

10 January 2019

David Wong
Auckland Council

Dear David

Felton Mathew Avenue: Fletcher Residential Limited plan change request – Additional information

Thank you for the feedback on the additional information request.

I have set out below the request. In some cases I have attached the response. In other cases the information is still being sought and I will send it through to you shortly.

1. Transport

(a) Trip generation

The existing trip generation (as outlined in Section 4.2 of the Transport Assessment Report prepared by Commute Transportation Consultants) uses the total GFA of the existing industrial building (approximately 7,000m²) which is larger than subject site (Lot 1) with a GFA of 4,450m². As a result, overestimating the baseline trip generation for the existing industrial activity. Please update the Section 4.2 of the TAR to ensure the existing trip generation for the industrial activity uses the warehouse GFA as shown in Figure 5 of the UDS.

The following answers are what was provided in December but repeated here for completeness

Existing Trip Generation:

Currently, the site is unoccupied, and therefore is assumed to generate no vehicle trips.

Proposed Trip Generation (Option 1 – Light Industrial):

The proposed light industrial storage facilities are considered to exhibit the characteristics of a “warehouse” and therefore the RTA predicts a peak hour trip rate of 0.5 trips / 100 m² GFA and a daily trip rate of 4 trips / 100 m² GFA.

The proposed warehousing measures approximately 1,750sqm GFA. Given this area and the RTA trip generation rates detailed above, the site is calculated to generate approximately 9 trips in the peak hour and 70 trips daily.

Proposed Trip Generation (Option 2 – Residential):

The peak hour trip generation of dwelling houses is typically estimated using the predictive models within the RTA Guide. All dwellings have been assessed as ‘Dwelling Houses’. The trip generation has been assessed for the maximum yield of 26 dwellings. The RTA Guide details a peak hour trip rate of 0.85 trips / dwelling and a daily trip rate of 9 trips /dwelling for dwelling houses. This results in approximately 22 trips in the peak hour and 234 trips daily.

Assessment:

From the above, the proposal is likely to generate 9 (industrial) or 22 (residential) trips in the peak hour and up to 70 (industrial) or 234 (residential) trips per day. These proposed volumes are between 1.1% and 3.7% of daily traffic volumes on Felton Mathew Avenue for Option 1 and Option 2 respectively. Given the low volume of trips generated and the capacity on Felton Mathew Avenue, both options are considered to be able to be readily accommodated into the local traffic network.

(b) Right-of-way

The Design Statement suggests that a new access will be provided. Please provide further detail on how access to the proposed subdivision will be established, and whether the ROW needs to be retained.

The only right-of-way across the site is Vector's right to enter the substation on the site. This is preserved on the title and is preserved in the future proposals by Fletcher Residential.

The question this might be referring to is the access to the Hobson Bay to Glen Innes shared path cycleway. This is addressed in the urban design question below.

Figure 5 and Figure 7 of the UDS detail where the new access connections are proposed for Option 1 and Option 2 respectively. The vehicle crossings are considered to be located suitably far from the intersection to the north to enable the ongoing safe and efficient operation of both this existing intersection, and the proposed site accesses. A new vehicle crossing and accessway will be provided leading to a carpark for Option 1, that will further designed and assessed in future consenting stages. A new vehicle crossing and accessway, connecting to JOALs that service the individual dwellings will be provided for Option 2, that will further designed and assessed in future consenting stages. In any case, it is considered that access can be provided to Felton Mathew Avenue to provide safe and efficient access and egress of vehicles and pedestrians to the local road network. The ROW is proposed to be retained and incorporated into future design, to be confirmed in future consenting stages.

Urban design

Confirmation is sought on whether there will be a pedestrian (shared) link created between Felton Mathew Avenue and the shared path.

Currently there is no access to the shared path across the Fletcher site. During the construction of this path Auckland Transport requested construction vehicle access to the shared path to assist them in the implementation of the works. Fletcher agreed this. That only ever operated as construction access.

The suggestion of some form of access was raised previously. The response Fletcher received from Auckland Transport was that there are already formal connections to the shared path at appropriate locations. There did not seem to be an interest from Auckland Transport in providing another access point.

This plan change is advanced on the basis that there will not be an access. If the land is rezoned there will be a resource consent for the development. That would be the time at which the issue of this shared path can be debated, should there be a changed view that the Council would now like some form of access. The resource consent is when the site design and logistics of any connection is known and can be worked through.

To be clear, there is no proposed pedestrian access as part of this plan change.

2. Mana whenua consultation

Please outline the matters that were discussed at the pre-application meeting held with Ngāti Tamaoho, Ngāti Te Ata, and Te Ākitai Waiohū.

There has been no additional consultation to that outlined in the application. The feedback from the various iwi is set out in the table below:



Iwi	Organisation	Response
Ngai Tai ki Tamaki	Nga Tai ki Tamaki Tribal Trust	We've spoken with and they would like a hui
Ngati Tamaoho	Ngati Tamaoho Trust	Meet with 18/10
Te Ahiwaru – Waiohua	Makaurau Marae Maori Trust	Not come back to us
Te Patukirikiri	Te Patukirikiri Incorporated	Not come back to us
Ngati Paoa	Ngati Paoa Iwi Trust	Not come back to us
Te Akitai Waiohua	Te Akitai Waiohua Iwi Authority	Meet with 18/10
Te Runanga o Ngati Whatua	Te Runanga o Ngati Whatua	Not come back to us as yet, but they have emailed
Ngati Whanaunga	Ngati Whanaunga Incorporated	Not come back to us
Te Kawerau Maki	Te Kawerau Iwi Tribal Authority & Settlement Trust	Not come back to us
Ngati Whatua o Kaipara	Nga Maunga Whakahi o Kaipara Development Trust	Leaving it to NWO
Ngati Te Ata		meet with 18/10

3. Economic assessment

An assessment of the potential development types that could occur on the site with the requested change to a Mixed Housing Suburban Zone and whether these are consistent with the objectives and policies of the Auckland Unitary Plan.

While this has come under the heading of economic assessment, this is actually a planning question.

If the rezoning is successful and the land is zoned Mixed Housing Suburban, Fletcher intends to develop the site for medium density residential development, probably terrace housing.

That is the dominant new building typology within the Mixed Housing Suburban zone. It is fully consistent with the description and the objectives and policies of the zone as outlined in the planning report and section 32 analysis forming part of this plan change request. In particular, medium density, terrace housing is consistent with the following:

"H4.1. Zone description

The Residential – Mixed Housing Suburban Zone is the most widespread residential zone covering many established suburbs and some greenfields areas. Much of the existing development in the zone is characterised by one or two storey, mainly standalone buildings, set back from site boundaries with landscaped gardens.

The zone enables intensification, while retaining a suburban built character. Development within the zone will generally be two storey detached and attached housing in a variety of types and sizes to provide housing choice. The height of permitted buildings is the main difference between this zone and the Residential – Mixed Housing Urban Zone which generally provides for three storey predominately attached dwellings..."

“H4.2. Objectives

(1) Housing capacity, intensity and choice in the zone is increased.

(2) Development is in keeping with the neighbourhood's planned suburban built character of predominantly two storey buildings, in a variety of forms (attached and detached)....”

“H4.3. Policies

(1) Enable a variety of housing types including integrated residential development such as retirement villages.

(2) Achieve the planned suburban built character of predominantly two storey buildings, in a variety of forms by:

(a) limiting the height, bulk and form of development;

(b) managing the design and appearance of multiple-unit residential development; and

(c) requiring sufficient setbacks and landscaped areas....”

4. Stormwater management

(a) *The supplied specialist reports relating to flooding are not consistent with regards to the extent of the flood plain. Please clarify which information should be relied upon and how the information within these reports interrelate.*

Information to come.

(b) *The Maven infrastructure report states that any new buildings will have the required 500mm freeboard “above the identified flood level”. Please clarify which flood level this relates to.*

Information to come.

(c) *The peak overland flow through the site has been extracted from the Tamaki North Catchment Model (as per the OPUS memo attached in the Infrastructure report). Catchment models assume full flow capacity for the piped system. While the applicant has acknowledged the code of practice requirement for reduction in capacity of large diameter pipes (10%) this is not reflected in a subsequent increase to the peak overland flow.*

Information to come.

(d) *Further, as this pipe is effectively a culvert (with an inlet on the upstream side of Felton Mathews Ave, the code of practice requires a total blockage scenario to be assessed (refer to Section 4.3.9.8) based on the inlet diameter of 1200mm.*

Information to come.

(e) *No supporting calculations have been provided to support the reduced floodplain shown on the plan C450 - as such this cannot be assessed. Further, Plan C451 shows a reduction in flow width for the proposed overland flow, without demonstrating the additional capacity.*

Information to come.

(f) *No Cross sections have been provided as referred to in the report and plans; as such these cannot be assessed.*

Information to come.

(g) *Section 2. notes that the proposed OLFP will “provide a consistent flowpath depth of 200mm over a greater area” – the Proposed floodplain C451 shows a narrower flow width than existing.*

Information to come.

(h) *Minor change in OLFP extents proposed for downstream end. It is acknowledged that this is relatively minor, and unlikely to impact any other parties.*

Information to come.

(i) *No assessment has been undertaken to assess the frequency of overland flow through the site.*

Information to come.

(j) *There is not mention of access / egress during flooding.*

Information to come.

5. Noise and vibration

- (a) *Please confirm whether or not the application site is bordered on two sides by land zoned Business – Light Industry.*
- (b) *Please confirm which set of noise limits, either E25.6.2 or E25.6.19, are applicable to Business (Light Industry) zoned activities on sites adjacent to residentially zoned land.*
- (c) *Please include the assessment of the potential effects from the permitted use of the Business – Light Industry zone to the north-east of the application site.*
- (d) *Please also assess the reverse sensitivity effects of the proposal on the use of the adjacent Business – Light Industry zoned sites. Please identify how activities on these sites could be constrained by having to comply with the residential zone interface noise limits (AUP Section E25.6.19) rather than the light industry zone noise limits (AUP Section E25.6.5).*
- (e) *Please identify the potential noise source heights and relative locations to the potential receivers within the application site, based on the permitted building heights and set back distances in the Business Light Industry Zone.*
- (f) *Please identify how the potential activities on the adjacent Business Light Industry zoned sites will need to be modified to comply with the residential zone interface noise limits (AUP Section E25.6.19) rather than the light industry zone noise limits (AUP Section E25.6.5).*

The above information is to come.

Overview comment noise

This series of questions is clearly looking at the issue of reverse sensitivity. However, with respect, it fails to take account of three particular features:

- (a) Any reverse sensitivity issues relate to the Fletcher land. The manufacturing arm of Fletcher have given their written consent to this rezoning. Fletcher is fully capable of and fully intends to manage reverse sensitivity issues. The light manufacturing plant already does and will continue to operate within the noise standards of the Council. Were this a resource consent the Council would be required to ignore issues of reverse sensitivity, Fletcher having given their written consent. In this case there are no issues of reverse sensitivity because both the industrial and residential development will comply with the interface standards between Residential and Light Industrial zoning.
- (b) Issues are raised with the industrial land to the east. However, this zoning is somewhat notional in that this land is designated by NZTA for an arterial road. It is not intended for industrial purposes. NZTA recently worked through the future of this land when it was considered to be made available for emergency housing in the Glen Innes area. However, the decision was that the land was needed to be futureproofed for arterial road. Preliminary design concepts have been advanced on route alignment for this new road. While the same reverse sensitivity issues apply as to the light industrial land to the south, the reality is that this land will not be developed for industrial purposes.

The arterial road will also not have issues of reverse sensitivity. It is a wide designation to allow for various activities. This residential site will be no different to the adjacent residential sites. This is not a motorway or high speed road. It is simply an arterial road as happens throughout Auckland with residential development adjacent to it.

- (c) One of the motivations for Fletcher is to enable it to better manage reverse sensitivity issues at the interface. Because it will design and build the new homes it will ensure that they are designed to modern noise attenuation standards.

6. Land contamination

- (a) *A Preliminary Site Investigation and likely a Detailed Site Investigation, carried out in accordance with the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES), is required to enable change of land use to be assessed.*

This information is to come.

Thank you for your ongoing assistance with this matter.

Yours faithfully

A handwritten signature in blue ink that reads "J. Duthie". The signature is written in a cursive style with a large, stylized 'J' and 'D'.

John Duthie
Tattico Limited