Appendix 4 and Appendix 5. • Does the reference to schedule 10 item 2084 in Appendices 4 and 5 relate to item 2804 in schedule 10? • Does the reference to IXXX.6.13.1 in (A10) and (A11) refer to IXXX.6.13(1)? <p>Reasons: There are possible inconsistencies or errors that need clarification.</p>	<p>i. <i>Is 'side' missing from IXXX.6.6(1)?</i> Response: Discussed with Christopher Turbott – item included in error.</p> <p>ii. <i>The precinct plans to be retained appear different in Appendix 4 and Appendix 5.</i> 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:</p> <ul style="list-style-type: none"> • Franklin 2 Precinct Plan 1. • Franklin 2 Precinct Plan 2 Road Hierarchy, Pedestrian and Cycle Network. • Franklin 2 Precinct Plan 3 Stormwater Management Areas. <p>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.</p> <p>iii. <i>Does the reference to schedule 10 item 2084 in Appendices 4 and 5 relate to item 2804 in schedule 10?</i> 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.</p> <p>iv. <i>Does the reference to IXXX.6.13.1 in (A10) and (A11) refer to IXXX.6.13(1)?</i> 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.</p>	No further information request.

#	Information category	Further information requested	Applicant Response	Second Request for information
P10	Planning – show homes	<p>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).</p> <p>Reasons:</p> <p>This information is necessary to understand the effects of the proposed show homes rule in multiunit and multistorey buildings provided for in the THAB zone and whether it would affect the integrity of the THAB zone rules and their intended outcomes.</p>	<p>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.</p>	No further information request.
P11	Planning – framework plan resource consents.	<p>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.</p> <p>Advise whether the framework plan resource consents would be surrendered if the plan change is successful.</p> <p>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.</p> <p>Reasons:</p> <p>The granted framework plan resource consents contain general land use concepts including indicative zoning. It is appropriate to consider whether inconsistencies could arise with the plan change and if so, how they would be resolved.</p> <p>The plan change seeks to remove the requirement for framework plan resource consents. This would not negate granted</p>	<p>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.</p> <p>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.</p>	No further information request.

#	Information category	Further information requested	Applicant Response	Second Request for information
		framework plan consents which would continue in effect. However, it is appropriate to understand whether the framework plan consents would be surrendered and if so whether specific conditions in them are addressed in the precinct.		
P12	Planning – Appendix 16	<p>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.</p> <p>Reasons:</p> <p>Some of the content of Appendix 16 contains the names and addresses of private individuals along the views they have expressed. The council cannot notify information contain names and addresses or other information that could be used to identify people.</p>	<p>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.</p>	No further information request.
P13	Precinct provisions: IXXX.4.1 Activity Table (A14)			<p>Please consider amending IXXX.4.1 Activity Table (A14) to <i>Subdivision and development that <u>does not comply</u> complies with IXXX.6.15.</i></p> <p>IXXX.4.1 Activity Table (A13) and (A14) have the same wording.</p>
P14	Precinct provisions			<p>Please clarify how the following heading numbering and text relates to the standards before and after it.</p> <p><i>IXXX.6.16 College Sub-precinct</i> <i>Wesley College is located in the College sub-precinct. The sub-precinct provides for the ongoing operation and development of the college. Within the sub-precinct the Special Purpose – School zone provisions apply in addition to the Residential – Mixed Housing Urban zone.</i></p> <p>Reason: this is ambiguous, for example this intended to be heading with the provisions below only applying in the college sub-precinct.</p>
Transport matters – Matt Collins, Abley				

#	Information category	Further information requested	Applicant Response	Second Request for information
T1	Transport – land use assumptions	<p>Please provide details of the forecast number of households and number of jobs for Paerātā, and how does that differ from council's land use forecast.</p> <p>Reasons:</p> <p>This is required to determine whether the proposed land use activities generally align with the planned transport network to support growth in the wider area. If it's helpful, the land use assumptions in the transport modelling used to support the Pukekohe and Paerātā Supporting Growth Programme Notices of Requirement would be an acceptable reference source.</p>	<p>A review of the MSM model zones shows that the Franklin 2 Precinct is made up of zone 568 and 569. The full 568 zone is located within the precinct, while only a portion of zone 569 is located within the precinct. However, given that the remaining portion of zone 569 is zoned Rural – Mixed Rual, any growth that is forecast for this zone is assumed to occur within the Franklin 2 Precinct.</p> <img alt="A map showing the Franklin 2 Precinct with various numbered zones. Zone 568 is highlighted in red, indicating it is the full zone within the precinct. Zone 569 is also shown, with a portion highlighted in red and the rest in a different color. Other zones are numbered 566, 565, 564, 563, 562, 561, 560, 559, 557, 558, 556, 555, 551, 553, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 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			employment number may in practice reduce the number of external trips during the peak commuter periods.	
T2	Transport – land use assumptions	<p>Please provide further evidence of whether the assumed residential yield in the ITA aligns with the commercially feasible development potential of the sites. Also please estimate how much difference there could be and how might such differences alter the transport effects.</p> <p>Reasons:</p> <p>The ITA assumes that the rezoning could result in 5143 dwellings, but it is not clear if this is commercially feasible yield and how the yield could vary in practice and alter effects on the transport network.</p> <p>It could be useful to compare the predicted yield with that of consented development in Paerātā Rise and discuss any differences. It may also be helpful to compare the anticipated yield in the THAB zone with other consented developments in similar THAB zone locations, or an alternative method of verifying the yield assumptions.</p> <p>This information will assist with confirming the stated yield assumption, as the ITA uses this as a basis for concluding that overall traffic effects will be similar to the effects assessed for Plan Variation 3.</p>	<p>The Urban Designer has advised the following:</p> <p>How the Yield Was Determined</p> <p>Although a large area around Paerātā Station is zoned Terrace Housing and Apartment Buildings (THAB), it is unlikely that the entire area will be built to its maximum density of six-storey apartments. Instead, the Indicative Density Plan in the Urban Design Plan set applies a graduated density approach, informed by proximity to key amenities such as transport, commercial centres, and open spaces, while also considering topographical constraints.</p> <p>The highest-density apartment typologies are concentrated closest to the railway station, where accessibility to public transport and services is greatest. This area aligns with densities typically seen in Auckland's medium-density apartment developments, ranging between 80–180 dwellings per hectare (dw/ha) for three to six storey apartments incorporating a mix of at-grade and basement parking. Examples include Bernoulli Gardens in Hobsonville Point (182 dw/ha), 340 Onehunga (137 dw/ha), and Moroki Apartments in Glen Innes (103 dw/ha).</p> <p>Areas that incorporate mixed-use apartment typologies with ground-floor retail and two to four storeys of residential above typically achieve 100–150 dw/ha, as seen in developments like Brickworks in Hobsonville Point (130 dw/ha).</p> <p>As the distance from the station increases, the density transitions to two to three storey terrace housing, providing a more gradual development pattern. Standard two-storey terraces (7.5–10m wide) typically yield 35–45 dw/ha, comparable to Stonefields and the Buckley Precinct in Hobsonville. Higher-density three storey terraces (5–7.5m wide) can achieve 45–75 dw/ha, with developments such as Altair in Wellington (75 dw/ha) and One Central Latimer Terraces in Christchurch (66 dw/ha) serving as reference points.</p> <p>In the northeastern wing of the precinct, which is furthest from both the train station and the proposed Central Park, the density further reduces to standalone homes (15–25 dw/ha) and low-density semidetached or duplex homes (30–35 dw/ha), aligning with early-stage developments at Paerata Rise.</p> <p>The densities used in this assessment are based on real development case studies across Auckland and New Zealand, ensuring they are both practical and achievable. These calculations consider parking provision and development controls such as building heights and site coverage.</p> <p>While these densities are applied and deemed appropriate from an urban design perspective, the final built form will ultimately be influenced by market demand. The mix of housing typologies delivered over time will depend on economic feasibility,</p>	No further information required.

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			<p>developer preferences, and broader market conditions. The density framework serves as a strategic guide, but the realised built environment will evolve in response to development viability and consumer demand dynamics.</p> <p>The following table provides a summary of the average density anticipated per zone, being 31 dw/ha in the MHU zone and 71 dw/ha in the THAB zone. In comparison, the currently built portion of Paerata (MHU zone) has been built out at 22 dw/ha.</p> <table border="1"> <thead> <tr> <th></th><th colspan="6">AVERAGE DENSITY PER ZONE (February 10,2025)</th></tr> <tr> <th></th><th>THAB ZONE NET AREA</th><th>THAB ZONE DWELLINGS</th><th>THAB AVERAGE DENSITY (dw/ha)</th><th>MHU ZONE NET AREA</th><th>MHU ZONE DWELLINGS</th><th>MHU AVERAGE DENSITY (dw/ha)</th></tr> </thead> <tbody> <tr> <td>Mixed Use Apartments above retail at ground level (Average 120dw/ha)</td><td>2.07</td><td>248</td><td></td><td>0.00</td><td>0</td><td></td></tr> <tr> <td>High Density Apartments 3-6 Storeys (Average 110dw/ha)</td><td>9.74</td><td>1071</td><td></td><td>0.00</td><td>0</td><td></td></tr> <tr> <td>Medium Density 3 storey Attached Dwellings and Walkup Apartments (Average 65 dw/ha)</td><td>10.25</td><td>666</td><td></td><td>0.00</td><td>0</td><td></td></tr> <tr> <td>Medium Density: 2-3 Storey Attached Dwellings (Average 47 dw/ha)</td><td>12.10</td><td>569</td><td></td><td>10.50</td><td>494</td><td></td></tr> <tr> <td>Low Density Semi-detached and Standalone Typologies (Average 33 dw/ha)</td><td>0.00</td><td>0</td><td></td><td>15.29</td><td>505</td><td></td></tr> <tr> <td>Low Density Standalone Typologies (Average 22 dw/ha)</td><td>0.00</td><td>0</td><td></td><td>24.75</td><td>545</td><td></td></tr> <tr> <td>TOTAL</td><td>34.15</td><td>2554</td><td>75</td><td>50.54</td><td>1543</td><td>31</td></tr> </tbody> </table> <p>Given the average density per zone for the remaining portion of the MHU is anticipated to be 1.4 time that of the existing Paerata development, it is considered that the assessed density appropriately assesses the potential future density of this zone. Similarly, the use of Auckland case study examples to determine the THAB density is considered appropriate to assesses the potential future density of this zone.</p>		AVERAGE DENSITY PER ZONE (February 10,2025)							THAB ZONE NET AREA	THAB ZONE DWELLINGS	THAB AVERAGE DENSITY (dw/ha)	MHU ZONE NET AREA	MHU ZONE DWELLINGS	MHU AVERAGE DENSITY (dw/ha)	Mixed Use Apartments above retail at ground level (Average 120dw/ha)	2.07	248		0.00	0		High Density Apartments 3-6 Storeys (Average 110dw/ha)	9.74	1071		0.00	0		Medium Density 3 storey Attached Dwellings and Walkup Apartments (Average 65 dw/ha)	10.25	666		0.00	0		Medium Density: 2-3 Storey Attached Dwellings (Average 47 dw/ha)	12.10	569		10.50	494		Low Density Semi-detached and Standalone Typologies (Average 33 dw/ha)	0.00	0		15.29	505		Low Density Standalone Typologies (Average 22 dw/ha)	0.00	0		24.75	545		TOTAL	34.15	2554	75	50.54	1543	31	
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T3	Transport – PT peak hour trips	<p>Please provide an estimation of the number of peak hour public transport trips by mode (bus and rail) and origins/destinations.</p> <p>Reasons:</p> <p>This assists in estimating effects on and planning for the PT network.</p>	<p>Public transport trips (PT) are likely to be comparable to the rates anticipated in the Drury-Opāheke and Pukekohe-Paerata Structure Plan ITA1, which adopts the following PT modes share in 2048:</p> <ul style="list-style-type: none"> • 20% of all trips are via PT <ul style="list-style-type: none"> ◦ 50% PT for long distance trips north 	No further information required.																																																															

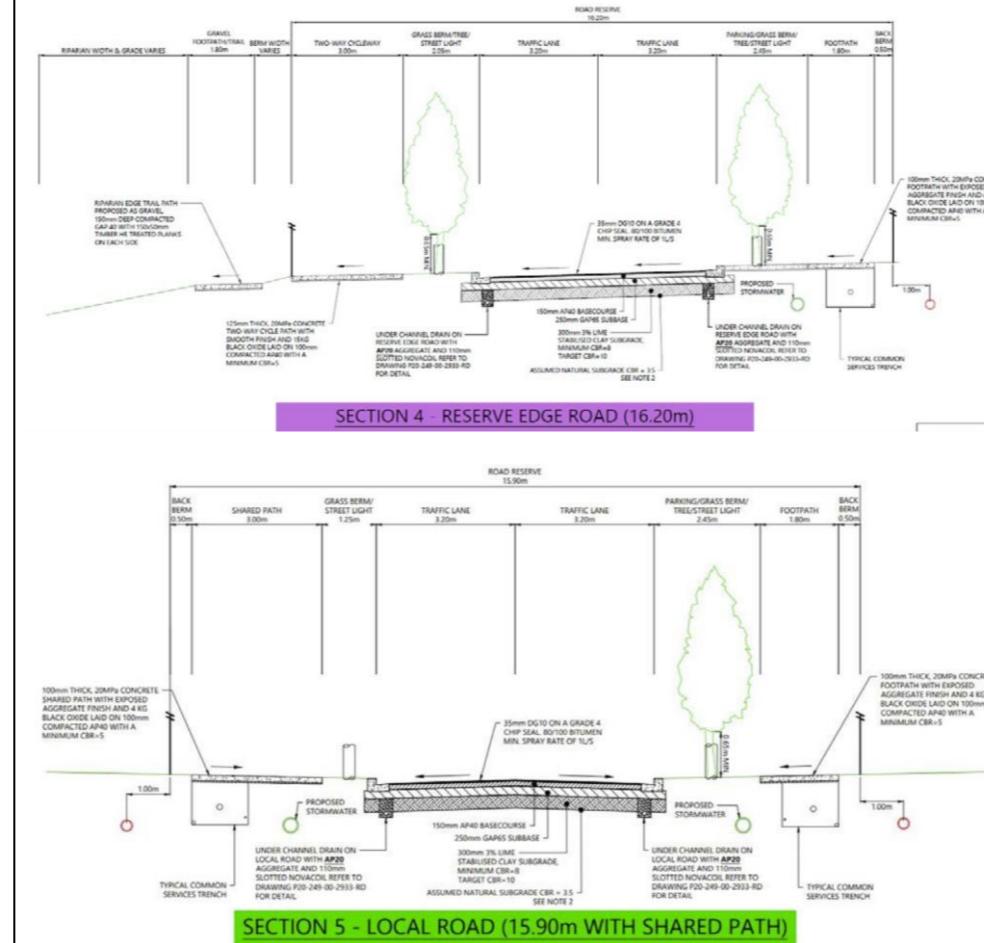
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			<ul style="list-style-type: none"> ○ 16% PT for nearby trips (ie Papakura) ○ 5% PT for local trips (ie Pukekohe) <p>The Drury-Opāheke and Pukekohe-Paerata Structure Plan ITA highlights that while the bus services will provide an important role, majority of PT trips are anticipated to be long distance trips, for which rail was assumed to be the PT mode of choice. As such, of the 20% PT trips only 2-4% are likely to be bus trips.</p> <p>On this basis, a potential mode split distribution has been derived as follows:</p> <ul style="list-style-type: none"> • Each dwelling is anticipated to generate 1 peak hour trip, distributed as follows: <ul style="list-style-type: none"> ○ 0.58 vehicle trips – car driver ○ (0.1) vehicle trips – car passenger (included within the car driver count) ○ 0.2 PT trips (18% rail, 2% bus) ○ 0.12 walking and cycling trips <p>Given the Franklin 2 zoning is forecast to result in some 5,143 dwellings, the residential component of the Precinct is anticipated to generate some 900 peak hour rail trips, and 100 peak hour bus trips, as shown in Table 1-1.</p> <p>Table 1-1: Public Transport Trip Forecasts</p> <table border="1"> <thead> <tr> <th>Origin/Destination</th><th>Portion of PT trips assumed to each O/D</th><th>Rail</th><th>Bus</th></tr> </thead> <tbody> <tr> <td>Long Distance – Manukau to City Centre</td><td>55%</td><td>509</td><td>57</td></tr> <tr> <td>Nearby – Papakura</td><td>30%</td><td>278</td><td>31</td></tr> <tr> <td>Local - Pukekohe</td><td>15%</td><td>139</td><td>15</td></tr> <tr> <td>TOTAL</td><td>100%</td><td>926</td><td>103</td></tr> </tbody> </table>	Origin/Destination	Portion of PT trips assumed to each O/D	Rail	Bus	Long Distance – Manukau to City Centre	55%	509	57	Nearby – Papakura	30%	278	31	Local - Pukekohe	15%	139	15	TOTAL	100%	926	103	
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T4	Transport – vehicle trip generation effects and safety	<p>Please provide further assessment of the safety and efficiency effects of peak hour trips at the key access points to the site (existing and future, as listed in table 1 of precinct) and any other key locations on the network, and comment on whether the transport upgrades and timing triggers remain valid.</p> <p>Reasons:</p> <p>The Economic Assessment concludes that the Plan Change may increase economic</p>	<p>In response to the second paragraph above, the Economic Assessment is referring to the likely realised commercial. By increasing the residential density near the commercial zone (notably the southern area near the train station), the commercial that is likely to be realised here is higher than if mixed housing urban zone was retained. With regards to the increased commercial based activity that is shown in Table 7-4 of ITA, this should be considered in relation to the subsequent paragraphs of the ITA. These paragraphs highlight the discrepancy between the two trip generation assessments (the Beca assessment for original Plan Change and Commute's assessment for proposed Plan Change) which include:</p> <ul style="list-style-type: none"> • Beca undertook a network model which assessed the interrelations between land uses, and also was able to optimise the network operations, with this information then informing the trip rates adopted. 	Further information required. Please Refer to our question at T1.																				

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		<p>activity and local employment, and the ITA concludes that the Plan Change could generate a significant increase in commercial activity-based vehicle trips (559 veh/hr in the AM peak and 616 veh/hr in the PM peak). The ITA concludes that, because the number of total trips (i.e. accounting for a reduction in residential trips) remains similar to that assessed under Plan Variation 3 (250 veh/hr increase in the AM peak and 355 veh/hr decrease in the PM peak), no further assessment is required.</p> <p>However, residential trip distribution is likely to be different to commercial trip distribution, and therefore the ITA may be over simplistic in its conclusion that the Plan Change sits within the envelope of effects assessed during Plan Variation 3. Also, refer to other RFIs relating to trip generation assumptions in the ITA.</p> <p>The changes in peak hour vehicle trips may affect the triggers in Table IXXX.6.13.1 Access Upgrades and Timing of Development: Rate of development and alignment with access upgrades. This may require updated traffic modelling.</p>	<ul style="list-style-type: none"> The Commute assessment was based on first principle trip rates. <p>The benefit of a network model is that the interdependencies of the residential and commercial land uses can be assessed iteratively. A full network model was not considered necessary for the proposed Plan Change given the land use that the proposed zoning is unlikely to significantly change the density that is realised over the full site. From a first principle assessment, it is noted that the number of residential dwellings has increased slightly compared to the previous transport assessment, while the commercial space from a zoning perspective has reduced by a notable amount (approximately one third).</p> <p>With regards to the triggers, it is noted that a total of 947 dwellings have been granted consent, and therefore the Precinct threshold will be triggered after 253 further dwellings are consented. Once the threshold is triggered, assessment of all access points will be required. The existing intersections can accommodate 250 additional dwellings acceptably. The table below assesses the existing and future safety and operations for each of the triggers proposed. In our opinion the triggers are considered appropriate.</p> <table border="1"> <thead> <tr> <th>Access</th> <th>Existing</th> <th>Future</th> </tr> </thead> <tbody> <tr> <td>Te Rata Boulevard</td> <td> <p>Safety: This intersection was upgraded from a giveaway controlled intersection to a roundabout in 2022. In the past 3 years (2022-2024) there have been 3 noninjury crashes within 100m of this intersection. One involved a motorcycle clipping a road cone, a rear end crash, and a car utilising the cycle path to overtake a truck. As such, there are no inherent safety trends.</p> <p>Operations: Currently operates acceptably based on observations. Some queuing was observed to occur however the queues were observed to dissipate quickly.</p> </td> <td> <p>This intersection has been designed to allow for dual circulating lanes and approaches. 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T5	Transport – vehicle trip generation effects and safety	<p>Please provide further evidence to support there being no triggers in <i>Table IXXX.6.13.1 Access Upgrades and Timing of Development: Rate of development and alignment with access upgrades relating to commercial activities.</i></p> <p>Reasons:</p> <p>Table 7-4 of the ITA indicates that the Plan Change will generate significantly more peak hour trips for commercial activities. The Operative Franklin 2 Precinct has transport assessment provisions relating to commercial GFA. However, Table IXXX.6.13.1 Access Upgrades and Timing of Development: Rate of development and alignment with access upgrades for the proposed Franklin 2 Precinct provisions do not include any triggers relating to commercial activity.</p>	<p>The commercial activity is considered beneficial to the Precinct as without the commercial activity the residential trip generation would be higher- all residents would need to leave the Precinct to undertake commercial activities. Furthermore, the purpose of the commercial activity is to service the Precinct. The commercial activity is not intended to be an attraction for new primary trips, and therefore tying the triggers to this activity is not considered necessary. As such, the commercial trips in themselves are not considered to trigger the need for intersection upgrades.</p> <p>It is acknowledged that the current Precinct requires both residential and commercial provisions to exceed certain values before the triggers are met. In our opinion, this trigger is not ideal as in theory all of the residential dwellings could be built out and the existing triggers still not met. Another reason that the commercial component of the trigger was removed is to ease implementation. Understanding the consented dwelling count approved in the Precinct to date can be challenging. Adding the consented commercial space to date as a requirement adds an additional complexity to subsequent resource consent reviews.</p>	Further information required. Please refer to our question at T1.																

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T6	Transport – vehicle trip generation effects and safety	<p>Please provide further evidence to support the assumed internal capture reduction factor applied to for Retail and F&B activities.</p> <p>Reasons:</p> <p>Table 7-2 of the ITA identifies that 40% of supermarket, F&B, and retail trips are expected to be internal within Paerātā, which may be over optimistic given one of the commercial centres is located on SH22 and therefore is likely to attract trips from outside of Paerātā. Please provide further evidence of this assumption. Alternatively, please consider sensitivity testing with a lower internal capture rate.</p>	<p>The internal capture rates were adopted based on rates that have previously been accepted for other Plan Change sites. In particular, for Auranga B2 a 40% internal capture rate was adopted for the supermarket and retail trips, with this internal capture rate agreed through expert conferencing at the Council Hearing. Given the Precincts location and surrounding land use (predominantly rural zone), a high internal capture is considered appropriate. The intent is for the commercial to service the Precinct, rather than the commercial being a destination. The commercial centre has always been located adjacent to SH22. It is acknowledged that locating the bulk of the commercial centre approximately 1km further north in the north-western corner of the Precinct the area may attract more pass-by trips of vehicles travelling to Waiuku. The volume of additional Waiuku pass-by trips as a result of the centre relocating are considered minimal.</p>	Further information required. Please refer to our question at T1.																																																																				
T7	Transport – vehicle trip generation effects and safety	<p>Please confirm the assumed inbound/outbound trip splits for the AM and PM peaks.</p> <p>Reasons:</p> <p>Table 7-2 of the ITA provides inbound/outbound trip splits for different land uses. These appear to be for the AM peak. Table 7-3 then provides expected trip generation based on Table 7-2, however it is unclear whether Table 7-3 correctly applies different trip splits for AM and PM periods. Please confirm the assumed inbound/outbound trip splits for the AM and PM peaks.</p>	<p>The AM and PM headings have been added to Table 7-2 which has been replicated below.</p> <p>Table 7-2: Trip Reduction and Direction Assumptions</p> <table border="1"> <thead> <tr> <th rowspan="2">Activity</th> <th rowspan="2">Internal capture</th> <th rowspan="2">Multipurpose trip reduction</th> <th rowspan="2">Pass by Trips</th> <th colspan="2">AM Peak Hour</th> <th colspan="2">PM Peak Hour</th> </tr> <tr> <th>Trips in</th> <th>Trips out</th> <th>Trips in</th> <th>Trips out</th> </tr> </thead> <tbody> <tr> <td>Residential MHU</td> <td>10%</td> <td>0%</td> <td>0%</td> <td>20%</td> <td>80%</td> <td>80%</td> <td>20%</td> </tr> <tr> <td>Residential THAB</td> <td>10%</td> <td>0%</td> <td>0%</td> <td>20%</td> <td>80%</td> <td>80%</td> <td>20%</td> </tr> <tr> <td>Supermarket</td> <td>40%</td> <td>10%</td> <td>20%</td> <td>55%</td> <td>45%</td> <td>50%</td> <td>50%</td> </tr> <tr> <td>Retail</td> <td>40%</td> <td>10%</td> <td>20%</td> <td>65%</td> <td>35%</td> <td>50%</td> <td>50%</td> </tr> <tr> <td>Food and beverage</td> <td>40%</td> <td>10%</td> <td>20%</td> <td>65%</td> <td>35%</td> <td>50%</td> <td>50%</td> </tr> <tr> <td>Office</td> <td>10%</td> <td>0%</td> <td>0%</td> <td>90%</td> <td>10%</td> <td>10%</td> <td>90%</td> </tr> <tr> <td>Medical Centre</td> <td>10%</td> <td>0%</td> <td>0%</td> <td>65%</td> <td>35%</td> <td>50%</td> <td>50%</td> </tr> </tbody> </table>	Activity	Internal capture	Multipurpose trip reduction	Pass by Trips	AM Peak Hour		PM Peak Hour		Trips in	Trips out	Trips in	Trips out	Residential MHU	10%	0%	0%	20%	80%	80%	20%	Residential THAB	10%	0%	0%	20%	80%	80%	20%	Supermarket	40%	10%	20%	55%	45%	50%	50%	Retail	40%	10%	20%	65%	35%	50%	50%	Food and beverage	40%	10%	20%	65%	35%	50%	50%	Office	10%	0%	0%	90%	10%	10%	90%	Medical Centre	10%	0%	0%	65%	35%	50%	50%	No further information required.
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T8	Transport – vehicle trip generation effects and safety	<p>Please provide a copy of Franklin 2 Structure Plan - Integrated Transport Assessment, 8 September 2014.</p> <p>Reasons:</p> <p>The ITA references and relies on the Integrated Transport Assessment for Plan Variation 3 in multiple locations. Please</p>	<p>Please find a copy attached to this letter (CI23 response – Attachment 05- Transport Responses (Commute Transportation)).</p>	No further information required.																																																																				

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		provide a copy of this assessment to assist in understanding transport effects.		
T9	Transport - cycling	<p>Please provide an evaluation of the extent to which the proposed cycle network provides a well-connected internal street network for cycling that connects to public transport and the RTN station in particular.</p> <p>Reasons:</p> <p>Franklin 2 Precinct Plan 2 Road Hierarchy, Pedestrian and Cycle Network indicates that Boulevard Road and part of the east/west Collector Road will not have cycle facilities along the central section. This is confirmed by the Indicative Pedestrian and Cycle Network Plan contained in the Urban Design Plan Set. In our view this creates potential gaps in the cycle network as illustrated below.</p>  <p>An alternative route is provided via a Riparian Reserve Separated Cycleway, however in our view this creates a less direct, and potentially less attractive, route for cyclists. In our view it is important to maximise the cycle catchment for the Paerātā train station and to provide alternatives to, and reduce dependency on, private motor vehicles.</p>	<p>The cycle network has been updated in response to this comment. Both paths shown above have been added to the plan, noting the east-west local road connection to Sim Road has been removed as a result of the new east-west collector road connection.</p>	No further information required.

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T10	Transport - cycling	<p>Two design options are proposed for active modes along the reserve and includes a 'shared pedestrian/cycleway' and a 'riparian reserve separated cycleway.' Please provide details on their design and function, identifying differences between them. It is also noted that cycling infrastructure should be consistent without abrupt changes along corridors.</p> <p>Reasons:</p> <p>This is to better understand the intended purpose, functionality, and design of different types of active mode paths and how they will link into the adjacent network.</p>	<p>The intended cross sections of the reserve edge road and the local road are shown in the infrastructure report and replicated below. It is noted that the two-way cycleway on the reserve edge road is anticipated to be a shared path to ensure that a facility for all ages and abilities is provided on the park side of the corridor.</p> 	<p>Please consider changing notations on shared paths to 'pedestrian and cycle facilities'</p> <p>The reserve edge road is proposed to contain a shared pedestrian/cycleway rather than a separated cycleway. Shared paths require a departure from standards so AT would prefer that this level of detail wasn't specified in the precinct provisions. Reference should be made to 'pedestrian and cycle facilities' instead.</p>
T11	Transport – collector road	<p>Please confirm if there is a development agreement with the owners of 933 Paerata Road to construct the collector road intersecting this property.</p> <p>Reasons:</p> <p>The reason for this request is to understand if there is a risk that this road and its pedestrian/cycle link is not constructed and whether alternatives would be needed. This may be required if the land is not owned by the applicant and if there is no existing development agreement.</p>	<p>Grafton Downs Limited have been in contact with the landowner (Newland Holding Pty Limited) who does not oppose the PPC.</p>	<p>No further information required.</p>

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T12	Transport – consultation with NZTA	<p>Please provide a summary of feedback received from NZTA.</p> <p>Reasons:</p> <p>The Consultation report states that a meeting was scheduled with NZTA for the 28 November 2024. Please provide a summary of feedback received from NZTA following this meeting.</p>	<p>Please find attached the meeting minutes from this meeting in CI23 response – Attachment 05- Transport Responses (Commute Transportation) . In summary, NZTA was open to the proposal.</p>	<p>No further information required.</p>
T13	Transport –road design and function	<p>Please clarify the intended design and purpose of the road along the eastern boundary of Wesley College, i.e. whether it is for active modes only or whether it will allow restricted/unrestricted vehicle access.</p> <p>Reasons:</p> <p>This is to better understand the effects of the proposed development from a road safety and efficiency perspective.</p>	<p>This will be a local road. There is potential that residential dwellings will be constructed on the western side of this road, with this road providing access to these dwellings.</p> <p>A shared path is anticipated on the eastern side, along the park edge, with just a footpath on the western side.</p>	<p>No further information required.</p>

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T14	Transport – road design and function	<p>Table 8-2: Road Function and Required Design Elements in the ITA does not match Appendix 1 – Road Design and Design Elements Table in the proposed Precinct provisions. Please clarify which table is to be included in the proposed precinct provisions.</p> <p>Reasons:</p> <p>This is to better understand the intended road design and ensure consistency between assessments provided in the ITA and what is proposed in the precinct provisions.</p>	<p>The Precinct Provisions are understood to match Table 8-2 of the ITA, which is replicated below. This table has also been updated to address matters raised by AT Request No.17</p> <p>AT Request No.17</p> <p><i>“Insert the following notes underneath the table and linked back to the ‘Minimum Road Reserve’ and ‘Bus Provisions’ columns:</i></p> <p><i>Note 1: Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints, or other localised design requirements.</i></p> <p><i>Note 2: Carriageway and intersection geometry capable of accommodating buses. This ensures flexibility to meet specific needs of the road controlling authority when designing the transport network.”</i></p> <table border="1"> <thead> <tr> <th>Road / Road Class</th> <th>Minimum Road Reserve (refer Note 1)</th> <th>Total number of lanes</th> <th>Speed Limit (Design Km/hr)</th> <th>Access Restrictions</th> <th>Bus Provision (refer Note 2)</th> <th>Cycle provision</th> </tr> </thead> <tbody> <tr> <td>Te Rata Blvd and Sim Road</td> <td>28</td> <td>2</td> <td>50</td> <td>Yes (where protected cycle lane and in locations due to median)</td> <td>Yes</td> <td>As per Precinct Plan</td> </tr> <tr> <td>Link Road</td> <td colspan="6">Link Road is being constructed by a third party</td></tr> <tr> <td>Collector Road</td> <td>24</td> <td>2</td> <td>50</td> <td>Yes (where protected cycle lane)</td> <td>Yes</td> <td>Yes on both sides</td> </tr> <tr> <td>Local Roads - General</td> <td>15.9</td> <td>2</td> <td>30</td> <td>No</td> <td>No</td> <td>No</td> </tr> <tr> <td>Local Roads – Reserve Edge</td> <td>16.2</td> <td>2</td> <td>30</td> <td>Yes (where protected cycle lane)</td> <td>No</td> <td>Yes on one side</td> </tr> </tbody> </table> <p>Note 1 Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints, or other localised design requirements.</p> <p>Note 2 Carriageway and intersection geometry capable of accommodating buses. This ensures flexibility to meet specific needs of the road controlling authority when designing the transport network.</p>	Road / Road Class	Minimum Road Reserve (refer Note 1)	Total number of lanes	Speed Limit (Design Km/hr)	Access Restrictions	Bus Provision (refer Note 2)	Cycle provision	Te Rata Blvd and Sim Road	28	2	50	Yes (where protected cycle lane and in locations due to median)	Yes	As per Precinct Plan	Link Road	Link Road is being constructed by a third party						Collector Road	24	2	50	Yes (where protected cycle lane)	Yes	Yes on both sides	Local Roads - General	15.9	2	30	No	No	No	Local Roads – Reserve Edge	16.2	2	30	Yes (where protected cycle lane)	No	Yes on one side	<p>Please consider removing the following sentence should be removed from the proposed precinct provisions:</p> <p><i>“This ensures flexibility to meet specific needs of the road controlling authority when designing the transport network.”</i></p> <p>This comment was not intended for inclusion in the notes. The amendments requested have otherwise been made.</p>
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T15	Precinct provisions: Table IXXX4.1 (A10) and (A11)			Please clarify how it will be determined whether (A10) or (A11) will apply and consider whether identifying critical metrics (such as delay or Level of Service) within IXXX.6.14 could reduce the potential for conflicting views during future resource consent applications.																																										

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				<p>Table IXXX4.1 (A10) and (A11) are (RD) and (D) respectively.</p> <p>Table IXXX.6.14.1 requires a transport assessment to be undertaken; it does not specifically require a transport upgrade to be undertaken. As such, Standard IXXX.6.14 is open to debate and the council and the Applicant may have different views on whether the scale of effect on key intersections warrants any upgrades.</p> <p>For example, a transport assessment required under Table IXXX.6.14.1 may identify that one of the existing accesses on the State Highway network will operate at level of service (LoS) F on a particular movement. The author of the transport assessment may deem this acceptable; however the council may determine that an upgrade is required.</p>
T16	Precinct provisions: IXXX.8.1(2)(a)			<p>Please clarify what Activity and Standard this Matter relates to. Further, is there any overlap with IXXX8.1(4), and if so, could the two Matters of Discretion be combined? Finally, please clarify why discretion is limited to efficiency effects on the roading network consider amending it to <i>“safety and efficiency effects on the transport network”</i>.</p>
T17	Precinct provisions: IXXX.8.1(4)(a)			<p>Please consider amending this to be more specific about what effects are to be assessed. Further, a resource consent may require an assessment under Table IXXX6.14.1 but that assessment may determine that a further upgrade is not required. Please consider amending this to:</p> <p><i>“(a) the effects of subdivision and development on the safe and efficient operation of the transport network, and the effectiveness of any upgrades proposed to mitigate those effects.”</i></p>
T18	Precinct provisions: IXXX.8.2(2)(a)			<p>Please clarify what Activity and Standard this Matter relates to. Further, is there any overlap with IXXX8.1(4), and if so, could the two Matters of Discretion be combined? Finally, please clarify why discretion is limited to efficiency effects on the roading network. We suggest this be amended to <i>“safety and efficiency effects on the transport network”</i>.</p>
T19	Precinct provisions: IXXX.8.2(4)			<p>A resource consent may require an assessment under Table IXXX6.14.1 but that assessment may determine that a further upgrade is not required. Please consider whether assessment criteria anticipate this outcome?</p>

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T20	Precinct provisions			Please consider whether there is consistency between references to 'subdivision and development' and 'development' throughout the precinct provisions. For example IXXX.8.1(2) Matters of Discretion and IXX.8.2(2) Assessment Criteria should apply to subdivision, as well as development.
T21	Precinct provisions			Please consider whether there is consistency with reference to 'residential lots or dwellings,' rather than just 'dwellings' in the Franklin 2 Precinct.
T22	Precinct provisions			Please consider whether the appendix numbers identified in policies 17-19 are correct and corresponds with the correct appendix documents in the proposed precinct plan. Please consider whether Appendix 1 should be labelled 'Road Function and Design Elements Table', not 'Road Design and Design Elements Table'. The Appendix 1 title should be updated accordingly, as well as any reference to this appendix throughout the precinct provisions.

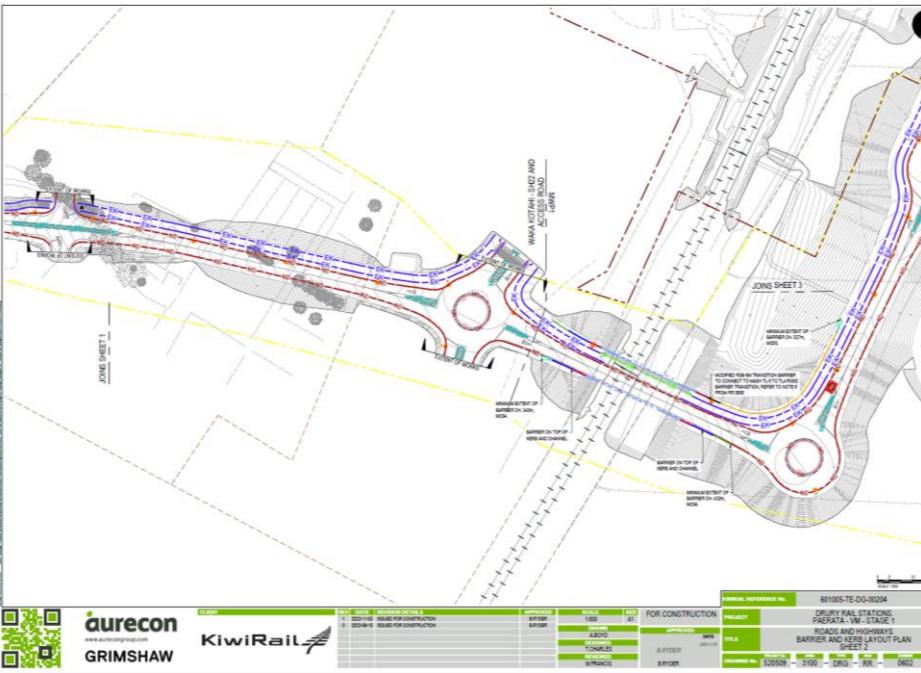
Water and wastewater – Amber Taylor, Watercare																		
W1	Water and wastewater – increase in plan enabled capacity	<p>Please clarify the assumed dwelling density used for each proposed residential zone.</p> <p>Reasons:</p> <p>Appendix 13 Infrastructure Report outlines at sections 4.3.2 and 4.3.3 that the net impact of the change in zoning has decreased the wastewater design flows and decreased the water peak design demand. It is unclear how the number of residential lots enabled by the PPC has been estimated.</p> <p>This assists 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>	<p>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.</p> <p>The number of DUEs for residential Lots 3 stories or less is:</p> $688+1,033+505+545+1,046 \text{ (completed or consented DUE)} = 3,817 \text{ DUEs}$ <p>Number of DUEs for residential Lots 4 stories or more = $248+1,005 = 1,253$ DUEs</p> <p>Total number of DUE = 5,070</p> <p>Table 1: Franklin 2 Potential Density Plan</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">POTENTIAL DENSITY SCENARIO (MAY 2025)</th> </tr> <tr> <th>Typology</th> <th>Net Area (ha)</th> <th>Yield (approx.)</th> </tr> </thead> <tbody> <tr> <td>Mixed Use Apartments above retail at ground level (Average 120 dw/ha)</td> <td>2.07</td> <td>248</td> </tr> <tr> <td>High Density Apartments 3-6 Storeys (Average 110 dw/ha)</td> <td>9.14</td> <td>1005</td> </tr> <tr> <td>Medium Density 3 storey Attached Dwellings and Walk-up Apartments (Average 65 dw/ha)</td> <td>10.58</td> <td>688</td> </tr> </tbody> </table>		POTENTIAL DENSITY SCENARIO (MAY 2025)		Typology	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
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W2	Water and wastewater - school	<p>Please clarify why a different demand scenario has been used for 1000 school students in the 2014 vs 2024 assessment.</p> <p>Reasons:</p> <p>Appendix 13 Infrastructure Report outlines at sections 4.3.2 and 4.3.3 that the underlying (2014) assessment and the current (2024) assessment both consider demand from 1000 school students. The demand tables assume 334 DUE for the 2024 assessment vs 666 DUE for the 2014 assessment.</p> <p>This assists 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>	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • Boarding students require 140 litres per student per day. • Day students require 20 litres per student per day. <p>These figures have been incorporated into our calculations, and the flows have been calculated based on the number of students.</p> <p>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.</p> <p>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.</p> <p>Please note we have applied the daily flow figures in accordance with the Wastewater Code of Practice, ensuring consistency with industry standards.</p> <p>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.</p> <p>However, for the purposes of this plan change application, we are satisfied with the DUE estimate presented here as it is conservative and suitable for the comparison to the previous plan change assessment.</p>	<p>Please confirm whether the school will have a maximum capacity of 1,000 students or if it will be 1,000 day students plus 500 boarding students meaning a total of 1,500 students will attend.</p> <p>Reasons: The report refers to 1,000 students however there are references to 500 boarding students. Providing clarity on this will ensure Watercare has understood the total maximum number of students the PPC will enable.</p>																		

W3	Demand calculations			<p>Please provide the 220L/p/day daily demand as set out in the Code of Practice standards for your assessments.</p> <p>Reason: the applicant has used 200L/p/day which is not in accordance with the Code of Practice.</p>
W4	Matters of discretion and assessment criteria			<p>Please provide an explanation for the inconsistency between the Matters of Discretion IXXX.8.1.6(c) which requires the Council to consider "infrastructure servicing" when assessing subdivision listed as a restricted discretionary activity in Activity Table IXXX.4.1, and the Assessment Criteria IXXX.8.2.6(c) which only requires consideration of on-site stormwater management for the same activity.</p> <p>Reason: To understand how water supply and wastewater infrastructure servicing will be considered in the Assessment Criteria.</p>
Economics – Derek Foy, Formative Ltd				
E1	Economics - population projections	<p>Please update the Economics assessment to refer to the Auckland Growth Scenario v1.1 projections.</p> <p>Reasons:</p> <p>The Economics assessment (Appendix 11) identifies the existence of Auckland Council's "ACMar23" projections but applies the latest Statistics NZ population projections because (it states) the ACMar23 projections are not available at a detailed spatial level, such as Property Economics required for their assessment. The Economics assessment goes on to state that "unless a more detailed breakdown of ACMar23 projections that align with the spatial specifically required for the identified core catchments is made available, the Stats NZ projections remain the most appropriate data source for the economic assessment.</p> <p>In October 2024 Auckland Council published a more detailed breakdown of the ACMar23 projections. The ACMar23 projections are now referred to as "Auckland Growth Scenario" (AGS23), and published projections include household, population and employment projections over a 30-year period from 2022 to 2052. Council bases its strategic planning (including NPS-UD HBA and Future Development Strategy) on the</p>	<p>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.</p>	<p>No further information request.</p>

		AGS23, with the current version being v1.1. That data is published to a Macro Strategic Zone resolution. The Economics assessment should use the AGSv1.1 projections in its assessment of both residential demand, and sustainable centre floorspace demand. The AGS23 v1.1 projections are available for download from Knowledge Auckland (https://knowledgeauckland.org.nz/publications/auckland-growth-scenario-2023-version-11-ags23v11-data/)		
E2	Economics - Affordable housing	<p>Please explain how enabling more dwellings in the precinct would improve housing affordability to a greater degree than the operative housing affordability provision.</p> <p>Reasons:</p> <p>The Economics assessment assesses the effect of removing the 'Affordable Housing' provision within the Franklin 2 precinct. The conclusion from that assessment is that the PPC request would enable an additional 760 dwellings compared to the likely yield under the current MHU zoning within the precinct, and that additional capacity would more than offset the removal of the 'Affordable Housing' provision. That position appears to be based on an assumption that the number of dwellings in the precinct will be a more influential effect on housing affordability than a specific housing affordability provision.</p> <p>The link between the statement that additional capacity is more significant in terms of increased residential supply than is the housing affordability provision is explained, and is stated as a fact when it lacks any causative relationship, such as (for example) that some of the new typologies enabled would be expected to sit at affordable price points, or that increased supply in the precinct would bring down the average sales price.</p>	<p>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.</p>	No further information request.
E3	Economics - business activity	<p>Please expand the Economics assessment to include consideration of the business activity that the proposed Business - Mixed Use zone would enable in the precinct.</p> <p>Reasons:</p>	<p>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.</p>	No further information request.

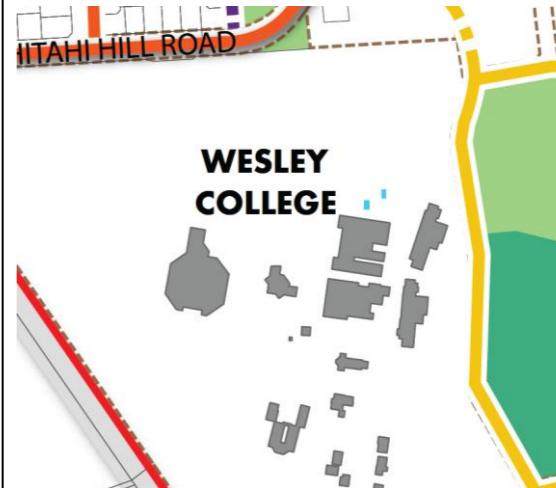
		<p>The Economics assessment assessed the appropriateness of the commercial land provision in the precinct and concludes that the “cumulative net developable area of approximately 6.8ha, is sufficient to accommodate all the convenience commercial needs of the Paerata Rise community at full capacity and also some of the non-commercial recreational, educational and religious and community facilities”. The Economics assessment has not assessed the role that the proposed Business – Mixed Use Zone will play within the precinct, and has not assessed the potential effects of that zone on other centres. The land area of the Mixed-Use zone would be in addition to the area of centres zones (Local and Neighbourhood) that were considered as part of the Economics assessment, and the Mixed use zone would enable many of the same type of activities as the proposed centre zones. The omission of the Mixed-Use zone from the Economics assessment means the assessment establishes an incomplete picture of the potential effects of the PPC request.</p>	
Urban design and landscape – Rebecca Skidmore, R.A. Skidmore Urban Design Ltd			
UD1	Urban design – effect of NZTA Link Road designation	<p>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.</p> <p>Reasons:</p> <p>To better understand the implications of the designation and delivery of this roading connection on the surrounding urban structure and form.</p>	<p>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.</p> <p>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.</p>

				
UD2	Urban design - topography	<p>Please provide additional analysis of the topographical constraints within the Precinct on urban form outcomes (particularly in relation to the THAB zone).</p> <p>Reasons: The UDA report identifies areas of steeper contours as a constraint requiring thoughtful design solutions. The request is made to better understand the extent and magnitude of the constraint and the likely implication on urban form outcomes.</p>	<p>The additional topographical constraints information within the Precinct is provided in Attachment 1, Drawing SK003.</p>	<p>Please provide a key for the elevation categories depicted in Sheet SK003 of the updated Urban Design Plan Set.</p>
UD3	Urban design – railway buffers	<p>Please provide further detail of the extent and form of visual and sound buffers required along the railway corridor.</p> <p>Reasons: The UDA report identifies this requirement as a constraint. The request is made to better understand the nature and extent of the constraint.</p>	<p>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.</p>	<p>No further information request</p>
UD4	Urban design – walkable RTN catchment	<p>Please provide a more detailed analysis of the walkable catchment around the Paerata Train Stations and an explanation of why the proposed THAB zone does not extend to the</p>	<p>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</p>	<p>No further information request</p>

		<p>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.</p> <p>Reasons:</p> <p>The updated masterplan contained in the UDA report (p.14) identifies the 400m and 800m radii from the train station. Further analysis is sought identifying the walkable catchment from the train station and description of how the Precinct provisions responds to this in accordance with the requirements of the NPS-UD, particularly policy 3(c).</p>	<p>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.</p> <p>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.</p>	
UD5	Urban Design – central open space	<p>Please advise why the central open space is included within the College sub-Precinct.</p> <p>Reasons:</p> <p>The request is made to better understand the implications of this open space being located within the sub-precinct.</p>	<p>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.</p>	No further information request
UD6	Urban design – neighbourhood park	<p>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.</p> <p>Reasons:</p> <p>Section 4.3 of the UDA notes the benefit of co-locating these elements. The request is made to better understand the potential benefit of spatially identifying this open space feature (while acknowledging it would be delivered through a consent process).</p>	<p>Precinct Plan 1 in the Proposed Plan Change has been amended to show a neighbourhood park adjacent to the Sim Road Business: Neighbourhood Centre.</p>	No further information request
UD7	Urban design – aerial photograph	<p>Please provide an aerial photograph with the proposed Precinct Plan overlaid</p> <p>Reasons:</p>	<p>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).</p>	<p>The plan provided in SK002 overlays the indicative masterplan on an aerial rather than the Precinct Plan. This is helpful, but please also provide the Precinct Plan overlaid on an aerial, as requested.</p>

		<p>This request is made to assist a spatial understanding of the features identified on the Precinct Plan in relation to the existing environment.</p>		
UD8	Urban design – design outcomes	<p>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.</p> <p>Reasons:</p> <p>The UDA report includes reference to a number of detailed design outcomes (including provision of an indicative masterplan, open space design elements and methods to achieve integration with the transmission line corridor. The request is made to understand how key outcomes will be achieved at the resource consent stage, either through the underlying zone provisions or the Precinct Provisions.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	No further information request
		N/A	N/A	Below are queries arising from additional updates/changes

				<p>Page 19 of the updated Urban Design Statement includes Figure 11, depicting proposed movement network changes. The Legend includes a 'public transport Interchange' but this is not shown on the diagram.</p> <p>Please confirm the location of the interchange - is this the train station?</p>
		N/A	N/A	<p>Please provide a description (including a map with contours overlaid on Precinct Plan 1) and analysis of the underlying topography, its associated landscape character and the resulting topographical constraints within the Precinct and identify the implications in relation to the proposed zone distribution and features shown on Precinct Plan 1</p> <p>Reasons: A Landscape Assessment has not been provided with the PPC request. However, this information is sought to better understand how the distribution of zoning and key structuring elements relates to the underlying topography and associated landscape character (in the context of change enabled by the operative zone and Precinct provisions)</p>
Built Heritage – Cara Francesco, Auckland Council				
H1	Built heritage – removal of control	<p>Please provide details of the heritage justification for removing the demolition activity control applying to the water tower, fire shed and Caughey Memorial Hospital.</p> <p>Reasons: As part of the previous process, a preliminary built heritage assessment was prepared by Matthews and Matthews Architects Ltd (2014) for the applicant. It appears this informed the establishment of a specific suite of provisions within the precinct to recognise the heritage values of the W.H. Memorial Hospital, the water tower and the fire shed. These provisions are now proposed to be deleted, however, no assessment of the effects of this in relation to the potential loss of heritage values has been provided in the application material. (Note: this is separate from the Caughey Memorial Chapel which the application material does address, and which is proposed to be retained on Schedule 14.1 Schedule of Historic Heritage).</p>	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Please provide revised provision to:</p> <ul style="list-style-type: none"> -reflect demolition activity control provisions in the proposed precinct text. - include the building footprints of the fire shed and water tower on all relevant Appendix 9 plans/drawings to accurately reflect their existing presence on the Wesley College site. - include the fire shed and water tower on the 'illustrative masterplan'. <p>Reinstatement of the demolition activity control provisions in the precinct for the water tower and fire shed is strongly supported. To follow through with this, it is requested this is reflected in the proposed track changed precinct provisions (Appendix 4 and 5).</p> <p>It is also noted that the footprint of the fire shed, and water tower need to be reflected as existing buildings throughout the relevant Appendix 9 urban design plans, as a matter of accuracy. (Drawn in blue to illustrate indicative location on drawing number SK009), May 2025.</p>

		<p>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.</p>	 <p>Annotation in blue showing indicative location of fire shed and water tower, which is requested to be shown as existing buildings on relevant Appendix 9 plans/drawings.</p> <p>The fire shed and water tower should also be included on the 'illustrative masterplan' (Appendix 9, drawing SK007) (indicative location circled in red).</p> 
H2	<p>Built heritage - demolition</p> <p>Please provide a copy of the granted consent documents relating to the demolition of the W.H. Memorial Hospital building. (<i>Building subject to Restricted Discretionary consent for demolition under '6. Sub-precinct: Wesley, 1. Activity table, 1.1 Area A, Development'</i>)</p> <p>Reasons:</p> <p>Based on a site inspection to Wesley College on 11 December 2024, the W.H. Memorial Hospital building has been demolished. Details of the consenting approval are requested to understand the decision-making for removing the building.</p>	<p>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.</p>	<p>No further information request.</p> <p>Note: The Demolition of the former Hospital building may be followed up by the Council outside the subject plan change process with the landowner.</p>

Notable trees – Leon Saxon, Arborlab				
NT1	Notable trees	<p>Please confirm what the colour coding in the table at Appendix 3 of the arboriculture report identifies.</p> <p>Reasons:</p> <p>To correctly understand the information.</p>	I [Gerard Mostert, Senior Consultant Arborist, Peers Brown Miller Ltd] have modified the colour code and heading (it was explained by a note in the original table). WCD = Within Council Designation – OCD = Outside Council Designation (i.e. the extent of the original Notable tree designation), referring to Attachment 7 of the cl23 response – Updated Arboricultural Report.	No further information request.
NT2	Notable trees	<p>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).</p> <p>Reasons:</p> <p>To correctly understand the information.</p>	Council's arborist is correct – height x spread x girth in metres, approximate. I [Gerard Mostert, Senior Consultant Arborist, Peers Brown Miller Ltd] have stated this explicitly in the table now, referring to Attachment 7 of the cl23 response – Updated Arboricultural Report.	No further information request
NT3	Notable trees	<p>Please confirm what the acronyms (BT and ET) refer to in the table at Appendix 3 of the arboriculture report identifies.</p> <p>Reasons:</p> <p>To correctly understand the information.</p>	The acronym is Below / Exceeds Threshold (i.e. in terms of STEM score. Now stated explicitly in the table, referring to Attachment 7 of the cl23 response – Updated Arboricultural Report.	No further information request
NT4	Notable trees	<p>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'?</p> <p>Reasons:</p> <p>To correctly understand the information.</p>	Nick Pollard comments "ID 2804 of Schedule 10 to the Auckland Unitary Plan for Notable Tree locates 6 species at 801 Paerata Road. The trees identified as Within Council Designation (WCD) are within the site known as 801 Paerata Road and listed under the Botanical Name / Common Name. The other trees are identified in the Franklin 2 Precinct. While these trees may be within 801 Paerata Road, they are not listed for ID 2804 are therefore Outside Council Designation (OCD), referring to Attachment 7 of the cl23 response – Updated Arboricultural Report.	No further information request
NT5	Notable trees	<p>Why do some of the trees listed in Appendix 3 of the arboriculture report not have STEM scores?</p> <p>Reasons:</p> <p>To understand why some trees were not included / assessed for scheduling.</p>	In my report I [Gerard Mostert, Senior Consultant Arborist, Peers Brown Miller Ltd] state that trees that "have no hope" of meeting the Standard Tree Evaluation Method (STEM) threshold were deliberately excluded. I go on to say that the trees have to be at least 8m in height to have any chance of meeting the STEM threshold. Practically speaking, trees that do not have a STEM score can be ignored for the purposes of this assessment.	No further information request
NT6	Notable trees	<p>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.</p> <p>Reasons:</p>	These trees were originally grouped together in the Council designation. One could remove the word "group" without affecting the intention.	No further information request

		To correctly understand the information.														
NT7	Notable trees	<p>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.</p> <p>Reasons:</p> <p>This would make cross-referencing easier for anyone assessing the application (commissioners etc).</p>	<p>This has been done, referring to Attachment 7 of the cl23 response – Updated Arboricultural Report.</p>	No further information request												
Open Space – Lea van Heerden, Auckland Council																
OS1	Open space - provision	<p>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.</p> <p>Reasons:</p> <p>The proposed zone change will result in higher densities than previously proposed. The applicant has applied the same provision, specifically neighbourhoods' parks, as originally intended.</p> <p>However, the increase in density may result in a gap within the open space network where it relates to a formal neighbourhood park and the reason for the request is based on AUP RPS B2.7 objectives and policies.</p> <p>However, it all depends on the actual density applied to the zone.</p> <p>A medium to high density may trigger a request to include an additional location of a neighbourhood park. However, if the intent is medium to low density, then the provision as provided is sufficient.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p><i>Table 2: Franklin 2 Precinct Potential Density Plan</i></p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">POTENTIAL DENSITY SCENARIO (MAY 2025)</th> </tr> <tr> <th>Typology</th> <th>Net Area (ha)</th> <th>Yield (approx.)</th> </tr> </thead> <tbody> <tr> <td>Mixed Use Apartments above retail at ground level (Average 120 dw/ha)</td> <td>2.07</td> <td>248</td> </tr> <tr> <td>High Density Apartments 3-6 Storeys (Average 110 dw/ha)</td> <td>9.14</td> <td>1005</td> </tr> </tbody> </table>		POTENTIAL DENSITY SCENARIO (MAY 2025)		Typology	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	No further information request.
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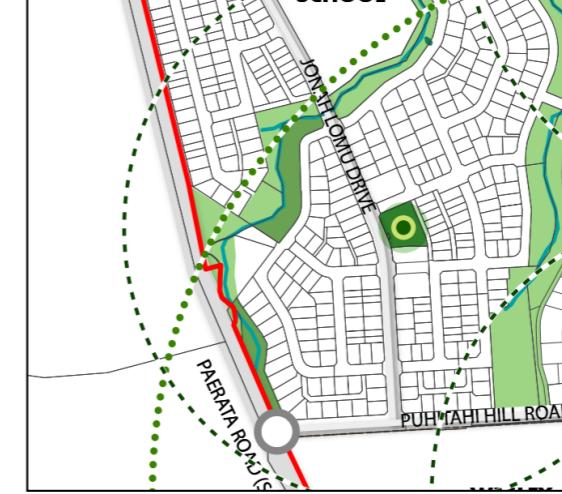
		 <table border="1"> <tbody> <tr> <td>Medium Density 3 storey Attached Dwellings and Walk-up Apartments (Average 65 dw/ha)</td><td>10.58</td><td>688</td></tr> <tr> <td>Medium Density: 2-3 Storey Attached Dwellings (Average 47 dw/ha)</td><td>21.98</td><td>1033</td></tr> <tr> <td>Low Density Semi-detached and Standalone Typologies (Average 33 dw/ha)</td><td>15.29</td><td>505</td></tr> <tr> <td>Low Density Standalone Typologies (Average 22 dw/ha)</td><td>24.75</td><td>545</td></tr> <tr> <td>Potential Total Future Dwellings</td><td>83.81</td><td>4024</td></tr> <tr> <td>Completed or Consented Dwellings in Phases 1-3</td><td>48.15</td><td>1046</td></tr> <tr> <td>Total Dwellings in Franklin 2 Precinct</td><td>131.96</td><td>5070</td></tr> </tbody> </table> <p>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.</p>	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	
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OS2	Open space – suburb park	<p>Please explain the rational 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.</p> <p>Reasons:</p> <p>The Wesley College sub-precinct requirement does not address the integration of the suburb or central park.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	No further information request.																				
OS3	Open space - deletion of open	Clarify how the in the absence of the omitted open space provisions, the intended open space outcomes of the plan change will be	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	No further information request.																				

	space objectives and policies	<p>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.</p> <p>Reasons:</p> <p>We request the following additional information to address the absence of precinct-specific objectives and policies related to open space and their implications for the plan change. This information is critical to understanding the nature of the proposed plan change, the efficiency and effectiveness of how well the open spaces will be integrated with park edge roads as specified in the urban design document, mitigated or managed from an open space network perspective.</p>	<p>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.</p> <p>E38.2 Objectives</p> <p>(2) <i>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.</i></p> <p>(3) <i>Land is vested to provide for esplanades reserves, roads, stormwater, infrastructure and other purposes.</i></p> <p>(8) <i>Subdivision maintains or enhances the natural features and landscapes that contribute to the character and amenity values of the areas.</i></p> <p>Policy E38.3. (18) deals specifically with open space it states:</p> <p><i>Recreation and Amenity Spaces</i></p> <p>(18) <i>Require subdivision to provide for the recreation and amenity needs of residents by:</i></p> <p>(a) <i>providing open spaces which are prominent and accessible by pedestrians;</i></p> <p>(b) <i>providing for the number and size of open spaces in proportion to the future density of the neighbourhood; and</i></p> <p>(c) <i>providing for pedestrian and/or cycle linkages</i></p> <p>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.</p>	
OS4	Opens space - quality of open space	<p>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.</p> <p>Reasons:</p> <p>The provided information will contribute into shaping a better understanding of the open space network proposed and the necessity for it to expand or transform (change in number, size, and function). This will then enable a determination as to whether the capacity and the quality of the open spaces</p>	<p>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.</p>	No further information request.

		<p>will be sufficient in the changing character of the area.</p> <p>The council would not seek to acquire land for the proposed development of neighbourhood parks where the land is severely encumbered—there might be a need to accommodate the land elsewhere.</p>		
OS5	Open space - types	<p>Please clearly delineate which areas of proposed open spaces are required/proposed for stormwater purposes versus recreation purposes.</p> <p>Reasons:</p> <p>A clear distinction needs to be made in respect of the types of open space to be provided. For instance, drainage reserves should be shown as such on the precinct plan and should consider existing or potential flood areas. Confirmation is sought that the proposal accurately reflects the potential for flooding on proposed open space land that is identified as subject to flooding on the council's GIS so that the council can objectively assess its suitability for potential acquisition for open space purposes specifically relating to neighbourhood and suburb/central parks.</p>	<p>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.</p>	<p>No further information request.</p>

Healthy Waters – Amber Tsang

			<p>As part of the review comments for OS5 (i.e. an open space Cl23 FIR, see snapshot at the bottom), Healthy Waters request below information:</p> <ul style="list-style-type: none"> • Please provide justifications for the proposed removal of the open space area at the southern corner of the plan change area as indicated on the operative Precinct Plan 1: Franklin 2 Precinct and in the adopted Wesley College Paerata North Stormwater Management Plan (SMP) (see snapshot below). • Please demonstrate the feasibility of how the approved flood management approach (i.e. avoidance of development in the 1% AEP floodplain and attenuation of stormwater to match with the pre-development flood peaks for the 10% and 1% AEP events) as outlined in the adopted SMP is intended to be achieved. Consultation with Healthy Waters is required if any new and additional public stormwater assets are intended to be vested.
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			<p>Reasons for request:</p> <p>The southern corner of the plan change area is located within a 1% AEP floodplain as identified on the Auckland Council GeoMaps and in the adopted SMP. It is stated in the adopted SMP that development is to be avoided in the 1% AEP floodplain and hence, this area has been preserved as open space for flood storage. Proposed deviation from the approved flood management approach will need to be explained, assessed and justified. The feasibility of how flood effects can practically be avoided and/or mitigated will need to be demonstrated.</p> <p>Healthy Waters as the Network Discharge Consent holder request below information:</p> <ul style="list-style-type: none"> • Please provide an addendum memo to address any amendments to and/or deviations from the adopted SMP proposed as part of PC Franklin 2 Precinct. 	
Ecology – Andrew Rossaak, Morphum				
EC1	Ecology – differences in riparian areas	<p>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.</p> <p>Reasons:</p> <p>The plan change proposes to retain and expand on the provision of a greenway network along the existing streams which flow through the Precinct.</p> <p>There are, however, a number of locations where the current precinct plan provides riparian and open space corridors, however, these are lost on the Proposed Open Space Network (which is the referenced plan in the application material to show the ecological effects). Specifically, these include, but are not limited to:</p> <ul style="list-style-type: none"> • The stream and wetland complex in the north of the precinct, extending south of Karaka Rad. • A stream parallel to Karaka Road, north of Te Rata Boulevard. 	<p>The existing Franklin 2 Precinct Plan 1 has provided the planning framework for the Paerātā Rise development.</p> <p>Objective 12 of the Operative Franklin 2 Precinct provisions (AUP, Chapter I, 6.30) states “<i>Subdivision of the precinct will facilitate restoration of riparian margins</i>”. 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.</p> <p>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.</p> <p>The Franklin 2 Precinct development has (thus far) been progressed in Phases and Stages, with requisite consent approvals obtained for each stage.</p> <p>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.</p> <p>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.</p> <p>In particular, features noted in the RFI as excluded from the revised open space network are as follows:</p>	<p>Recent revisions appear to have reduced riparian plantings along the watercourse between Jonah Lomu Road and Paerata Road (SH22). Please provide the reason for this.</p> 

	<ul style="list-style-type: none"> Stream extending Northwest from Sim Road. Based on observations during a site visit, this may contain wetland complexes. Stream immediately south of the entrance to Wesley College Stream/wetland to the east of property 890 Paerata Road. <p>This appears to be an overall net loss of riparian extent.</p> <p>The proposed plan change should not result in reduced riparian ecological values or extent. The initial ecological assessment indicated the wetlands and riparian to be restored and open space of 55 to 60ha.</p> <p>It is also noted that in the more than 10 years since the ecology was assessed, there have been significant identification and legislative changes associated with wetlands and these will need to be considered within the proposed plan change.</p>	<ul style="list-style-type: none"> 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. <p>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).</p>	
EC2	<p>Ecology – ecological values</p> <p>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.</p> <p>Please provide evidence that the proposed open spaces will provide the protection of the ecological values identified.</p> <p>Reasons:</p> <p>The ecology is discussed as being important to the area, however, it's not clear in the application what these ecological values are, where they are found and how that will be maintained. This information may have been assessed for the original precinct development. However, it would be useful to demonstrate how the plan change will not adversely affect these and take into account current legislation.</p>	<p>The Paerātā Rise development forms the headwaters of a branch of the Whangapouri Creek, which flows into the Drury Creek and Pāherehure 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.</p> <p>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.</p> <p>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.</p>	<p>Please provide response to address the second part of the question.</p> <p>From the information provided, it is understood that the watercourses are considered to be the only natural ecological values of the precinct.</p> <p>The second part of the question is not addressed and there remains uncertainty as to what is open space for public amenity and where ecological effects have been addressed.</p>

EC3	Ecology – ecological areas and wetlands	<p>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.</p> <p>Please note any constructed wetlands that are to provide ecological values and how these would be protected.</p> <p>Reasons:</p> <p>Some of the open spaces depicted are existing stormwater treatment wetlands. These are not considered to provide ecological value and should not be included in the extent proposed as ecological effects management.</p> <p>It is noted that there are indicative neighbourhood parks in the Proposed Open Space Network plan, although there is no indication if these have any ecological purpose.</p> <p>It's not clear from the Proposed Open Space Network plan which areas are required to maintain or for ecological enhancement and which are for amenity or stormwater management. There is potential that this would link back to the initial precinct studies.</p>	<p>Open space classifications are not solely for the purpose of ecological restoration and enhancement.</p> <p>Stormwater treatment wetlands are not proposed as ecological mitigation, though they often do have an ancillary ecological benefit.</p> <p>Proposed neighbourhood parks are not proposed as ecological mitigation, though they often do have ancillary ecological benefits.</p> <p>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.</p>	<p>It is understood no created wetlands are for direct ecological gains. It is also understood that no open space areas are set to achieve specific ecological outcomes.</p> <p>Please provide further information to specify how wetlands will be maintained when their catchments are diverted or reclaimed including ephemeral streams, e.g. Wetland complex off Simms Rd.</p>
EC5	Ecology - methods	<p>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.</p> <p>Reasons:</p> <p>The application states that "In addition, the proposed precinct provisions direct that subdivision, and development is sensitive to the Precinct's natural ecological values which are identified as a significant feature. This policy direction further ensures the ecological values of the Precinct's streams and wetlands features are protected."</p> <p>The proposed policy states that "Enhance ecological and natural character values and avoid additional stream bank erosion by requiring the riparian margins of the identified streams in the precinct plan to be planted</p>	<p>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.</p> <p>Other measures that have been implemented through the resource consent process to manage effects include:</p> <ul style="list-style-type: none"> • 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. 	<p>No further information request.</p>

		<p>with suitable native vegetation at the time of subdivision".</p> <p>The proposal considers only planting for stream enhancement, and whilst important, there are other mechanisms that can be used to enhance streams and wetlands and the habitats they provide, particularly when there are significant changes planned in the catchments.</p>		
Geotech – Auckland Council				
G1	Geotechnical - risk information	<p>Please provide an update or addendum to the 2014 BECA geotechnical report addressing the matters opposite.</p> <p>Reasons:</p> <p>The supporting geotechnical document should consider the latest proposed zoning (which now includes 6-storey THAB which may have different foundation requirements). This includes (but not limited to) updated description of the site and updated geotechnical drawings.</p> <p>The geotechnical document should include 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. This may not be a common practice at the time the BECA report was prepared in 2014.</p> <p>The severe rainfall and winds experienced over Auckland Anniversary weekend, Cyclone Gabrielle and subsequent severe weather e.g., 9 May 2023 may have resulted in instability on site or potentially affected the site. Therefore, confirmation from the applicant's geotechnical consultant (who has since undertaken at least a site visit following the severe rainfall event) is needed. The applicant's geotechnical consultant should confirm the recommendations and conclusions in the provided geotechnical report remain relevant or have been revised accordingly.</p>	<p>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.</p>	<p>No further information request.</p>