Clause 23 Request Tracking Table

Site / Project	Pukekohekohe Gateway Plan Change

In addition to the responses provided in the 'Applicant Response' column of the below table, the following attachments support the response to Auckland Council's Further Information Request under Clause 23 of the First Schedule to the Resource Management Act 1991 (RMA), dated 17 June 2025 on behalf of Auckland Thoroughbred Racing Inc. (ATR):

- Appendix 1 – Additional RPS Assessment;
- Appendix 2 – Proposed Plan Change;
- Appendix 3 – Economic Response Memorandum;
- Appendix 4 – Acoustic Response Memorandum;
- Appendix 5 – Revised Landscape Visual Effects Assessment
- Appendix 6 – Updated Stormwater Management Plan;
- Appendix 7 – Isochrone Analysis;
- Appendix 8 (8.1 to 8.5) – Sidra Model Outputs;
- Appendix 9 – Concept Transport Designs for Information; and
- Appendix 10 – Wastewater Flow Memorandum.

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Economics			
E1 – Development Capacity	Please provide a source for the Infill and Greenfield "Reasonably Expected Development Capacity" data, such as is presented in Figure 3 of the Economics Assessment.	Assessing the development capacity analysis requires understanding the data that feeds into that analysis, and it is not clear whether that reasonably expected infill data has been independently assessed by Urban Economics, or sourced from Auckland Council data.	Refer to the Economic Response Memorandum included at **Appendix 3**.
E2 – Residential land supply	Please clarify the conclusion that with 20.3-21.4 years of supply there is sufficient capacity to meet the requirements of the NPS-UD.	The NPS-UD requires 30 years of supply, which the UEL report appears to indicate is more years of supply than currently exists in Pukekohe.	
E3 – Residential land supply	Please include the dwelling capacity that is enabled within the area subject to the recently approved Plan Change 98 (47 Golding Road & 50 Pukekohe East Road, Pukekohe – i.e. sub-precinct C within the subject plan change).	PC98 was made fully operative on 13 June 2025. It forms part of the existing environment, and should be accounted for in the section 32 assessment. This would be relevant to a number of threads of the Economics Assessment, including the market concentration assessment, and the supply assessment.	
E4 – Competitive land market	Please amend the economic assessment of competitiveness of the land markets to take into account sales of existing dwellings in Pukekohe.	The Economics Assessment assesses competitiveness in the residential land market using the Herfindahl-Hirschmann Index, but does not include sales of existing dwellings and infill dwellings in that assessment. Given existing and new dwellings form part of the same broad residential dwelling	

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		market, the competitiveness assessment should factor in both market segments.	
E5 – Household projections	Please update the economics assessment to refer to Council's adopted population and household growth projections.	The Economics Assessment presents household projections references as "Statistics NZ, UE". Auckland Council bases its strategic planning (including NPS-UD HBA and Future Development Strategy) on a custom projection series referred to as "Auckland Growth Scenario" (AGS), with the current version being v1.1. The Council projections are available from https://data-aucklandcouncil.opendata.arcgis.com/datasets/ed61b2290e914993a2f63eca2f73bb49_0/explore/. While it is possible to have a different opinion as to likely future growth, it would assist Council's assessment of the merits of the application if Council's official projections were also included.	
E6 – Infrastructure investment	Please discuss the relevance of planned infrastructure investment under the FULSS to the current application, and discuss consistency of that information with the applicant's infrastructure assessment (Appendix 4).	The Economics Assessment describes as an economic benefit the fact that the proposed development will more completely use existing infrastructure capacity, basing its assessment on infrastructure information provided in the FULSS. The FULSS has now been superseded as a future development planning instrument by the Future	

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		Development Strategy, and while the FDS does not contain the same resolution of information as the FULSS, and therefore is differently useful to assessment for the application, information provided in the FULSS is now dated and may be out of date, and therefore of little relevance to the assessment.	
<u>Acoustic</u>			
A1 – Noise effects on future residents	Given the high rail noise levels and subsequent significant acoustic design implications, please clarify why recommended mitigation does not include provision of an adequate separation distance buffer instead of the minimum 5m setback distance which is understood related to meeting health and safety concerns around property maintenance	This information is required to assess the effects on future residents.	Refer to the Acoustic Response Memorandum included as Appendix 4.
A2 - Noise effects on future residents	Please advise why a precinct provision is not proposed to require an acoustically designed noise barrier (i.e. solid fence) along the common boundary between the precinct and the rail corridor.	This information is required to assess the effects on future residents.	
A3 - Development	Please advise if a no-complaint covenant is appropriate for ensuring reverse sensitivity effects on KiwiRail are avoided.	This information is required to assess the reverse sensitivity effects on the operation of the adjoining rail corridor.	A no-complaint covenant along the rail corridor is not considered necessary or appropriate. The proposed acoustic development standards proposed to apply to land adjoining the rail corridor within Sub-Precinct B

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			(proposed Standard IX.6.6, IX.6.7 and IX.6.8) have been widely applied and accepted across the Auckland region where Future Urban zoned land is being rezoned for residential land use adjacent to the rail corridor, without a no-complaints covenant being deemed necessary to manage potential effects. In addition, KiwiRail have reviewed the proposed standards for development within Sub-Precinct B and within proximity of the rail corridor, and have confirmed that they are happy with the proposed approach and are in support of the proposed acoustic provisions that formed the lodged Plan Change request.
A4 – Precinct provisions	Please advise the recommended minimum setback distance that Activities Sensitive to Noise should be located from the rail corridor to ensure compliance with the recommended rail vibration criterion of 0.3mm/s vw95.	This information is required to assess the effects on future residents.	Refer to the Acoustic Response Memorandum included as Appendix 4.
A5 – Precinct provisions	Please clarify how the proposed 'Vibration Alert Layer' adequately manages effects.	This information is required to assess the effects on future residents and the reverse sensitivity effects on the operation of the adjoining rail corridor.	
A6 - Development	Please advise if road traffic noise (existing & future) from Buckland Road next to the western site boundary will give rise to adverse effects in buildings containing Activities Sensitive to Noise.	Road traffic noise, like rail noise, is not controlled by any AUP standards, but traffic noise effects have not been discussed. It is understood Auckland Transport has requested this matter is addressed, similar to standards applied in other Precinct Plans.	

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A7 – Reverse sensitivity	Please assess reverse sensitivity effects on the existing Business – General Business Zone and the proposed Business – Light Industry Zone.	Residential activity in proximity to this zone may constrain existing business and Watercare Services activities.	
A8 – Precinct provisions	Please advise why reference is made to G4 of the New Zealand Building Code instead of ventilation requirements set out in E25.6.10 (3)	G4 of the New Zealand Building Code sets out minimum requirements and compliance does not necessarily result in a comfortable indoor thermal environment.	
<u>Urban Design and Landscape</u>			
UD1 – Land use pattern	Has any consideration been given to an alternative land-use pattern / zoning, other than residential, to be applied to the Site?	The proposed Pukekohe Gateway Precinct includes Business zoned land at its' northern extent and adjoins established business environments to the north and west and adjoins the Special Purpose zone to the east. The Structure Plan also depicts an extension of business land to the south of the Site in the longer term. Given the limited connectivity (and poor amenity of pedestrian routes) from the Site to public transport (primarily the train station), poor access to a range of urban amenities and the potential amenity effects of continued operation of the adjacent racecourse on residential activity, there seems some logic in consolidating business activity at this southern periphery of Pukekohe.	Some consideration was given to non-residential land-uses on the site as part of this process and the former PC30 application. This included whether to provide for the following zones over all or parts of the Site: • Neighbourhood Centre; • Mixed-Use; • General Business; and • Light Industrial. As discussed in Section 2.5.1 of the NDS, a Neighbourhood Centre zone was discounted on the basis that small-scale retail convenience and other complimentary activities could already be provided to the site through the adjacent General Business Zone and the Mixed Housing Urban zone itself. In terms of other zoning options including Mixed-Use, General Business and Light Industrial, these were all originally discounted for various reasons during the development of PC30. The potential impact on the

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		Neither the Neighbourhood Design Statement or the Economic Assessment makes any reference to consideration being given to the potential use of the land for business purposes.	transport network and the extent of upgrades required, as well as the efficient functioning of Pukekohe Town Centre were identified as issues for not advancing an even greater extent of business zoning across the PPC area. Further, it was noted that the PPC area's quality landscape setting and outlook would provide for a high-quality setting for residential activities. It was also noted that the nature of commercial development (in particular the type enabled via a light industrial or general business zoning) would typically require much more substantial land modification to enable suitably sized building platforms and associated car parking areas, particularly in the eastern portion of the PPC area. As such, a concern was identified around the potential interface effects of commercial activities on the race-course itself. In this regard, the precedent currently being established by "The Hill" development at Ellerslie Race Course was considered to provide for a more appropriate response for an interface with an operational race course.
UD2 – Urban design outcomes	Is additional policy guidance and assessment criteria necessary to ensure the urban design outcomes sought for the neighbourhood park are achieved?	Precinct Plan 1 identifies an indicative Neighbourhood Park. While the Neighbourhood Design Statement identifies the role and key characteristics of a neighbourhood park, this is not reflected in the Precinct policies, and assessment criteria for the Precinct. It's suggested that further detail is provided that seeks to ensure suitable slope, aspect, street frontage and	Additional policy guidance is not necessary. There is sufficient existing guidance within the AUP that will need to be considered as part of future resource consent processes. In addition to H5.3.3(a), Chapter E38 of the AUP includes several provisions which will inform future detailed design and development of the Site. This includes E38.3.10, E38.3.14, E38.3.18, E38.12.1(7), E38.12.2(7)(j). In addition to the above, if it is intended that the neighbourhood park is to be vested with Auckland

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		integration with mature trees is achieved for the future park in subdivision design.	Council, then its design would be subject to the Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy. This policy identifies an extensive list of matters from pages 47 through to 73 which Auckland Council will take into account (and future applicant will need to consider) when seeking to vest a neighbourhood park.
UD3 - Vegetation	Has an analysis of the urban structuring role of the mature vegetation on the Site been carried out? If so, are the Precinct provisions robust enough to ensure the role of mature vegetation in contributing to the Precinct's sense of place and amenity is achieved?	The Neighbourhood Design Statement appears to rely on the Arboricultural Assessment to determine which existing mature trees should be identified on Precinct Plan 1. Has an amenity assessment been carried out to determine which trees could make a positive contribution to the neighbourhood's sense of place (providing a link to the Site's history) and amenity. If the role of the mature trees is considered important for urban structuring, character and amenity purposes, it's questioned whether Policy 6(a) and assessment criterion 1(k) are strong enough to ensure their retention and integration into the neighbourhood design.	While the NDS has had regard to the Arboricultural Assessment, this hasn't been the primary basis for determining what trees have been identified on Precinct Plan 1. All trees were surveyed and identified prior to feed into the development of a preliminary masterplan to inform potential development outcomes and factored into optioneering. From the outset, the intent has been to seek to retain as many trees as possible. However, this desire needed to be balance with the need to provide for an efficient block structure that can accommodate a range of housing typologies and sufficient yield that could justify investment in redevelopment of the land, the need to develop a connected street network (e.g. connecting in with the PC87 area) and the requirement to facilitate earthworks to create flat building platforms / sites as well as raise some land above potential flood heights. In this regard we note that Policy 6(a) and assessment criterion 1(k) are not intended to create an absolutist approach to the retention of these trees as they do not

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			meet the requirements for protection under Chapter D13 the AUP. Rather, their retention must be balanced against wider site objectives and requirements, with their inclusion within Precinct Plans 1 and 3 providing a clear signal to a future developer and/ or designer that those trees identified need to be considered in detail and their removal (if required) assessed through a resource consent process.
UD4 / LS1 – Stream works	Should Tutaenui Stream and its margins be identified on Precinct Plan 1 as a natural feature that defines the southern edge of Pukekohe?	The Neighbourhood Design Statement identifies Tutaenui Stream as the southern boundary of the Site that provides an informal border between Pukekohe and Buckland. It also highlights (in the Opportunities and Constraints section) the southern edge as a key 'gateway' to the Site and Pukekohe more broadly and notes the potential for landscape and built form treatment to reinforce these. While Precinct Plan 1 identifies the opportunity for Mahi Toi in this location, the gateway function would be reinforced by identifying this stream corridor as an important open space edge / boundary.	The Tutaenui Stream and its tributaries located within the Pukekohekohe Gateway Precinct have been identified in Precinct Plan 1. Additionally, resource consents relating to the subdivision of the land adjacent to the Tutaenui Stream will trigger ecological requirements that will further enhance the 'gateway' - namely ecological planting and pest management. Ultimately, this would serve as an attractive backdrop to the mahi toi provided for in the Precinct Plan.
UD5 / LS2 – Road frontage	Given the proposed 'gateway' role of the proposed Precinct, has consideration been given to ensure a	The Precinct has an extensive frontage to Buckland Road. The 'Illustrative Masterplan' contained in the Neighbourhood Design Statement	Adequate consideration has been given to the Buckland Road frontage.

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	suitable frontage to Buckland Road is achieved?	depicts residential properties largely backing onto Buckland Road. Given the character of this street corridor, it is likely that residential properties would seek to achieve a solid edge treatment along the boundary, which may result in a poor street interface forming the gateway to Pukekohe. Has consideration been given to the need for additional interface controls with the adjacent Special Purpose zone to ensure a suitable residential amenity is achieved and maintained. Any response to this request should take into account request A6 and AT 10 relating to acoustic attenuation provisions adverse effects arising from the road traffic noise associated with the operation of Buckland Road.	Any sites fronting Buckland Road will remain subject to H5.6.8 (front yards), H5.6.11 (landscaping) and H5.6.15 (front fences and walls). Individual developments must comply with these standards while comprehensive developments of more than three dwellings must still consider any infringements as part of a restricted discretionary activity. Collectively it is noted that the purpose of these standards is to: • to create an urban streetscape character and provide sufficient space for landscaping within the front yard; • to create a landscaped urban streetscape character within the zone; • provide privacy for dwellings while enabling opportunities for passive surveillance of the street or adjoining public place; and • minimise visual dominance effects to immediate neighbours and the street or adjoining public place. In addition to the above, there are a number of other contextual factors and precinct provisions which will support the delivery of a 'gateway' development. These include: • The identification of a mahi toi opportunity with supporting provisions to provide for a physical 'gateway' element adjacent to Buckland Road; • The location of the Tutaenui Awa and its tributaries. The former's width triggers a requirement for the provision of a 20m wide esplanade reserve along the southern portion of Sub-precinct B while proposed provisions require 10m riparian planting along the

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			Tutaenui Awa and its tributaries. This will result in several locations of dense vegetation being located directly adjacent to the Buckland Road frontage; • Sub-precinct B is already partially elevated above Buckland Road. It is likely further land modification, lifting the ground level in this area will be required to address potential flood risks. This elevation provides for vertical separation of units fronting Tutaenui Road reducing the need to provide a solid edge treatment. It is noted that any future retaining structures in this location will be subject to a resource consent process where detailed design of this interface can be addressed appropriately through existing AUP provisions; • There is an existing "no-complaints" covenant area within Sub-precinct B surrounding the wastewater pumpstation relating to odour in the vicinity of Buckland Road. This is near a low-point in the site and would be a logical location for a communal stormwater device, further complimenting the general openness and riparian planting required along the Tutaenui Awa and its tributaries; • Urbanisation of the Buckland Road frontage would be accompanied by street tree planting in line with AT and AC Parks requirements; • The identification of several amenity trees along the Buckland Road Frontage; and • Compliance with the NZBC for new dwellings generally requires the use of both insulation and double glazing. These generally result in quieter,

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			more amenable housing than would be the case from historical residential development located along arterial roads.
UD6 / LS3 – Residential amenity **Includes interface with I434. Pukekohe Park Precinct**	Has consideration been given to the need for additional interface controls with the adjacent Special Purpose zone to ensure a suitable residential amenity is achieved and maintained?	The Urban Design Assessment section of the Neighbourhood Design Statement notes that the proposed Open Space – Informal Recreation zone provides a buffer between the racecourse activity and residential activity within the proposed new Precinct. However, there are interfaces adjacent to the open space zone where there is a direct interface between the R:MHU zone and the Special Purpose zone. A broad range of activities and associated buildings up to 16.5m are permitted activities within the Special Purpose zone. While a height in relation to boundary control applies to boundaries that interface with other zones, this control does not apply to temporary buildings or light towers and associated fittings which are also permitted activities. Further analysis of potential amenity effects is requested.	Yes, additional interface controls were considered but not deemed necessary for a number of reasons. We note that the northern and part of the eastern boundary of the MHU zone in Sub-precinct A and the northern boundary of MHU zone in Sub-precinct B will continue to share a boundary with the Pukekohe Park Precinct. Starting with Sub-precinct B, the boundary has been set-back approximately 20m from the closest point to the outer rail of the course proper. This provides sufficient physical separation from race course activities and provides ATR with flexibility in managing this area to address any interface issues should this be required. It is noted that additional clearance of 5m beyond the outer rail of the course proper is required for course operations (e.g. moving the outer rail, course maintenance / access). The location of this area relative to course amenities such as the grandstand, stables and physical access means that it is highly unlikely that this area would be required to accommodate substantially scaled buildings or intensive activity. Turning to Sub-precinct A, we note that a HiRB of 4m+60^0 will be applicable to permanent buildings whilst temporary buildings are, by their nature, temporary. The northern boundary is also shared with the primary

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			access into Pukekohe Park which means there is also a practical limitation on development along this edge. Further, as part of the masterplanning process detailed consideration was given as to the location of this boundary to ensure that ATR retains sufficient space to manage any potential interface effects at this boundary. There is approximately 30m of separation distance from the existing public grandstand with the intention that this area can be utilised for landscaping and support a positive sense of arrival for patrons and other visitors. We also note that the northeastern corner of the residential area will need to be raised a few meters above the ground level in this location to avoid potential flood risks. This elevation also provides for a degree of protection / buffering from adjacent operations at Pukekohe Park. Renders demonstrating the interface along the northern boundary have been prepared as part of consultation with internal stakeholders. These demonstrate the position of key access points and elevation changes between the land 

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			The above image is looking east from the Pukekohe Park Entrance towards the course proper, with the residential boundary to the right. The image below shows a perspective looking west from the vicinity of the course workshop towards Sub-precinct A.  The eastern boundary of Sub-precinct A which does not adjoin the proposed open space zone, again will need to be elevated above the adjacent course by approximately 2 to 3m to avoid potential flood risks. This elevation provides a degree of physical separation from the adjacent part of the course. In addition, there is an operational requirement to maintain a line of site between the members grandstand and southern end of the course proper to ensure the entire race can be witnessed by patrons and course announcers. This has the practical effect of limiting the height and scale of development that could occur in this area to around 1-

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			storey. As such, it is likely that this space would be utilised for overflow carparking (noting that this currently occurs on the PPC area) or additional event space (e.g. marquees). With regards to lighting / light towers which could potentially impact future residents across both precincts, Pukekohe Park already acts as a training base for over 100 horses for six-days per week. Training sessions begin before sunrise and are aided by the use of artificial lighting that already exists and it is intended that this use will remain in the long-term. There are controls are the direction of illuminance levels for lighting that apply to operations at Pukekohe Park which are designed to address potential amenity effects associated with light spill. In addition, it is observed that proximity to an operational race course is itself considered a positive amenity that helps to differentiate this site from new residential developments in and around Pukekohe. In this regard, its operations provide a unique selling point for future development of the Site. Finally, it is noted that ATR, as the long-term operator of Pukekohe Park, are incentivised to ensure a good relationship with any neighbouring development. As the owner of the land they have the ability to incorporate a range other non-RMA measures such as covenants or design requirements within Sale and Purchase agreements. Additionally, prospective residents themselves are best placed to assess whether this constitutes an adverse amenity effect and would have

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			the option of not living in a property in proximity to the course if they have concerns.
LS4 – Landscape character	Has an assessment of visual effects on users of surrounding open spaces (such as Pukekohe Hill) been carried out?	Section 2.3.2 of the Landscape and Visual Assessment ("LVA") identifies the viewing audiences for carrying out the assessment of visual effects. Users of surrounding open spaces is not identified as a particular audience. A photograph from Pukekohe Hill (Figure 5) is included in this section. However, it is unclear what reference is being made to that photograph.	Users of open spaces were not specifically assessed as a collective group. This is because other than Pukekohe Hill Reserve there are no views to the Site from other nearby open spaces. This is illustrated by the ZTV analysis which was also ground-truthed during site visits. Rather, 'Viewing Audiences' are used to aid the discussion and open space users, in this case visitors to Pukekohe Hill Reserve, are discussed as a part of Viewing Audience 1. Figure 5 in the LVA report (refer **Appendix 5**) is an image to help the reader get a sense of the view from Pukekohe Hill.
LS5 – Landscape assessment	Please provide a rating of magnitude of visual effects for each of the groups discussed in Section 4.2.	Section 4.3 of the LVA includes a statement that "the visual effect rating is low". A more granular rating assessment is required to understand the different effects experienced by the various groups that will view the Precinct from surrounding areas.	This has been added to the updated LVA report (refer to **Appendix 5**).
LS6 – Landscape principles	Please provide an assessment of how the underlying zones and/or precinct provisions address each of the landscape principles identified in Section 5 of the LVA.	From the assessment carried out, the LVA sets out a number of landscape principles that are recommended to ensure landscape-related effects are appropriately managed. The request is made to better understand if and how	This assessment is included below with respect to the identified landscape principles: • Where practicable, allow for views from the development to local geological features such as Pukekohe Hill, the Pukekohe East Explosion Crater and Bombay Hills:

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		these recommendations have been addressed by the PPC.	○ Activity IX.4.1 (A2); and ○ Assessment Criteria IX.8.2(1)(c). • Create a legible development layout that is broadly consistent with existing Pukekohe development patterns. Explore opportunities to integrate the future development with the surrounding are through open spaces and pedestrian and cycle movement networks. ○ Activity IX.4.1 (A2); ○ Assessment Criteria IX.8.2(1)(a); ○ Precinct Plan 1 which identifies the indicative key local road network which will inform the design and layout of future blocks; ○ Policy E38.3(10); and ○ Assessment Criteria E38.12.2(7)(a). • Respect the underlying Pukekohe geology and topography through contour-sensitive development and minimisation of retaining structures. ○ Policies E38.3(3), E38.3(14). • Create gateways that signal the main entrance to the Site and create a sense of arrival on the approach to Pukekohe from the south. ○ Policy IX.3(2)(b); ○ ActivityIX.4.1(A1); ○ Assessment Criteria IX.8.2(p); and ○ Precinct Plan 1 which identifies the location of Mahi Toi at the southern gateway. • Enhancement of ecological values through the integration of wetlands, streams, and riparian areas

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			into a cohesive open space network. This will provide for stormwater management and enhanced ecology whilst contributing to recreational opportunities visually softening views of the future development from the surrounding area. o Policies IX.3(2)(b), IX.3(9); and o Standard IX.6.4. • Streetscape and private lot planting to provide visual screening and the overall visual softening of new built-form. <u>Private lot planting and landscaping:</u> o Policy H5.3(2); and o Standard H5.6.11. <u>Streetscape planting:</u> o Detailed design process at Engineering Plan Approval stage. • Where practicable, retention of existing trees within the Site and along Buckland Road. <u>Trees within the Plan Change area</u> o Policy IX.3(6)(a); and o Assessment Criteria IX.8.2(1)(k); and o Precinct Plan which identifies amenity tree. <u>Trees along Buckland Road</u> o Chapter E17 Trees in Roads of the AUP.
<u>Parks / Open Space</u>			
OS1 – Design and Location of Open Space –	It is understood from discussions that Auckland Thoroughbred Racing Inc propose to retain ownership of land	The submitted information does not state the specific reason for electing re-zone the 2.14 hectares of Open Space –	ATR intend to retain private ownership and in turn will be responsible for the ongoing maintenance of the area

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Informal Recreation Zone	either side of the re-aligned culvert/stream. Please confirm and clarify if this applies to all the intended purpose of the Open Space – Informal Recreation Zone. Specifically, advise if this area is anticipating an esplanade, and clarify the intended ownership model (public or private).	Informal Recreation Zone (OZIR) in Sub-Precinct A. It is also unclear whether this zoned area is intended to fulfil esplanade requirements or is proposed independently of any such requirements, and whether it is intended for public or private ownership. This information is required to understand the function and accessibility of the proposed open space, and to assess its alignment with potential esplanade reserve requirements and public open space provision expectations including whether Healthy Waters would be likely to accept the land to vest as reserve if this is required as an esplanade reserve.	proposed to be rezoned Open Space – Informal Recreation zone through this Plan Change request. By way of update, ATR are preparing a resource consent application in parallel with this Plan Change request, for the stream naturalisation and realignment, which aligns with the extent of the proposed Open Space – Informal Recreation zone, and will be held in private ownership and maintained by ATR. The purpose of the Open Space – Informal Recreation zone is to provide stormwater conveyance through the site, along with an open space area with enhanced amenity for future residents of the Plan Change area which will provide a physical buffer between the Pukekohe Park track and the future residential development.
<u>Stormwater and Flooding</u>			
SW1 – Stormwater management approach	Please confirm the stormwater management approach proposed for different areas and update the SMP accordingly. Please confirm and/or clarify the following: Communal wetland is identified in Section 7.1.4 and Table 4 of the SMP as being the preferred stormwater management option/approach for	There are inconsistencies presented in the SMP which leads to uncertainty of what stormwater management approach is being proposed. Please also note that Healthy Waters does not support the "toolbox" approach (i.e. Table 5 of the SMP).	**Stormwater Management Approach Confirmation - Communal Wetland** We confirm that the communal wetland remains the recommended and preferred approach for both water quality treatment and SMAF1 hydrology mitigation. This aligns with the outcomes of engagement with Mana Whenua and Healthy Waters. That said, we have intentionally built flexibility into the SMP to accommodate potential changes through the

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	water quality treatment and SMAF1 hydrology mitigation. It is stated in the summary of Mana Whenua engagement (Section 5 of the SMP) that both Ngāti Te Ata Waiohua and Ngāti Tamaoho agreed that wetlands are the preferred option. It is also stated in the summary of Healthy Waters consultation that large communal devices are preferred by Auckland Council and Auckland Transport as opposed to raingardens in road reserves. However, Table 5 of the SMP proposes roadside raingardens for water quality treatment and detention tanks for hydrology mitigation. It is stated in Table 5 of the SMP that the roadside raingardens option is subject to Auckland Transport asset owner approval. It is also stated in Section 7.4 of the SMP that any stormwater management devices that are within the public road corridor will be vested to and maintained by Auckland Transport. Auckland Transport as asset owner will need to assess & approve the stormwater devices in the road corridor. Developers must demonstrate that their SMP is consistent with Schedules 2 and 4 of the NDC for it to be adopted. Please advise if there has		detailed design phase, infrastructure constraints, or operational requirements. This is particularly relevant for areas where connection to the communal wetland may not be practicable. **Clarification on Table 5** The reference to roadside raingardens and detention tanks in Table 5 is intended as an alternative option, only to be used if site-specific constraints emerge during design development. The SMP has been updated (refer **Appendix 6**), to clarify this intent and ensure that the communal wetland is clearly positioned as the primary and preferred solution, with alternative approaches subject to further assessment and stakeholder approvals. Additionally, the Auckland Transport Design Manual (AT-TDM) permits the use of raingardens within the road corridor, provided they meet the design requirements, including a minimum surface area of 20m². We anticipate that any consultation with AT on use of proposed raingardens would be subject to AT-TDM compliance and Auckland Transport approval and will be undertaken at the appropriate consenting stage.

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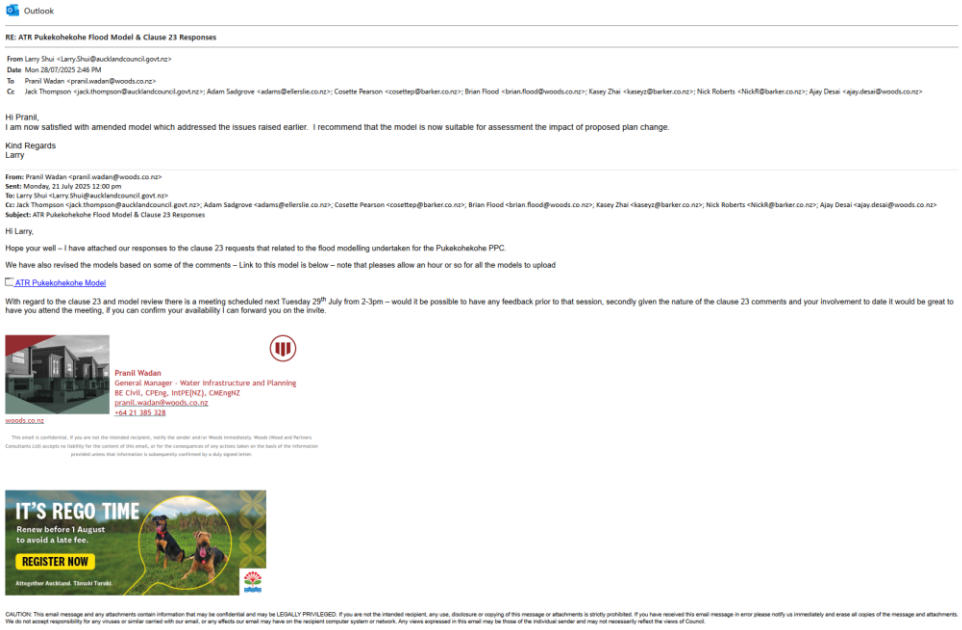
	been any consultation with Auckland Transport as the future asset owner of these proposed devices.		
Flooding	Flood modelling review closed and model results accepted as of 28/07/2025.  Outlook **RE: ATR Pukekohekohe Flood Model & Clause 23 Responses** **From** Larry Shui <Larry.Shui@aucklandcouncil.govt.nz> **Date** Mon 28/07/2025 2:46 PM **To** Pranil Wadan <pranil.wadan@woods.co.nz> **Cc** Jack Thompson <jack.thompson@aucklandcouncil.govt.nz>; Adam Sadgrove <adams@ellerslie.co.nz>; Cosette Pearson <cosettep@barker.co.nz>; Brian Flood <brian.flood@woods.co.nz>; Kasey Zhai <kaseyz@barker.co.nz>; Nick Roberts <NickR@barker.co.nz>; Ajay Desai <ajay.desai@woods.co.nz> Hi Pranil, I am now satisfied with amended model which addressed the issues raised earlier. I recommend that the model is now suitable for assessment the impact of proposed plan change. Kind Regards Larry **From:** Pranil Wadan <pranil.wadan@woods.co.nz> **Sent:** Monday, 21 July 2025 12:00 pm **To:** Larry Shui <Larry.Shui@aucklandcouncil.govt.nz> **Cc:** Jack Thompson <jack.thompson@aucklandcouncil.govt.nz>; Adam Sadgrove <adams@ellerslie.co.nz>; Cosette Pearson <cosettep@barker.co.nz>; Brian Flood <brian.flood@woods.co.nz>; Kasey Zhai <kaseyz@barker.co.nz>; Nick Roberts <NickR@barker.co.nz>; Ajay Desai <ajay.desai@woods.co.nz> **Subject:** ATR Pukekohekohe Flood Model & Clause 23 Responses Hi Larry, Hope your well – I have attached our responses to the clause 23 requests that related to the flood modelling undertaken for the Pukekohekohe PPC. We have also revised the models based on some of the comments – Link to this model is below – note that pleases allow an hour or so for all the models to upload ATR Pukekohekohe Model With regard to the clause 23 and model review there is a meeting scheduled next Tuesday 29th July from 2-3pm – would it be possible to have any feedback prior to that session, secondly given the nature of the clause 23 comments and your involvement to date it would be great to have you attend the meeting, if you can confirm your availability I can forward you on the invite. Pranil Wadan General Manager - Water Infrastructure and Planning BE Civil, CPEng, IntPE(NZ), CMEngNZ pranil.wadan@woods.co.nz +64 21 385 328 woods.co.nz IT'S REGO TIME Renew before 1 August to avoid a late fee. REGISTER NOW Altogether Auckland. Tāmaki Tarahi.		
SW2 - Flooding	The proposed imperviousness in the PPC area is not reflected in the flood model for the subcatchments affected	This information is required to enable a full assessment of any actual and/or potential flood effects.	The pre and post development modelling is undertaken based on permitted imperviousness for - Special Purpose - Major Recreation Facility Zone (80%). The expected

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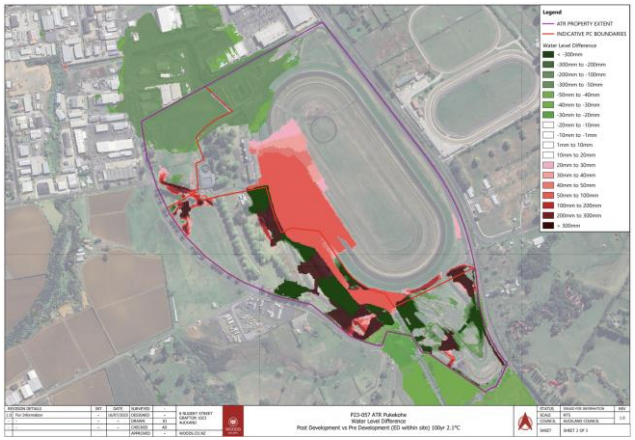
	under the post development scenario. Increased imperviousness can impact peak flows. Please review the subcatchments boundary in relation to the proposed terrain changes and update the flood model accordingly.		imperviousness for residential development enabled by the Plan Change is lower than the currently permitted allowances for the Special Purpose – Major Recreation Facility zone (down to approximately 60%). Sensitivity undertaken with pre-development set to existing imperviousness (greenfield in general) and shown below. There are no increases upstream or downstream on third-party land. 
SW3 - Flooding	Change of roughness value can impact flood depth. For the post-development scenario, the roughness value (i.e. manning's n value) for the roughness zones in the model should reflect the proposed land use changes in the PPC area, including proposed planting in the naturalised	This information is required to enable a full assessment of any actual and/or potential flood effects.	Changes have been incorporated into the model, including a roughness value of Manning's 0.1 for private lots and 0.02 for roads and impervious surfaces. A composite Manning's n value of 0.10 has been adopted for the diversion channel/stream to account for the representative roughness of a low-flow channel (n ≈ 0.04) and densely vegetated banks/floodplain (n ≈ 0.12), consistent with the ranges given in Chow (1959) and

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	stream. For the proposed residential zone, the private yard area should have a roughness value of 0.12 ~0.15 to reflect the fences, garden walls, and plantings to be installed at these urban properties. The future residential buildings and roads should also be considered for the roughness data. For the pre-development scenario, the roughness value for large open spaces (e.g. parks and racecourses) should be as low as 0.03. Please update the flood model and apply the appropriate roughness value to reflect the proposed land cover.		Auckland Council's Stormwater Code of Practice v4 (2023). Results show minor improvements upstream and downstream of the site as a result of improved conveyance along the proposed stream alignment. Results are reflected in the updated SMP (refer **Appendix 6**).
SW4 - Flooding	Both the pre and post development model show excessive flood depth at some nodes (see snapshot below). These excessive flood depths can distort the model results. Please check the attributes for these nodes and amend the model as needed.	This information is required to enable a full assessment of any actual and/or potential flood effects.	The flood depths are calculated for dummy nodes/break nodes incorrectly in ICM where no ground levels are required. These do not affect the model results. Overall model results are stable.

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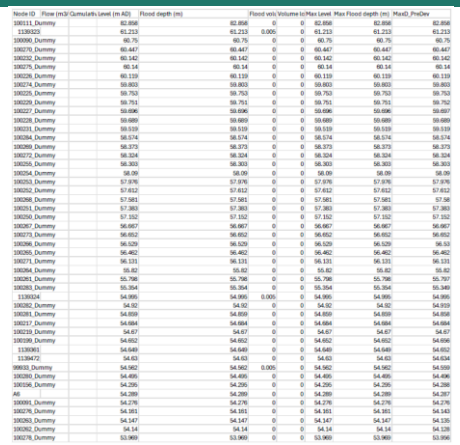
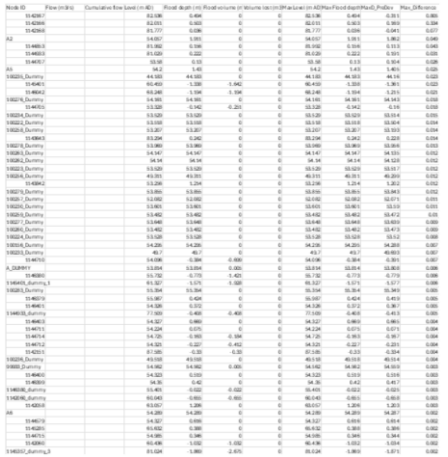
			
SW5 - Flooding	The flood model indicates excessive flow velocities in some links (see snapshot below). Please check these links and confirm if they are reasonable or amend as needed. US node ID / Max US flo / Max US Fr / Max US to / Max US velo 1139172_1139173 186.8458 100652.8 1.1E+08 46476.031 1145401_dummy_2 3.16716 99.06 388.517 80.045 1145401_dummy_1 4.44174 51.345 198.854 51.948 1145360 2.43327 34.005 122.458 23.954 1142528 1.04872 27.087 122.711 20.573 1143400 4.9295 20.913 85.941 20.416 100114_Dummy 1.23572 21.395 118.474 20.005 100040_Dummy 27.25919 10.291 144.114 18.507 100069_Dummy 21.36379 3.839 135.069 15.665 100075_Dummy 22.55494 3.526 132.297 15.643 1145401 1.7714 8.902 66.393 10.912 100028_Dummy -13.1112 3.885 113.544 -10.896 100071_Dummy -12.2068 3.231 125.75 -10.041	This information is required to enable a full assessment of any actual and/or potential flood effects.	Model checked for velocities, the shown velocities are instantaneous velocities which can be observed during minor timesteps reductions. These do not affect the peak velocities or levels/flows in the model. A summary of the velocities in these pipes has been provided to Healthy Waters.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
SW6 - Flooding	It is concluded in Section 8.3 of the SMP that the modelled results show no flood level increases upstream or downstream of the PPC area. However, based on our review, there are pre and post development flood level differences at some nodes (i.e. indicating upstream and downstream flood level increases, see snapshots below). Please investigate and update the flood impact assessment accordingly. 	This information is required to enable a full assessment of any actual and/or potential flood effects.	Noted. The majority of manholes located with no influence on the PPC. Level/depth differences noted are at dummy nodes/break nodes and less than 20mm, which are within model tolerances and not visible within floodplains. Flood levels have been checked outside of the PPC to ensure no third-party effects. There are no increases downstream or upstream with revised model results.

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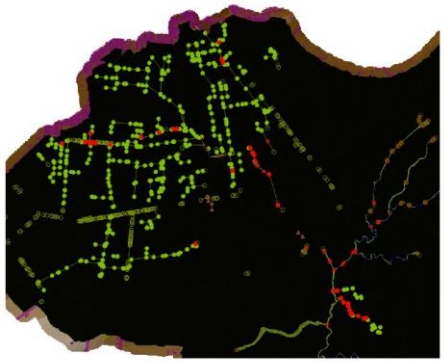
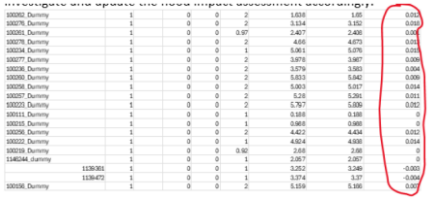
			
SW7 – Flooding	The flood model indicates pre and post development flood level differences in some river reaches (see snapshot below). Please investigate and update the flood impact assessment accordingly. 	This information is required to enable a full assessment of any actual and/or potential flood effects.	As outlined above.

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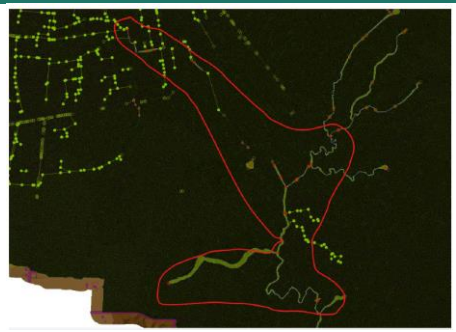
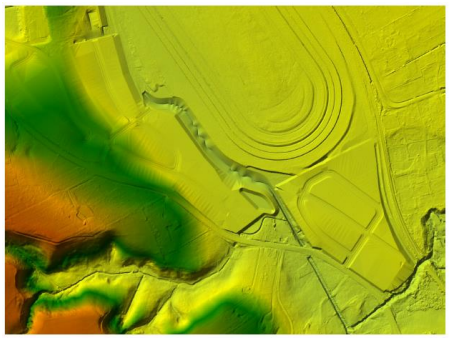
			
SW8	Please compare the post and pre development terrain data and advise changes in flood storage in a 1%AEP CC 3.8 scenario i.e. loss or gain in flood storage volume within the PPC area. PPC Terrain (Post Development)  Existing Terrain (Pre Development)	This information is required to enable a full assessment of any actual and/or potential flood effects.	Noted. The flood storage for 100yr 2.1C within the site is calculated for pre and post development scenarios. Pre-development - 245,000m^3 Post development flood storage - 205,000m^3 Stormwater tanks - between 5000m^3 depending on the number of lots. (potential lots - 450-600) Pond - approx. 1,000m^3 Total post development storage - 211,000m^3

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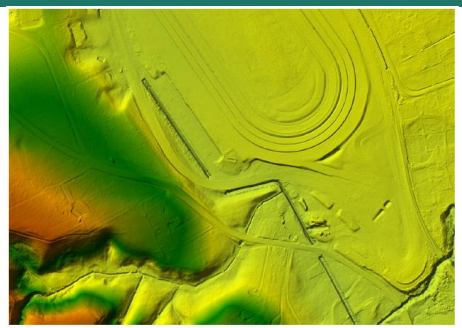
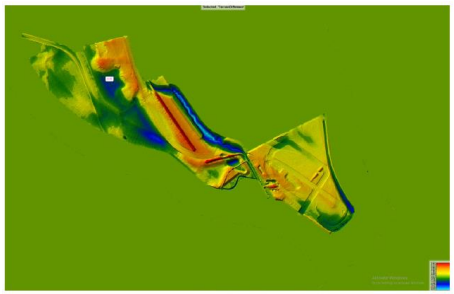
	 Terrain differences 		
SW9 – Flooding	Please present and assess the model run for the 10yr existing rainfall for the pre and post development scenarios and the 10yr with 3.8 climate change for the pre and post development scenarios.	This information is required to enable a full assessment of any actual and/or potential flood effects.	Provided. Review closed and model results accepted as of 28/07/2025
SW10 - Flooding	Please present and convert the flood model results e.g. the maximum flood depths to ASC raster files and a post-pre	This information is required to enable a full assessment of any actual and/or potential flood effects.	Provided. Review closed and model results accepted as of 28/07/2025

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	differences raster calculated to clearly show flood level differences, wet to dry, and dry to wet area for all model run scenarios.		
Arboriculture			
Arb1 – Amenity trees assessment	Please provide a Notable tree assessment of the two groups of trees identified as 'Amenity Trees' as groups of trees.	The two groups of trees identified as 'Amenity Trees' are currently identified as notable. It is stated at 4.3 of the arboricultural report that "due to the spread-out nature of the growing locations of the surveyed trees, providing a group score for all trees assessed would be hard to justify under the current assessment guidelines as tree canopy is not contiguous." Notwithstanding this, the canopies of the two groups of landscape trees are either contiguous or are at least close enough to warrant consideration as a group.	As considered by Greenscene, providing a group assessment based on the Guidelines for Nominating a Notable Tree for Evaluation (e.g., 1. Canopies touch; 2. Canopies overlap; 3. Canopies are not further than 5 metres apart) would result in a multitude of tree protection areas/groups of trees, as well as individual/standalone trees that do not meet the group criteria. Furthermore, the Guidelines for Nominating a Notable Tree for Evaluation group criteria requires an individual tree to score independently as notable, i.e. '*At least one individual in a group must be scheduled independently as notable and all trees in the group must be physically close to each other or form a collective or functional unit through meeting at least one of the following criteria: 1. Canopies touch; 2. Canopies overlap; 3. Canopies are not further than 5 metres apart*'. Greenscene note that providing an average score for a 'group' is considered to be limiting in its effect/result. Undertaking a 'group assessment' may compound observed inaccuracies and unverified information currently detailed in the AUP Schedule 10 (that identifies all Notable trees on site as 'unverified position of trees').

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			Therefore, in order to provide an accurate and accountable schedule of trees on site, individual tree assessments were undertaken as a pragmatic approach to providing quality data that would better support the existing site information currently on record at Council.
Arb2 – Amenity trees assessment	Given the assessment of the Landscape and Visual Effects expert, please provide comment from the appropriate specialists on why these trees have not been considered to have any 'stand-alone' special factors (Section 8 of the AUP Notable Tree Nomination Form).	The LVA report makes several statements about the London plane trees as follows: "Much of the site comprises maintained lawn interspersed with rows of large specimen trees. These trees vary in species, age, and health, adding ecological and visual value to the landscape. The driveway, a remnant of the original road to Pukekohe, is flanked by many of these trees. Many of these original trees are AUP notable and around a dozen are proposed to be retained within the development as indicated by the illustrative masterplan in appendix 9 and arborists report" and "The Great South Road played a pivotal role in the history of Pukekohe and its surrounding regions,…" and "Plane trees near the Pukekohe Park Raceway, planted along the old Great South Road in the early 20th century, were part of efforts to beautify key routes and provide shade. These trees became a defining feature of the southern approach to Pukekohe, reflecting the	The matters under section 8 of the AUP Notable Tree Nomination Form are also included as factors for consideration under Policy B4.5.2(1) of the RPS. An assessment of all trees within the Plan Change area against this policy is included in the additional RPS Assessment at **Appendix 1**. The RPS assessment has been informed by the Ecological Assessment and Landscape and Visual Effects Assessment.

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		region's growth. Over time, they have contributed to the area's historical character and natural beauty, offering environmental benefits and aesthetic appeal. Despite urban changes, many of these trees have been preserved as living reminders of Pukekohe's heritage, demonstrating the communities dedication to protecting its natural environment and historical identity."	
Arb3 – Notable tree assessment	Please provide scoring and relevant assessment of the two 'groups' of trees on the knoll.	There are two 'groups' of trees on the knoll where the trees which have been put forward for scheduling as notable are located. There are two scenarios for these two groups of trees which have either not been explored, or at least not discussed in the arboricultural report. The first is to consider these trees as 'groups' and find the 'average' score for the trees in the group as per the Guidelines for Nominating a Notable Tree for Evaluation' document. The second is to consider whether, as a group, the trees have any special (stand-alone) factors.	Please refer to the response outlined in Arb1 with respect to the assessment of trees as a 'group'. Furthermore, an example of one of the two 'groups' of trees on the knoll (refer to the below map) includes one tree that has scored 23, as well as four 'adjacent' trees that had individual scores of 11, 11, 7 and 11. The average for this 'group' would be 12.6, which does not meet the threshold for notable nomination. 

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			Therefore, it was considered that providing individual tree assessment scoring was the most appropriate outcome in this instance in relation to the two 'groups' of trees on the knoll.
Arb4 – Effects on 'Amenity trees'	What consideration has been given to including standards or rules such as the provision of Tree Protection for the Landscape Trees, in the form of additions to the Activity Table (Table IX.4.1) and Standards at IX.6, similar to those found at Chapter D13 Notable Trees Overlay and/or E16 Trees in Open Space Zones?	IX.10.3 Pukekohekohe Gateway Precinct: Precinct Plan 3 – Amenity Trees identifies 20 trees, seventeen of which are London Plane trees that flanked the original road to Pukekohe. Policy IX.3(6)(a) and assessment criteria IX.8.2(k) refers to retention of these trees "where practicable". This is considered minimal protection provided to the proposed Landscape Trees.	It is not considered necessary to incorporate additional standards or rules into the Plan Change with respect to the 'Amenity Trees'. The proposed Plan Change and the amendments to Schedule 10 were informed by technical arboricultural assessment of trees within the Plan Change area, including those trees identified as 'Amenity Trees' within Precinct Plan 1. The arboricultural assessment identified that none of these trees meet the criteria for nomination as a Notable Tree under the AUP. As the provisions under Chapter D13 apply to Notable Trees, and these trees do not meet that threshold, applying similar standards or rules is not considered necessary or an efficient method of managing them. The provisions within E16 apply to trees in open spaces that are a public asset, and are therefore not relevant to trees located within the Plan Change area. However, any future formation of new open space zones that includes existing trees will provide protection under E16. Overall, and as previously outlined above in UD3, the relevant proposed provisions enable the retention of these trees to be balanced against wider site objectives and requirements to be assessed at the time of resource consent. This framework is considered to be efficient and effective, having regard to the attributes of these

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			trees and taking into account that they do not meet the criteria for scheduling under D13.
<u>Ecology</u>			
Eco1 – Riparian planting	Has consideration been given to referencing the AUP Appendix 16 Guideline for Native revegetation plantings as the appropriate standard for what this planting plans (plant densities, maintenance, monitoring provisions etc) in IX.6.4 'Riparian Margins within Sub-Precinct A or Sub-Precinct B' and/or the special information requirements IX.9(1) Riparian planting plan?	This information is required to understand the suitability of the provisions to achieve the stated outcomes.	The AUP Appendix 16 Guidelines relate to the requirements for native revegetation planting when applying for consent to subdivide in rural areas to create additional development rights based on the replanting of native vegetation, and therefore has detailed requirements to ensure the objectives of such planting are met. This is not considered to be relevant to the purpose of proposed Standard IX.6.4, which is to 'Contribute to improvements to water quality, habitat and biodiversity', or an appropriate cross reference in this case. The planting proposed in the riparian margins in this proposed plan change area will be within an urban area which has other considerations, such as minimum landscaping requirements at the time of urban development. Typically, other urban precincts in the AUP do not reference the Appendix 16 Guidelines and instead have a clause regarding information requirements consistent with the currently proposed clause. This clause will require a planting plan to be submitted as part of any subdivision or development application, and is an opportunity to confirm planting details as part of the resource consent process.
Eco2 – Riparian planting	The Section 32 Report states that the proposed riparian planting rule will require 20m riparian planting adjacent to the Tutaenui Stream (section 7.3.2).	This information is required to understand the suitability of the provisions to achieve the stated outcomes.	We confirm that the proposed precinct provisions includes a 10m planting requirement to permanent and intermittent streams within the Pukekohekohe Gateway Precinct.

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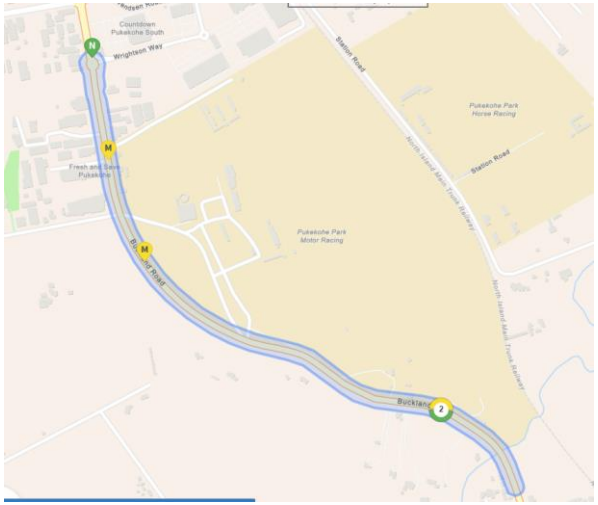
	However, rule IX.6.4 requires only 10m around permanent and intermittent streams. It is unclear then if and how there would be 20m of planting around the Tutaenui. Please clarify.		
Transportation			
T1 – ITA	Please extend the crash analysis to cover the whole length of the roads fronting the PPC area (i.e. Manukau Road north of Kitchener Road).	The crash analysis needs to be extended to identify the full extent of any crash trends along the entire frontage of the site and affected by the Plan Change.	A new crash search was undertaken using the NZTA Crash Analysis System (CAS) for all reported crashes along the PCC Site frontage and inclusive of the northern portion of the plan change area. The search period was 2020-2024 and any crashes that occurred in 2025 at the time of the search. The search terminates at the Wrightson Way roundabout to the North. The study area and locations in which crashes occurred is shown in the snip below. 

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			An additional two crashes have been identified and occurred in the new study area (ID 2023252117 and ID 2021213993): • Crash ID 2023252117 was a minor injury crash occurred outside 220 Manukau Road when a southbound vehicle attempted to turn right into the South Auckland Motors carpark. A following driver, who failed to notice the stationary vehicle, collided with the rear of the turning vehicle. The crash was attributed to careless driving. • Crash ID 2021213993 was a non injury crash that occurred at the Manukau/Wrightson Way roundabout. This crash was a rear end crash and occurred due to driver inattention. The remaining crashes were identified and analysed within the supporting ITA. In summary, no crashes involved pedestrians or cyclists or vehicles accessing/egressing the PPC Site. No common crash trends or factors have been identified and as such, no specific road safety issues have been identified in relation to the PPC Site.
T2 – ITA	Please provide an assessment of the accessibility of the plan change area for pedestrians and cyclists to key destinations (such as employment, schools, supermarkets, train station etc.), including the provision of drawings showing isochrones for the	The assessment is required to better understand how the plan change is accessible for active mode users to key destinations	An Isochrone Analysis has been prepared, providing an assessment of the accessibility of the plan change area for pedestrians and cyclists to key destinations, and is included at Appendix 7. The key destinations assessed included education facilities, open spaces and reserves, employment opportunities in the surrounding Business and Industrial Zones, Franklin Hospital, Pukekohe Train Station, and the Woolworths Supermarket on Manukau

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	area accessible for pedestrians and for cyclists.		Road. As illustrated, it is considered that overall, the Plan Change area has good levels of accessibility to these surroundings amenities and facilities.
T3 – ITA	Details are required to assess whether the trip rates used are representative of the subject site and to confirm how the average trip generation rate has been derived.	Details are required to assess whether the trip rates used are representative of the subject site and to confirm how the average trip generation rate has been derived.	As described in Section 6.2 of the ITA, the trip rates are sourced from the average of those provided in the Institute of Transportation Engineers Trip Generation Manual (ITE Manual), and the RTA Guide to Traffic Generating Developments (RMS document), and a traffic survey from an existing residential development located in Auckland. The survey data was derived from a Beachlands North survey that was considered comparable to the subject site and was associated with the 'low density' trip rate. Using the aforementioned industry accepted guidelines and the Beachlands North survey, the 'low' density trip rate was averaged between the three sources to provide an AM rate of 0.8 and a PM rate of 0.83 per low density dwelling. The 'medium density' trip rate was derived solely from the RTA Guide, noting that the ITE provided a lower rate of 0.46 per medium density dwelling in the AM and 0.56 per medium density dwelling in the PM. It is important to note that all of the trip generation data referenced predates the COVID-19 pandemic. Since then, remote and hybrid working patterns have become more prevalent, and no contemporary trip generation data is currently available that reflects these behavioural

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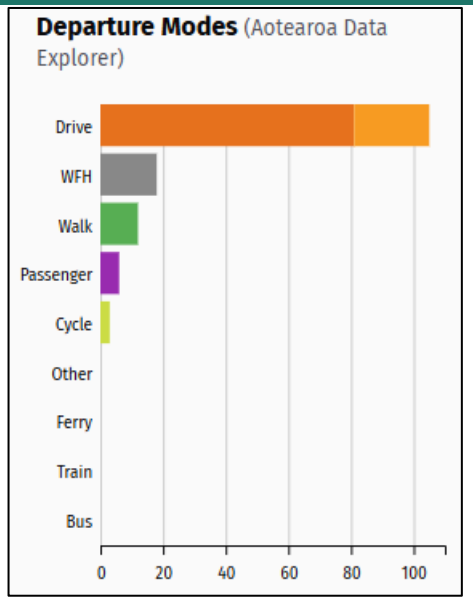
			changes. Additionally, many of the studies informing the selected trip rates assumed the provision of two on-site parking spaces per dwelling, which was previously a District Plan standard requirement. In contrast, two-space provision is now relatively uncommon in medium density developments, which has a reducing effect on trip rates. Taking these factors into account, the trip rates adopted for this assessment are considered robust and appropriate for the subject development.
T4 – ITA	Please provide an assessment of the total person trip generation of the site and the likely mode split from the site.	The Integrated Transport Assessment guidelines require an assessment of the total trip generation of a development.	Census data obtained from the Stats New Zealand Commuter Waka website provides a breakdown below of the departures for work. The subject site is located within the 'Pukekohe Central' constituency. The graph below shows the associated departure mode split.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			 A total of 74% drive to work in a car or a company car, 12% work from home (WFH), 8% walk, 4% are a passenger in a private vehicle and 2% cycle. 75 people (58% of departures) travel from Pukekohe Central for work, while 51 people (40% of departures) also live & work within Pukekohe Central. People travel to at least 1 different area, the largest external destination being Wiri West (6 people—5% of departures). Adopting this mode split to the trip rates described in the ITA of 371 vehicle trips, proportionally would result in the following: Driving = 371 (74%)

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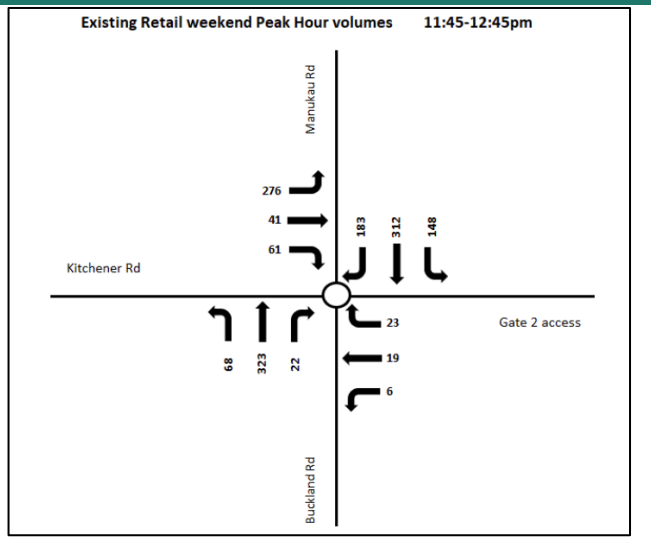
			WFH = 60 (12%) Walking = 40 (8%) Passenger = 20 (4%) Cycle = 10 (2%)
T5 – ITA	Please provide the SIDRA model layout for each of the intersections modelled.	The layouts are required to confirm what layout has been adopted for the traffic modelling, and that the layouts are consistent with the stated form of intersections.	Full Sidra layouts and results are provided as separate PDF files. The titles of the files correspond to the section of the ITA that presents the results for that intersection. Sidra model outputs are provided as **Appendix 8.1 to Appendix 8.5**.
T6 – ITA	Please provide SIDRA Lane and Movement Summary Output for all the intersections modelled.	The summary model output is required to better understand the forecast operation of the intersections.	Full Sidra layouts and results are provided as separate PDF files. The titles of the files correspond to the section of the ITA that presents the results for that intersection. Sidra model outputs are provided as **Appendix 8.1 to Appendix 8.5**.
T7 – ITA	Please demonstrate that the SIDRA model of the existing layout of the Kitchener Road / Manukau Road / Buckland Road intersection has been calibrated against existing conditions, including delays and queues.	Calibration is required to ensure that the traffic modelling of the existing intersection layout reflects actual operation. Calibration is required to ensure that the with development option is based on a model that reflects actual operation.	With the existing intersection being a T-intersection, with Kitchener Road as the minor arm, and with no anecdotal reports of excessive queueing on the Kitchener Road arm, no queue surveys were undertaken and therefore the Sidra default values were assumed to provide a fair representation of performance.
T8 – ITA	Please provide an assessment of the cumulative effects on the operation of the transport network due to the proposed plan change and events within Pukekohe Park Precinct, such as markets and/or racing events.	The assessment is needed to understand the potential effects on the operation of the network due to the cumulative effects of the proposed development during events at Pukekohe Park. Events	As is normal for assessments of residential plan changes, only the AM and PM weekday peak hours have been considered in the traffic modelling. Events are relatively infrequent but have been operating as existing use since the 1960s. In general, traffic congestion due to events is tolerated region wide, and it's rare to carry out specific traffic modelling (other than to support a brand new events facility). However, an assessment has previously

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			been undertaken to assess the effect of the largest (annual) event at the venue, combined with the existing situation plus the activation of Plan Change 30 (proposed to be incorporated as Sub-Precinct C). Although this does not include the additional traffic generated at coincident times on a Saturday from the PPC Site, it does consider the closure of the existing (southern) Gate #3 of the venue, and therefore provides an indication of likely performance on the largest event day. The assessment is summarised below: To establish the effect of the removal of Gate #3 on race days, traffic modelling sensitivity testing was undertaken. In 2023, a Transportation Assessment report was produced by Commute to assess the effect of Plan Change 30 (within the northern portion of the Pukekohe Park site). That report referenced 2008 traffic counts undertaken as part of an earlier assessment. Those traffic counts included a survey of the busiest Saturday of the Pukekohe Park race calendar, the Counties Cup Day. The figure below shows the traffic counts for that Saturday peak hour (11:45am-12:45pm):

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			 A Sidra model was set up to analyse the performance of the intersection under these traffic conditions, assuming that the current give way crossroads arrangement is retained. This represents the situation with Gate #3 retained (Scenario A), as the survey was undertaken under current access conditions. The results of the Sidra model are provided within the table below:

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response

Approach	Mvmt	Weekend Peak Hour		
		Average Delay (s/veh)	LOS	Average queue (vehicles)
Buckland Road (South)	LT	4.6	A	1
	TH	0.0	A	1
	RT	14.1	B	1
PPC Site (East)	LT	6.1	A	1
	TH	13.0	B	1
	RT	23.8	C	1
Manukau Road (North)	LT	5.1	A	4
	TH	0.5	A	4
	RT	11.7	B	4
Kitchener Road (West)	LT	10.2	B	6
	TH	26.3	D	6
	RT	25.7	D	6

A second Sidra was created to show the performance of the intersection should Gate #3 no longer be available for use for daily operations or race days (Scenario B). This was done by apportioning the trips expected to turn to/from the south at Gate #3 over to Gate #2. The traffic distribution gravity model created during the 2018 PC30 assessment derived that 60%, 10% and 30% of trips would originate to/from the north, west and east respectively, therefore the trips to/from the south at the subject intersection were increased to represent 30% of the total. This led to an additional 6 exiting and 52 entering at Gate #2. The results are shown in the table below:

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response

Approach	Mvmt	Weekend Peak Hour		
		Average Delay (s/veh)	LOS	Average queue (veh)
Buckland Road (South)	LT	4.6	A	2
	TH	0.0	A	2
	RT	13.0	B	2
PPC Site (East)	LT	6.4	A	1
	TH	14.4	B	1
	RT	26.3	D	1
Manukau Road (North)	LT	5.1	A	4
	TH	0.5	A	4
	RT	11.7	B	4
Kitchener Road (West)	LT	11.1	B	7
	TH	30.0	D	7
	RT	29.4	D	7

The results show a slight increase in queuing and delays for the Site access and Kitchener Road. The average right-turn delay for the site access increased by 3 seconds, which had no noticeable impact on vehicle queues. The average right-turn delay from Kitchener Road increased by 5 seconds, resulting in only one additional vehicle being added to the average queue. The results therefore indicate that the closure of Gate #3 will have negligible impact on overall intersection performance. As a result, it was concluded that Gate #2 can accommodate all traffic movements once Gate #3 is closed.

Given this assessment and the satisfactory results, even on the largest event of the year, it is considered without further modelling that the addition of the PC site is

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			unlikely to have a significant effect on performance. However, as discussed earlier, congestion during rare events is generally tolerated and can be easily avoided by motorists.
T9 – ITA	Please confirm the extent of the upgrade works to the whole of the eastern side of Buckland Road along the site frontage other than the provision of a path as set out in Table IX.6.1.1(c), e.g. what works are to be undertaken to upgrade Buckland Road to an urban standard.	The Precinct Provisions refer to the provision of a 3m shared path along Buckland Road. To better understand the form of this upgrade further details are required as to the form of the upgrade. As the area is being urbanised, it would normally be expected that the site frontage is upgraded to urban standard including kerb and channel, as is required of PC87 for the western side of Buckland Road	For information purposes, a concept design of the shared path on the eastern side of Buckland Road is included at Appendix 9. Notwithstanding, it is noted that detailed design will be confirmed through the resource consent process.
T10 – ITA	Please provide an assessment of the chosen location of the southern key intersection into Sub-precinct B that demonstrates that the location is safe, has appropriate visibility and that the road is suitable for the proposed intersection (including any widening for the right turn bay). This should take into account the existing and anticipated future speed limit on Buckland Road.	The assessment is required to confirm that there is a safe feasible location for the proposed southern key intersection into Sub-precinct B. There is no certainty as to when, if at all, the speed limit on Buckland Road will be reduced from 80km/h to 50km/h, therefore, the intersection will need to be designed to operate safely for both posted speed limits.	The southern key intersection to Sub-precinct B is proposed to form a T-intersection. Austroads: Guide to Road Design Part 3: Geometric Design (Austroads) has been used to determine an appropriate sight distance. The site is located within the signposted 80km/h speed limit area. It is noted that the location of the access is around 200m west of the 50km/h speed limit and therefore drivers will be preparing to slow down on approach. For comparison, the requirements for an 80km/h speed environment and a 50km/h speed environment have been undertaken. Buckland Road is relatively flat and a driver's eye height is 1.1m and the top of a vehicle being 1.25m.

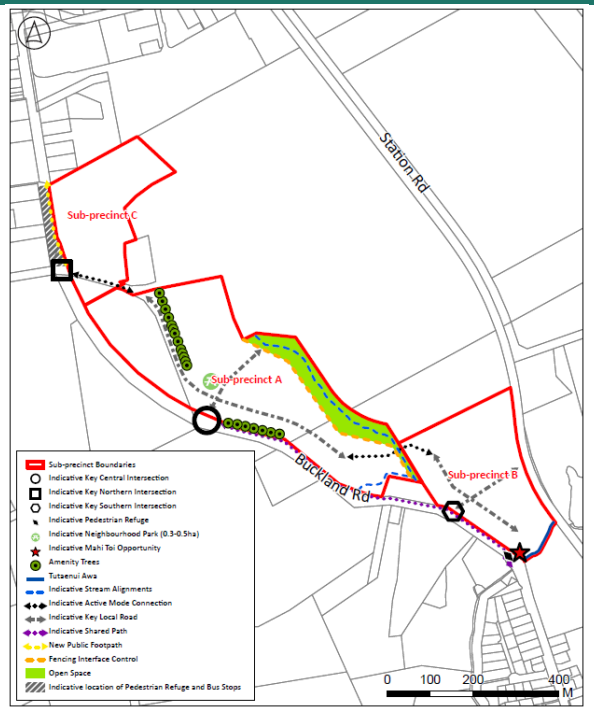
Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			This equates to a Safe Intersection Sight Distance (SISD) requirement of 181.1m under an 80km/h operating speed environment and 96.8m under an 50km/h operating speed environment. The available sight distance to the west is 268.5m and to the east is 187.8m. Therefore, the SISD complies under both scenarios.
T11 – ITA	Please provide concept layouts of the intersections at: a) Kitchener Road / Buckland Road / Manukau Road / Sub-precinct C; and b) Buckland Road / PC87 / Sub-precinct A. The layouts should take into account the existing and anticipated future speed limit on Buckland Road.	The layouts are required to: a) confirm that the proposed form of intersections are feasible; and b) Confirm that the modelled arrangements for the intersections match the anticipated form of the intersections (noting that the geometry of the intersections affects capacity). It is acknowledged that the intersections will be subject to detailed design. However, some concept design is required to confirm that the intersections are feasible and whether the intersections can be formed within the available land.	For information purposes, a concept design of the proposed roundabout is provided as Appendix 9.
T12 – ITA	Please demonstrate that it would be feasible to provide a roundabout for the central key intersection should development with the proposed plan change proceed ahead of development of PC87.	This information is required to understand whether the access into Sub-precinct A can be established in accordance with the proposed Precinct Provisions in advance of PC87	For information purposes, and to demonstrate the feasibility of a roundabout at this location, a concept design of the proposed roundabout is provided as Appendix 9. The fourth arm on the southwestern arm can feed into the existing driveway at that location should the subject

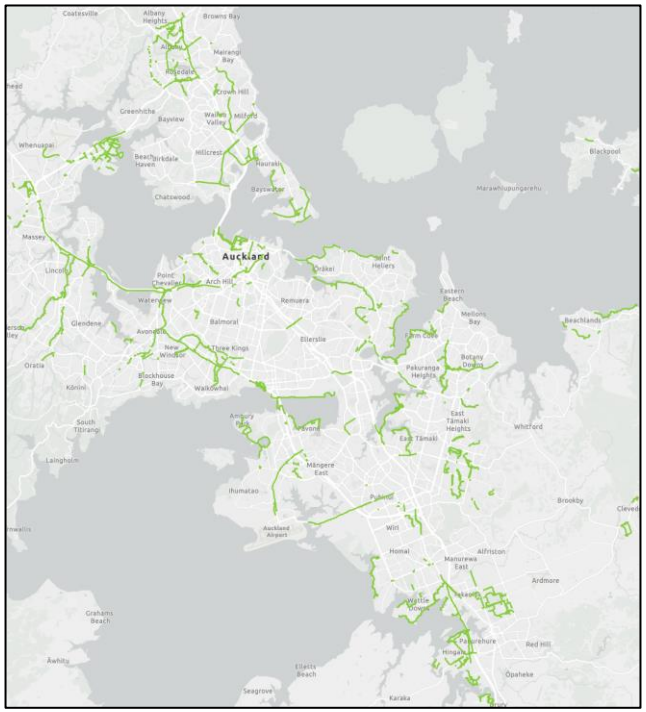
Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			PPC site proceed ahead of PC87. No third-party land is required in the design. Further, Part IX.8.2 (f) (Assessment Criteria) within the proposed Pukekohekohe Gateway Precinct Provisions states: *Where an interim upgrade is proposed the design allows for the ultimate upgrade to be efficiently delivered.* That provision ensures that the roundabout will be able to accommodate the connection to PC87 once it is made.
T13 – ITA	Please provide an assessment that demonstrates that the refuge island crossing for pedestrians and cyclists on Buckland Road at the southern end of the plan change can be provided safely (including a visibility assessment), and key dimensions that show that the refuge if feasible and can be provided within the available carriageway width. The assessment should take into account the existing and anticipated future speed limit on Buckland Road.	The assessment is required to demonstrate that it is feasible to provide a safe refuge island crossing facility. The crossing facility will need to accommodate both pedestrians and cyclists to enable northbound Buckland Road cyclists to cross to the shared path on the eastern side of Buckland Road.	There are 2 key sight distance requirements at pedestrian crossing facilities: Crossing Sight Distance (CSD) and Approach Sight Distance (ASD). CSD is based on the stopping sight distance required for a driver to perceive a hazard (such as a pedestrian in a refuge island), react, and safely stop and is documented in Section 3.3 of Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections. This was assessed at the 80km/h speed environment and a 50km/h speed environment, a walking speed of 1.2 m/s and a crossing length of 3.6m (kerb to island) and 1.5m pedestrian set back from the road (total crossing distance = 5.1m). The crossing distance to the island is

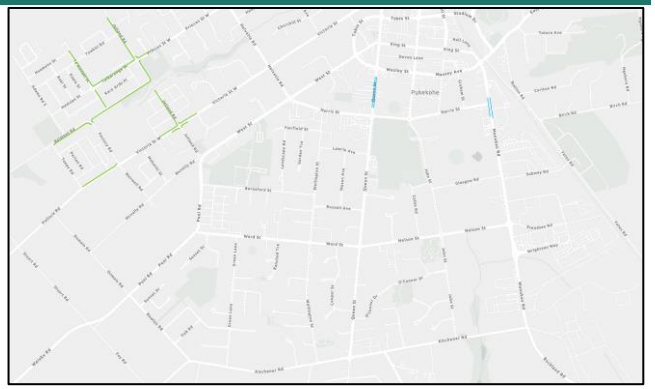
Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			included in the assessment as the island provides a suitable refuge for a pedestrian to stop and wait for a suitable gap in the adjacent traffic lane. CSD = t*V/3.6 CSD = 94.4m in an 80km/h operating speed environment. There is 223.3m between southbound vehicle and pedestrian and 105.9m from northbound vehicle to pedestrian and therefore would comply with the CSD requirement. ASD ensures that approaching drivers are aware of the presence of a pedestrian crossing facility. ASD should be provided at 1.1 eye height and the surface of the roadway (generally 0.m). A reaction time of 2.0 seconds, a coefficient of deceleration of 0.36%, a flat topography and an 80km/h speed environment is adopted at this location.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			ASD = (R*V/3.6) + (V^2/(254*(d+0.01a))) ASD = 114.4m in an 80km/h operating speed environment. There is 137m available ASD to northbound drivers and over 200m to southbound drivers. Based on the above assessment, the location of the proposed refuge crossing facility complies with Austroads guidelines and is appropriately located.
T14 – ITA	Please provide details as to the intended ownership of the active mode connections between Sub-precinct A and B, and between Sub-precinct A and C, and the anticipated standard of these facilities (e.g. width and type of surface).	This information is required to understand the level of provision and potential consistency in the level of provision of active mode facilities to provide connectivity within the plan change area.	The active mode connections between Sub-Precinct A and Sub-Precinct B and between Sub-Precinct A and Sub-Precinct C could be either publicly or privately owned. The active mode connections will be subject to detailed design at the appropriate future consenting stage, at which time details including widths and type of surface will be determined.
T15 – ITA	Please provide details as to what will trigger the provision of the active modes connection between sub-precincts A and C and how this is reflected in the Precinct Provisions.	This information is required to understand when the active mode connection between sub-precincts A and C will be provided and how this will be coordinated with other transport infrastructure for active modes,	A footpath must be provided along the eastern side of Manukau Road for the extent of the Sub-Precinct C frontage north of the intersection of Kitchener Road with Manukau Road and Buckland Road, as required by Standard IX.6.2, prior to the occupancy of any new building within Sub-Precinct C. The extent of this new footpath is shown in Precinct Plan 1.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
		particularly for provision for movements to and from the north.	The operative Buckland Road Precinct (I455) requires the provision of a footpath and cycling facilities along the western side of the Buckland Road frontage from the Precinct boundary in the south to the intersection of Kitchener Road with Manukau Road and Buckland Road in the north. This is triggered by any new subdivision or development with frontage to 301 or 303 Buckland Road (refer Standard I455.6.1.2). Where development in the Pukekohekohe Gateway Precinct occurs before subdivision or development occurs within the Buckland Road Precinct (I455), proposed assessment criteria IX.8.2(g) requires local road connections to be provided within Sub-Precinct A to connect active modes to the intersection of Kitchener / Buckland / Manukau Road. The trigger for this is when any subdivision or new buildings prior to subdivision occur within Sub-Precinct A or Sub-Precinct B and where the active modes on the western side of Buckland Road (required under I455) are not yet constructed and operational. How the active modes connections that are required through the proposed Pukekohekohe Gateway Precinct are integrated is demonstrated in Precinct Plan 1, as shown below.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			
T16 – ITA	Please provide analysis or assessment that demonstrates that a shared path along Buckland Road is an acceptable form of facility for pedestrians and cyclists, noting that shared paths are not an approved form of facility in Auckland Transport's TDM.	The use of a shared path is likely to require a Departure from Standard from Auckland Transport. Assessment is required to provide justification as to why separate footpath and cycle facilities cannot be provided and that a shared path is the only alternative viable solution. Note: A departure from standard may be required for the use of the shared	Although in the TDM, shared paths are not an approved form of facility, they are still provided in locations that fit the appropriate character of the location. Such locations are often in semi-rural locations such as the subject site, but they are found all over Auckland. Recent examples include active mode connections in Drury South, Flatbush, and Pukekohe West (see further below). The image (taken from AT's Auckland Cycling Map) below shows only the shared paths in Auckland, and excludes all other types of cycle facilities:

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
		path. Approval of the Plan Change does not constitute an approval of a departure from standard.	 There is clearly a spread of shared path provision throughout the region, including several new residential areas. Further examination of the AT Cycleway Map establishes that there are very few cycle facilities in Pukekohe. The below figure shows the only existing cycle facilities in Pukekohe:

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			 It can be seen that there are two streets (Queen Street and Manukau Road) at the southern end of the town centre with painted and unprotected cycle lanes for short distances, with the Queen Street facility being within the door zone of parked cars, as shown in the photograph below. 

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
			It can also be observed on the map that there is a network of shared paths in a new housing area to the east of the town centre. These are well designed and provide a well-connected and safe active mode network. A photograph of the facility on Taikarana Street that connects the local community to the new Tamaoho School is shown in the photograph below:  In summary, there are very few cycle facilities in Pukekohe, and only the shared paths in Pukekohe West provide safe and quality connections. There are no existing active mode facilities along Buckland Road. Once the shared path is installed along the eastern side of Buckland Road as proposed, and once a similar facility is provided by PC87 on the opposite side of the road to the north, Buckland Road will be the premium active mode route in the Pukekohe township and will connect the two communities of Pukekohe and Buckland with a quality and safe facility.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
T17 – ITA	In the event that PC87 upgrades along Buckland Road do not occur prior to development within sub-precincts A or B, please provide details as to what active modes facilities will be provided along Buckland Road and/or provide details as to how active modes will be able to travel north of Kitchener Road.	These details are required to understand how active modes will be able to travel to the north if there are no facilities provided along Buckland Road between the central key intersection and Kitchener Road prior to upgrade works as part of PC87.	In the event that PC87 upgrades along Buckland Road do not occur prior to development within sub-precincts A or B in the Pukekohekohe Gateway Precinct, proposed assessment criteria IX.8.2(1)(g) requires local road connections to be provided within Sub-Precinct A to connect active modes to the intersection of Kitchener / Buckland / Manukau Road. Proposed Standard IX.6.1 requires the provision of a 3m shared path along the eastern side of Buckland Road, as shown in Precinct Plan 1, prior to the occupation of any new dwelling within Sub-Precinct A or B. Therefore, if development within Sub-Precinct A or B occurs prior to the active modes connection on the western side of Buckland Road being constructed and operational, active mode facilities will be provided through Sub-Precinct A to provide connections with the intersection of Kitchener / Buckland / Manukau Road. North of the Kitchener / Buckland / Manukau Road intersection, there is an existing footpath on the western side of Manukau Road, as well as a 1.8m footpath along the eastern side of Manukau Road for the extent of Sub-precinct C (required as per Standard IX.6.2), and if that has not yet been constructed, provision has been made for achieving a safe interim connection for active modes along the Sub-Precinct C frontage north to the existing footpath under proposed assessment criteria IX.8.2(1)(h)).
T18 – ITA	Please provide details as to how the specific transport infrastructure upgrades listed in item 4.1(a) to (f)	This information is required to understand how the effects of PC30 will be addressed by the proposed plan	The proposed Pukekohekohe Gateway Precinct has considered clauses 4.1(a) to (f) of the existing private covenant, and includes a number of provisions to

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
	inclusive of the covenant will be incorporated into the proposed Precinct Provisions.	change and precinct provisions, noting that only two of the items have been included in the proposed precinct provisions as part of Standard IX.6.2, Table IX.6.2.1.	efficiently and effectively address these items in the context of AUP precinct provisions. Refer to the Proposed Plan Change included at **Appendix 2**.
Planning, statutory and general matters			
PL1 – Notable trees, RPS B4.5.2 identification and evaluation	Please include a specific assessment of Policies B4.5.2(1) and (2) drawing on the arboriculture, landscape and archaeological assessments to inform the evaluation.	The section 32 Report at 5.2.1.11 relies solely on the assessments by Greenscene and the Paper Street Tree Company. This uses the 'Guidelines for Nominating a Notable Tree for Evaluation' as the basis for assessment. These are guidelines intended for the general public and while they contain most of the factors for identification and evaluation, RPS Policies B4.5.2(1) and (2) must be addressed to establish whether a tree(s) meet the threshold for inclusion in Schedule 10 Notable Trees. Refer also to the Arborist request for information (Arb 2), and the evaluation by Paper Street Tree Company not reflecting the landscape assessment regarding the amenity trees and the trees being either side of the original alignment of the road into Pukekohe.	Assessment of the proposal against Policies B4.5.2(1) and (2) of the RPS is included in the additional RPS Assessment at **Appendix 1**.
PL2 – RPS B2.5	Please provide an assessment against AUP RPS B2.5 Commercial and industrial growth.	The plan change is required to give effect to the AUP RPS under s75 of the RMA. This is considered particularly	Assessment of the proposal against the relevant provisions under B2.5 Commercial and Industrial growth

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
		relevant given the location of the land adjoining and adjacent to Business zone land and the potential to add to economic growth opportunities and employment.	is included in the additional RPS Assessment (**Appendix 1**).
PL3 – Stream naturalisation	It is understood the stream realignment and naturalisation will be part of a future resource consent process. While it is not necessary to ensure all consents are or will be granted before considering the plan change, given the stream realignment and naturalisation is a key part of the precinct plan outcomes, further information is required to understand: a. Is there are a reasonable expectation that these works would be granted consent, noting that under Chapter E3 these works would be a non-complying activity? b. What are the implications on the precinct provisions if the final stream realignment differs considerably from that shown on IX.10.1 Pukekohekohe Gateway Precinct: Precinct Plan 1 – Indicative Road and Open Space Network?	This information is required to understand if the stream realignment is feasible (subject to addressing matters required by the AUP) given that it is a key part of the future layout of the precinct.	The resource consent for the Pukekohe Park stream realignment and naturalisation resource consent will be submitted in late August. An update, as well as a copy of the relevant drawings and Assessment of Environmental Effects ('AEE') Report will be provided in due course.
PL4 – Medium Density	As discussed during pre-lodgment consultation, Schedule 1, clause 25(4A) requires the Council must not accept or	This information is required by Schedule 1, clause 25(4A)	The preference is to revisit whether the MDRS need to be incorporated into the Precinct once the clause 23 matters are resolved and prior to the clause 25

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
Residential Standards	adopt a request if it does not incorporate the MDRS as required by section 77G(1). A proposed amendment to the RMA may mean this is no longer required if that part of Plan Change 78 requiring MDRS be incorporated into every relevant residential zone is withdrawn. The outcome of the RMA Amendment and the Council's decision on MDRS is not known at this time. Please advise whether you wish to put the Council's decision regarding clause 25 on hold until this matter is resolved. Noting that this can be revisited once clause 23 matters are resolved.		recommendation. This is the preferred approach based upon a shared understanding that a proposed amendment to the RMA may mean that this is no longer a requirement.
PL5 – Land covenant (Instrument No 10148071.4)	Land covenant (Instrument No 10148071.4) included in the bundle of certificates of titles grants rights relating to Wastewater Operations (Pukekohe Wastewater Pump Station (WWPS)). Clause 6 references operations that generate noise, odour and visual effects. While this is a covenant between the parties, please advise: a. What consideration has been given to the implications of this covenant on the proposed re-zoning of adjoining land for residential activities.	This information is to assist in understanding the potential for reverse sensitivity on the Pukekohe WWPS and enabling residential development on the adjacent property.	The following comments are made with respect to the covenant under Instrument No. 10148071.4: • The boundaries of the proposed Pukekohekohe Gateway Precinct and the indicative key local road layout identified in Precinct Plan 1 will retain sufficient space to incorporate buffers between the Pukekohe WWPS and future residential lots; • The stream located to the north western boundary of the Pukekohe WWPS lot which in addition with proposed Standard IX.6.4, which requires a 10m riparian margin to be planted, will create a buffer at this interface;

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
	b. What standards may be necessary in the precinct plan address this matter. For example, the Neighbourhood Design Statement outlines that the Precinct Provisions include urban design-related provisions aimed at ensuring successful development outcomes, including the establishment of a 'physical buffer' with WWPS.		• The covenant will apply to the relevant records of title, separate to the proposed Plan Change request and provisions of the AUP. On this basis, additional standards within the Pukekohekohe Gateway Precinct are not considered to be necessary to address the matters identified under Land covenant (Instrument No 10148071.4).
PL6 – Reverse sensitivity	The Acoustic Assessment states: *The operation of the pumpstation is currently required to comply with the same numerical noise limits at the existing notional boundary of 353 Buckland Road (approximately 18m away from the boundary of the pumpstation). We consider that this existing requirement will result in noise emissions in the Residential Zone of the Pukekohekohe Gateway Precinct that are similar or lower.* a. Please confirm that the current noise level requirements applying at the boundary of 360 Buckland Road (not owned by Auckland Thoroughbred Racing Inc) is I434. Pukekohe Park Precinct, Table I436.6.31 General noise standards. b. If Table I436.6.31 General noise standards applies, how comparable is this to Table E25.6.19.1 Noise levels at	This information is to assist in understanding the potential for reverse sensitivity on the Pukekohe WWPS, specifically in regard to enabling residential development on the adjacent property.	Refer to the Acoustic Response Memorandum included as Appendix 4.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
	the business zone interface which will apply with the plan change?		
PL7 – Mahi Toi Cultural Structures	Tabel IX.4.1. Activity table lists Mahi Toi Cultural Structures as a permitted activity. IX.6 Standards states the Mixed Housing Urban zone and Open Space – Informal Recreation zone standards do not apply to Mahi Toi Cultural Structures within the Pukekohekohe Gateway Precinct. No standards applying to Mahi Toi Cultural Structures are included within the Pukekohekohe Gateway Precinct. Please advise how adverse effects of the height and bulk of the Mahi Toi Cultural Structures will be managed in the absence of standards and achieve a compatibility with the scale of building and anticipated character of the two zones.	This information is required to understand the effects of the Mahi Toi Cultural Structures and compatibility with the zones if listed as a permitted activity and the underlying zone standards or no precinct standards apply to the permitted activity.	A maximum height of 5m for permitted Mahi Toi Cultural Structures has been added to Activity Table IX.4.1(A1) (refer updated Pukekohekohe Gateway Plan Change). This was agreed to in collaboration with Ngaati te Ata Waiohua and Ngāti Tamaoho at a hui on 23 July 2025, where iwi representatives advised that a 5m height limit of mahi toi cultural structures (approximately similar to that of a single-story dwelling) would be appropriate as a permitted activity, as it will enable mana whenua to deliver a structure that will achieve Policy IX.3(2), while achieving compatibility with the scale of buildings and development anticipated in the surrounding urban environment and Plan Change area. All Mahi Toi Cultural Structures that exceed the 5m permitted height limit will be subject to the standard Residential – Mixed Housing Urban and Open Space – Informal Recreation zone standards under the AUP(OP).
I434. Pukekohe Park Precinct			
PL8 – Interface with residential activities	Standards I434.6.1 Noise and I432.6.2 Special noise events Please advise how the number of special noise events in each of the noise limits categories has been established.	This is required to understand the compatibility of the proposed residential zoning adjoining the Special Purpose - Major Recreation Facility Zone. It is noted that I313 Ellerslie Racecourse Precinct has 5 special events at 75dB LAeq(5min) and 8 events at 75dB	The Proposed Plan Change included at **Appendix 2** has been amended to provide for up to 5 special events, consistent with Ellerslie Racecourse Precinct.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
		LAeq(5min) are proposed in I434. Pukekohe Park Precinct	
PL9 – Interface with residential activities	Standard I434.6.8 Helicopter flights a. Please advise the need for 60 helicopter movements in any 12 month period. b. Please advise if this reflects the current number of helicopter movements that have occurred on site in the last 3 years or is to cater for a potential future increase in activities on the site.	With the removal of motorsport activities from the precinct, it is unclear why the total number of helicopter movements remains unchanged. For example, in I313 Ellerslie Racecourse, Precinct, helicopter movements are limited to 30 movements under standard I313.6.11 Helicopter flights.	Amendments are proposed to Standard I434.6.8 Helicopter flights through this Plan Change application. Under the current Pukekohe Park Precinct, Standard I434.6.11 provides for 30 helicopter movements per Category A day, of which not more than 6 Category A days are permitted in any 12 month period. In addition, under the current Pukekohe Park Precinct, Standard I434.6.11 provides for an additional 30 helicopter movements in any 12 month period. Therefore, under the existing Pukekohe Park Precinct, up to 210 helicopter movements are permitted. The proposed 60 helicopter movements over any 12 month period, and 10 on any day is a significant reduction to what is permitted under the current Pukekohe Park Precinct provisions. The 60 helicopter flight movements that are proposed to be provided for are not necessarily reflective of the current number of helicopter movements that have occurred in the last 3 years, rather this standard is intended to provide ATR with flexibility for Pukekohe Park and the ongoing operations as well as future activities on the site, acknowledging that Pukekohe Park zoned Special Purpose – Major Recreation Facilities and Policy H26.3(2) requires a range of appropriate accessory and compatible activities within the precincts to be provided for, of which helicopter flights have already been determined an appropriate compatible activity at Pukekohe Park.

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
PL10 – Interface with residential activities	Standard I434.6.9 Temporary buildings a. Please advise the reason for the increase in the duration of temporary buildings from 90 to 120 days. b. Please advise if this increase is related to existing temporary buildings or a potential future increase in activities on the site.	This is required to understand the compatibility of the proposed residential zoning adjoining the Special Purpose - Major Recreation Facility Zone. Refer also to requests UD 6 and LS 3.	The purpose of the proposed amendment is to provide increased flexibility to the range of activities provided for in the Special Purpose – Major Recreation Facilities zone and Table I434.4.1 Activity Table. The operative Pukekohe Park Precinct recognises and provides for the provision of temporary buildings to support activities anticipated in the zone. A 30-day increase is not considered to be significant, and potential effects can be appropriately managed due to the temporary nature of the activity. It is anticipated that this increase will apply to all future temporary buildings any temporary buildings in place at the time the plan change is made operative (should the plan change request be approved). As identified above, the purpose of the amendment is to increase flexibility for existing activities, and is not related to an overall increase in activities on the site.
<u>Auckland Transport</u>			
AT1 – Anticipated yield	Please provide information to demonstrate how the yield outlined in the ITA has been calculated (i.e. 500 dwellings anticipated across the plan change site).	The reason for this request is to better understand how the traffic effects have been determined. The ITA does not explain how the anticipated dwelling yield has been determined.	A masterplanning exercise was undertaken for the Site to understand the potential development outcomes from the application of various residential densities. This included looking at potential densities which could be realised via the Single House Zone, Mixed Housing Suburban Zone, Mixed Housing Urban Zone and a combination of the Mixed-Housing Urban and Terrace Housing and Apartment Building zones as well as the nature of greenfield development that is currently occurring around the Pukekohe area to provide a realistic understanding of likely development outcomes. This exercise identified the potential for between 250

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			and 600 homes could be accommodated across the Site depending on lot sizes, the width of terraced homes and extent of apartment buildings. This was necessary as it would be unreasonable to assume that a site zoned Mixed-Housing Urban would develop in its entirety as 3-storey walk-up apartments as enabled by the zone provisions. The result of this exercise is demonstrated in Section 2.2 of the NDS which shows approximately 480 dwellings in a range of typologies (detached, duplex and terraced) and lot sizes consistent with the nature of greenfield development occurring across south Auckland. This represents a gross density of 23 dwellings per hectares. Other recent developments in Pukekohe such as south of Belmont Road and along Nanjing Road delivered gross densities of between 21 to 28 dwellings per hectare. As such, an estimate of 500 homes was considered to provide a realistic assessment of development potential within the plan change area.
AT2 – Dwelling distribution	Please provide information to demonstrate how the distribution of dwellings (and related traffic) across Sub-precinct A and Sub-precinct B has been calculated (i.e. two-thirds of dwellings anticipated within Sub-precinct A and a third in Sub-precinct B).	The reason for this request is to better understand how the traffic effects have been determined.	Sub-precinct A features 13.46ha of Mixed Housing Urban Zoned land. Sub-precinct B features 7.35ha of Mixed Housing Urban Zoned land. Combined this is 20.81ha. Using the following equations, we can calculate the percentage of land area within each sub-precinct proposed to be used for housing. • Sub-precinct A - 13.46/20.81*100 = 65% • Sub-precinct B - 7.35/20.81*100 = 35%

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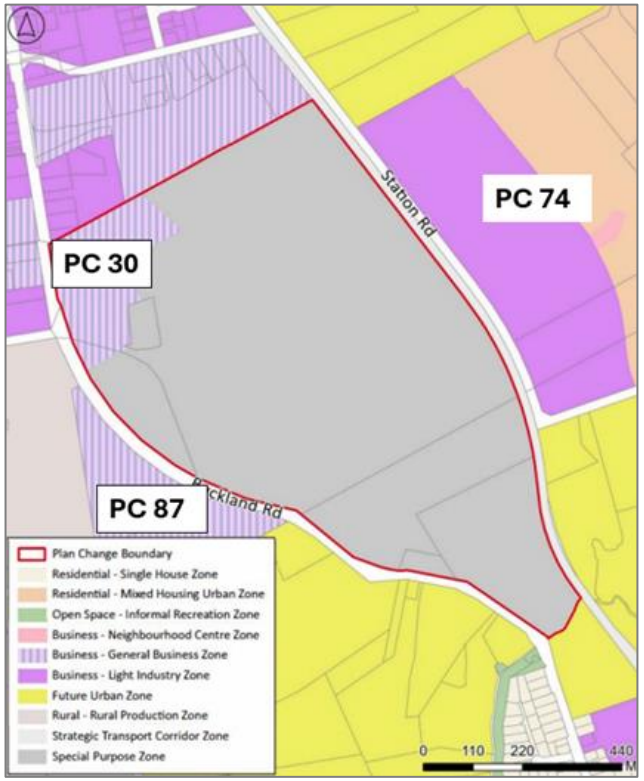
			Based on the above, it is considered reasonable to assume that Sub-precinct A would accommodate approximately 2/3 of dwellings while Sub-precinct B would accommodate the balance.
AT3 – Other PC sites	The ITA should include a plan showing the other plan change sites. Section 4.1 of the ITA states that this is shown by Figure 2, but it does not.	The reason for this request is to better understand the location of plan changes 30, 74 and 87 and associated infrastructure upgrade requirements in relation to the subject plan change site.	The below plan identifies the locations of plan changes 30, 74 and 87 which are located within the immediate vicinity of the proposed Plan Change area. 

Reference / Category of Information	Specific Clause 23 Request	Reason for Request	Applicant Response
AT4 – Existing public transport	Section 3.6 Public Transport of the ITA is out of date and should be updated to include a more up to date assessment of existing and confirmed future public transport provisions for the area, and how future residents will access these services. The #398 bus service was discontinued in July 2021 when the Waikato Regional introduced the #44 bus service. In addition, while the RPTP included plans for an AT Local in the area, this has been paused because of concerns about the ability of a potential on-demand service to work well as a first/last leg option for people accessing the train station. Instead, the local bus services have had frequency upgrades to better match the train timetable. Accordingly, there are all-day services past the site, although the frequency ranges from about 30 to 60 minutes in the peak and 2-hourly off-peak and on weekends.	The reason for this request is to better understand how existing public transport provisions will support development enabled by the proposed plan change.	Service 44 is a recent addition (commencing on 10 Feb 2025) that is not available on the Auckland Transport website, as it appears to be run as a Waikato service as a feeder between Pokeno and the Te Huia Train Service at Pukekohe Train Station. It runs via Buckland Road and the PPC site, operating as a hail & ride facility along Buckland Road (i.e. there are no bus stops). Services run northbound between ~7am until ~7:30pm; and southbound ~8am to ~8:30pm. The frequency is irregular with services ranging from every 30 minutes during the peak hours to every 1.5 hours off peak. For a semi-rural position, the service provides future residents of the PPC site a reliable and relatively regular opportunity the opportunity to connect to Pukekohe Train Station (and other nearby destinations), with connections to Hamilton (via the Te Huia Train Service) and Auckland via Te Huia and the other northbound train services. The service is considered to be far superior to the former daily services running past the site, and significantly enhances opportunities for mode shift.
AT5 – Plan change area	Confirm the boundary of the proposed plan change area. Figure 14 in the ITA shows the small section of Business – Light Industry zoned land on Buckland Road but this area is not included in the	The reason for this request is to confirm the boundary of the plan change site.	The Plan Change application includes the Watercare Wastewater Pump Station site at 360 Buckland Road, and the Plan Change request seeks to rezone the pumpstation from Special Purpose – Major Recreation Facility zone to Business – Light Industry zone, as per

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	boundary of the Proposed Precinct Plan.		Watercare's request that B-LIZ is the most appropriate zone for the site. The Watercare Wastewater Pump Station site is not proposed to be included within the proposed Precinct and therefore is excluded from the proposed Precinct Plan. It is noted that this land is subject to an existing WSL Designation (Designation 9569).
AT6 – Pedestrian crossing facilities	Section 5.3 Indicative Active Mode Connections in the ITA states that a raised pedestrian (zebra) crossing will likely be provided on the northern or southern leg of the proposed middle roundabout (Sub-precinct A). The proposed precinct plan should be updated to include the indicative location and design of all proposed raised pedestrian crossing facilities, noting that facilities should be provided on all sides of the proposed intersections The proposed precinct provisions should also be updated to include this as a required transport upgrade.	The reason for this request is to understand how the development will ensure the safety of active mode users when crossing Buckland Road.	For information purposes, concept designs of the proposed roundabouts are provided in Appendix 9. It is considered that active mode crossings are not required where footpaths are not provided both sides of the road, but are provided wherever they are.
AT7 – Active modes	Please clarify the active mode facilities that are proposed within the site and their locations. The plans provided in the ITA and precinct provisions show different locations. It is also noted that the active mode connection between Sub-precinct A	The reason for this request is to understand what active modes facilities are proposed and where.	Within Precincts A and B, footpaths are provided on both sides of all local roads. Within those local roads, cyclists can safely share the carriageway, given the narrow streets with traffic calming and a design speed of 30kph. There will be an active mode link between those two precincts. The precinct provisions ensure that such a link will be provided, but the detail of how that will be done

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	and B is only possible through the open space due to stormwater pond location. Please show this accurately on plans.		is unnecessary at Plan Change level. The connection is shown as indicative only as the precise location and design will be shown in a subsequent resource consent application, should the plan change be granted.
AT8 – Speed limits	What are the safety implications if the speed limit on Buckland Road is not reduced? The ITA and traffic modelling assumes that the speed limit along the Buckland Road frontage will be lowered from 80km/h to 50km/h. While it is assumed that the speed limit will be lowered on Buckland Road as urbanisation occurs, this cannot be guaranteed, nor should it be assumed that it would be in place on day 1.	The reason for this request is to better understand the traffic effects of the proposal and that the proposed intersections can operate safety at the current speed.	As outlined above, visibility assessments have demonstrated that requirements are met for both 50kph and 80kph design speeds. However, it is logical and prudent to reduce the speed limit to recognise the urbanisation of the road.
AT9 – Modelling	Section 7.2 of the ITA states that if the roundabout required by PC30/sub-precinct C is not constructed, the existing T-intersection can operate at a reasonable level. Provide information explaining how a LOS F at the PM peak with an average delay of 74 second for right-turn movements onto Buckland Road from Kitchener Road is considered acceptable.	The reason for this request is to understand safety and network effects that the proposed development will have on the existing road network.	For PM peak hour conditions, Level of Service F is considered acceptable, and such levels of service are evident in most busy intersections throughout Auckland during peak hours, while some level of traffic delay is necessary to encourage travel by other modes. The results in this case state that if the Kitchener Road / Buckland Road intersection remains as a T-intersection, then for that interim period, a delay of 74 seconds is predicted for right turners out of Kitchener Road. That level of delay is not considered unsafe, and is unlikely to lead to poor decision making. Further, the average queue of 10m (between 1 and 2 cars) and a 95th percentile queue of 24m (3 cars) is not considered excessive.

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AT10 – Noise	AT seeks that acoustic attenuation provisions are included within the precinct provisions to protect activities sensitive to noise from adverse effects arising from the road traffic noise associated with the operation of Buckland Road. The volume of traffic on an arterial road in Auckland generally exceeds volumes along state highways and, as such, this has become a common provision in private plan changes.	The reason for this request is to protect future activities sensitive to noise from adverse effects of traffic noise on a busy arterial.	Refer to the Acoustic Response Memorandum included as **Appendix 4**.
AT11 – Buckland Road	The following additional connection should be provided, and Precinct Plan 1 should be updated accordingly: An active modes connection along the eastern side of Buckland Road (Sub-precinct A frontage).	AT requires that the additional active modes connection be provided to complete the active modes network and improve connectivity between Sub-precincts B and C.	As explained earlier, it is considered that the layout as proposed provides a safe and high quality active mode connection that is ideally suited to this semi rural environment, and includes consideration of the eventuality of facilities on the western side of the road not being constructed by use of the safe internal roads. Further upgrades are not considered necessary.
AT12 – Sub-Precinct C	The 75 right turn vehicle movement from Sub-precinct C has not been assessed in the ITA. We understand this trigger was developed through the original work for PC30 and was therefore listed in the covenant. Please provide an assessment of the appropriateness of this trigger, given use and traffic volumes of this intersection have changed since PC30 (i.e. traffic lights in the town centre and	The reason for this request is to ensure the trigger remains appropriate for the reasons given.	The trigger was duplicated directly from the existing land covenant developed through the PC30 process. We understand that the trigger of 75 right turning movements was derived during discussions through the PC30 hearing process, and was retained to remain consistent with those conversations. Thought has been put into converting the 75 right turning movements into a GFA ceiling, but that method is troublesome given that a variety of land use activities can be enabled within that sub-precinct and the operative Business – General Business Zone, meaning that doing so would create a

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	additional development to the south) and any changes in development plans from the applicant. This assessment should also consider traffic generated from development enabled under Plan Change 74 and 87. While the future SGA proposal Pukekohe South-east Arterial NoR 5 will provide a new connection to the west across the railway line thereby capturing traffic movements from the Plan Change 74 site, funding for this road is not confirmed and there is no certainty of when it will be constructed. Noting that AT is open to this trigger being converted to a GFA trigger, with appropriate assessment.		wide range of trigger points. Further discussions with Auckland Transport have been held, and it was decided to retain the trigger as it stands for consistency. The ITA took traffic flows from PC87 into consideration, however, plan change 74 was not taken into consideration as it is on the opposite side of the NIMT with no direct connection to Buckland Road, and following dispersion of trips throughout Pukekohe and the wider region is unlikely to see any noticeable effects along Buckland Road.
<u>Watercare Services Limited</u>			
WC1 – Impact on Council growth forecast	Please clarify how the proposed Residential – Mixed Housing Urban Zone will impact the Council's growth forecast for the Pukekohe area.	The Pukekohe Wastewater Pump Station (Pukekohe WWPS), at 360 Buckland Road is anticipated to accommodate growth for approximately 60 years in line with the Council growth forecast (AGS). It remains unclear whether the proposed increase in demand for wastewater services enabled by this proposed plan change will be additive to forecast demand or will reallocate growth from	Demand to the wastewater network (including the Pukekohe Wastewater Pump Station) as a result of the proposed plan change is not considered to be additive to the forecast demand nor a growth reallocation from current live zoned or future urban zoned land. The proposed Pukekohekohe Gateway Precinct area is currently live zoned urban land, and it is expected that this was considered as part of the Auckland Council growth forecast. Prior to lodgement of the Pukekohekohe Gateway Plan Change, assessments were undertaken to compare residential yields that will be enabled under the

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		current live zoned and future urban land within the Pukekohe area.	proposed plan change (which seeks to rezone approximately 20.82 hectares from Special Purpose – Major Recreation Facility to Residential – Mixed Housing Urban) against existing development permitted on the site including new buildings for a primary, compatible, or accessory activity to horse racing or motorsport activities under the current Pukekohe Park Precinct (I434) of the AUP(OP). These further assessments have been included as **Appendix 10**. These assessments, which were previously shared with Watercare staff, however were not submitted as part of the lodged Plan Change request, conclude that the wastewater discharge enabled by the proposed plan change is **less than** the potential flows currently permitted under the existing AUP(OP). Further to this, after initial consultation, Watercare confirmed that the pump station and transmission network has capacity for the expected additional flow. Therefore, the proposed plan change seeking to rezone approximately 20.82 hectares from Special Purpose – Major Recreation Facility to Residential – Mixed Housing Urban zone will not increase demand for wastewater services beyond what is permitted and is expected to be sufficiently accommodated for in the 60 years of anticipated growth in Pukekohe in line with Auckland Councils growth forecast.